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PACIFIC POWER
A DIVISION OF PACIFICORP

September 3, 2014

Margie Harris
Executive Director
Energy Trust of Oregon
421 SW Oak Street, Suite 300
Portland, OR 97204

Re: Pacific Power's Comments on the 2015-2019 Strategic Plan (July 25, 2014 version)

Dear Margie:

Thank you for the opportunity to provide comments to the Energy Trust of Oregon's strategic plan for 2015-2019. These comments are in addition to our comments on the planning process provided on March 25, 2014.

Pacific Power recommends the customer investment (in addition to $968 million Energy Trust investment) be included in the last paragraph on page two. Including the customer investment in addition to the Energy Trust investment and comparing those to the energy bill savings and additional economic benefits will improve customer understanding of your business case.

The five year energy efficiency goals provided on page five are a useful and illustrative context for the combined results of the two electric utilities. To better compare how these high level goals relate to past Pacific Power results, our demand side management team worked with the Energy Trust planning team to arrive at a rudimentary allocation between utilities (about 40% to Pacific Power) and calculated an annual average. The resultant target (about 19 aMW) is close to our prior IRP sections and annual results. This high level correlation provides some assurance about the initial alignment of the planning assumptions. As in prior years, a target by year will be generated by PacifiCorp's IRP which will reflect Pacific Power's resource needs and territory specific economic value. The annual targets will continue to form the basis of the annual funding requirements.

Partnerships (page 10) are valuable strategies for increasing the Energy Trust reach and effectiveness. We encourage the Energy Trust to involve the utilities early in any strategic partnership process to explore opportunities for us to further complement any of these efforts. And, as these partnerships increase, transparency and customer understanding improves if key assumptions between partners including savings attribution and calculations are aligned to the greatest extent possible.

Pacific Power also appreciates the focus on addressing hard to reach markets and operational efficiencies and looks forward to on-going collaboration to help achieve these outcomes.

Thank you. Please feel free to contact me if you should have questions.

Sincerely,

Scott D. Bolton