

March 8, 2012

**VIA ELECTRONIC FILING**

Public Utility Commission of Oregon  
550 Capitol Street, NE, Suite 215  
Post Office Box 2148  
Salem, Oregon 97308-2148

Attn: Filing Center

RE: UM 1158, Recommendations for Performance  
Measures for the Energy Trust of Oregon

Thank you for the opportunity to provide comments in this proceeding.

Electric and gas savings and levelized costs: Energy Trust supports the proposed approach. We endorse the notion of resetting these metrics based on public review of Energy Trust's annual budget and action plan. We do suggest revising the language to reference Energy Trust conservative goals rather than the conservative/IRP target. We do so because Energy Trust realigns its goals annually with the funding utilities, while the IRP targets typically are revised biannually, creating a possibility for the two targets to get out of alignment in a particular year. In addition, using the Energy Trust conservative goal for savings would align savings with the levelized cost metric, which relies on Energy Trust conservative goals.

Renewables: We appreciate the time to work with OPUC staff in 2012 to better understand the impacts and frame new program targets. The new tax credit environment will have a significant impact on Energy Trust's programs and acquisition targets.

Program delivery efficiency: A significant reduction in percentage of revenue from 11% to 9% is recommended. Energy Trust can support this recommendation if the costs characterized as "administrative" are clearly defined. For purposes of clarity, we propose the performance measures align with our financial glossary definition of program support costs, which is reported to the board of directors and OPUC:

***For the purpose of these performance measures, program support costs are defined as program costs, except for the more direct program costs as reflected in the following costs areas: program management, program delivery, program incentives, program payroll and related expenses, outsourced services, planning and evaluation services, customer service management and trade ally network management.***

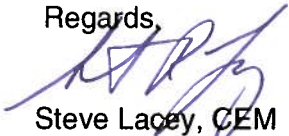
Customer satisfaction: Energy Trust understands that the OPUC is seeking more quantifiable customer satisfaction performance metrics. We support using existing measurement tools to measure overall customer satisfaction rather than taking on the added cost of developing a new tool, and believe Fast Feedback is the best existing mechanism for this purpose in most programs. We also support the 75% minimum proposed.

We have some concerns that expanding Fast Feedback to capture four separate metrics will make the survey longer and more time-consuming, both for the surveyor and the customer. We do not want to undermine the original purpose of Fast Feedback, to identify potential program improvements. It also should be noted that Fast Feedback does not cover New Buildings and non-solar renewable programs. We also believe there may be other existing channels or methods for collecting data on the additional metrics of interest to the OPUC.

For these reasons, we propose moving forward with Fast Feedback to capture overall customer satisfaction in most Energy Trust programs, supplementing it with other evaluation data for programs where Fast Feedback is not available. We suggest that we work with OPUC in 2012 to explore additional customer satisfaction metrics. Additional measures could include interaction with program representatives, ease of applying for incentives or application forms, and turnaround time for processing incentives.

Thank you for considering these comments.

Regards,

A handwritten signature in blue ink, appearing to read 'S. Lacey', is written over the typed name.

Steve Lacey, CEM  
Director of Operations

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing Comments of Energy Trust of Oregon in Docket No. UM 1158 upon each party listed below by electronic mail.

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DATED this 8<sup>th</sup> day of March, 2012.

Respectfully submitted,



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