



**Portland General Electric Company**  
121 SW Salmon Street • Portland, Oregon 97204  
PortlandGeneral.com

June 30, 2014

Public Utility Commission of Oregon  
Attn: Filing Center  
3930 Fairview Industrial Drive SE  
P. O. Box 1088  
Salem, Oregon 97308-1088

RE: UM 1696 PGE's Comments on Energy Trust Filing for Cost Effectiveness  
Exceptions for Specific Electric Measures

Portland General Electric (PGE) provides the following comments on the Energy Trust Filing for Cost Effectiveness Exceptions for Specific Measures (cost effectiveness exceptions).

Energy Trust has engaged in a thorough and thoughtful process to review cost effectiveness of various electric measures. This is important work as it can guide improvements to current programs, such as with ductless heat pumps, and gives specific time bounds on making others cost effective, such as with LED A-Lamps, thus keeping programs valuable.

PGE does have a concern around "significant non-quantifiable non energy benefits," a condition laid out in UM 551 in which measures that may not pass both utility and TRC cost-effectiveness tests may continue to be included in Energy Trust programs. We note that non-energy benefits have increasingly become a justification for organizations featuring Energy Trust incentives such as Clean Energy Works and MPower.

PGE believes that the time has come to attempt to quantify the value of these non-energy benefits. We note that Energy Trust has enumerated non-energy benefits to weatherization on page 3 of its filing including "thermal comfort, noise reduction, home durability, health benefits and property value increase." Enumerating the value of these benefits will contribute to a better understanding of their role in achieving energy savings, and the need to continue programs based on these benefits. It may also clarify whether electric customers should pay for the achievement of these non-energy benefits.

Energy Efficiency remains PGE's preferred resource and we support the Energy Trust in its work to keep its programs strong and cost effective. We welcome the opportunity to discuss ways to take the reckoning of non-energy benefits to a new level.

Please direct any questions regarding this filing to Lauren Shapton at (503) 464-8579.

Please direct all formal correspondence and requests to the following email address  
[pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com)

Sincerely



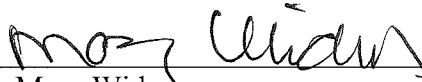
Karla Wenzel  
Manager, Pricing and Tariff

cc: UM 1696 Service List

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused **PORTLAND GENERAL ELECTRIC COMPANY'S COMMENTS ON ENERGY TRUST FILING FOR COST EFFECTIVENESS EXCEPTIONS FOR SPECIFIC ELECTRIC MEASURES** to be served by electronic mail to those parties whose email addresses appear on the attached service list for Docket No. UM 1696.

Dated at Portland, Oregon, this 30<sup>th</sup> day of June, 2014.



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