

A World Institute for a Sustainable Humanity ♦ Climate Solutions ♦ Community Action Center
Community Action Council of Lewis, Mason & Thurston Counties ♦ Community Action Partnership
Community Action Partnership Association of Idaho ♦ Community Action Partnership of Oregon
Community Action Program of East Central Oregon ♦ Earth Ministry ♦ eFormative Options
Energy Project ♦ Envirometrics, Inc. ♦ HEAT Oregon ♦ Idaho Clean Energy Association
Idaho Climate Think Tank ♦ Idaho Conservation League
League of Women Voters of Idaho ♦ Metropolitan Alliance for Common Good
Montana Environmental Information Center ♦ New Buildings Institute
Natural Resources Defense Council ♦ NW Energy Coalition ♦ Okanogan County Community Action Council
Oregonians for Renewable Energy Progress ♦ Puget Sound Cooperative Credit Union
Sierra Club ♦ Snake River Alliance ♦ South Central Community Action Partnership
Sunlight Solar Energy, Inc. ♦ Washington Environmental Council
Washington State Community Action Partnership ♦ Washington Interfaith Power & Light

July 18, 2014

Richard G nec 
Vice President, Energy Efficiency
Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

Dear Mr. G nec ,

The undersigned groups appreciate the opportunity to comment on the ***Proposed Revisions to the BPA Energy Efficiency Post-2011 Implementation Program*** of June 18, 2014. BPA held a very thorough and collaborative open process to determine which elements of the Post 2011 Framework for Energy Efficiency are working well and which would benefit from changes. As a part of this process, Workgroup 3 was formed to address potential improvements to low-income energy efficiency services throughout BPA territory. This letter addresses BPA's response to Workgroup 3's recommendations.

Workgroup 3's diversity enriched discussions and made consensus-finding a challenge. The group unanimously endorsed three recommendations aimed at clearing a path forward to better serve low-income customers. After the workgroup's hard, determined efforts, BPA's adoption of just one of the three recommendations is a major disappointment.

We appreciate BPA's willingness to adopt recommendation 2: convening a workgroup to continue the important discussions of system improvements that can be made through collaboration between BPA, utilities and low-income advocates and service providers. We are particularly excited about the possibilities for streamlining and simplifying processes for utilities and community action program agencies. We also think the new workgroup will make good headway in ensuring full accounting for low-income energy efficiency services and that utilities receive credit for the kilowatt-hours saved through this work.

We vehemently disagree with BPA's refusal to adopt workgroup recommendations 1 and 3. Recommendation 1 established an important principle for BPA energy efficiency programs, the expectation that low-income end users should have access throughout BPA territory to specific, targeted programs. These end-use customers pay into the BPA system through their bills but the cost structure of regular energy efficiency programs makes their participation unaffordable. Fairness requires that these customers have access to programs they can afford. We urge BPA to adopt this recommendation.

Recommendation 3 asked Bonneville to create a process whereby a utility could request that BPA directly administer a portion of their Energy Efficiency Incentive (EEI) dollars directly to low-income energy efficiency programs in its service territory. This will help utilities, especially small, rural utilities with limited energy efficiency staff, establish programs for low-income customers. We do not believe that BPA devoted sufficient resources to exploring this recommendation and we urge BPA to implement this recommendation.

Although some utilities run excellent low-income programs in partnership with their local CAP agencies, the reality is that many utilities served by BPA do not fund specific services for low-income end users. Information from BPA indicates that in 2014 only 23 (out of 133) utilities reported information regarding low-income energy efficiency savings. The need for specific, targeted, low-income energy efficiency services is high; demand is greater than current resources can meet.

BPA can help its customer utilities better serve their low-income populations by providing energy efficiency programs that will lower their bills and reduce shut-offs. We urge you to adopt all three recommendations in the low-income workgroup's final report. Thank you for considering of these comments.

Sincerely,

Michael Karp

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