

3TIER Environmental Forecast Group

Advocates for the West

AirWorks, Inc.

Alaska Housing Finance Corporation

Alliance to Save Energy

Alternative Energy Resources Organization

American Rivers

BlueGreen Alliance

Bonneville Environmental Foundation

Centerstone

Citizens Utility Board of Oregon

City of Ashland

City of Seattle Office of Sustainability & Environment

Clackamas County Weatherization

Climate Solutions

The Climate Trust

Community Action Partnership of Oregon

Community Action Partnership Assoc. of Idaho

Conservation Services Group

David Suzuki Foundation

Earth and Spirit Council

Earth Ministry

Ecova

EDF Renewable Energy

eFormative Options, LLC

Emerald People’s Utility District

The Energy Project

Energy Trust of Oregon

Environment Oregon

Environment Washington

Friends of the Earth

Grasslands Renewable Energy

Home Performance Guild of Oregon

Home Performance Washington

Housing and Comm. Services Agency of Lane Co.

Human Resources Council, District XI

Iberdrola Renewables

Idaho Conservation League

Idaho Rural Council

Idaho Rivers United

Interfaith Network for Earth Concerns

Laborers International Union of North America, NW Region

League of Women Voters – ID, OR & WA

Local Energy Alliance of Washington

Metrocenter YMCA

Montana Audubon

Montana Environmental Information Center

Montana Renewable Energy Association

Montana River Action

Montana Trout Unlimited

The Mountaineers

National Center for Appropriate Technology

Natural Resources Defense Council

New Buildings Institute

Northern Plains Resource Council

Northwest Energy Efficiency Alliance

Northwest Energy Efficiency Council

Northwest Renewable Energy Institute

Northwest Solar Center

NW Natural

NW SEED

Olympic Community Action Programs

Opportunities Industrialization Center of WA

Opportunity Council

One PacificCoast Bank

Oregon Energy Coordinators Association

Oregon Environmental Council

Oregon HEAT

Oregonians for Renewable Energy Policy

Pacific Energy Innovation Association

Pacific NW Regional Council of Carpenters

Pacific Rivers Council

The Policy Institute

Portland Energy Conservation Inc.

Portland General Electric

Puget Sound Alliance for Retired Americans

Puget Sound Cooperative Credit Union

Puget Sound Energy

Renewable Northwest Project

River Network

Salmon for All

Save Our wild Salmon

Seattle Audubon Society

Sea Breeze Power Corp.

Seattle City Light

Sierra Club

Sierra Club, Idaho Chapter

Sierra Club, Montana Chapter

Sierra Club, Washington Chapter

Silicon Energy

Smart Grid Oregon

Snake River Alliance

Solar Oregon

Solar Washington

South Central Community Action Partnership

Southeast Idaho Community Action Partners

Southern Alliance for Clean Energy

Spokane Neighborhood Action Programs

Student Advocates for Valuing the Environment

SustainableWorks

Sustainable Bainbridge

Sustainable Connections

Trout Unlimited

Union Of Concerned Scientists

United Steelworkers of America, District 12

Washington Environmental Council

Washington State Department of Commerce

Washington State University Energy Program

A World Institute for a Sustainable Humanity

World Steward

April 24, 2013

Steven V. King

Acting Executive Director and Secretary

Washington Utilities and Transportation Commission

1300 S. Evergreen Park Dr. S.W.

PO Box 47250

Olympia, WA 98504-7250

**RE: Docket No. UG 121119, Avista Corp — Tariff Revision — Temporary Discontinuation of Natural Gas Demand­Side Management Programs**

Dear Mr. King:

The following comments are provided by the NW Energy Coalition (“Coalition”) in advance of the Commission’s April 25, 2013 Open Meeting. The Coalition would like to reiterate its support for the continuation of Avista’s natural gas conservation programs, particularly its low-income program, despite the challenge presented by unusually low natural gas prices.

In previous comments submitted for both this docket and UG-121207, the Commission Investigation into Natural Gas Conservation Programs, the Coalition has advocated for the use of a Total Resource Cost (TRC) test that fully values all the benefits conferred by energy efficiency. Since the draft policy for UG-121207 has yet to be finalized, we feel that the most conservative approach would be to grant Avista a two-year waiver to continue their programs as-is. This mirrors the approach taken by the Oregon Public Utility Commission (PUC) at yesterday’s Public Meeting.[[1]](#footnote-1)

A waiver would preserve the many benefits of gas conservation programs without preempting the ongoing conversation about how to best evaluate cost effectiveness for natural gas.

Coalition staff plans to participate in the open meeting scheduled for April 25th via the bridge line. Any questions regarding this submission should be directed to Lynne Dial, 206-621-0094 or lynne@nwenergy.org.

Sincerely,

 

Lynne Dial

1. The PUC’s order has not come out yet, but the proposed commission motion for the 2013-2014 action plan was adopted with a few modifications yesterday. The draft proposed order can be accessed here: <http://www.oregon.gov/puc/meetings/pmemos/2013/042313/reg2.pdf>. [↑](#footnote-ref-1)