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June 20, 2012

Mr. David Danner, Executive Director and Secretary Washington Utilities and Transportations Commission PO Box 47250 Olympia, WA 98504-7250

RE: Docket 120807

Conversion and Transition Plan

This is a request to have the Conversion and Transition Plan submitted by PSE on June 1, 2012 amended to reflect a final service delivery date of December 31, 2012. We understand that the long-term successful partnership between OlyCAP and PSE must come to an end with Jefferson County Public Utility District transitioning into providing utility service in Jefferson County in April of 2013, but we believe there are numerous reasons that support maintaining the program and its current service in Jefferson County until December 31, 2012.

Service delivery should remain in place until December 31, 2012 because:

- Contract signed in November 2011 has both parties agreeing to provide service through December 31, 2012 knowing full well of the 2013 transition from PSE to PUD.
- We project all project spending over the calendar year and are now forced to eliminate projects based off of this potential loss of 5 months' worth of project funding from PSE. Each project relies on multiple Federal, State, and private funding sources (Department of Energy, Health and Human Resources, Matchmaker). With PSE in place through 2012 we do not compromise any projected projects serving low-income households.
- Five homes have already been audited and are ready for weatherization and 11 more in the queue with the projected project completion dates prior to December 31, 2012. Seven PSE homes have been completed already this year.
- We acknowledge that the PSE Low Income Weatherization Program is not cost-effective at this time for Jefferson County by itself. However, Jefferson County is a very small part of the PSE community. Keeping this contract in place through December 31, 2012 will not affect cost effectiveness for the program as a whole. The contract is for \$117,408, a very small proportion of the \$90.8 million* in PSE's conservation programs

- (0.13%). The contract is funded by the ratepayers in the surcharges so is staying within the community as a benefit to Jefferson County customers.
- With PSE funding in place through December 31, 2012 the leveraging potential to conserve energy and serve low-income households in Jefferson County is tremendous. Our ability to maximize the funds for the benefit of both the families and the funding agencies (including PSE) brings the highest return for the dollars spent.

The need for help for these families is very real; as long as they are still PSE customers it seems arbitrary to cut the services and leave the program completely inoperative for the remainder of the year.

We appreciate your consideration of this request. It is our duty to continue to advocate for and serve low-income households in Jefferson County and the energy services programs we administer changes lives each year as a result.

Sincerely,

Janet Anderson
Executive Director