

the Energy Project January 13, 2009

1322 N State St
Bellingham, WA 98225

Phone
(360) 255-2169

Fax
(360) 671-2753

Email
chuck_eberdt
@oppc.org

Mr. David W Danner
Executive Director and Secretary
Washington Utilities & Transportation Commission
P.O. Box 47250
1300 S Evergreen Park Drive, SW
Olympia, WA 98504-7250

Re: Docket UE-082180 Advice No. 08-07 - Revisions to PacifiCorp's Schedule 114 Low Income Weatherization Program

2009 JAN 16 PM 2:55
RECEIVED
STATE OF WASHINGTON
UTILITY AND TRANSPORTATION
COMMISSION

Dear Mr. Danner,

As an intervener in Docket No. 082180 representing the interests of OIC of Washington, the Blue Mountain Action Council, and the Northwest Community Action Council, The Energy Project fully supports the filing the Company has made regarding their low-income energy efficiency program as fully meeting the requirements in the stipulation. We appreciate the company's efforts to find a mutually satisfactory position that will help the agencies administer the program more simply and walk away from fewer homes and note that the proposal has the unanimous support from the advisory group members

We believe this filing takes good steps in that direction because the removal of the cap on administrative charges simplifies the administration of the program while more fairly allocating administrative costs. At the same time, the change in the repair cost allowance will permit agencies to spend more than the average cost in homes with greater repair needs, while maintaining the overall cost effectiveness of the program. This is especially important, since the condition of the low-income housing stock in general requires greater investment of this type in order to install the energy conservation measures with legitimate expectation of life cycle savings. The increase flexibility that will result means agencies will have to walk away from fewer of the homes they assess. This further improves program administration.

For these reasons, we believe the changes are in the interest of PacifiCorp's customers, particularly the low-income customers who are eligible for the programs. We encourage the Commission to approve the filing. Thank you.

Respectfully,


Charles M. Eberdt



A Project of
the Opportunity Council
The Washington State
Office of Community
Development and
The Washington State
Community Action
Partnership