



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

February 19, 2013

**Email / US Mail**

puc.filingcenter@state.or.us

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

**RE: UM 1158 – Comments of Portland General Electric Company on the Proposed 2013 Performance Measures for the Energy Trust of Oregon**

Portland General Electric appreciates the opportunity to comment on the proposed 2013 performance measures for the Energy Trust of Oregon (ETO), which defines minimum expectations for the ETO's performance. Setting, monitoring and evaluating ETO performance is important to achieving the energy efficiency and renewables targets in our IRP. PGE offers these comments:

- As AR 564 (data sharing between utilities and the Energy Trust of Oregon) is fully implemented, the ETO will have more opportunities to do marketing on its own, not solely to customers who have participated in programs or through the utilities. PGE requests that the ETO measure the costs per customer acquired for mass marketing efforts it undertakes, with an eye to using the most cost-effective channels.
- Ongoing support for the development of renewable resources is also important to PGE. We believe that cost-effectiveness should be a key criterion in evaluating which projects ETO supports. We recommend a 2013 performance measure be added to the ETO report for the cost per kw of installed renewables.

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.

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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,



Karla Wenzel  
Manager, Pricing and Tariffs

KW:jlt

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cc: UM 1158 Service List

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused the foregoing **PORTLAND GENERAL ELECTRIC COMPANY'S COMMENTS ON THE PROPOSED 2013 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 19<sup>th</sup> day of February, 2013.



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**SERVICE LIST**  
**OPUC DOCKET # UM 1158**  
2/19/13

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