



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

March 12, 2012

**Email / US Mail**

puc.filingcenter@state.or.us

Oregon Public Utility Commission  
550 Capitol Street NE, Ste 215  
PO Box 2148  
Salem, OR 97308-2148

**RE: UM 1158 – Comments of Portland General Electric Company on the Proposed 2012 Performance Measures for the Energy Trust of Oregon**

Portland General Electric appreciates the opportunity to comment on the proposed 2012 performance measures for the Energy Trust of Oregon (ETO), which define minimum expectations for the ETO's performance. Setting, monitoring and evaluating ETO performance is important to achieving the energy efficiency our IRP identifies as the least cost resource for our customers. PGE offers these comments:

- PGE concurs with PacifiCorp that ETO Energy Efficiency (EE) savings targets should be disaggregated by utility (at least for PacifiCorp and PGE).
- In addition, PGE also recommends clarifying that targets represent cumulative savings by year end.
- PGE questions the OPUC Staff recommended performance measure being set at 10% below the IRP target. We assume the recommendation is intended to take into account the removal of the BETC; the BETC adjustment is materially smaller than the 10% reduction. PGE requests clarification on the reduction and its relationship to the removal of the BETC.
- Given that the targets are proposed to be set based on what the ETO characterizes as the conservative savings goal, it does not seem necessary to then further adjust it downward by 10%. The minimum Energy Trust target set should be at least equal to the IRP Target.

Thank you again for this opportunity to comment. PGE appreciates the Energy Trust's delivery of energy efficiency for PGE customers; it is integral to our resource plan to serve customers.

UM 1158

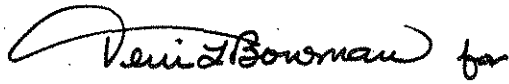
PGE Comments on Proposed 2012 Performance Measures for the ETO

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If you have any questions or require further information, please call me at (503) 464-8718. Please direct all formal correspondence and responses to the following email address: [pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Karla Wenzel for". The signature is fluid and cursive.

Karla Wenzel  
Manager, Regulatory Analysis & Administration

KW:jlt

*encl.*

cc: UM 1158 Service List

## CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **PORTLAND GENERAL ELECTRIC COMPANY'S COMMENTS ON THE PROPOSED 2012 PERFORMANCE MEASURES FOR THE ENERGY TRUST OF OREGON** to be served by electronic mail to those parties whose email addresses appear on the attached service list for OPUC Docket No. UM 1158.

Dated at Portland, Oregon, this 12<sup>th</sup> day of March, 2012.

for 

Karla Wenzel  
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### SERVICE LIST DOCKET UM 1158

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