To Whom It May Concern:

Pacific Power supports the Energy Trusts' efforts to encourage additional home retrofits by providing relevant information that drives customers to take action. Preliminary research indicates software that generates an Energy Performance Score (EPS) for existing homes might be an effective tool to motivate customers; however, according to the Energy Trust's February 15, 2012 presentation, the EPS to-date has neither driven action nor additional investment. Pacific Power considers this tool as additive to the current suite of tools and reports already used by installation contractors and program management teams for similar purposes. For this reason, and additional reasons outlined below, Pacific Power is concerned the EPS will not support the Energy Trust's core mission to help customers save energy.

Pacific Power agrees with the point raised by a member of the contractor community at the February 15, 2012 Conservation Advisory Committee meeting that the efficacy of a $200 cost for a dwelling EPS should be compared with providing a $200 incentive directly to customers. The point made by OPUC staff that the deployment of the EPS tool should result in a demonstrable system benefit for the $200 cost per dwelling is also shared by Pacific Power. A plan with milestones to evaluate the effectiveness of the tool and an exit strategy should be provided prior to launch. In addition, it's important to communicate to users that Energy Trust support of this tool may not continue if results are not forthcoming.

The full extent of the alignment between this effort and recommendations provided by the SB 79 task force is not immediately apparent. As stated above, Pacific Power is providing comments in the context that the EPS serves as an additional customer engagement tool and not as a tool to implement a mandatory EPS. Any comments from the Oregon Department of Energy on the work to date and intended uses would be very informative to us and possibly other stakeholders who were not afforded the opportunity to participate in the task force.

The Oregon Department of Energy rules allow the EPS to include an estimated amount of carbon dioxide per housing unit; however, this element is not mandatory for inclusion in the EPS. Due to the complex nature of providing an estimate for carbon dioxide emissions and the questions that remain on this issue, Pacific Power's preference is this estimate is removed from any EPS used by the Energy Trust. Homeowners with specific interest in carbon reductions have a broad variety of tools to evaluate additional investment decisions, including participating in the voluntary green pricing program (which provides the customer with information on the emissions avoidance value from the purchases) and installing renewable energy systems.

The complexity of establishing a score for homes with multiple fuel types is embodied in the Energy Trust observation that "conservation measures will have only small impacts on scores unless several are done at once." Solving the large impact of heat system type on scores in the pilot phase by utilizing source energy is not supported by Pacific Power since it adds analytical complexity to a tool designed to motivate broad-based customer activity with easily understood metrics. To minimize the heating system impact on score, Pacific Power supports indexing the scores and information to a reference house with the same heating fuel; electrically heated homes would be compared to an electrically heated home reference and likewise for gas-heated homes.

If the carbon estimate is included, it should also be tied to the reference home. Using a reference home should provide a better tool for showing the broadest group homeowners which conservation measures make the most economic sense.

Finally, this work is complex, analytically intensive and has been in progress for multiple years. Hopefully this final iteration will generate a pilot tool that can be used and evaluated. If the combination of work to date and stakeholder comments generated through this process don't provide some clear indications of how to move forward, Pacific Power would encourage the Energy Trust to assess the value of additional work and consider suspending deployment until further rules are developed or a third party such as the national or state department of energy provides a software tool.

Thanks for the opportunity to comment on the development of the EPS pilot.

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