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General Manager

Brian L. Skeahan

Public Utility District No. 1 of Cowlitz County, WA
961 12th Avenue ♦ PO Box 3007
Longview, WA 98632
(360) 423-2210 ♦ WA Toll Free (800) 631-1131
Fax: (360) 577-7559 ♦ Web: www.cowlitzpud.org

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July 12, 2007

Mr. Mark Walker
Director, Public Affairs Division
Northwest Power and Conservation Council
851 S.W. Sixth Avenue, Suite 1100
Portland, OR 97204

Dear Mr. Walker:

Thank you for the opportunity to comment on the Northwest Power and Conservation Council's Document 2007-07 entitled "Achievable Savings - A Retrospective Look at the Northwest Power and Conservation Council's Conservation Planning Assumptions."

Cowlitz PUD recognizes the need for the Council to approach its conservation planning and assumptions on a regional basis; for example, the 85% for non-lost opportunity conservation resources over a 20-year period, and 65% for lost opportunity. However, the Council should not expect utilities to accept these target levels for their utility because they are not realistic nor technically achievable for all customer sectors, nor for all measures. Each individual local utility must focus on the specific characteristics, conditions and factors that make up its own service territory. Each utility's service territory is unique regarding what is "achievable." In many service territories, what is achievable locally will vary significantly from what is achievable regionally, both by sector and overall. There are various factors that account for the differences, such as a utility's load mix (i.e. residential, commercial, industrial and irrigation), program delivery infrastructure, previous conservation achievements, rate of load growth, etc.

Other areas that can dramatically affect what is achievable and can add to its complexity are state and federal codes and standards, as well as region-wide market transformation actions. It would be very difficult and nearly impossible for utilities throughout the region to achieve the high numbers that the Council assumes, since utilities have little control over any codes, whether they are state, federal or city.

All this being said, the Council, in future assessments, should consider dividing its achievable assessments into various segments related to code actions and standards, regional transformation efforts, utility-specific actions, and consider any other segmentation needed to clarify what is - or is not - achievable. What a utility can achieve in its local service territory does not necessarily fit with the Council's regional perspective.

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