

Ms. Carole Washburn
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

**re Northwest Natural Gas
Docket UG-011231 Tariff Revision**

Dear Ms. Washburn,

The Energy Project would like to commend Northwest Natural Gas for filing Schedule G "Residential Weatherization and Energy Conservation Services Program," as an amendment to their Tariff WN U-6. We believe this is a very timely. The rise in gas prices were especially hard on consumers, particularly low-income consumers.

We must add, however, that the level of reimbursement (25% of cost effective measures up to \$350) for this program is not sufficient. We understand and can appreciate the company's desire for their Washington efforts to be consistent with what they are doing in Oregon. At the same time we see no reason that Washington residents should be deprived of a more effective program by an Oregon statute. The fact that energy efficiency will contribute to reliability, address peak capacity restraints, act as a buffer against market volatility, and reduce the need to go to the market for product extends the value of energy efficiency programs beyond the immediate recipient to other rate payers, if not to the benefit of the company itself. Given the price increases this past two years, these programs are especially valuable to low-income consumers. We would like to make the most of them to provide as much benefit as possible. In that regard, we hope this filing is just the beginning of a more comprehensive approach and look forward to any opportunities to work with the company in that regard.

Thank you for the opportunity to provide these comments.

Respectfully,

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