August 30, 2016

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

RE: Comments on the draft report Northwestern Residential Electric Bills

Dear Council Members:

The NW Energy Coalition commends the Council staff on thought-provoking analysis contained in the draft report: Northwestern 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 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