

Advocates for the West
Affiliated Tribes of Northwest Indians
AirWorks, Inc.
Alaska Housing Finance Corporation
Alliance to Save Energy
Alternative Energy Resources Organization
American Rivers
A World Institute for a Sustainable Humanity
Beneficial State Bank
BlueGreen Alliance
Bonneville Environmental Foundation
Centerstone
Citizens' Utility Board of Oregon
City of Ashland
City of Seattle Office of Sustainability & Environment
Climate Solutions
Community Action Center
Community Action Partnership Assoc. of Idaho
Community Action Partnership of Oregon
David Suzuki Foundation
Drive Oregon
Earth and Spirit Council
Earth Ministry
Ecova
eFormative Options
Emerald People's Utility District
EnergySavvy
Energy Trust of Oregon
Enhabit
Environment Oregon
Environment Washington
HEAT Oregon
Home Performance Guild of Oregon
Home Performance Washington
Housing and Comm. Services Agency of Lane Co.
Human Resources Council, District XI
Idaho Clean Energy Association
Idaho Conservation League
Idaho Rivers United
Interfaith Network for Earth Concerns
League of Women Voters Idaho
League of Women Voters Oregon
League of Women Voters Washington
Montana Audubon
Montana Environmental Information Center
Montana Renewable Energy Association
Montana River Action
National Center for Appropriate Technology
Natural Resources Defense Council
New Buildings Institute
Northern Plains Resource Council
Northwest Energy Efficiency Council
NW Natural
NW SEED
OneEnergy Renewables
Opower
Opportunities Industrialization Center of WA
Opportunity Council
Oregon Environmental Council
Oregon Solar Energy Industries Association
Oregonians for Renewable Energy Progress
Pacific Energy Innovation Association
Pacific NW Regional Council of Carpenters
Physicians for Social Responsibility Oregon Chapter
Physicians for Social Responsibility Washington Chapter
Portland General Electric
Puget Sound Advocates for Retired Action
Puget Sound Cooperative Credit Union
Puget Sound Energy
Renewable Northwest Project
Save Our Wild Salmon
Sea Breeze Power Corp.
Seattle City Light
Seinergy
Sierra Club
Sierra Club, Idaho Chapter
Sierra Club, Montana Chapter
Sierra Club, Washington Chapter
Smart Grid Northwest
Snake River Alliance
Solar Installers of Washington
Solar Oregon
Solar Washington
South Central Community Action Partnership
Southeast Idaho Community Action Agency
Spokane Neighborhood Action Partners
Sustainable Connections
The Climate Trust
The Energy Project
Union Of Concerned Scientists
United Steelworkers of America, District 12
US Green Building Council, Idaho Chapter
Washington Environmental Council
Washington Local Energy Alliance
Washington State Department of Commerce
Washington State University Energy Program
YMCA Earth Service Corps



August 30, 2016

NW Power and Conservation Council
VIA email: comments@nwcouncil.org

RE: Comments on the draft report *Northwest Residential Electric Bills*

Dear Council Members:

The NW Energy Coalition commends the Council staff on thought-provoking analysis contained in the draft report: *Northwest Residential Electric Bills*. The report is an interesting look at the factors that influence residential electric bills throughout the region – including utility type, energy efficiency and poverty. In addition to other findings, the report confirms a long-standing, often-repeated point of the NW Energy Coalition – that higher energy efficiency leads to higher overall bill savings for utility customers.

We generally find the report to be well done and documented. However, we have a few suggestions to clarify and improve the quality of the final report.

- 1) The report discusses the finding that public utilities with the greatest increases in average annual residential electric bills occurred among those that have the largest growth rates in electricity use per customer, and that these utilities are the same that acquired less residential conservation (see page 23-24). It would be useful in the final report to substantiate this correlation between lower energy efficiency acquisition and the rate of bill increase over time more thoroughly in the final report and, especially, to illustrate the trend graphically.
- 2) The discussion and tables related to poverty and utility type on pages 25 and 26 of the report are interesting, but why was this particular topic was not broken down in the same manner as the other topics for subtypes of public utilities? This breakdown by utility type would be useful to include in the final report.
- 3) We recommend clearly defining the classifications of urban and rural used in the report.

- 4) The report categorizes IOU's as urban, even though, as noted in the report, portions of some IOU territory are also classified as rural. It would be helpful to provide information about the percentage territory among IOU's that falls into the rural designation in the final report.
- 5) The layout used for Table 11 on page 21 is confusing. We recommend considering a new layout that better illustrates the variables included in this table.
- 6) The text on page 22 discussing cooperatives in urban service areas does not match the numbers in Table 13. The text says these utilities acquired 0.4% of regional residential conservation savings, but the Table 13 says 2%.
- 7) Figure 13 and the underlying calculations and data used are confusing. We are uncertain if the figure is calculating using raw data or averages and why the number of data points in Table 13 differs from the number of points in Figure 13.

Thank you for the opportunity to provide these comments. We look forward to the release of the final report on this topic.

Regards,

/s/ Wendy Gerlitz

Wendy Gerlitz
Policy Director