



Citizens' Utility Board of Oregon

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24 September 2012

Public Utility Commission of Oregon

550 Capitol Street, N.E., Suite 215

P.O. Box 2148

Salem, Oregon 97308-2148

Attn: Filing Center

RE: UG-1622, Energy Trust of Oregon Request on Cost Effectiveness of Energy Efficiency Investments

The Citizens' Utility Board of Oregon (CUB) is responding to filings made by Energy Trust of Oregon (ETO) requesting that various gas efficiency measures not be subject to cost benefit tests for a period of two years. The request includes putting aside the total resource cost test and the utility cost test as required by PUC Order No. 94-590 for those two years.

Per that order, there are guidelines for exceptions. CUB believes that ETO's request complies with those guidelines for allowed exceptions and supports ETO's request. It is critical for the efficiency programs to continue, and no one—customers, companies, or the energy efficiency industry—is served well by drastically cutting back on existing programs during this time of low gas prices. Reducing efficiency programs during periods of low prices makes it difficult to resume efficiency work when prices eventually increase. The requested exception period will allow all parties to examine gas price trends and make appropriate program design and financial allocation decisions in response.

CUB appreciates the opportunity to comment on the filing and looks forward to being part of continuing conversations on appropriate investments in energy efficiency.

Sincerely,

Bob Jenks

Executive Director