

## **Energy Efficiency Provisions**

Some states that have enacted renewable portfolio standards (RPS) provide that energy efficiency savings can be used to meet the RPS. Other states have established separate goals or requirements for energy efficiency. The following list summarizes state actions on establishing energy efficiency targets and highlights provisions that apply to public power utilities. A separate section shows individual public power utilities that have adopted their own energy efficiency goals.

### **Alaska** – Law enacted June 2010

The state's energy policy, established in HB 306, creates a goal of 50% of generation from renewable and alternative energy sources by 2025 and in 15% increase in energy efficiency on a per capita basis between 2010 and 2020.

### **Arizona** – Arizona Corporate Commission rules approved July 2010

The Arizona Corporate Commission rules require investor-owned utilities to reduce electric sales by 22% by 2020. There are also interim-year targets. Demand response and load management programs can account for 10% of the energy savings. Cooperatives are also subject to the rule, except their targets are set one-quarter percent lower.

### **Arkansas** – Public Service Commission approved standards December 2010

Under its Sustainable Energy Resources docket, the Public Service Commission (PSC) set energy efficiency performance targets to reduce electric kilowatt-hour (kWh) sales by 0.25% in 2011, rising to a 0.75% reduction in 2013 (see Order No. 17 in Docket No. 08-144-U).

### **California** – Law enacted September 2006

The state's Energy Action Plan includes a goal that utilities invest in energy efficiency before acquiring other resources such as new generation or purchased power. The state Public Utilities Commission enforces this goal through regulation of investor-owned utilities, and AB 2021 was enacted to establish energy efficiency requirements for public power utilities. The law requires the California Energy Commission (CEC) to develop statewide estimates of all potential cost-effective efficiency savings and to establish annual targets for savings. Publicly owned electric utilities must identify its own savings and targets and report them to the CEC. Public power utilities must also report each year – to its customers and the CEC – on its investments, programs, expenditures, cost-effectiveness and results of energy-efficiency and demand-reduction programs. In procuring energy to serve its customers, publicly owned electric utilities must first acquire all available, cost-effective energy-efficient and demand-response resources.

### **Colorado** – Law enacted May 2007

HB 1037 requires the state Public Utilities Commission to set energy savings and peak demand reduction goals for investor-owned utilities. The reduction goals must be at least five percent of the utility's peak demand and energy sales by 2018 from measures

begun in 2006 or later. The actual goals will be based on the utility's cost-effective demand-side management (including conservation and energy efficiency programs) potential.

**Connecticut** – 2005 Amendment to RPS; Law enacted June 2007

The 2005 revisions to the state's RPS added the category of Class III resources, which include energy efficiency measures related to commercial and industrial customers. The current law (2007) requires a supplier or distribution company providing standard offer or supplier of last resort service to obtain 20% of energy from Class I renewable energy sources and 3% from Class I or Class II sources by 2020. These companies must also obtain Class III resources, which include: electricity from customers' combined heat and power systems installed in 2006 or later; waste heat recovery systems, installed after March 2007, that produce electrical or thermal energy; and savings from conservation and load management programs started in 2006 or later. Class III requirements equal 1% in 2007 and rise to 4% in 2010 and subsequent years. The 2007 law also requires investor-owned utilities to file annual integrated resource plans and to meet their needs first through all available, cost-effective energy efficiency and demand reduction resources.

**Delaware** – Laws enacted June 2007 and July 2009

The 2007 law creates a sustainable energy utility (SEU) to develop and coordinate programs for Delaware's households and businesses. The SEU, unaffiliated with any of the state's gas or electric utilities, will design and delivery comprehensive end-user energy efficiency and customer-sited renewable energy services.

The 2009 law established energy efficiency goals for electric and gas distribution utilities. Municipal electric utilities and cooperatives are included in the definition of "affected electric energy provider." Electric providers must achieve electricity consumption savings and peak demand reductions of 2% by 2011 and 15% by 2015. By December 31, 2010, a working group will complete a study and set quantitative reduction targets in kilowatts and kilowatt-hours. Energy providers must demonstrate compliance and will be assessed a civil penalty for failure to meet the 2015 goal.

**Florida** – Public Service Commission December 2010 Order

The Order established 10-year energy efficiency goals – in MWs – for the state's investor-owned utilities.

**Hawaii** – RPS enacted June 2004

Hawaii's RPS requires that 20% of electricity be generated from renewable resources by the end of 2020. Electrical energy savings achieved through implementation of energy efficient technologies count toward the RPS. These include: heat pump water heating, ice storage, ratepayer-funded energy efficiency programs, and use of waste heat from some cogeneration systems.

**Illinois** – Energy efficiency requirement enacted August 2007

The same law that established an RPS for the Illinois Power Agency, the agency created to purchase power for the state's large investor-owned utilities, also requires large

investor-owned utilities (IOUs) to implement energy efficiency measures to meet energy savings goals. These are: 0.2% of energy deliveries in 2008, increasing to 2% of energy deliveries in 2015 and thereafter. There is a separate requirement to implement demand-response measures to reduce peak demand by 0.1% over the prior year, beginning in 2008 for 10 years.

**Indiana** – Commission order December 2009

The Indiana Utility Regulatory Commission ordered the state's jurisdictional utilities (which include public power utilities that have not opted out of state regulation) to create demand-side management programs that would reduce energy use by 2% by 2019. Programs must include a core group – home energy audits, low-income weatherization, residential lighting, energy efficiency for schools, and a commercial/industrial program – but utilities are free to offer additional programs in order to achieve the required energy savings

**Iowa** – Energy efficiency goal enacted May 2008

Public power and cooperative utilities must establish energy efficiency goals and implement cost-effective programs designed to meet the goals. The law also requires these utilities to submit reports on their progress in achieving the goals. (In January 2008, the Iowa Utilities Board directed investor-owned utilities to develop energy efficiency plans to achieve 1.5% in energy savings by December 31, 2011.)

**Maine** – RPS goal enacted June 2006

The 2006 law made it state policy to increase new renewable generating capacity by 10% by 2017 (the goals were made mandatory in a June 2007 law) and allowed the PUC to authorize long-term contracts up to ten years for capacity resources. The law also set priorities for the PUC in selecting these capacity resources, and set new interruptible, demand response or energy efficiency resources as the first priority.

**Maryland** – Energy efficiency goal enacted April 2008

The 2008 law establishes an energy efficiency goal to reduce state-wide per capita electricity consumption and per capita peak demand by 15% by the end of 2015.

Municipal utilities and small cooperative utilities shall include energy efficiency and conservation programs as part of the service they provide customers. The Public Service Commission shall require all other utilities to establish cost-effective programs to meet specific consumption and peak demand targets.

**Massachusetts** – Energy efficiency goal enacted July 2008

The 2008 law includes numerous provisions to promote the development of renewable energy, clean energy and energy efficiency programs. In regard to energy efficiency, the law requires investor-owned utilities to meet resource needs first through cost-effective energy efficiency improvements. It also sets a goal of meeting 25% of the commonwealth's electric load (both capacity and energy) through demand side resources by 2020. These include: energy efficiency, load management, demand response, and generation located behind a customer's meter.

In January 2010, the Department of Public Utilities (DPU) approved a savings target of 2.4% of electricity sales in 2012.

**Michigan** – RPS law enacted October 2008

The law establishes an RPS of 10% by 2015 for all utilities in the state. Up to 10% of the standard may be met by energy optimization credits (energy efficiency, load management, and conservation) or advanced cleaner energy credits. Separately, the law establishes an energy optimization program for all utilities, requiring annual energy savings each year and reaching 5.5% in 2015.

**Minnesota** – Energy efficiency and climate change law enacted May 2007

The 2007 law establishes an annual energy-savings goal of 1.5 percent of annual retail energy sales for all utilities. Utilities must file energy conservation improvement plans with the Public Utilities Commission (PUC), and the PUC can only approve plans that establish savings goals of one percent or more. Other items, such as electric infrastructure improvements and waste heat recovery, may count as energy savings in addition to the minimum one percent goal. Utilities are not required to make energy conservation investments that are not cost-effective, even if an investment is necessary to reach the goal.

**Missouri** – RPS objective enacted June 2007; Energy Efficiency goals established by PSC, to be effective May 2011.

The state's voluntary RPS calls for 4% of total retail electric sales to be generated by renewable-energy resources by 2012, increasing to 8% by 2015 and 11% by 2020. Credits towards this goal can be achieved through implementation of energy-efficient practices, defined as "verifiable reductions in energy consumption, or verifiable reductions in the rate of energy consumption growth." Eligible energy efficient improvements include pricing signals, electronic controls, education, information, infrastructure improvements, and the use of high-efficiency equipment and lighting. The Missouri Public Service Commission requires investor-owned utilities to submit a biennial report on the progress of their programs beginning in 2009.

In November 2008, voters passed a ballot initiative that establishes a mandatory RPS for investor-owned utilities of 2% by 2011 and 15% by 2021. It does not define renewable resources or include any references to energy efficiency.

A 2009 law encourages electric utilities to implement "demand-side" programs (energy efficiency, load management, demand response) with a goal of achieving all cost-effective demand-side savings. In February 2011, the PSC approved energy efficiency rules to meet this goal. The rules, which became effective in May 2011, set a target for investor-owned utilities to reduce energy use by 9.9% and peak load by 9% by 2020.

**Nevada** – RPS revised June 2005

Nevada's RPS requires 20% of retail sales to be from renewable resources by 2015. The 2005 revisions to the earlier laws allow utilities to meet the standards through renewable energy and energy savings achieved through efficiency measures. In order to qualify for efficiency credits, improvements must be: installed in 2005 or later; installed at the retail customers' location; and partially or fully subsidized by the electric utility.

Additionally, the overall consumers' demand must be reduced (not shifted to off-peak hours). Energy efficiency improvements can qualify for up to one-fourth of the RPS per year. A 2007 law allows district heating systems powered by geothermal hot water to qualify for energy efficiency credits.

**New Jersey** – Law enacted July 2007

A. 3301 sets targets for reducing greenhouse gas emissions. It also authorizes the Board of Public Utilities to adopt energy efficiency portfolio standards that will reduce electricity consumption 20% by 2020.

**New Mexico** – Energy efficiency law enacted February 2008

The February 2008 law requires investor-owned utilities to implement energy efficiency measures resulting in 5% energy savings over 2005 levels by 2014 and 10% savings over 2005 levels by 2020. The state Public Regulation Commission is allowed to provide a profit incentive on the development of cost-effective energy efficiency and load management resources that are financially more attractive to the utility than developing supply-side resources. An earlier law, enacted in April 2005, encouraged utilities to implement cost-effective energy efficiency programs.

**New York** – PSC order established Energy Efficiency Portfolio Standard June 2008

The New York Public Service Commission's (PSC) June 2008 order adopts the goal of reducing electricity use by 15% from the forecast usage by 2015. To achieve the goal, the PSC set specific, interim, three-year targets for reductions for the state's investor-owned utilities. To fund new energy efficiency initiatives, the PSC established higher system benefits charges (SBC) – increasing the amount collected by investor-owned utilities by \$159 million annually – through 2011.

Public Power: Two state utilities – Long Island Power Authority and New York Power Authority – are not covered by the PSC's order, although the order notes that they both have established energy efficiency goals and their savings will count toward the 15% reduction goal. The PSC will consider whether to set specific targets for municipally owned utilities under PSC jurisdiction later.

**North Carolina** – RPS enacted August 2007

The state's RPS requires that IOUs obtain 12.5% of retail electricity sales from renewable resources by 2020. Up to 25% of the requirement can be met by implementing energy efficiency measures, defined as "an equipment, physical, or program change implemented after January 1, 2007, that results in less energy used to perform the same function." Energy efficiency measures include energy produced from combined heat-and-power systems powered by non-renewable fuels. After 2020, up to 40% of the requirement may be fulfilled by energy-efficiency measures.

Public Power: Municipal and cooperative utilities are required to meet a 10% renewable energy standard by 2018. These utilities may count reductions in energy consumption through implementation of demand-side management or energy efficiency measures towards the RPS.

**Ohio** – RPS enacted May 2008

By 2025, investor-owned utilities and electric power suppliers must obtain 25% of the power for retail electricity sales from alternative energy resources. These include: renewable resources, improvements in generator efficiency that do not cause an increase in CO<sub>2</sub> emissions, customer cogeneration, clean coal, advanced nuclear energy, fuel cells, solid-waste conversion, demand-side management and energy efficiency improvements. The law also establishes an RPS requiring 0.25% of energy from renewable resources in 2009 and rising to 12.5% in 2024 and thereafter. Utilities are not required to comply with annual RPS benchmarks or the overall 25% alternative energy benchmark if it is reasonably expected that implementation would raise costs by 3% or more of what they would have been otherwise.

Additionally, utilities are required to implement energy efficiency programs to achieve incremental reductions in energy savings each year and cumulative energy savings of 22% by the end of 2025. Utilities must also implement peak demand programs to reduce peak demand by 1% in 2009, and an additional 0.75% each year thereafter through 2018.

**Pennsylvania** – RPS enacted November 2004; Law enacted October 2008

The 2004 law establishes an alternative energy portfolio standard with two tiers. By 2020, 8% of supply must be from Tier I resources and 10% of supply must be from Tier II resources. Demand-side management is included in Tier II resources. DSM is defined to include: energy efficiency technologies, management practices or strategies that reduce customers' electricity consumption; load management or demand response technologies that shift demand from high- to low- demand periods; and the use of industrial by-products, such as exhaust gases, to produce electricity at the facility of a customer.

A 2008 law establishes an energy efficiency standard for investor-owned utilities. They must reduce demand by 3% in 2013 – compared to 2009-2010 levels – and reduce peak demand by 4.5% in 2013 – compared to 2007-2008 levels.

**Rhode Island** – Energy efficiency provisions enacted June 2006

The 2006 law extends standard offer service (SOS) through 2020 and requires distribution companies obtaining SOS to include least-cost procurement of system reliability and energy efficiency. System reliability includes procurement of diverse resources, distributed generation and demand response resources. In regard to energy efficiency, a distribution company is required to obtain “energy efficiency and energy conservation measures that are prudent and reliable and when such measures are lower cost than acquisition of additional supply, including supply for periods of high demand.”

The law also requires distribution companies to submit plans for procurement of system reliability and energy efficiency procurement every three years. The plan must include measureable goals for each energy resource. National Grid, the investor-owned utility that serves the large majority of customers in Rhode Island, must submit its first plan September 1, 2008.

Public Power: The Rhode Island Public Utilities Commission (PUC) subsequently opened a proceeding to establish standards for the procurement of energy efficiency and system reliability (Docket No. 3931). In a decision issued July 18, 2008, the PUC ruled that it could not exempt Pascoag Utility District, the state's only public power utility,

from the law, but did not require the utility to submit energy efficiency procurement plans. Instead, the PUC will consider Pascoag's portfolio submitted with its SOS filing to be in compliance with the statute; as part of the submission, Pascoag must verify to the PUC that the utility is procuring all energy efficiency that is less costly than supply.

**South Dakota** – Energy efficiency added to renewable goal by law enacted March 2009

In February 2008, the governor signed HB 1123, which establishes a renewable energy goal of 10% of all electricity sold at retail by 2015. The goal applies to each retail provider of electricity in the state, regardless of the ownership status of the utility. Municipal and cooperative utilities that receive wholesale power through a municipal power agency or generation & transmission cooperative may aggregate their renewable resources to meet the goal. In March 2009, the governor signed SB 57, which allows energy efficiency measure to count towards meeting the goal.

**Texas** – Energy efficiency law enacted June 2007

The 1999 restructuring law established a goal for electric utilities to provide incentives for power suppliers to acquire cost-effective energy efficiency equivalent to at least 10% of the electric utility's annual growth in demand. The 2007 law increased the percentage to 20% of the annual growth in demand from residential and commercial customers by 2009. In August 2010, the Public Utility Commission increased the goal from 20% to 25% in annual growth in demand from residential and commercial customers by 2012 and 30% by 2013. A 2011 law sets an energy efficiency goal for IOUs of 30% of annual load growth. Once a utility's 30% requirement equals 0.4% of summer weather-adjusted peak demand, the goal will switch to 0.4% of peak demand each year.

Public Power: Municipally owned utilities with more than 500,000 megawatt-hours in retail sales in 2005 shall provide cost-effective energy efficiency programs to their customers.

**Utah** – RPS goal enacted March 2008

The 2008 law provides that 20% of each utility's adjusted retail sales come from renewable resources by 2025, if cost-effective. Retail sales are adjusted to exclude zero-carbon sources; municipal utilities' retail sales are also adjusted to subtract the amount of savings from energy efficiency programs, while cooperative and IOU sales are adjusted to subtract the amount of savings from demand-side management.

**Vermont** – Efficiency Vermont established 2000.

Legislation enacted in June 1999 authorized the Public Service Board (PSB) to collect a fee from all customers to fund energy efficiency programs. The PSB created Efficiency Vermont, funded by these fees, to administer energy efficiency services in the territories of all of the state's utilities, except for the Burlington Electric Department, which administers its own energy efficiency programs. Efficiency Vermont is operated by an independent, non-profit organization under contract to the PSB.

**Virginia** – Revision to restructuring law enacted April 2007

In addition to rolling back many of the provisions of the state's retail choice legislation, this 2007 law established a goal of reducing electricity consumption by retail

customers in the state by ten percent of 2006 levels by the year 2022. The State Corporation Commission (SCC) must submit a report to including recommendations on appropriate demand side management, conservation, energy efficiency, load management, real-time pricing and consumer education programs to meet the goal. The SCC may also recommend a lower goal if it determines the 10% reduction is not achievable.

**Washington** – RPS passed in November 2006 ballot initiative

All utilities serving more than 25,000 customers must meet an RPS of 3% of load by 2012, rising to 15% of load by 2020. Each of these utilities must also develop its cost-effective energy conservation potential and by 2010 publish its target conservation goals for the next ten years. Utilities that fail to meet energy conservation or renewable energy targets must pay a \$50 per MWh administrative penalty, adjusted for inflation. However, a utility that spends 4% of its retail revenue requirement on the incremental costs of eligible renewable resources is in compliance with the RPS portion of the target.

**West Virginia** – RPS enacted June 2009

All electric utilities, except rural electric cooperatives, municipally owned electric facilities or utilities serving less than 30,000 residential customers in the state, must meet an alternative and renewable energy portfolio standard of 25% by 2025. The standard is met by owning alternative and renewable energy portfolio credits, which are awarded in different amounts per megawatt-hour (MWH) depending on the resource. The Public Service Commission shall award one credit for each MWH conserved as a result of an approved energy efficiency or demand-side energy initiative project.

**Wisconsin** – Public Service Commission standards approved December 2010

A July 2007 law (Wisconsin Act 141) requires the Public Service Commission (PSC) to review energy efficiency and renewable resource programs periodically. As part of this process, the PSC recommended new energy efficiency goals in November 2010 (see Docket 5-GF-191), and these goals were approved by the legislature's Joint Committee on Finance in December 2010. The goals call for annual reductions in peak load and electric sales of 0.75% in 2011 and increasing to 1.5% in 2014 and thereafter.



## **Individual Public Power Utility Energy Efficiency Goals**

California: Silicon Valley Power (Santa Clara) is required to spend 2.85% of its electric sales revenues on cost effective energy efficiency, new renewable generation, low-income energy programs, and new electric technologies research and development. Look under “SVP Energy Efficiency and Solar Electric Program Update for 2007” for a description of the utility’s energy efficiency goals through 2017.

<http://www.siliconvalleypower.com/res/>

In 2005, Glendale Water & Power established an energy efficiency goal of one percent of annual sales.

[www.energy.ca.gov/sb1/meetings/2007-10-04\\_workshop/comments/City\\_of\\_Glendale\\_water\\_and\\_power\\_2007-10-10.PDF](http://www.energy.ca.gov/sb1/meetings/2007-10-04_workshop/comments/City_of_Glendale_water_and_power_2007-10-10.PDF)

The City of Riverside has adopted the “Green Riverside Action Plan.” One of its goals is to reduce the City’s per capita base load energy consumption by 10% through energy efficiency and conservation programs by 2016.

<http://www.riversideca.gov/utilities/pdf/gp/actionplan-june.pdf>

Roseville Electric’s strategic plan calls for a reduction in peak demand and total energy requirements of 5% by 2012; this is to be accomplished through the use of energy efficiency, renewable energy, and load management programs. In September 2007, the City Council adopted annual energy efficiency targets of 0.6% of total annual consumption. (See page 4 of report at the following link. For best results, cut and paste the link into the browser.)

<http://www.roseville.ca.us/civica/filebank/blobdload.asp?blobid=11973>

In May 2007, Sacramento Municipal Utility District’s (SMUD) board approved energy efficiency goals to reduce energy consumption by 15% over 10 years (to 2017).

[http://www.smud.org/news/releases/07archive/05\\_17energyefficiencygoals.pdf](http://www.smud.org/news/releases/07archive/05_17energyefficiencygoals.pdf)

Florida: In 2006, Gainesville Regional Utilities implemented new energy efficiency and demand-side management programs as part of their integrated resource plan. The utility established a goal of reducing energy consumption by 10.1% by 2015.

<http://www.gru.com/Pdf/AnnualReport2007/2007FullAnnualReport.pdf> (See page 4 of 2006-2007 annual report.)

Iowa: In 2004, Waverly Light & Power joined the World Wildlife Fund’s Power Switch initiative, and committed to meet 15% of its energy needs through energy efficiency programs by 2020.

<http://www.worldwildlife.org/who/media/press/2004/WWFPresitem687.html>

Nebraska: In January 2009, the Omaha Public Power District announced its goal of producing 10% of its load from renewable resources by 2020. In conjunction with that

goal, the utility set a target of reducing its customers' use of electricity by 50 MWs by the end of 2012.

[http://www.oppd.com/AboutUs/NewsEvents/22\\_000932](http://www.oppd.com/AboutUs/NewsEvents/22_000932) (See January 21, 2009 press release.)

New York: In 1999, the Long Island Power Authority (LIPA) began a 5-year Clean Energy Initiative to achieve energy and capacity savings. Since then, additional money has been committed to the program, which has been extended through 2008. Cumulative energy savings through 2006 were 464 gigawatt-hours, while annual peak demand savings were 175 MWs. In May 2008, LIPA announced a second 10-year program – Efficiency Long Island – to begin in January 2009. The program aims to reduce peak demand by 500 MWs by 2018.

<http://www.lipower.org/pdfs/cei/annual06.pdf>

[http://www.lipower.org/newscenter/pr/2008/050808\\_eli.html](http://www.lipower.org/newscenter/pr/2008/050808_eli.html)

The New York Power Authority is working to help achieve the state's plan to cut energy use by 15% by 2015. The Authority has invested over \$1 billion in energy efficiency programs and these save enough electricity to meet the needs of more than 300,000 households each year. Beginning in 1990, the Authority has sponsored energy efficiency improvements in public buildings. The projects now cover 2,300 buildings, and the measures have reduced demand by 190 MWs.

<http://www.nypa.gov/es.htm> and <http://www.nypa.gov/services/esprograms.htm>

South Carolina: In 2007, Santee Cooper's Board of Directors approved a goal of obtaining 40% of its energy from non-greenhouse gas emitting resources, biomass fuels, energy efficiency and conservation, by 2020.

<https://www.santeecooper.com/portal/page/portal/SanteeCooper/AboutUs/Newsroom/2007%20PDFs/101907NewGreenCommitment.pdf>

[http://www.cleanenergysc.com/docs/STATE\\_110207\\_S-C\\_OPED.pdf](http://www.cleanenergysc.com/docs/STATE_110207_S-C_OPED.pdf)

Texas: Austin Energy's Energy Resource, Generation, and Climate Protection Plan – dated April 22, 2010 – calls for the utility to achieve energy efficiency savings of 800 MWs by 2020. The Austin City Council initially established a strategic energy policy for Austin Energy in August and September of 2003, and has since adopted additional resolutions to direct the utility's energy policy.

<http://www.austinenergy.com/About%20Us/Newsroom/Press%20Releases/2010/greenEnergyApproval.htm>

<http://www.austinenergy.com/About%20Us/Environmental%20Initiatives/climateProtectionPlan/generationBriefingSummary.pdf>

CPS Energy, in San Antonio, has a goal of reducing demand by 771 MWs by 2020.  
[http://www.cpsenergy.com/Residential/Information\\_Library/Strategic\\_Energy\\_Plan\\_faq.asp](http://www.cpsenergy.com/Residential/Information_Library/Strategic_Energy_Plan_faq.asp)

Vermont: In 1990, the Burlington Electric Department (BED) issued a bond to fund energy efficiency programs. While BED does not have a specific energy efficiency goal, as the result of its programs, annual electricity consumption in 2007 was one percent greater than in 1989.  
<http://www.burlingtonelectric.com/EnergyEfficiency/EnergyEfficiencyAnnualReport.pdf>

Washington: Seattle City Light has a long history of investing in energy efficiency programs. Its draft five-year plan (2008-2012) sets a goal of meeting most of the utility's projected load growth – or a total of 65.5 MWs – with energy efficiency.  
[http://www.seattle.gov/light/conserve/docs/Conservation\\_5\\_Year\\_Action\\_Plan.pdf](http://www.seattle.gov/light/conserve/docs/Conservation_5_Year_Action_Plan.pdf)