

June 25, 2004
WL-032-04

Public Utility Commission of Oregon
Attn: Janet Fairchild
550 Capitol St NE #215
PO Box 2148
Salem OR 97308-2148

Re: Energy Trust of Oregon Performance Measures

Dear Janet:

We appreciate Staff's efforts in establishing a level of oversight for the publicly mandated funds received by the Energy Trust of Oregon. These efforts support the wise expenditures of these funds; ensuring customers receive fair treatment and have a good experience with Energy Trust programs. The Energy Trust has shown a laudable transparency in their operations.

PGE's following comments are provided in support of the goals of effective communication and oversight processes between the Commission, Staff, Energy Trust, IOUs and the public.

1. **Overall Programs Operational Efficiency and Effectiveness** The Energy Trust should report, by utility, its energy efficiency goals and targets distinctly for specific groups of customers in terms of energy savings, expenditures and cost effectiveness. Under separate cover (WL-029-04; dated June 14, 2004), we provided to the Energy Trust and Staff historical benchmark data regarding PGE's historic performance. This approach supports utility needs regarding resource planning and other related public initiatives (e.g., Oregon's LCP and BPA's C&RD). Results presentation should enable comparison to past programs and current customer groupings. The benchmarks should be shown by sector (e.g., single family/multi-family residential, small/medium/large commercial and industrial). For planning, cost-effectiveness should be evaluated per measure using guidance from the standard practice manual. This provides documentation on the measurement methodologies and calculations.
2. **Planned vs. Actual Results Comparisons** The initial planned and resulting actual results (through program evaluations) should be shown annually by each program, by program within each sector; and should include counts of measures, first-year and lifecycle kWh savings, and cost effectiveness calculations in grouping noted in item

1. It would also be useful for the Commission to state that the Energy Trust maintain program planning and evaluation documentation for all programmatic years if that is not already in place.

3. **Customer Satisfaction Tracking** Staff appropriately included customer satisfaction indices and targets. For the Energy Trust's work, there is an added complexity because customer satisfaction with the utilities may be affected by Energy Trust performance, depending on the outcome of certain customer experiences, such as utility referrals to the Trust. Utilities have agreed to indices such as service quality measures, and at fault complaints as part of utility performance. We suggest overarching satisfaction categories such as timeliness, follow through, favorable experience, etc., as performance indices that can inform Staff (via customer research and surveys) about the quality of customer interaction.
4. **On-Going Performance Measurement Improvement** We suggest that the Commission plan to annually review their performance measure(s) for the first three years in order to refine and adjust the tools. While cost and kWh need to be strictly measured, some indicators will shift with program maturity and may settle over time. Useful conventions may be developed whereby new programs are reviewed annually, and mature programs can be reviewed at no more than 3-year intervals. But all of this will depend on the rate of implementation and development of Energy Trust programs.

Thank you for the opportunity to offer these comments. We would be pleased to continue our participation in this process.

Sincerely,

Wayne Lei, Director
Environmental Policy

DK/SKN/WL:w1

Copy: Pamela Lesh, Randy Dahlgren, Patrick Hager, Carol Dillin, Jennifer Busch, Kimberly Hamling, Doug Kuns, Sharon Noell, Anne Wahr, Lauren Shapton, Nancy Miller and Dennis Bleything

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