

TIER Environmental Forecast Group
Advocates for the West
iRWorks, Inc.
Alaska Housing Finance Corporation
Alliance to Save Energy
Alternative Energy Resources Organization
American Rivers
BlueGreen Alliance
Bonville 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
DF Renewable Energy
Formative 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
Indrola Renewables
John Conservation League
John Rural Council
John Rivers United
Interfaith Network for Earth Concerns
Intercross 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
The 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
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 Demand-Side
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

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.

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>.

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,

A handwritten signature in cursive script, appearing to read "Lynne Dial".

Lynne Dial