

March 16, 2017

***VIA ELECTRONIC FILING***

Steven V. King  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive SW  
PO Box 47250  
Olympia, WA 98504-7250

**RE: Advice 17-03—Schedule 114—Residential Energy Efficiency Rider—Optional for Qualifying Low Income Customers**

Pacific Power & Light Company (Pacific Power or Company), a division of PacifiCorp, submits the following revised tariff sheets in accordance with RCW 80.28.050 and WAC chapter 480-80. The Company respectfully requests an effective date of May 1, 2017.

|                                    |              |  |
|------------------------------------|--------------|--|
| Second Revision to Sheet No. 114.2 | Schedule 114 | Residential Energy Efficiency Rider—Optional for Qualifying Low Income Customers |
| Third Revision to Sheet No. 114.3  | Schedule 114 | Residential Energy Efficiency Rider—Optional for Qualifying Low Income Customers |
| Third Revision to Sheet No. 114.4  | Schedule 114 | Residential Energy Efficiency Rider—Optional for Qualifying Low Income Customers |

The Low Income Weatherization program is designed to leverage funds with state and federal grants to cover the costs associated with energy efficiency improvements installed in the homes of income eligible households. The Company partners with three local non-profit agencies to provide weatherization services throughout its Washington service territory. These agencies include Blue Mountain Action Council located in Walla Walla, Northwest Community Action Center in Toppenish, and Opportunities Industrialization Center of Washington in Yakima. The leveraging of Company funding along with Washington Match Maker Program funds allows the agencies to provide these energy efficiency services to more households at no cost to participating customers.

Order 12 in Docket UE-152253 included the following:

Pacific Power must also initiate a stakeholder collaborative to discuss changes to its low-income weatherization program. This collaborative may be conducted in concert with the LIBA collaborative; or separately, as resources permit. In addition to Staff and the Energy Project, the Company should invite Public

Counsel, Boise, and NWECA to participate. Any mutually agreed upon modifications or additions should be filed with the Commission by April 1, 2017.<sup>1</sup>

The Low Income Weatherization Program collaborative was conducted separately from the LIBA collaborative. Meetings took place on December 15, 2016 and February 2, 2017. The draft filing was distributed to the collaborative group on February 23, 2017, and no concerns or requests for additional changes were raised. The following three program revisions were mutually agreed upon:

1. Eliminate the \$1 million annual funding cap. This cap has been in place since 2001 and has not been met, however there is an expectation that it will be reached in the near future based upon agency production levels and budget utilization. The program is cost-effective, so a cap is not necessary. This revision is included on Tariff Sheet No. 114-2.
2. Eliminate the requirement that water pipe wrap is allowed only when installed with floor insulation. The agencies find pipe wrap is often determined to be cost-effective per their energy audit results even when floor insulation is not installed. Revisions have been made on Tariff Sheets Nos. 114.3 and 114.4 to incorporate this change.
3. Add water heater blankets to the list of approved measures. This measure was eliminated as newer models have greater insulation built in to the units so that wraps are not needed. Agency staff stated they are still serving homes that have older models in working condition that would benefit from the installation of a water heater blanket. The agencies install water heater blankets in compliance with the Washington Department of Commerce Weatherization Manual, which currently requires all water heaters located in an unconditioned space to be insulated with a list of exceptions. This measure is added to Tariff Sheet No. 114.4.

In addition to the proposed changes described above, references to measure life and “always considered cost effective” throughout the Energy Efficient Measure section in Tariff Sheet No. 114.3 and 114.4 have been removed. Agencies will use the measure lives included in the Washington Department of Commerce’s Weatherization Manual. This change is included in the first paragraph on Tariff Sheet No. 114.3.

It is respectfully requested that all formal correspondence and Staff requests regarding this filing be addressed to:

By e-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah Street, Suite 2000  
Portland, Oregon, 97232

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<sup>1</sup> *Wash. Utils. & Trans. Comm’n v. Pacific Power & Light Company*, Docket UE-152253, Order 12 ¶ 255 (Sep. 1, 2016).


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Please direct any informal inquiries regarding this filing to Ariel Son at (503) 813-5410.

Sincerely,

A handwritten signature in cursive script, appearing to read "R. Bryce Dalley", with a long horizontal flourish extending to the right.

R. Bryce Dalley  
Vice President, Regulation