

3TIER Environmental Forecast Group
Advocates for the West
AirWorks, Inc.
Alaska Housing Finance Corporation
Alliance to Save Energy
Alternative Energy Resources Organization
American Rivers
The Apollo Alliance
Audubon Washington
Bonneville Environmental Foundation
Central Area Motivation Program
Citizens Utility Board of Oregon
City of Ashland
Clackamas County Weatherization
Climate Solutions
The Climate Trust
Community Action Partnership of Oregon
Community Action Partnership Assoc. of Idaho
Conservation Services Group
David Suzuki Foundation
Earth and Spirit Council
Earth Ministry
Ecova
eFormative Options, LLC
Emerald People's Utility District
The Energy Project
Energy Trust of Oregon, Inc.
enXco Development Corporation
Environment Oregon
Friends of the Earth
Environment Washington
Grasslands Renewable Energy
Home Performance Guild of Oregon
Home Performance Washington
Housing and Comm. Services Agency of Lane Co.
Human Resources Council, District XI
Iberdrola Renewables
Idaho Conservation League
Idaho Rivers United
Idaho Rural Council
Interfaith Network for Earth Concerns
Kootenai Environmental Alliance
Laborers International Union of North America, NW Region
League of Women Voters – ID, OR & WA
Local Energy Alliance of Washington
Metrocenter YMCA
Missoula Urban Demonstration Project
Montana Audubon
Montana Environmental Information Center
Montana Public Interest Research Group
Montana Renewable Energy Association
Montana River Action
Montana Trout Unlimited
Moontown Foundation
The Mountaineers
Multnomah County Weatherization
National Center for Appropriate Technology
Natural Resources Defense Council
New Buildings Institute
Northern Plains Resource Council
Northwest Energy Efficiency Alliance
Northwest Energy Efficiency Council
Northwest Renewable Energy Institute
Northwest Solar Center
NW Natural
NW SEED
Olympic Community Action Programs
Opportunities Industrialization Center of WA
Opportunity Council
One PacificCoast Bank
Oregon Action
Oregon Energy Coordinators Association
Oregon Environmental Council
Oregon HEAT
Oregonians for Renewable Energy Policy
Pacific Energy Innovation Association
Pacific NW Regional Council of Carpenters
Pacific Rivers Council
The Policy Institute
Portland Energy Conservation Inc.
Portland General Electric
Puget Sound Alliance for Retired Americans
Puget Sound Cooperative Credit Union
Puget Sound Energy
Renewable Northwest Project
River Network
Salmon for All
Save Our Wild Salmon
Seattle Audubon Society
Seattle City Light
Sierra Club
Sierra Club, Idaho Chapter
Sierra Club, Montana Chapter
Silicon Energy
Snake River Alliance
Solar Oregon
Solar Washington
South Central Community Action Partnership, Inc
Southeast Idaho Community Action Agency
Southern Alliance for Clean Energy
Spokane Neighborhood Action Programs
Smart Grid Oregon
Student Advocates for Valuing the Environment
SustainableWorks
Sustainable Bainbridge
Tahoma Audubon Society
Trout Unlimited
Union Of Concerned Scientists
United Steelworkers of America, District 11
Washington CAN!
Washington Environmental Council
Washington State Department of Commerce
Washington State University Energy Program



NW Energy Coalition
for a clean and affordable energy future

September 24, 2012

Public Utility Commission of Oregon
550 Capitol Street, N.E., Suite 215
P.O. Box 2148
Salem, OR 97308-2148

Attn: Filing Center

RE: UM 1622, Energy Trust of Oregon Exceptions

The NW Energy Coalition (“Coalition”) submits this filing in support of the Energy Trust filing in UM 1622, Energy Trust of Oregon Exceptions. The NW Energy Coalition is a coalition of more than 115 groups, including utilities, environmental, faith-based, consumer and low-income organizations, unions, and clean energy businesses working for a clean and affordable energy future. For the past 30 years, NWECA has promoted equity in ratemaking and advocated for cost-effective conservation, accounting for environmental costs in resource choices, and engagement of the public in energy decision-making in Oregon and throughout the Pacific Northwest.

In this docket the Energy Trust requests approval for temporary exceptions to existing cost effectiveness guidelines for certain gas efficiency measures as well as the implementation of a two-phase prescriptive duct sealing pilot run. Commission Order No. 94-590 in UM 551 requires the total resource cost test (“TRC”) and the utility cost test (“UTC”) to determine cost effectiveness of energy efficiency measures. The same order provides for exceptions in a number of different situations.

The Energy Trust’s request in UM 1622 complies with the guidelines for exceptions under Order No. 94-590 and therefore the Coalition recommends that the Commission affirm the temporary exceptions and the duct sealing pilot request in this docket.

Respectfully submitted,

Wendy Gerlitz
Senior Policy Associate
NW Energy Coalition
Portland, Oregon

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **Initial Comments of NW Energy Coalition** to be served by electronic mail to those parties whose email addresses appear on the attached service list, and by First Class Mail, postage prepaid and properly addressed, to those parties on the service list who have not waived paper service from OPUC Docket No. UM 1622

DATED this 24th day of September, 2012.



Wendy Gerlitz
Senior Policy Associate
NW Energy Coalition
Portland, Oregon

Summary Report

UM 1622 ENERGY TRUST OF OREGON EXCEPTIONS

Category: Miscellaneous

In the Matter of
ENERGY TRUST OF OREGON
Request for Exceptions; Filed by Debbie Menashe.

Filing Date: 8/2/2012

SERVICE LIST:

DEBBIE MENASHE
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