



0000115507

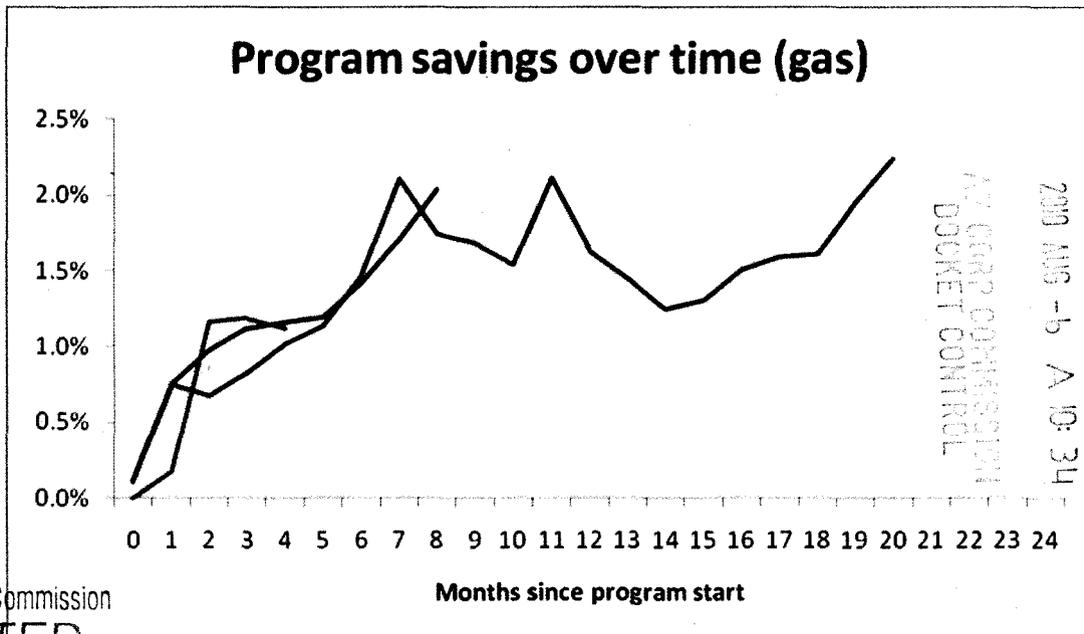
**ORIGINAL**

OPOWER, an energy efficiency and smart grid software company, submits these comments to the Arizona Corporation Commission (“ACC”) to discuss the success of behavior-based programs in driving measurable reductions in natural gas consumption across the country over the past several years.

OPOWER is currently working with over 38 utilities across 18 states, including some of the country’s largest gas providers. Energy savings have been dramatic with gas usage, in addition to electricity usage, as a result of OPOWER’s behavior-based programs. A representative list of OPOWER’s gas clients, including both gas-only and gas and electric utilities, is provided below.

STATE	UTILITY	FUEL TYPE
California	San Diego Gas & Electric	Electric and Gas
	Southern California Gas Company	Gas
Illinois	Ameren	Electric and Gas
Massachusetts	National Grid	Electric and Gas
Michigan	Consumers Energy	Electric and Gas
Minnesota	CenterPoint Energy	Gas
	Xcel Energy	Electric and Gas
	Minnesota Energy Resources Corporation	Gas
New York	National Grid	Electric and Gas
Washington State	Puget Sound Energy	Electric and Gas

OPOWER’s Home Energy Reporting program has been consistently effective in driving energy consumption reductions in each deployment to date. OPOWER’s program has saved a total of 1,220,319 therms across our gas deployments, at a cost of between \$0.40 & \$0.90 per therm. The figure below shows the consistency of savings gas utilities have achieved using OPOWER’s program, with percentage savings (y-axis) illustrated against time (x-axis). Only utilities with over five months of results are shown.



RECEIVED

2010 AUG -6 A 10:34  
ACC CORP COMMISSION  
DOCKET CONTROL

Arizona Corporation Commission  
**DOCKETED**

AUG 6 2010

DOCKETED BY



0000115507

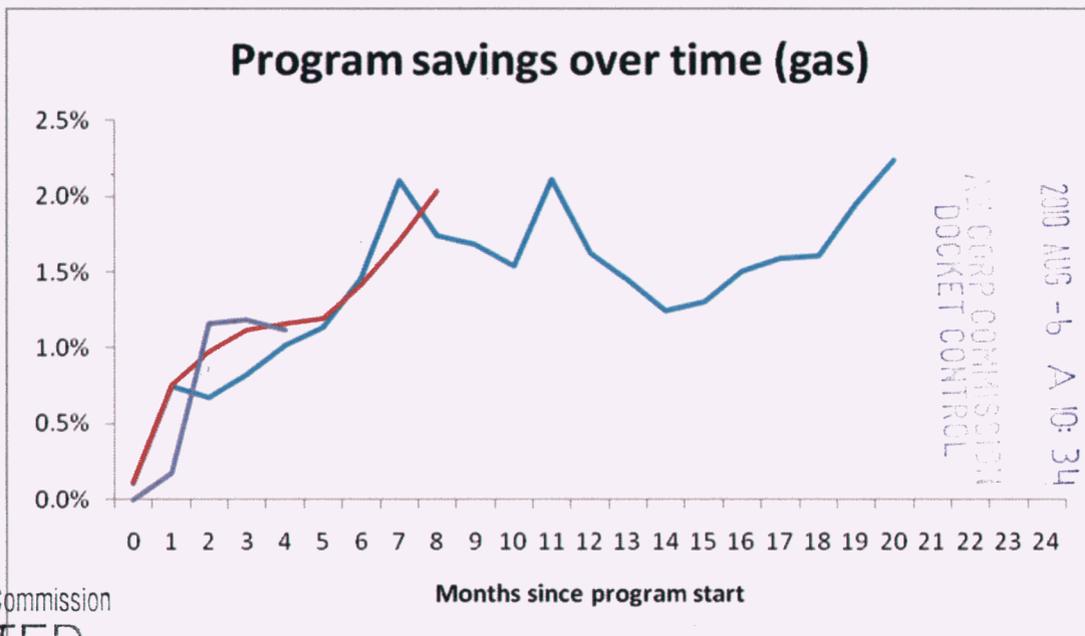
**ORIGINAL**

OPOWER, an energy efficiency and smart grid software company, submits these comments to the Arizona Corporation Commission (“ACC”) to discuss the success of behavior-based programs in driving measurable reductions in natural gas consumption across the country over the past several years.

OPOWER is currently working with over 38 utilities across 18 states, including some of the country’s largest gas providers. Energy savings have been dramatic with gas usage, in addition to electricity usage, as a result of OPOWER’s behavior-based programs. A representative list of OPOWER’s gas clients, including both gas-only and gas and electric utilities, is provided below.

STATE	UTILITY	FUEL TYPE
California	San Diego Gas & Electric	Electric and Gas
	Southern California Gas Company	Gas
Illinois	Ameren	Electric and Gas
Massachusetts	National Grid	Electric and Gas
Michigan	Consumers Energy	Electric and Gas
Minnesota	CenterPoint Energy	Gas
	Xcel Energy	Electric and Gas
	Minnesota Energy Resources Corporation	Gas
New York	National Grid	Electric and Gas
Washington State	Puget Sound Energy	Electric and Gas

OPOWER’s Home Energy Reporting program has been consistently effective in driving energy consumption reductions in each deployment to date. OPOWER’s program has saved a total of 1,220,319 therms across our gas deployments, at a cost of between \$0.40 & \$0.90 per therm. The figure below shows the consistency of savings gas utilities have achieved using OPOWER’s program, with percentage savings (y-axis) illustrated against time (x-axis). Only utilities with over five months of results are shown.



Arizona Corporation Commission  
**DOCKETED**

AUG 6 2010

DOCKETED BY

2010 AUG -6 A 10:34  
AZ CORP COMMISSION  
DOCKET CONTROL

RECEIVED

OPOWER's gas results are discussed in detail below:

- Strong Program Performance: As an example, National Grid (MA)'s deployment of OPOWER's program has been a success, with an average savings of 1.0%. Notably, the savings in the past several months of the program have been increasing, averaging 1.5%.
- Rapid Initial Program Ramp-up: As OPOWER has deployed more programs, our ability to ensure rapid adoption is improving. For example, Centerpoint Energy (MN) deployment is less than six months old and is already averaging 1.1% savings, translates into over 20,000 therms saved across the service territory.
- Year-over-year Improvements: The OPOWER program is proving to drive sustained, and improving energy savings over time. As a proof point, gas savings with Puget Sound Energy have been getting better over time. Savings for the utility's second winter is 52% better than the first winter, with average savings of 1.43%. The results from OPOWER's PSE deployment has been independently verified by Professor Ian Ayres of Yale University.<sup>1</sup>

Important to note is that rather than impacting only select groups, behavior-based results are consistent across income, age, and have an above-average impact for seniors and low-income citizens. Furthermore, OPOWER's gas results have been consistent across utility type (gas-only and dual fuel) and geographies, making behavior-based programming one of the most reliable sources of natural gas savings.

Conservatively, OPOWER believes that it could save around 2 million therms a year all Arizona homes with gas took advantage of behavior-based programming. This savings level means that, as part of a broader energy efficiency portfolio, behavior-based programming can help Arizona utilities meet their state-mandated energy efficiency goals.

---

<sup>1</sup> Ayres, Ian. *Evidence from Two Large Field Experiments that Peer Comparison Feedback Can Reduce Residential Energy Usage*. 2009.

<<http://www.opower.com/LinkClick.aspx?fileticket=HAzjluOXrr8%3d&tabid=72>>