

Affiliated Tribes of Northwest Indians  
AirWorks, Inc.  
Alaska Housing Finance Corporation  
Alliance to Save Energy  
Allumia  
Alternative Energy Resources Organization  
American Rivers  
Backbone Campaign  
Beneficial State Bank  
BFA Energy  
BlueGreen Alliance  
Bonneville Environmental Foundation  
Byrd Barr Place  
City of Ashland  
City of Seattle Office of Sustainability & Environment  
CleanTech Alliance  
Climate Smart Missoula  
Climate Solutions  
Community Action Center of Whitman County  
Community Action Partnership Assoc. of Idaho  
Community Action Partnership of Oregon  
Community Energy Project  
Earth Ministry  
Ecumenical Ministries of Oregon  
eFormative Options  
Elevate Energy  
Energy350  
EnergySavvy  
Energy Trust of Oregon  
Environment Oregon  
Environment Washington  
Forth  
Global Ocean Health  
Green Energy Institute at Lewis & Clark Law School  
Grid Forward  
Homes for Good  
Home Performance Guild of Oregon  
Human Resources Council, District XI  
Idaho Clean Energy Association  
Idaho Conservation League  
Idaho Rivers United  
League of Women Voters Idaho  
League of Women Voters Oregon  
League of Women Voters Washington  
Montana Audubon  
Montana Environmental Information Center  
Montana Renewable Energy Association  
Multnomah County Office of Sustainability  
National Center for Appropriate Technology  
National Grid  
Natural Resources Defense Council  
New Buildings Institute  
Northern Plains Resource Council  
Northwest EcoBuilding Guild  
Northwest Energy Efficiency Council  
NW Natural  
OneEnergy Renewables  
Opportunities Industrialization Center of WA  
Opportunity Council  
Oracle/Opower  
Oregon Citizens' Utility Board  
Oregon Energy Fund  
Oregon Environmental Council  
Oregon Physicians for Social Responsibility  
Oregon Solar Energy Industries Association  
Pacific Energy Innovation Association  
Pacific NW Regional Council of Carpenters  
Portland Energy Conservation, Inc.  
Portland General Electric  
Puget Sound Advocates for Retirement Action  
Puget Sound Cooperative Credit Union  
Renewable Hydrogen Alliance  
Renewable Northwest  
Save Our *wild* Salmon  
Seattle City Light  
Sierra Club  
Sierra Club, Idaho Chapter  
Sierra Club, Montana Chapter  
Sierra Club, Washington Chapter  
Small Business Utility Advocates  
Snake River Alliance  
Snohomish County PUD  
Solar Installers of Washington  
Solar Oregon  
Solar Washington  
South Central Community Action Partnership  
Southeastern Idaho Community Action Agency  
Spark Northwest  
Spokane Neighborhood Action Partners  
Sustainable Connections  
The Climate Trust  
The Energy Project  
Transition Missoula  
UCONS, LLC  
Union of Concerned Scientists  
United Steelworkers of America, District 12  
Washington Environmental Council  
Washington Physicians for Social Responsibility  
Washington State Community Action Partnership  
Washington State Department of Commerce  
Washington State University Energy Program  
YMCA Earth Service Corps  
Zero Waste Vashon



April 21, 2020

Oregon Public Utility Commission  
201 High St SE #100, Salem, OR 97301

VIA EMAIL

Re: UM 1696, ETO Manufactured Home Replacement Pilot Extension

Dear Commissioners:

The NW Energy Coalition is pleased to submit this letter of support for Energy Trust of Oregon's (ETO) extension request for their manufactured home replacement pilot. We are grateful for staff's thorough stakeholder and memo-drafting process. ETO's measured, flexible approach within this pilot fills an important gap in replacing some of Oregon's most energy-intensive and unhealthy residences.

The timeliness of this extension request cannot be overstated; the health impacts of living in manufactured homes constructed pre-1976 are exactly the impacts that can exacerbate covid-19 symptoms for already vulnerable communities.

In the course of preparing these comments, we reached out to organizations that have been partnering with ETO on this program. The organizations we spoke with commended ETO's on-the-ground work and the flexibility of ETO's funding.

A large proportion of the poorest Oregonians live in private mobile home parks, have limited to no income, and/or are seniors, all of which dissuade their participation in this loan-based program. Moreover, cost-effectiveness measurements used in the state of Oregon do not fully capture the health and societal benefits of these replacements. We look forward to the non-energy impact quantification that will be made possible through the extension of this docket, as well as to continuing to engage at the PUC in support of robust measurements of program effectiveness.

Sincerely,

Heather Moline  
Policy Associate, NW Energy Coalition