

June 24, 2014



***Via Electronic Mail***

Oregon Public Utility Commission  
**Attn: Filing Center**  
3930 Fairview Industrial Dr. SE  
PO Box 1088  
Salem, OR 97308

Re: Comments of Home Performance Guild of Oregon on UM 1622

Dear Commissioners,

The Home Performance Guild of Oregon (Guild) offers the following preliminary comments on the issues associated with UM 1622 in advance of the July 29th workshop. Thank you for this opportunity and for advancing this important discussion in the State of Oregon.

The July 1st Energy Trust of Oregon (Energy Trust) report to the Commission titled "Cost-Effectiveness Review for Specific Gas Measures and Programs" is a thorough response to the Oregon Public Utilities Commission's (OPUC's) direction in Order 13- 256 under docket UM 1622. The report provides extensive information about the cost effectiveness of gas energy efficiency measures and the Guild supports many of the recommendations in the report, while others we believe should be re-considered and still others deserve further study.

The Guild would like to draw special attention to some issues that we see as critical to this docket:

**Whole Home Air Sealing**

The Guild disagrees with Energy Trust's recommendation that in 2015, incentives for air sealing as a stand-alone measure no longer be offered for single-family homes. We believe that the measure is a hallmark of the weatherization program and that all efforts should be made to maintain this measure. Conceivably, it could be eligible for exception criterion A: Produces significant non-quantifiable non-energy benefits. Alternatively, this measure should be a strong candidate for the proposed Core Residential Program (see below).

**Insulation**

The Guild agrees with Energy Trust's assessment that participant non-energy benefits are widely acknowledged for insulation. The Guild further agrees that offering incentives for wall, floor and duct insulation are a valuable part of overall customer service. We therefore believe that all efforts should be made to maintain these measures as well. Conceivably, they could all be eligible for



exception criterion A: Produces significant non-quantifiable non-energy benefits. Alternatively, these measures should strong candidates for the proposed Core Residential Program (see below).

### **Customer Mobility**

The Guild feels it is important to note that we live in an increasingly mobile population. Someone living in a house heated by one fuel type has a strong possibility of re-locating within a few short years to another home with a different source of home heating. A good quality home weatherization and insulation practice across the entire building stock is the best way to ensure that a mobile population enjoys the benefits of lower energy costs and good occupant comfort.

### **Non-Energy Benefits**

The Guild appreciates that Energy Trust pointed out that participant non-energy benefits are widely acknowledged for insulation, which include thermal comfort and noise reduction. We would add improved indoor air-quality (particularly in the homes of asthma sufferers) to the short-list of non-energy benefits worthy of special mention; even while there are many more worth considering. The Guild supports the related UM1696 proposals by PGE and Pacific Power to seek out and develop improved information on non-energy benefit's (NEB's).

### **Core Program**

The Guild recommends that the OPUC work with Energy Trust and stakeholders in developing a greater understanding of Energy Trust's proposal that a Core Residential Program (Core Program), that would provide customer access to certain measures as a basic utility customer service, be established by the OPUC outside of the framework of cost-effectiveness. We believe that such an idea warrants very careful consideration. As outlined by Energy Trust, it intends to engage with the OPUC in discussions that encompass the role of incentives, the appropriate level of program management, contractor engagement, training, quality control, customer assistance and promotion. We suggest the following additional considerations:

- What is in a Core Program:  
Careful consideration must be put into the selection process regarding which measures are in the Core Program, along with the process by which measures get added at later dates and/or by which measures get removed. With regards to which measures are in the Core Program, the Guild would suggest considering the consumer's expectations first, regardless of the cost effectiveness of the measures, i.e. measures that currently are and are not cost effective may belong in a Core Program. It was suggested by Energy Trust that wall, floor and duct insulation are a valuable part of overall customer service, and they went on to propose defining a Core Residential Program within which these and other residential measures play a role. We agree that those and other measures should play a role in a Core Program. Other measures that may fit well in a Core Program include whole home air sealing (currently not cost effective) and windows (currently cost effective).



- How is the Core program Justified:  
Careful consideration must be afforded to the reasoning used to justify the Core Program. This reasoning must be sensible, defensible and in-line with the core principles of Energy Trust and the OPUC. Energy Trust provided a number of very strong reasons to support a Core Program, which included: Fairness, Customer Service, Uncertainty, Compatibility with Other State Supported Efforts, Impacts on the Electric Efficiency Portion of the Program, Customer Engagement and Visibility. Each of these deserves and would benefit from deeper consideration and research to foster them with greater weight and defensibility.

With these considerations in mind, the Guild has begun working with our national association and partners to gather research on other programs around the country that have implemented and/or considered offering energy efficiency programs similar to the proposed Core Program. It is the Guild's intent to bring these considerations to the discussion on a Core Program as it progresses.

The Home Performance Guild of Oregon appreciates the complexity of this issue now before the Oregon Public Utilities Commission. We offer these initial comments in hopes that this conversation will continue to evolve toward an approach that best serves the multi-layered interests of Energy Trust of Oregon and the customers of Energy Trust of Oregon - as ratepayers, consumers, homeowners, and residents of Oregon. We look forward to participating in that discourse.

Sincerely,

*/s/ Don MacOdrum*

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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Comments of Home Performance Guild of Oregon upon all parties of record in the UM 1622 proceeding by electronic mail.

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DATED at Portland, Oregon this 24th day of July, 2014.

/S/ Don MacOdrum

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