

Good afternoon Jess,

Here is summary of comments I compiled regarding the HB 2801 rulemaking.

One of OMEU's concerns as a participant in this process has been that any software used to determine an energy performance home score should be distinctive regarding the cost and possibly the source of electricity depending upon what is being "scored." For example, some software programs make certain assumptions based on average investor owned utility (IOU) energy costs and resource mix. Obviously, the numbers may be very different for home scores calculated in consumer owned utility (COU) territory with lower costs and a cleaner mix (i.e. hydropower).

Some OMEU members noted that in their experience actual impacts to kwh usage are not universal. Duct seal is a good example as the air flow change with and without sealed ducts varies from house to house. An analysis may give an indication of energy consumption, but won't be 100% accurate.

In addition, we don't really know what figures the Energy Trust uses by measure, but in terms of COUs in Oregon leveraging BPA's program, we would generally assume BPA savings figures by measure. We would encourage the model having the flexibility to evaluate savings using BPA's assumed kWh savings by measure.

Finally, some OMEU members perform energy audits (mostly residential). We don't "score" per se, but we provide those audits for free and OMEU wants to emphasize the importance of such utilities continuing to have the option of performing free energy audits even if they do not score a home for assessment purposes. Our local (OMEU) utilities are more familiar with their local residential and non-residential inventory. It would be problematic if such utilities were required to use this system in any audit mode - because there is a significant probability that a standardized system will be incorrect in each individual case. We want to continue to provide the best information possible to individual customers and would not support a system where we were required to supply false information.

I also received another comment that is noteworthy.

The electric utility industry has the benefit of almost 40 years of experience in trying out various methods of auditing homes; from very simple to very elaborate. Energy audits in and of themselves do not provide any reportable kWh savings. Therefore, the cost of auditing homes has historically had a financially negative program impact that must be overcome in order for a program to be cost-effective. The types of energy audits necessary to require the needed data points for most modeling software typically take a considerable amount of time and expertise to perform, potentially driving up auditing costs within a program. These more exhaustive audits and modeling have not proven to be more effective at persuading customers to participate in utility programs, compared to other more streamlined audit processes. In addition, I think most modeling software does not do a good enough job addressing the customer lifestyle impacts on energy use in the home.

Considering all of these insights, we encourage that utilities retain the flexibility to offer their customers the level of auditing services they feel are most suitable.

Thank you for the opportunity to provide comments. Please do not hesitate to contact me if you have any questions or concerns.

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