

**From:** [John Graham](#)  
**To:** [Comments](#)  
**Subject:** Comments on study of regional use and bills  
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Thanks for sending this report and for the invitation to comment. My comments are few and brief; thanks in advance for your interest. In several cases, the comment is meant to elicit additional research items that might create additional insights from this well-documented and clearly expressed body of work.

In no particular order, my thoughts are as follows.

Co-ops are investor-owned utilities of a kind, though the co-ops share access to BPA power and programs with other more strictly public utilities. They share a propensity for higher revenues with their investor-owned counterparts.

At p.4, you compare the effects of rural-ness, for want of a better term, on usage in utility service territories. My observation over the years has been that investor-owned utilities differ in their rural-ness; for example, the PacifiCorp service territory in Oregon has a non-contiguous service territory composed of multiple districts, the largest of which are a fraction of what, for example, PGE services in Portland. In that sense, it functions more like a collection of small-town and rural utilities, both there and in Washington with comparison to PSE.

Speaking of PGE, in was in recent years becoming a summer-peaking utility as its service territory saw increased use of air-conditioning systems. This has implications for efficiency program design, among others.

Another important development over the years has been the establishment of PSE as a dual-fuel utility. An analysis of the data in a subset which had PSE and Avista as members with a focus on internal fuel-switching seems interesting.

Thanks again for your interest; the study prompted some interesting reflections. Take care.

*Please note new contact information:*

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