



June 19, 2018

Mr. Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive, SW  
P.O. Box 47250  
Olympia, Washington 98504-7250

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UTIL. AND TRANSP.  
COMMISSION

Re: UTC Dkt. No. UE-171087  
Proposed Conservation Program for Residents of Manufactured Homes  
(Via UTC Web Portal)

Dear Mr. Johnson:

At the January 10, 2018, recessed open meeting of the Commission to consider the Biennial Conservation Plan (BCP) submitted by Puget Sound Energy (PSE), Mr. Tom Eckhart advocated on behalf of customers in manufactured homes that the Commission require PSE to expand its conservation portfolio to include a greater focus on the energy efficiency potential in the manufactured home sector.

Though the Commission did not at that time require program revision, the discussion from the bench at the open meeting indicated a desire that PSE and stakeholders do what they can to serve the needs of the low-income customers in manufactured homes.

Utility Conservation Services (UCONS) took that discussion as an invitation to work on a proposal. It did just that. Enclosed for filing in this docket is a "Proposed Energy Efficiency Program Submitted on Behalf of Low-Income Customers in Manufactured Homes in Puget Sound Energy's Service Territory." This proposal has been produced following consultations between UCONS and energy experts in the Department of Commerce and at Washington State University, with various stakeholders, such as The Energy Project and the Northwest Energy Coalition, and with associations representing residents of manufactured homes. We hope that some of these organizations will formally endorse this proposal.

This proposal is also based on UCONS's own substantial experience in providing energy efficiency services, including providing such services to residents of manufactured homes in PSE's service territory and, in the past year, to residents in manufactured homes served by Tacoma Power.

The UCONS proposal would address the need to acquire additional cost-effective conservation in the manufactured home, hard-to-reach market, as envisioned by the Seventh Power Plan of the Northwest Power and Conservation Council while fulfilling the obligation of PSE to acquire, and the Commission to require the acquisition of, all cost-effective conservation.

UCONS is submitting this proposal to PSE today in the hope that it will "adaptively manage" its conservation portfolio and implement this or a similar program this year, helping to fulfill its obligations under Washington's Energy Independence Act. It is important to give these customers opportunities now and not wait for the next round of biennial conservation plan development.

We urge the Commission to take necessary steps to encourage PSE to implement this proposal.

Sincerely,



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Enclosure

Cc (by electronic email; w/ enclosure):

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Commissioner Ann Rendahl  
Commissioner Jay Balasbas  
Tom Eckhart, UCONS  
Rob McKenna, Orrick

Bob Stolarski, Puget Sound Energy  
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