

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

DOCKET UE-070725

**THE ENERGY PROJECT
PETITION FOR
RECONSIDERATION**

1. Pursuant to WAC 480-07-850, The Energy Project respectfully petitions for reconsideration of Commission Order 3, issued in these proceedings on May 20, 2010. The Energy Project's petition is limited to one issue: the Commission's decision to require that \$4.57 million taken from the REC Proceeds deferral account established by Order 03 be spent in the 2010-2011 program year. The Energy Project requests the Commission revise Order 03 by extending the date by which these funds must be spent to December 31, 2013.

REASONS TO GRANT RECONSIDERATION

2. Granting this petition will "serve the public interest, as provided by the public service laws," by improving penetration rates and levels of conservation provided to low income customers with a pre-determined amount of funding from PSE. *See* RCW 80.01.040(3).

3. As the Joint Testimony and Charles Eberdt's Declaration explains, certain energy savings can be obtained only if energy repair dollars are available. Joint Testimony at pp. 8-9. Mr. Eberdt also points out that extending the date by which these funds must be spent to December 31, 2013 would stabilize the funding from year to year. Eberdt Decl. at ¶ 5. In

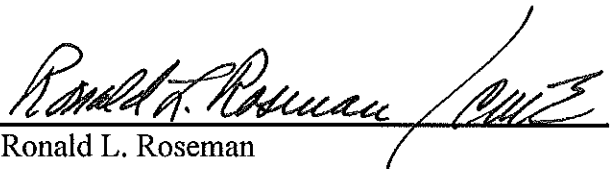
that way, agencies that provide installation and manage low income energy efficiency measures can perform more efficiently by avoiding the need to staff up in one year, letting the staff go in the following year, and then having to re-hire and retrain additional staff in the future.

4. An additional reason to extend the time frame is that low income agencies received unexpectedly \$2,000,000 from an Enron case designated by the Attorney General's office to be used for low income ratepayers but it must be spent by the end of 2010.

5. Regarding the funding from this order, it is our estimate that low income weatherization agencies may not receive this funding for two or three months. If that is the case then the 2010 program year will only have about four months remaining to spend the REC funds in 2010.

6. For the reasons set above and in Charles Eberdt's Declaration The Energy Project believes that extending the time frame to spend this funding to December 31, 2013 would allow for more energy savings to be obtained in low income ratepayer homes and more agencies in PSE's service area to participate.

Respectfully Submitted



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