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Sent: Wednesday, April 15, 2015 6:08 AM
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Subject: UM 1622 Filings Extended To 4-15-2015
Attachments: energyconservationhowto.blogspot.com-Defending Basic Best-Savings Weatherization
In Oregon.pdf

This is the third time I have offered the attachment as a docket item. If this stuck the other times, I am sorry. But, no one has offered a protest, or a thank-you.

I intend to reinforce the filing of Mary Mann, that we shall not surrender to bad math as subterfuge for eliminating weatherization and the Public Purpose Fund. Mary notes that use of present cost of labor and materials is bad math. I offer that a bigger element of bad math is use of present cost of energy. In a rational world, and soon, we will stop the evil fracking ruin-forever of our lands. Energy costs will then return to historic trends, outpacing inflation of the labor and materials costs. Correct math has all forces in favor of doing anything TODAY, that has even a modest return, say 6% or better. Anything a home owner knows he should do will make sense. My sense is that there is about an order of magnitude multiplier of returns due to sure inflation. There are many things-to-do that are repaid at present costs, in less than five years. Say there is two-year payback as in simplest air sealing. All returns beyond two years are measure of the multiplier. If the measure persists sixty years, there is a times-thirty multiplier even discounting inflation. Perhaps the multiplier might be two orders of magnitude. Doing nothing while facing disaster in climate change and an end of all notions of cheap energy, is madness. The offered outcome of UM 1622 processes, in allowed gambling by NW Natural in energy futures as our salvation, is madness. Let us now stop all talk of this stupid "hedging." Do any of the wizards know what they are offering?

Please find all of my growing thoughts in this matter, in my blog:

<http://energyconservationhowto.blogspot.com/search/label/Policy%20Revision>

With such submission, I may even go back and fix typos, at-your-service.

Please let me know if a maintained hyperlink might be a superior public comment. If not, and the found documents are wanted, I will offer all as pdfs.

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 energyconservationhowto.blogspot.com

<http://energyconservationhowto.blogspot.com/2015/01/defending-basic-best-savings.html>

Defending Basic Best-Savings Weatherization In Oregon

I will attend a meeting this morning, in a first-ever visit at Portland, Oregon's [Energy Trust](#) . The meeting topic, broadly, is [weatherization policy](#) in Oregon and nationally. The specific meeting objective has been declared by the [Oregon Public Utilities Commission](#) , in the person of staff member Juliet Johnson. In advance, I create this full public record of preliminaries. After the meeting, I will add my observations and any posted minutes.

Here are email notices from Juliet Johnson, and attachments as saved in my Google Drive.

Sent 1/5/2015:

Subject: UM 1622 ENERGY TRUST OF OREGON EXCEPTIONS

Hello – There will be a workshop at 9:30 AM on January 14, 2015 at Energy Trust (421 Southwest Oak Street #300 Portland, OR 97204) to discuss the idea of an incentive cap for energy efficiency measures, as described in Commission Order No. 14-332 in Docket UM 1622. A link to the order is attached.

<http://apps.puc.state.or.us/orders/2014ords/14-332.pdf>

As indicated in the order, the Commission is open to considering the idea of an incentive cap proposal for energy efficiency measures – especially for moderate income and multi-family customers – that includes the following elements:

- a. Meaningful reduction in incentives;
- b. Strong protocols to minimize free riders; and
- c. A design that favors lowest cost, highest savings measures.

The purpose of the January 14th workshop is to hear and discuss proposal concepts. You can call into the meeting at: [1-888-354-0094](tel:1-888-354-0094); Passcode 7765580#.

Please let me know if you have any questions.

Thanks,

Juliet

Juliet Johnson

Oregon Public Utility Commission

This is a second stage in my contribution of public input to hearing [UM1622 of 9/30/2014](#) . That decision hearing was a sham, with absolutely no respect for the public comments. Participants were allowed to post remarks and then

might ask to speak if present. My written remarks were email submission of PDF hard copy of several policy blog posts [here](#) . And here is all that has been understood from my submission:

In response to this docket Phillip Norman provided excerpts from a blog that he writes. In the blog excerpts he asserts gas prices will go up due to future unforeseen fracking regulations.

I immediately responded to the 1/5/2015 notice, with this:

OK, let us cap all payouts from Energy Trust, to NONE. There should never have been payout of public purpose funds, to anyone. The only decent output is as a to-be-repaid loan, offered regardless of a person's wealth. There can be really-good reasons any home owner would join this hugely-expanded Energy Trust program, tracking ALL measures that benefit a home owner, but never with a payout to a home owner. This is among comments I offered upon UM1622 hearings. Weatherization sponsorship by Energy Trust then clearly could not fail a profitability test except for the real ruin, the absurd \$25,000 per home overhead for each of the mere 2000 homes per year served.

OPUC shall be ashamed that they end all productive relationship of Energy Trust to home owners, while not testing merit of anything else Energy Trust does, including spending more than \$500,000 per year to promote useless Energy Performance Score, illegally not subjected to payback analysis.

Why should I bother to show up for the death notices? I might.
No one has responded to this message.

The 1/5/2015 notice included [these attachments](#) .
I responded with [these attachments](#) .

The final meeting notice is this, of 1/13/2015:

Attached are items we will review and discuss at UM 1622 Incentive Cap workshop at at Energy Trust. Please let me know if you have any questions or additional items for discussion.

Thanks,

Juliet Johnson
OPUC
[503-378-8714](tel:503-378-8714)

I responded to the 1/13/2015 notice, thus:

Why can't we talk about something that serves all of the best savings opportunities in all homes, the same? How can income or wealth weigh upon energy savings opportunities? Let's confess that renters, both in decrepit homes and in decrepit workplaces, and there are ever more of them, need weatherization most, and are ROBBED of their contributions to the Public Purpose Fund, for shame, for shame!

Why can't we talk of keeping the most important savings of all, in [air sealing](#)? The small cost of air sealing is always repaid in less than two years. Anyone who says otherwise is really, really causing harm . No insulation should be added in an attic floor, ever, without full prep of the floor, including conversion to LED lighting with elimination of all bad can lights, certainly all that are non-IC. Before adding insulation too, we must fix insufficient soffit ventilation, usually only one third of needed soffit vent area, and setting stapled-cardboard baffles that will fail in five years where sixty-year survival is mandatory. Let us not talk then of any allowance that blow and go criminals may secure rebates for their stupid actions doing more harm than good, not even adding much insulation value as they

cheat with voids and underfills, defying inspection by barring access. Part of our cure is to eliminate ALL of the mismanaged and failing promotion of weatherization in get-greedy, take back your share from the Public Purpose Fund, rebate handouts. The real human nature is cooperation, to preserve good life for all of Earth's creatures.

How many of the high-volume pushy, lying contractors are there in the blow and go, rewarded by \$10,000 per year handouts from the Public Purpose Fund? Surely this amounts to \$200,000 per year. All cooperative marketing money as bribes to love Energy Trust, might add up to \$500,000 per year. Then there is the illegal expenditure of \$500,000 per year, trying to get worthless EPS to fly. Compare \$1 million of this dirty money, to the 2014 payout in all existing home insulation rebates, of less than \$500,000, and stupid niggling that drags busy people downtown tomorrow, to hack off \$200,000. How mean! And how dangerously confusing to the general public! How else does Energy Trust spend \$8 million per year, that was intended to promote residential weatherization, and does not? How can we be quibbling over \$200,000 as the ONLY responsible management by OPUC?

80% of large-return investment in residential weatherization has never begun. It will be very evil, if this is all about the libertarian wish to get rid of another damned tax, that Public Purpose Fund. Make Energy Trust hated for its years of known wastefulness and non-performance. Make them hated more for no longer managing residential weatherization, but only handing dollars upward to corporations and the more-affluent. Get rid of Energy Trust then. Maybe even a Democratic legislature then, might eliminate the Public Purpose Fund.

I have described a better future where at least \$1 billion is used immediately in loans, to greatly increase the production of Energy Trust, knocking down the present \$25,000 per home served. There is a lot to be debated, in making good happen. Could an honest, intelligent and hard-working person, a critic, be banished from this important conversation?

We must not waste the day tomorrow, with the surrender agenda that has been offered. We must not imagine that Energy Trust may go on ever more-wastefully, in a failed rebates regime.

The 1/13/2015 notice included [these attachments](#) .

I responded with [these attachments](#) .

I have no heart for the throttled weatherization proposals. I can hardly bear to read them. My push for a different conversation has excessive zeal, I know. I expect dismissal by some, for numbers naivete. My numbers are gleaned from much reading however, and they contradict the glowing self-reports Energy Trust submits to OPUC. I am certain OPUC has been complicit in hiding Energy Trust's failed performance.

At 1/16/2015, begin a report upon the meeting. It appears that no minutes will be forthcoming.

"Free Riders" in a weatherization dictionary?

The participants spoke of "free riders" as negative, until the meeting end, where it was agreed that free riders are good. Free riders sounded good to me all along, never defined, understood by context. I think this may be a definition in weatherization: If someone does something good without some payout from the Public Purpose Fund, that is a free rider. As I see it, people want and need to do good. They resent thought they might need a bribe. Energy Trust employs bribes in rebate payouts as their only tool, and they don't like demonstration bribes are unnecessary, or worse. One participant reported that home owners in his experience, need only lists of the measures valued by society as most-productive, and they will have them done regardless of incentives. We agree on this! So, why did the meeting end with only commitment to shuffle and rethink incentive amounts within UM1622 constraints, and still without air sealing?

Renters:

My insult of the funds theft from renters drew discussion, and some hope new programs might emphasize renter opportunities, but no action was promised, and I expect there will be no diminishment of our shame.

OPUC Docket Invitation, Honest Work With Up-Front Financing, Equally For All:

Perhaps from respect of my comments, the only written comments received, OPUC promised that they are obliged to act upon any proposal that appears in their docket process. I must be committed then to cause action by a new docket submittal separate from that hijacked in continuation of home performance madness, In this new docket action, I must challenge the failed rebates regimes, by formally proposing a very large up-front financing plan, for honest lowest-cost work, rid of home performance scams. The new and very honestly-managed financing through a new Oregon State Bank, will dwarf the tiny delivery of such through Oregon State Representative Jules Bailey's hijacked [HB 2626 of 2009](#) . In its honesty it will draw support from the public to employ state and municipal reserved funds, and it will be capitalized even by individual investors seeking safest returns and noble purpose. Where Energy Trust serves only 2000 homes per year, and 1200 are with up-front financing despite extremely high cost, we see that rebates don't work. An honest up-front financing program will inspire the nation. Oregon will be the leader we imagine we are, not the greenness laughingstock.