

December 27, 2010

SENT VIA E-MAIL

David Danner
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Pk. Dr. S.W.
PO Box 47250
Olympia, WA 98504-7250

Re: Puget Sound Energy's Annual Conservation Plan, Docket No. UE-100177, and Energy Efficiency Services (EES) Program Tariff filing, Docket Nos. UE-101942 & UG-101943

Dear Mr. Danner:

The NW Energy Coalition submits these comments regarding Puget Sound Energy's (PSE) Annual Conservation Plan (ACP) filed December 1, 2010 (pursuant to Order 05 in Docket UE-100177) and PSE's Energy Efficiency Services (EES) program tariff filings, which will be considered by the Commission at the Open Meeting on December 30. Unfortunately, no one from the Coalition will be available to attend that meeting. This letter provides our support for PSE's EES program tariff filings taking effect as proposed.

PSE's ACP provides a wealth of information about its proposed program offerings and related budget details. PSE highlighted key issues and updates for its Conservation Resources Advisory Group (CRAG) at our November meeting, and provided opportunity for discussion and questions. We commend PSE on its efforts to ensure the CRAG is informed and consulted on emerging issues.

As PSE moves forward with its energy efficiency programs in 2011, we will be watching two areas with particular interest. First, we have raised concerns about PSE replacing its energy education in schools program (Powerful Choices) with an online downloadable format for teachers. Powerful Choices has engaged nearly 135,000 students in 90 schools throughout western Washington over the past 17 years. While we understand the Company's concerns about evaluation and savings verification, we believe educating children about the effects of energy consumption on the environment and its connection to issues such as global climate change can help them cultivate responsible attitudes toward energy use over the long term. In addition, students can be an important participant in their schools' energy conservation programs, and can influence their parents' energy decisions at home. Relying on perpetually busy teachers to access PSE's online materials and incorporate them into their classrooms without the assistance of guest lecturers may result in substantially decreased energy education in schools in PSE's service territory. We will monitor with interest whether PSE's online format is used regularly by teachers and considered effective.

Second, we continue to be interested in the application of PSE's Home Energy Reports program, administered by OPOWER. The evaluation results provided to the CRAG from PSE's internal

evaluation and the subsequent independent evaluation conducted by KEMA found a statistically significant difference in energy use between the experimental and control groups. This sounds very promising. We understand that savings persistence will be measured next, which will provide helpful additional information as PSE decides whether to propose further expansion of its pilot or future savings claims.

In summary, the Coalition supports PSE's Annual Conservation Plan and Energy Efficiency Services Program Tariff filing, and we appreciate the opportunity to submit these comments to the Commission.

Sincerely,

A handwritten signature in black ink that reads "Danielle Dixon". The signature is fluid and cursive, with a large initial "D" and a long, sweeping tail.

Danielle Dixon
Senior Policy Associate
NW Energy Coalition