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February 14, 2008

**VIA ELECTRONIC FILING  
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Washington Utilities and Transportation Commission  
P. O. Box 47250  
1300 S. Evergreen Park Drive SW  
Olympia, WA 98504-7250

Attention: Carole Washburn  
Executive Secretary

Re: Docket No. UE-001457  
Systems Benefit Charge Reporting

RECEIVED  
RECORDS MANAGEMENT  
2008 FEB 14 AM 9:40  
STATE OF WASH.  
UTIL. AND TRANSP.  
COMMISSION

Enclosed please find PacifiCorp's annual report of the Systems Benefit Charge collection and energy efficiency expenditures for the period January through December 2007, in accordance with the Commission's Accounting Order in Docket No. UE-001457.

Data requests for PacifiCorp should be addressed in the following manner:

- By E-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)
- By Facsimile: (503) 813-6060
- By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232

If you have any questions or comments regarding this report, please contact Jeff Bumgarner at (503) 813-5161.

Sincerely,

Paul M. Wrigley  
Director, Regulation

Enclosure

**PacifiCorp**

**Annual Review**

**of**

**2007 Energy Efficiency Programs**

**in**

**State of Washington**

**February 14, 2008**

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## **SUMMARY**

### **PacifiCorp's 2007 Annual Review of Energy Efficiency Programs**

#### **Achievements**

In 2007, PacifiCorp (the "Company") acquired resources through its energy efficiency program activity totaling **27,903,375 kWh/year or 3.19 MWa** in Washington (at generation).

#### **2007 Advisory Group and Advice Filings Summary:**

The Company provided a draft filing to its Advisory Group on March 19, 2007 proposing changes to the Refrigerator Recycling program. After receiving and responding to comments from the Advisory Group, the Company filed the program changes in Advice 07-02 on April 13, 2007, which was approved effective on May 31, 2007.

The filing included the following:

- Removal of the June 1, 2007 sunset date
- Reduction in customer incentive from \$40 to \$30 to improve program cost effectiveness
- Minor language changes to clarify the program description

On February 20, 2007 the Company provided the Advisory Group notification of a proposed change in insulation incentive levels from \$1 per square foot to \$0.50 per square foot for Home Energy Savings. After receiving and responding to comments from the Advisory Group, a change notice was posted on the Company's web site 45 days prior to making the change as of April 23, 2007.

In 2007, the Company also provided draft evaluations for the Refrigerator Recycling program (impact and process) and Energy Star New Homes program (process) and requested, received, and responded to comments from the Advisory Group.

Advisory Group and filing activity for the years 2000 – 2006 previously reported is included at the end of this report.

## **PROGRAM OVERVIEW**

In 2007, PacifiCorp achieved a total of **27,903,375 kWh/year or 3.19 MWa** in the State of Washington (at generation). Table 1 below shows achievements by program.

Table 1: 2007 PacifiCorp Program Achievements

<b>Program</b>	<b>Units</b>	<b>kWh/yr (at generator)<sup>1</sup></b>	<b>aMW (at gen)</b>	<b>Systems Benefits Charge Expenditures</b>
<b>Low Income Weatherization (114)</b>	185	384,448	0.04	\$ 673,841.38
<b>Energy Education in Schools (113)</b>	4,086	1,597,536	0.18	\$ 409,534.22
<b>Refrigerator Recycling (107)</b>	2,615	2,108,844	0.24	\$ 412,043.57
<b>Home Energy Savings (118)</b>	5,828	1,420,546	0.16	\$ 465,343.07
<b><u>Energy Star New Homes (108)</u></b>	<u>21</u>	<u>82,537</u>	<u>0.01</u>	<u>\$ 161,840.79</u>
<b>Total Residential</b>	<b>12,735</b>	<b>5,593,911</b>	<b>0.64</b>	<b>\$ 2,122,603.03</b>
<b>Energy FinAnswer (125)</b>	6	5,418,934	0.62	\$ 697,759.28
<b><u>FinAnswer Express (115)</u></b>	<u>82</u>	<u>4,234,315</u>	<u>0.48</u>	<u>\$ 570,268.55</u>
<b>Total Commercial</b>	<b>88</b>	<b>9,653,249</b>	<b>1.10</b>	<b>\$ 1,268,027.83</b>
<b>Energy FinAnswer (125)</b>	18	11,625,819	1.33	\$ 1,388,300.05
<b><u>FinAnswer Express (115)</u></b>	<u>30</u>	<u>1,030,397</u>	<u>0.12</u>	<u>\$ 148,018.14</u>
<b>Total Industrial</b>	<b>48</b>	<b>12,656,216</b>	<b>1.44</b>	<b>\$ 1,536,318.19</b>
<b>Total for Company programs</b>		<b>27,903,375</b>	<b>3.19</b>	<b>\$ 4,926,949.05</b>
Additional residential expenditures for administration related to prior Company programs				\$ 237.00
Northwest Energy Efficiency Alliance expenditures in 2007				\$ 461,801.99
<b>Total System Benefits Charge expenditures</b>				<b>\$ 5,388,988.04</b>

<sup>1</sup> Gross savings is reported for Low Income Weatherization, Energy Education in Schools, Energy Star New Homes, Energy FinAnswer and FinAnswer Express. Net savings is reported for Refrigerator Recycling and Home Energy Savings. Starting in 2008, gross savings will be reported for all programs to be consistent with the Northwest Electric Power and Conservation Plan.

## **RESIDENTIAL PROGRAMS**

### **Low-Income Weatherization (Schedule 114)**

PacifiCorp partners with three local non-profit agencies, Blue Mountain Action Council in Walla Walla, Northwest Community Action Center in Toppenish and Opportunities Industrialization Center of Washington in Yakima to provide weatherization services to income qualifying households throughout our Washington service area. The leveraging of PacifiCorp funding along with Washington MatchMaker Program funds allows the agencies to provide these energy efficiency services at no-cost to participating customers. The Company provides rebates to our partnering agencies for 50% of the cost of services while MatchMaker funds are available, and covers 100% of costs when these state funds are depleted. Participants qualify whether they are homeowners or renters residing in single-family homes, manufactured homes or apartments. Over 6,200 homes have been completed since the program began in the mid-1980s.

### **Energy Education in Schools (Schedule 113)**

The energy education curriculum was developed for 6<sup>th</sup> grade classrooms by our three partnering agencies (Blue Mountain Action Council in Walla Walla, Northwest Community Action Center in Toppenish and Opportunities Industrialization Center of Washington in Yakima). The agencies employ certified teachers to work with school administrators, teachers and students. They provide a minimum of 3 one-hour energy education sessions on topics such as electricity generation, conservation, meter reading and efficiency tips. Students receive a kit of measures including a CFL, a refrigerator/freezer temperature card, a nightlight, a shower timer, a hot water temperature card, a faucet aerator and a thermometer. A low flow showerhead is provided to those students where the results of a water flow test indicated this need. In the 2006-2007 school year, 4,086 students completed the course with an annual savings for measure installation of 346 kWh per student and annual savings from behavioral changes of 1,621 kWh per student. Table 1 includes savings of 346 kWh per year per student (at customer site), representing savings from measure installations only. The program is well received by teachers and students.

### **Refrigerator Recycling (Schedule 107)**

Schedule 107 was approved effective April 1, 2005. This program aims to decrease residential refrigeration loads by reducing the number of inefficient secondary and primary refrigerator and freezer models in operation. With this program, the Company offers all residential customers in Washington the opportunity to receive a \$30 incentive (by check and mailed within 30 days after collection) in exchange for turning in their old but working refrigerators and/or freezers for recycling. Each customer can recycle up to two units, refrigerators and/or freezers, per household. In addition, a packet with instant energy-saving measures is provided to each participating customer. The average participant saves about 500 kWh per year or about \$3 each month on their electric bill.

In 2007, over 2,600 units were recycled (80% refrigerators and 20% freezers).

In 2007, the Company finalized the Refrigerator Recycling impact and process evaluation for the period April 1, 2005 to March 31, 2006.

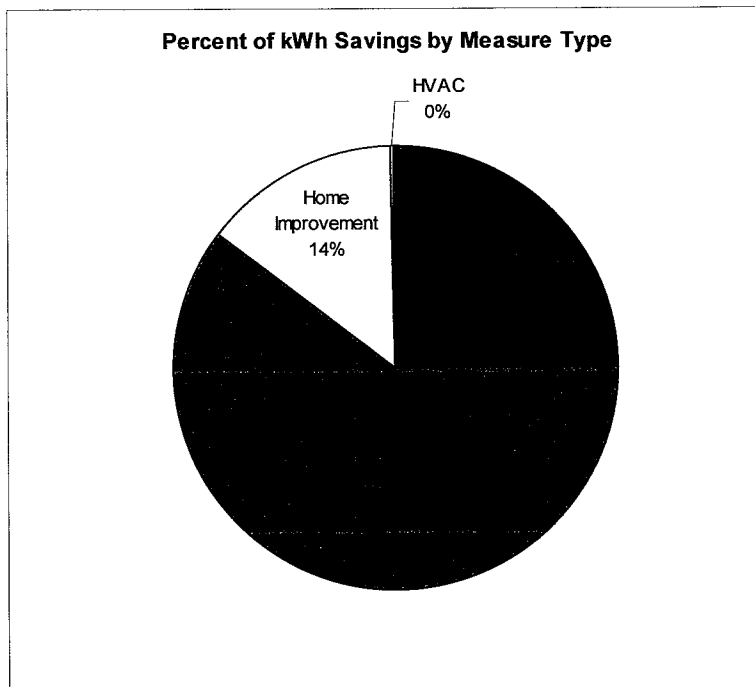
As of June 1, 2007, the Company began tracking and reporting net per unit savings using the updated values in the evaluation. The net per unit kWh per year savings for the period April 1, 2005 through May 31, 2007 and the period June 1, 2007 through December 31, 2007 assumed in the program is shown below.

Net annual savings (at customer site)	April 1, 2005 - May 31, 2007	June 1 to December 31, 2007
Refrigerator kWh/yr savings	849	392
Freezer kWh/yr savings	1,310	1,028
Kit kWh/yr savings	64	51

**Home Energy Savings incentives (Schedule 118)**

Home Energy Savings was approved effective September 14, 2006. The program provides incentives for appliances and lighting, home improvement, as well as heating and cooling upgrades.

The chart below shows the percent of 2007 energy savings results by measure type.<sup>2</sup>



<sup>2</sup> PacifiCorp's Assessment of Long-Term System-Wide Potential for Demand-Side and Other Supplemental Resources prepared July 11, 2007 indicates residential energy efficiency potential is largely lighting followed by heating and cooling (reflected as Home Improvement here) and appliances.

**2007 Home Energy Savings participation and savings by measure:**

	Unit counts	Units	Participant counts	Net kWh/yr savings (at site)
Clothes Washer Tier 1 (2006, MEF 1.42-1.99)	38	unit	38	8,512
Clothes Washer Tier 1 (2007, MEF 1.72-1.99)	258	unit	258	55,522
Clothes Washer Tier 2 (2006, MEF 2.0+)	50	unit	50	11,720
Clothes Washer Tier 2 (2007, MEF 2.0+)	764	unit	764	183,360
<b>Clothes washers, all</b>	1,110	units	1,110	259,114
Refrigerators	396	unit	396	27,181
CFL fixtures	84	fixture	59	6,182
Water heaters	83	unit	83	6,042
Dishwashers	170	unit	170	14,144
Ceiling fans	5	unit	5	420
Room air conditioners	36	unit	36	2,650
Room air conditioner recycling	3	unit	3	371
Attic insulation	110,977	square feet	92	76,574
Wall insulation	60,803	square feet	60	55,939
Floor insulation	46,197	square feet	46	27,718
Windows	21,721	square feet	171	20,417
Central air conditioners, SEER 15	7	unit	7	2,072
Central air conditioners, sizing	5	unit	5	1,036
Evaporative coolers	1	unit	1	1,003
CFLs <sup>3</sup>	35,830	CFL	3,584	756,924
<b>Total</b>			<b>5,828</b>	<b>1,257,788</b>

Insulation incentive levels were reduced in 2007 to reflect current market circumstances and improve program cost-effectiveness.

<sup>3</sup> Participant count for CFLs assumes 10 CFLs per participant.



### **Energy Star New Homes (Schedule 108)**

Schedule 108 was approved by the Commission effective April 1, 2005. The program offers builders financial incentives, cooperative advertising funds, as well as sales and technical support and training to participate in the Company's Energy Star New Homes program. Homes built to Energy Star specifications are at least 15% more efficient than state code, saving customers on their monthly energy bills and ensuring a comfortable and quality built home. This program is offered to builders constructing new homes and/or multi-family residences in PacifiCorp's Washington service area.

PROGRAM YEAR	# OF HOMES GOAL <sup>4</sup>	# OF HOMES	# OF BUILDERS MAKING COMMITMENTS <sup>5</sup>	TOTAL kWh SAVINGS (at customer site)
April 2005 – March 2006	40	12	6	23,628
April 2006 – March 2007	162	16	24	55,680
April 2007 – March 2008 YTD	198	21	14	73,080
Total	400	49	44	152,388

The process evaluation for the first program year, April 1, 2005 through March 31, 2006, was finalized in 2007.

Results to date indicate the program is not likely to ramp to the levels projected in the program filing. The Company and the program administrator have worked to improve program performance, however, have concluded it is necessary to seek other program designs or delivery options. The Company issued a request for proposals on October 11, 2007 for residential new construction among other items such as residential lighting measures. The Company analyzed the responses and plans to share a solution with the Advisory Group by April 15, 2008.

### **COMMERCIAL AND INDUSTRIAL**

#### **Energy FinAnswer (Schedule 125)**

#### **FinAnswer Express (Schedule 115)**

The Company offers two programs for commercial, industrial and irrigation customers:

- Energy FinAnswer – for comprehensive retrofits and new construction. The program includes a vendor neutral investment grade energy analysis and cash incentives equal to \$0.12 per kWh annual energy savings plus \$50 per kW average monthly demand savings (up to 50% of energy efficiency project costs). There is a cap to prevent incentives from bringing the payback for a project below one year. There is a cap for lighting energy savings per project since lighting-

<sup>4</sup> Multi-family plus single family

<sup>5</sup> The number of unique builder participants is 34

only projects are included in FinAnswer Express. The program includes commissioning support and post-installation verification services. It is marketed primarily via PacifiCorp account managers, trade allies, Energy FinAnswer consultants and project staff. Other leads come via word-of-mouth, past participants returning for additional projects and a combination of other Company outreach efforts. This program is an existing program enhanced with incentives as of October 2000.

- FinAnswer Express – for typical lighting, HVAC, premium efficiency motor, and other retrofits or new installations. The program includes an expedited energy analysis and incentives based on the equipment installed (\$/fixture, \$/horsepower, etc.). The program is marketed primarily via trade allies, PacifiCorp staff, and a combination of other Company outreach efforts. This program began as Small Retrofit Incentive and Retrofit Incentive (Schedules 115 and 116) in November 2000 and was improved and renamed FinAnswer Express (Schedule 115) effective May 1, 2004.

The changes approved effective January 1, 2007 included:

- New lighting and non-lighting measures, separate incentive tables for new construction and retrofit lighting, a tariff format change, and other enhancements for FinAnswer Express, and
- Enhanced design assistance services and incentives for new construction/major renovation projects along with other changes for Energy FinAnswer.

As part of implementing these program changes, PacifiCorp produced a separate FinAnswer Express brochure for new construction and met with design professionals and trade allies to increase new construction program participation. Lighting new construction participation increased (see charts below). In addition, PacifiCorp issued a request for qualifications for Energy FinAnswer new construction/major renovation design assistance services and provided training to those selected.

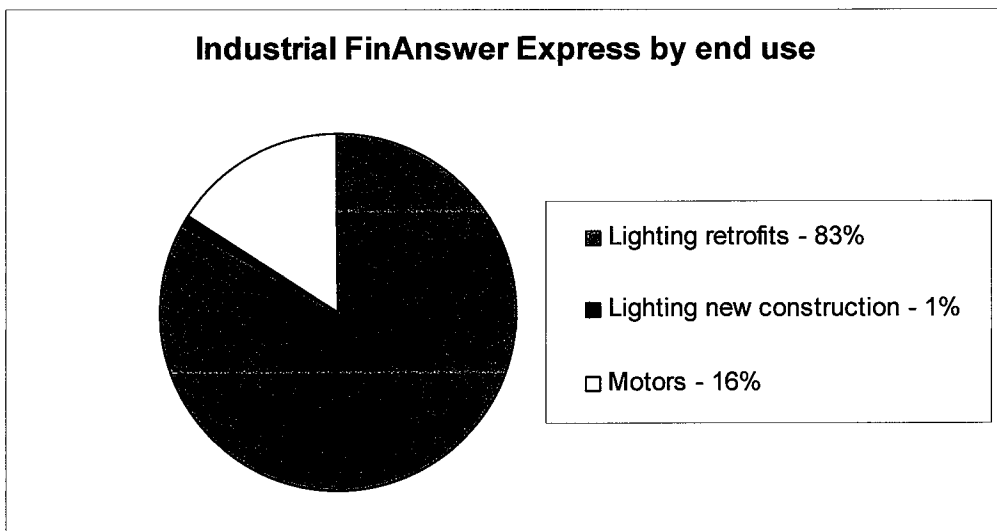
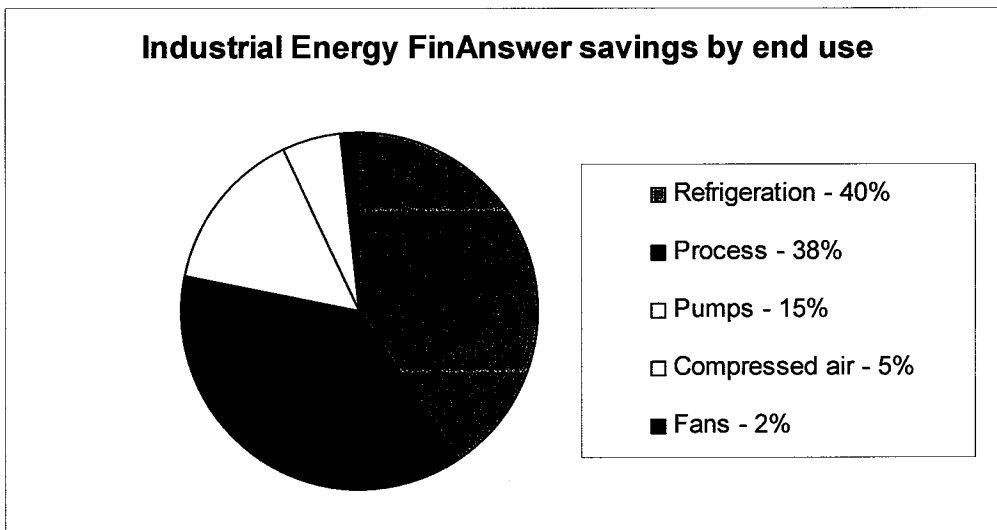
The impact and process evaluation reports for Energy FinAnswer and FinAnswer Express were substantially complete by year end. These reports cover projects installed in 2003 and 2004.

Table 1 includes savings documented based on post-installation results for each project installed in 2007. Savings for FinAnswer Express premium efficiency motors are based on deemed values. The unit counts for FinAnswer Express in 2007 are counts of incentive applications/projects. In reports for 2006 and prior, unit counts reflected one count per package of applications (applications were bundled and reported weekly).

### **Industrial sector**

Energy efficiency efforts in the industrial sector have focused on process refrigeration system improvements, variable frequency drives (VFDs), process and motor control upgrades, compressed air improvements, pumping improvements, pulp and paper processing upgrades, premium efficiency motors and lighting upgrades.

The mix of energy efficiency measures installed varies from year to year. The mix for 2007 installations included VFD control upgrades for pumps, fans, and refrigeration compressors; fast acting doors; carbon dioxide scrubbers used in controlled atmosphere storage; improved controls for pumping, refrigeration and compressed air systems; enhanced refrigeration equipment including evaporators and condensers; enhanced compressed air equipment including VFD compressors and dryers; dairy well water plate cooler and vacuum pump VFD upgrades; pulp and paper process equipment upgrades; wastewater treatment upgrades; and lighting. Below are charts showing 2007 savings results by end use system.



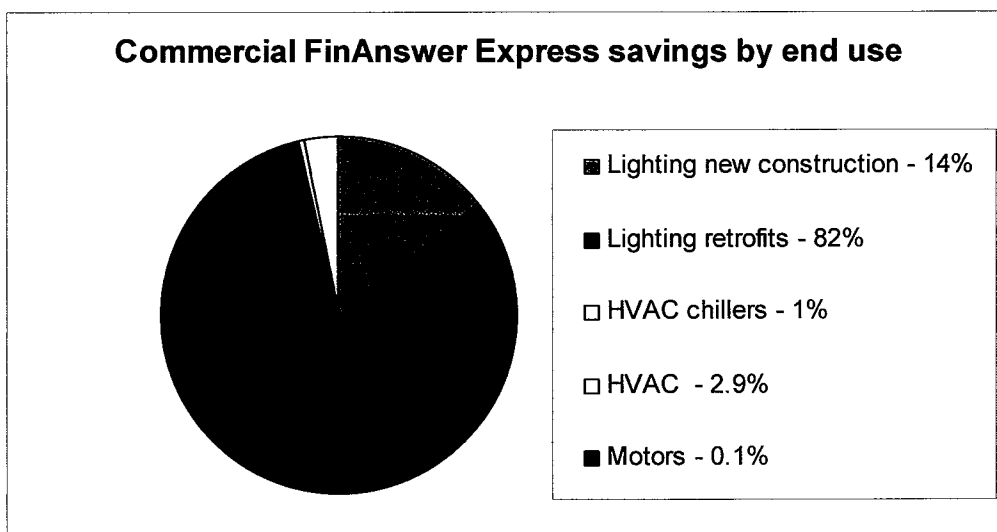
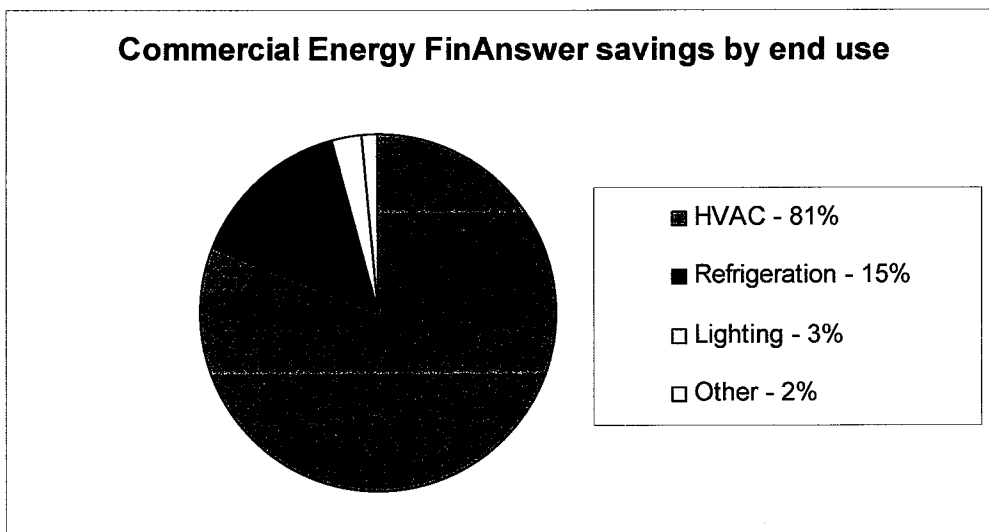
Vertical market segments for 2007 installations included the tree fruit industry (including refrigerated warehouses and controlled atmosphere storage), pulp and paper, dairy, municipal water pumping, and metal fabrication. In 2007, the Company provided energy analysis services to additional vertical market segments for these and other measures.

Energy efficiency measure installations resulting from these activities are expected in 2008 and beyond in some cases.

### **Commercial sector**

Energy efficiency efforts in the commercial sector have focused on lighting upgrades and controls, HVAC equipment retrofits and controls, and premium efficiency motors.

The commercial energy efficiency measure mix for 2007 installations included fluorescent lighting retrofits and new construction lighting, lighting controls, high efficiency chillers and package HVAC equipment, programmable thermostats, commercial refrigeration upgrades, premium efficiency motors, and other measures. Below are charts showing savings by end use.



Vertical market segments for 2007 installations included office buildings, financial institutions, grocery stores, churches, restaurants, schools and colleges, government facilities, hospitality, retail, medical, nursing homes, and athletic facilities.

### **Other Company energy efficiency efforts**

In addition to its energy efficiency incentive programs, the Company co-sponsors and promotes energy efficiency seminars for commercial/industrial customers and the industries that serve them. The Company also participates in Northwest Energy Efficiency Alliance sector initiatives.

### **SYSTEM BENEFITS CHARGE ACCOUNT**

Table 2 below is the System Benefits Charge 2006 monthly expenditures and revenue for Schedule 191.

**Table 2: System Benefits Charge Report**

	Expenditures	Schedule 191 Revenue Collected	Carrying Charge	Accumulative Balance
beg. bal. Dec-00	229,434.49			229,434.49
2001	3,748,180.61	(2,642,634.00)	(313.16)	1,334,667.94
2002	4,809,713.06	(6,120,094.00)	0.00	24,287.00
2003	4,702,026.03	(4,733,188.00)	(8,959.60)	(15,834.57)
2004	4,842,020.64	(4,677,576.58)	(9,051.13)	139,558.36
2005	3,989,209.37	(6,390,793.42)	(67,046.51)	(2,329,072.20)
2006	6,888,515.98	(6,554,684.00)	(280,846.28)	(2,276,086.50)
Jan-07	409,486.23	(460,267.00)	(17,011.41)	(2,343,878.68)
Feb-07	178,418.72	(444,210.00)	(15,822.79)	(2,625,492.75)
Mar-07	451,291.68	(361,688.00)	(19,622.86)	(2,555,511.93)
Apr-07	674,151.17	(318,366.00)	(18,483.70)	(2,218,210.46)
May-07	390,580.13	(317,305.00)	(16,578.84)	(2,161,514.18)
Jun-07	476,217.19	(313,005.00)	(15,633.97)	(2,013,935.95)
Jul-07	316,602.96	(370,048.00)	(15,052.10)	(2,082,433.09)
Aug-07	493,292.49	(394,538.00)	(15,564.05)	(1,999,242.65)
Sep-07	421,212.98	(358,349.00)	(14,460.28)	(1,950,838.95)
Oct-07	396,773.76	(339,927.00)	(14,580.52)	(1,908,572.70)
Nov-07	914,153.05	(354,258.00)	(13,804.47)	(1,362,482.13)
Dec-07	266,807.68	(442,072.00)	(10,183.15)	(1,547,929.60)
2007	5,388,988.04	(4,474,033.00)	(186,798.14)	(1,547,929.60)
Total	34,598,088.22	(35,593,003.00)	(553,014.82)	

## **Advisory Group and Advice Filings—as reported previously:**

### **2000**

In the stipulation in UE-991832 the Company agreed to file for approval of a System Benefits Charge (SBC). As part of the stipulation, the Company convened an advisory group of interested stakeholders in July 2000. The Company met with the Advisory Group in 2000 for input on the initial suite of programs and the initial SBC collection rate. An initial suite of programs and SBC tariff were filed and approved in late 2000.

### **2001**

The Company began collecting revenue through Schedule 191, the System Benefits Charge tariff, in January 2001. Expenditures for the initial suite of programs were expected to ramp up to an annual level of approximately \$4.1 million. The SBC collection level for 2001 was set at \$2.8 million to allow for first year ramp-up and uncertainties about market response to the programs. Actual expenditures in 2001 were \$3.7 million due to the increased interest in energy efficiency by customers in response to the volatility in the energy market and increased effort on the Company's part to respond to the regional call to action.

Working with input from the Advisory Group, the Company filed to increase the SBC from an annual collection rate of \$2.8 million to \$6.5 million to recover the higher expenditures in late 2001 and provide for ongoing expenditures in 2002.

### **2002**

The 2002 collection rate was approved in February of 2002. The intent was to collect \$6 million over the 11-month period from February to December 2002 and bring the SBC account into balance by the end of 2002.

As anticipated, the 2002 SBC collection rate was sufficient to bring the SBC account into balance by the end of 2002. The Company met and worked with the Advisory Group, then filed in November 2002 to decrease the collection rate to \$4.5 million annually and remove the sunset date on the tariff. These changes were approved and became effective in January 2003.

### **2003**

The Company met with its Advisory Group in December 2003 to provide an update and a preview of program enhancements planned for 2004. As of the end of 2003, expenditures and collections were in balance and the Company had no plans in the immediate future to make any changes to the System Benefits Charge (Schedule 191).

### **2004**

In early 2004, the Company provided its Advisory Group with a draft filing for planned C&I program enhancements, incorporated input, and filed the enhancements March 31, 2004. The enhancements were approved effective May 1, 2004. The Company provided its Advisory Group with a draft filing for administrative changes to its C&I program

tariffs later in 2004. These changes were approved effective December 11, 2004. As anticipated, there were no Schedule 191 changes filed in 2004.

The Company met with its Advisory Group October 27, 2004 to provide an update and a preview of potential residential program changes planned for 2005 as well as projected expenditures and collections for 2005. The potential residential program changes included adding "WashWise" and a residential new construction program in partnership with the Northwest Energy Efficiency Alliance, adding a refrigerator recycling program, and revisiting the On-Line Audit program at the conclusion of the marketing campaign for that program that began in 2004. Based on input from this meeting, the Company decided to file a Schedule 191 true-up in early 2005. The Company provided a draft Schedule 191 true-up filing to its Advisory Group December 30, 2004 requesting an adjustment to the collection rate from \$4.5 million to \$6.1 million to fund the ongoing operation of existing programs in 2005. The proposed higher collection rate anticipated an increase in expenditures in 2005 for commercial/industrial programs including one large industrial incentive payment for a project under construction. The draft true-up filing also indicated the Company may file another adjustment to Schedule 191 in 2005 when it filed new residential programs.

## **2005**

The true-up filing was made January 21, 2005 and approved effective February 24, 2005. The "WashWise" program was filed January 28, 2005 and approved effective March 1, 2005.

The Company met with its Advisory Group on February 2, 2005 to go over the draft filing for a refrigerator recycling program, an Energy Star New Homes program, and an increase in the SBC for the new programs. The group also discussed the Company's recommendation to transition the On-Line Audit program to available public domain audit tools and to not complete another evaluation of the On-Line Audit program.

After incorporating Advisory Group input, the Company filed on March 1, 2005 for approval of the residential refrigerator recycling program and Energy Star New Homes Incentive program, cancellation of the On-Line Audit program, and an increase in Schedule 191 from an annual rate of \$6.1 to \$6.7 million. This filing was approved effective April 1, 2005.

The Company provided a draft filing of administrative changes for FinAnswer Express (Schedule 115) and Energy Star New Homes (Schedule 108) to the Advisory Group in September 2005. The Company incorporated input received on the draft filing and added a sunset date for LED traffic signal incentives to the FinAnswer Express filing. The changes were filed November 3, 2005 and approved effective January 1, 2006.

## **2006**

The Company met with its Advisory Group July 19, 2006 to review a draft filing for a new residential incentive program (Home Energy Savings incentive program), to preview planned improvements for the commercial/ industrial programs, and to provide updates

on existing programs. The Advisory Group provided valuable input, which was incorporated in the Home Energy Savings filing.

On August 11, 2006 the Company filed Advice 06-004 proposing the Home Energy Savings program and administrative changes to the Energy Star New Homes program. On August 23, 2006, the Company provided written responses to the Advisory Group input on the draft filing. The filing was approved effective September 14, 2006.

On September 28, 2006, the Company filed Advice 06-006 requesting a reduction in the System Benefits Charge from \$6.7 to \$4.5 million annually for ongoing operation of existing programs and to balance the System Benefits Charge account. The reduction does not reflect a reduction in activity. In setting the \$6.7 million collection rate in 2005, the Company anticipated making a large incentive payment for an industrial project under construction. Sufficient funds had been collected for that payment, and the collection rate needed to be reduced to align ongoing expenditures and revenue and to balance the System Benefits Charge account. The large incentive payment was made in 2006. The Company anticipates the collection rate to balance cumulative expenditures and revenue in late 2008. The Company proposed a collection rate expected to balance in 2008 and not earlier for rate stability reasons. The System Benefits Charge adjustment filing was approved effective November 1, 2006.

The Company provided a draft filing proposing changes to three existing programs on October 13, 2006. The draft filing included tariff format changes for Energy Star New Homes, a tariff format change and program enhancements for FinAnswer Express, and program enhancements for Energy FinAnswer including enhanced design assistance services and incentives for commercial/industrial new construction and major renovation projects. On November 8, 2006, the Company filed the program changes in Advice 06-008. On November 21, 2006, the Company provided written responses to the Advisory Group input in the draft filing. The filing was approved effective January 1, 2007.