Portland General Electric Company
121 SW Salmon Street • 1WTC 1706 • Portland, Oregon 97204
office (503) 464-8536 • facsimile (503) 464-2222

Carol Dillin
Vice President, Customer Strategies
& Business Development

February 15, 2012

To Whom It May Concern:

Thank you for the opportunity to weigh in on the Energy Performance Score (EPS) pilot for existing homes.

PGE supports Energy Trust's efforts to encourage more home retrofits by innovative means, including piloting an EPS score for existing homes. It is important to determine in the pilot whether the EPS is in fact achieving savings in a cost-effective manner. Prior to launch, PGE requests Energy Trust publicize the milestones in its plan to evaluate the effectiveness of EPS in promoting home retrofits and its exit strategy should it be deemed that the tool is not realizing sufficient savings to be cost-effective. Because there are trade ally partners involved in making an EPS work, such as real estate agents, home performance contractors, architects, engineers, etc, it is important that Energy Trust is clear upfront on the pilot nature of the project and the potential to cancel Energy Trust support of an EPS if evaluation results are unfavorable.

PGE supports piloting the EPS score in its current form. PGE is not convinced that the carbon piece of the EPS is working, and looks forward to evaluation results to look at this further. At present, it appears to us that the carbon portion of the score adds to EPS complexity without increasing likelihood of customer action. We have experience citing this statistic with the general public. In spite of all the successes of our renewable power program, it is our experience that the language of carbon doesn't resonate with most consumers and might not motivate a significant quantity of regular customers to use EPS. In addition, the carbon score may change dramatically depending something beyond the control of the customer – the carbon content of the energy supply. Homes that could otherwise be comparable in terms of energy consumption could show significantly different carbon scores depending on their immediate location and electricity power supplier, resulting in EPS disparities between houses virtually across the street from one another in NE Portland, Canby, Forest Grove and Salem (e.g., PacifiCorp vs. PGE, or PGE vs. Canby Electric). To the extent that the carbon portion of the score does have an effect, we are not certain that the EPS should be providing a rationale for encouraging home choice on the basis of geographical location of the home.

There was much discussion at the Conservation Advisory Council meeting on using "source" data rather than "site" data in creating the EPS. Presenting "source" information would again increase the complexity of the EPS, and correspondingly customer confusion. We see no reason to move to source data, especially when the usefulness of the tool to encourage home upgrades is still in question. As of January 2012, the Northwest Power and Conservation Council (NWPCC) stated in their Summary of Results of the Direct Use of Natural Gas Analysis Draft that, "fuel choice has little effect on carbon emissions." While PGE doesn't wholeheartedly agree with NWPCC findings based on our current and ever-improving generation fuel mix, it will be difficult to market a scoring system which may directly conflict with the NWPCC results.

Thank you again for the opportunity to comment on the EPS pilot.

Sincerely,

Carol Dillin