

April 21, 2015

***VIA ELECTRONIC FILING***

Public Utility Commission of Oregon  
3930 Fairview Industrial Dr. S.E.  
Salem, OR 97302-1166

Attn: Filing Center

**RE: UM 1713—Investigation into Large Customer Energy Efficiency Limitations**

PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) submits these comments in response to the questions presented in the February 25, 2015 Initial Framing Document from the Public Utility Commission of Oregon (Commission) Staff. Questions from the Initial Framing Document are reproduced verbatim in these comments, followed by the response of the Company.

**1. Are customers with loads greater than 1 aMW receiving a direct benefit from conservation measures funded by amounts collected pursuant to SB 838?**

PacifiCorp has contracted with the Energy Trust of Oregon (ETO) to administer the majority of the funds collected pursuant to SB 838 (ORS 757.689). The Company defers to the ETO on this question in regards to these funds. For the portion of the SB 838 funds retained by the Company, customers with loads greater than 1 aMW do not receive direct benefits from these funds.

**2. What is the meaning of “any direct benefit” as used in ORS 757.689(2)(b)?**

PacifiCorp interprets the phrase “any direct benefit” to mean customer-specific technical studies and assistance, energy-use reductions and corresponding bill reductions attributable to installed energy efficiency measures provided with funding collected pursuant to SB 838.

**3. Are there any barriers that prevent the ETO from obtaining all cost-effective energy efficiency?**

At this time, PacifiCorp is not aware of any barriers preventing the ETO from obtaining all cost-effective energy efficiency from PacifiCorp customers.

**4. If such barriers exist, what other options exist to gain all cost-effective energy efficiency, including from customers with loads greater than 1 aMW?**

Please refer to PacifiCorp response to the previous question. PacifiCorp has not identified any barriers to the ETO obtaining all cost-effective energy efficiency and therefore does not have any recommendations regarding alternative options for obtaining all cost-effective energy efficiency at this time.

**5. Should the ETO approach to funding energy efficiency be flexible to take advantage of energy efficiency savings brought about by changes in technology and the economy?**

The Company is generally supportive of maintaining program flexibility. PacifiCorp supports the ETO in pursuing an approach to funding energy efficiency that is flexible enough to respond to changing technological and economic circumstances while remaining consistent with existing law and regulatory requirements.

**6. Should there continue to be a cap on energy efficiency funding provided by the ETO to PGE and PAC customers with loads greater than 1 aMW, and if so, what criteria should be used to set such a cap?**

The cap as currently administered by the ETO appears to implement the requirement that customers with load greater than 1 aMW do not receive the direct benefits of the SB 838 funds. PacifiCorp is supportive of further investigating the criteria used to administer the cap and alternatives to the cap that achieve the purpose of SB 838 but does not have specific recommendations at this time.

Please direct questions regarding this filing to Natasha Siores, Director, Regulatory Affairs and Revenue Requirements, at (503) 813-6583.

Sincerely,

Handwritten signature of R. Bryce Dalley in cursive script.

R. Bryce Dalley  
Vice President, Regulation

cc: UM 1713 Service List