



August 24, 2023

REPORT #E23-340

## Modulating Gas Valve for Commercial Dryer Study

Prepared For NEEA:

Noe Contreras, Sr. Product Manager

Prepared by:

Shawn Scott, Sr. Engineer

GTI Energy

1700 S. Mount Prospect Rd.

Des Plaines, Illinois 60018

Northwest Energy Efficiency Alliance

PHONE

503-688-5400

EMAIL

[info@neea.org](mailto:info@neea.org)

## Legal Notice

---

*This information was prepared by GTI Energy for NEEA.*

*Neither GTI Energy, the members of GTI Energy, the Sponsor(s), nor any person acting on behalf of any of them:*

*a. Makes any warranty or representation, express or implied with respect to the accuracy, completeness, or usefulness of the information contained in this report, or that the use of any information, apparatus, method, or process disclosed in this report may not infringe privately-owned rights. Inasmuch as this project is experimental in nature, the technical information, results, or conclusions cannot be predicted. Conclusions and analysis of results by GTI Energy represent GTI Energy's opinion based on inferences from measurements and empirical relationships, which inferences and assumptions are not infallible, and with respect to which competent specialists may differ.*

*b. Assumes any liability with respect to the use of, or for any and all damages resulting from the use of, any information, apparatus, method, or process disclosed in this report; any other use of, or reliance on, this report by any third party is at the third party's sole risk.*

*c. The results within this report relate only to the items tested.*

## Table of Contents

---

|   |     |
|---|-----|
| Legal Notice .....  | i   |
| Table of Contents.....  | ii  |
| Table of Figures .....  | iii |
| List of Tables .....  | iv  |
| Executive Summary .....   | 1   |
| Introduction .....  | 3   |
| Data Analysis Approach.....   | 6   |
| Weather Correction for NEEA Territory .....                         | 6   |
| Cost and Number of Dryers in NEEA Territory .....                   | 8   |
| Results and Discussions .....                                       | 10  |
| Conclusions .....   | 15  |
| Appendix A: Commercial Dryer Market Estimate From CBSA 4 2019 ..... | 16  |

## Table of Figures

---

|   | Page |
|---|------|
| Figure 1: EZ-Efficiency Bio-Therm Modulating Valve Controller .....               | 3    |
| Figure 2: Bio-Therm Modulating valve and controller installed at Site in MN ..... | 4    |
| Figure 3: Front of Hotel Dryers in IL .....                                       | 6    |
| Figure 4: MN Laundromat Back Access Room.....                                     | 6    |
| Figure 5: Chicago Area Illinois Hotel #1 energy use versus makeup Air Temp.....   | 7    |

## List of Tables

---

|   |    |
|---|----|
| Table 1: Summary Savings and Payback Periods across NEEA States .....               | 1  |
| Table 2: Annual Therm Savings Estimates with Varying Market Penetration Rates ..... | 2  |
| Table 3: CBSA Commercial Gas Dryer Market for NEEA Utilities.....                   | 4  |
| Table 4: NEEA Territory State Average Monthly Temp From Weather Spark.....          | 8  |
| Table 5: Chicago Site Hotel #1 Temp Correction Modifications.....                   | 8  |
| Table 6: EIA commercial Natural Gas Prices .....                                    | 9  |
| Table 7: Commercial Natural Gas Dryers across 4 NEEA States .....                   | 9  |
| Table 8: Summary Annual Therm and Cost savings for 4 NEEA States .....              | 10 |
| Table 9: Statewide Annual Energy Saving Estimates.....                              | 10 |
| Table 10: Idaho State Modulating Valve Savings and Payback Period.....              | 11 |
| Table 11: Montana State Modulating Valve Savings and Payback Period.....            | 12 |
| Table 12: Oregon State Modulating Valve Savings and Payback Period.....             | 13 |
| Table 13: Washington State Modulating Valve Savings and Payback Period.....         | 14 |

## Executive Summary

Standard commercial gas-fired dryers only have one firing rate. This is normally a high firing rate designed to heat up the clothes and drive off moisture during the initial stages of drying. In the later stages of drying not as much moisture remains in the clothes, not as much heat is needed and more energy is being wasted and lost out the flue. A modulating gas dryer allows the firing rate to change for the changing demand in heat needed. The Bio-Therm technology offered by EZ-Efficiency is an affordable post-OEM retrofit kit to change standard non-modulating dryers to modulating dryers. This technology allows a site to change a standard dryer to a modulating dryer at an installed cost around \$1150 per dryer. At this cost, it is estimated a typical user would have a simple payback of 4-5 years.

GTI Energy has completed a demonstration of 4 test sites (8 dryers) in the Chicago area as well as 5 sites (12 dryers) in Minnesota using the modulating dryer technology across 20 total dryers. Initial demonstrations in the Chicago area indicate average savings of 14% on natural gas used for drying<sup>1</sup>. The additional Minnesota study found 12% savings on natural gas use<sup>2</sup>. GTI analyzed this data across 20 dryers and two field demos to see what the savings and payback periods would look like for the 4 states in NEEA territory and the results are presented below in Table 1. Montana had a payback in as little as 3.94 years with higher natural gas costs and Idaho took 6.59 years with lower natural gas costs.

Table 1: Summary Savings and Payback Periods across NEEA States

| State      | Annual Baseline Gas Use (Therm)) | Annual MV Gas Use (Therm) | % Savings | Annual Savings (Therm) | Annual Cost Savings (\$) | Payback Period (Years) |
|------------|----------------------------------|---------------------------|-----------|------------------------|--------------------------|------------------------|
| Idaho      | 1,930                            | 1,701                     | 12.88%    | 229                    | \$174.50                 | 6.59                   |
| Montana    | 1,936                            | 1,706                     | 12.93%    | 230                    | \$291.66                 | 3.94                   |
| Oregon     | 1,922                            | 1,694                     | 12.85%    | 229                    | \$253.25                 | 4.54                   |
| Washington | 1,921                            | 1,693                     | 12.83%    | 228                    | \$246.26                 | 4.67                   |
| Average    | 1,927                            | 1,699                     | 12.87%    | 229                    | 241                      | 4.94                   |

The target market for this new technology is in the commercial sector, specifically laundromats, dry cleaners, hospitality, and healthcare facilities. Additionally, any other facilities with on premise laundry (OPL) may be a suitable fit, such as a gym, university, or even multi-family housing with large laundromat size dryers. These facilities often have commercial dryers sized between 30 and 250 lbs. and typically without modulating capabilities.

NEEA provide GTI with some market data pulled from CBSA 4 2019 data. According to this data there are an estimated 50,171 commercial gas dryers across NEEA member utilities in Idaho, Montana, Oregon, and Washington. Applying these energy savings and assumed market

1 Scott, S., Kosar, D., Cushman, G. "Nicor Gas Emerging Technology Program 1036: Commercial Dryer Modulation Retrofit Public Project Report." September 2014

2 Scott, S. "Advanced Commercial Clothes Dryer Technologies Field Test." Conservation Applied Research and Development (CARD) Final Report, January 2018

penetration rates provide the potential impact of this technology on energy efficiency programs and the potential therms savings that could be generated by the technology. Table 2 provides the summary of potential annual savings of this technology as it achieves market penetration across the 4 NEEA states. The Technology at only 10% market penetration would achieve over 1 million therms of annual savings and at 40% penetration would achieve over 4.5 million therms of annual savings. Providing rebates on the technology through energy efficiency programs would reduce the annual payback times and help to increase that market penetration rate and the overall therm savings that can be achieved.

*Table 2: Annual Therm Savings Estimates with Varying Market Penetration Rates*

| State             | Commercial Gas Dryers | Adoption Rate Annual Energy Savings (Therms) |                  |                  |                  |                  |
|-------------------|-----------------------|--|------------------|------------------|------------------|------------------|
|                   |                       | 10%  | 20%              | 40%              | 60%              | 80%              |
| <b>Idaho</b>      | 6,274                 | 143,675                                      | 287,349          | 574,698          | 862,048          | 1,149,397        |
| <b>Montana</b>    | 4,188                 | 96,324                                       | 192,648          | 385,296          | 577,944          | 770,592          |
| <b>Oregon</b>     | 14,311                | 327,722                                      | 655,444          | 1,310,888        | 1,966,331        | 2,621,775        |
| <b>Washington</b> | 25,399                | 579,097                                      | 1,158,194        | 2,316,389        | 3,474,583        | 4,632,778        |
| <b>Average</b>    | <b>50,171</b>         | <b>1,148,916</b>                             | <b>2,297,832</b> | <b>4,595,664</b> | <b>6,893,495</b> | <b>9,191,327</b> |

## Introduction

---

Standard commercial gas-fired dryers only have one firing rate. This is normally a high firing rate designed to heat up the clothes and drive off moisture during the initial stages of drying. In the later stages of drying not as much moisture remains in the clothes, not as much heat is needed and more energy is being wasted and lost out the flue. A modulating gas dryer allows the firing rate to change for the changing demand in heat needed. There are modulating dryers available directly from manufacturers, but they are relatively costly and would require a large capital expense from users to replace already installed non-modulating dryers. The Bio-Therm technology offered by EZ-Efficiency is an affordable post-OEM retrofit kit to change standard non-modulating dryers to modulating dryers (Figure 1).



*Figure 1: EZ-Efficiency Bio-Therm Modulating Valve Controller*

This technology allows a site to change a standard dryer to a modulating dryer at an installed cost around \$1150 per dryer. At this cost, it is estimated a typical user would have a simple payback of 4-5 years. The biggest barrier to the adaption of this technology will be its newness. Most commercial consumers will be unfamiliar with this technology and may be hesitant to adopt it. An additional potential barrier is that the installation of this technology would likely void any original manufacturer warranty on the dryer. Therefore, its installation would be preferred for appliances that are no longer under warranty coverage, which tends to be any dryer over three years old. However, The manufacturer has installed thousands of these units in CA now and many were installed on brand new dryers. At this time, EZ-Efficiency is the only manufacturer offering this technology. Gas modulation is a very mature technology, having been around for decades in various other appliances such as boilers and furnaces. However, its application in dryers is more recent.

The target market for this new technology is in the commercial sector, specifically laundromats, dry cleaners, hospitality, and healthcare facilities. Additionally, any other facilities with on premise laundry (OPL) may be a suitable fit, such as a gym, university, or even multi-family housing with large laundromat size dryers. These facilities often have commercial dryers sized between 30 and 250 lbs. and typically without modulating capabilities.

NEEA provide GTI with some market data pulled from CBSA data. According to this data there are an estimated 50,171 commercial gas dryers across NEEA member utilities in Idaho, Montana, Oregon, and Washington. A Summary of commercial gas dryers by state is provided in the Table below. These are estimated by CBSA across Lodging, Hospitals, Assembly, Mixed Commercial, Residential Care, and Retail.

*Table 3: CBSA Commercial Gas Dryer Market for NEEA Utilities*

|                   | Commercial Gas Dryers |
|-------------------|-----------------------|
| <b>Idaho</b>      | 6,274                 |
| <b>Montana</b>    | 4,188                 |
| <b>Oregon</b>     | 14,311                |
| <b>Washington</b> | 25,399                |
| <b>Total</b>      | 50,171                |

GTI Energy has completed a demonstration of 4 test sites (8 dryers) in the Chicago area as well as 5 sites (12 dryers) in Minnesota using the modulating dryer technology across 20 total dryers. Initial demonstrations in the Chicago area indicate average savings of 14% on natural gas used for drying<sup>3</sup>. The additional Minnesota study found 12% savings on natural gas use<sup>4</sup>. MN Pilot sites included two hotels (2 - 75 lb. dryers, 2 - 120lb dryers), one healthcare facility (2 - 75 lb. dryer), one university (1 - 75 lb. dryers), one dry cleaner (1- 50 lb. dryer) and one laundromat (2 - 45 lb. dryers, 2-30 lb. dryers). Chicago pilot sites included two hotels (1 - 75 lb. dryer, 1 - 170lb dryer), one healthcare facility (2 - 75 lb. dryer), and one laundromat (2 - 45 lb. dryers, 2-30 lb. dryers).



*Figure 2: Bio-Therm Modulating valve and controller installed at Site in MN*

3 Scott, S., Kosar, D., Cushman, G. "Nicor Gas Emerging Technology Program 1036: Commercial Dryer Modulation Retrofit Public Project Report." September 2014

4 Scott, S. "Advanced Commercial Clothes Dryer Technologies Field Test." Conservation Applied Research and Development (CARD) Final Report, January 2018

Both data sets can be used along with makeup air temperature monitoring conducted during all of the demos to apply the results to specific regions of the country. The make up air (outdoor temperature) does have a large effect on the total energy use of the dryer if the dryer back room was designed properly and supplied with enough makeup air. GTI will look at average temperatures across all 4 states (Idaho, Montana, Oregon, Washington) in NEEA territory and expected year-round outdoor temperature to modify the expected savings compared to MN and IL. Those studies will be adapted by this project to provide analysis for member territories. Analysis includes State specific baseline, installed cost, climate affects, and energy costs and payback periods. Local relevant data on air temperatures, and energy costs will all be used to modify the data sets and provide relevant energy savings and payback periods for the specific territory. For details on how each of those previous studies was conducted, equipment monitored and how savings numbers were achieved please refer to each of the final reports. For this NEEA report we will focus on how the results from those other studies can be applied to NEEA territory and how the combined data set of all 20 dryers shows estimated savings and payback periods for NEEA territory states.

## Data Analysis Approach

---

### ***Weather Correction for NEEA Territory***

GTI did a deep dive into the twenty dryers that were monitored in the two IL and MN field demonstrations of the BIO-Therm modulating dryer technology. Most commercial dryers are installed so that their front is exposed in the laundry room and provides access for putting clothes in the dryer, running the dryer and removing clothes from the dryer (Figure 3). The back of the dryer is then accessible through a small access room behind the dryer where makeup air is provided that is used for combustion and drying the clothes before it is exhausted outside (Figure 4). If the dryer access room behind the dryers is designed with enough makeup air the temperature in that room will approach outdoor temperatures, which has a large effect on how much energy the dryer uses. If the dryer is heating from 70 °F up to 160 °F for instance it will use a lot less energy than heating from 20 °F to 160 °F for drying. What GTI found in digging into this data though is that a lot of the dryer access rooms did not have enough makeup air and did not then have a traceable effect on the energy use pattern of the dryer.



*Figure 3: Front of Hotel Dryers in IL*



*Figure 4: MN Laundromat Back Access Room*

GTI Energy analyzed the data for all 20 dryers to look at how the makeup air temp effected the results and how that would change the results for NEEA territory. An example of how the makeup air temp influences the energy use of the dryers is shown in Figure 5 for Hotel #1 in the Chicago area. It shows a clear trend where energy use changes with makeup air temp. For average weather trends GTI Energy used Weather spark data<sup>5</sup>. For Idaho, Montana, Oregon, and Washington GTI used the average of a few cities in each state, which was directly how weather spark calculated state averages. The average temperatures used for those states can be seen in Table 4. GTI Energy for the Chicago area sites analysis used weather spark temperatures for Chicago and looked at how much above those outdoor temperatures the air being used for drying was in the small dryer room. That temperature difference was considered the increase above outdoor that occurred from the heat gain around the dryer in the small makeup air temp room. If this hotel was to be moved to a location in Oregon, that same heat gain was assumed and added to the outdoor temperature from weather spark for Oregon to calculate how much energy would be used for this same hotel in Oregon. The energy use trend lines as shown in Figure 5 were then used with the average expected monthly temps to calculate the monthly and then annual energy use. Table 5 shows how temperatures for the 4 NEEA territory states would be altered based on how far off from outdoor temperature this one Chicago area site was. For details of each site you can look at the data analysis that was conducted for each site in the summary excel spreadsheets provided to NEEA. In the end only 6 of 20 dryers were found to have their energy use varied by outdoor temperature. The other 14 sites energy savings could be applied directly to new locations.

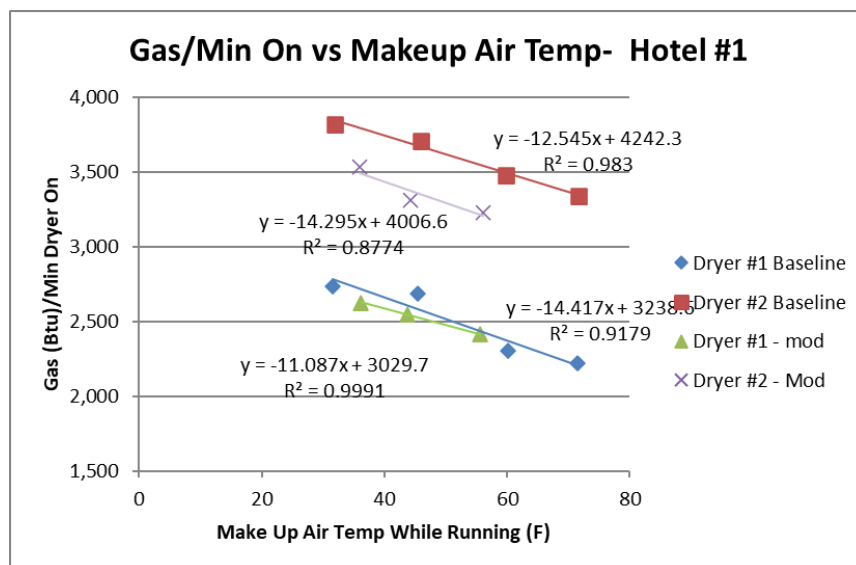


Figure 5: Chicago Area Illinois Hotel #1 energy use versus makeup Air Temp

<sup>5</sup> <https://weatherspark.com/y/14091/Average-Weather-in-Chicago-Illinois-United-States-Year-Round>

Table 4: NEEA Territory State Average Monthly Temp From Weather Spark

|                   | Jan       | Feb       | Mar       | Apr       | May       | Jun       | Jul       | Aug       | Sep       | Oct       | Nov       | Dec       |
|-------------------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|
| <b>Oregon</b>     |           |           |           |           |           |           |           |           |           |           |           |           |
| Portland          | 40        | 43        | 47        | 51        | 57        | 62        | 68        | 68        | 63        | 54        | 46        | 40        |
| Eugene            | 41        | 43        | 47        | 50        | 56        | 61        | 67        | 68        | 62        | 53        | 45        | 40        |
| Bend              | 32        | 34        | 39        | 43        | 51        | 58        | 66        | 65        | 57        | 47        | 37        | 31        |
| <b>Avg</b>        | <b>38</b> | <b>40</b> | <b>44</b> | <b>48</b> | <b>55</b> | <b>60</b> | <b>67</b> | <b>67</b> | <b>61</b> | <b>51</b> | <b>43</b> | <b>37</b> |
| <b>Idaho</b>      |           |           |           |           |           |           |           |           |           |           |           |           |
| Sandpoint         | 29        | 32        | 37        | 45        | 53        | 59        | 65        | 65        | 56        | 45        | 35        | 29        |
| Idaho Falls       | 21        | 25        | 36        | 45        | 54        | 62        | 69        | 68        | 58        | 46        | 33        | 22        |
| Boise             | 31        | 36        | 44        | 51        | 59        | 68        | 76        | 75        | 65        | 53        | 40        | 31        |
| <b>Avg</b>        | <b>27</b> | <b>31</b> | <b>39</b> | <b>47</b> | <b>55</b> | <b>63</b> | <b>70</b> | <b>69</b> | <b>60</b> | <b>48</b> | <b>36</b> | <b>27</b> |
| <b>Montana</b>    |           |           |           |           |           |           |           |           |           |           |           |           |
| Billings          | 28        | 31        | 39        | 48        | 57        | 66        | 74        | 73        | 62        | 50        | 37        | 28        |
| Bozeman           | 22        | 25        | 33        | 41        | 50        | 58        | 66        | 65        | 55        | 43        | 30        | 21        |
| Missoula          | 25        | 29        | 37        | 45        | 53        | 60        | 68        | 67        | 57        | 44        | 32        | 24        |
| <b>Avg</b>        | <b>25</b> | <b>28</b> | <b>36</b> | <b>45</b> | <b>53</b> | <b>61</b> | <b>69</b> | <b>68</b> | <b>58</b> | <b>46</b> | <b>33</b> | <b>24</b> |
| <b>Washington</b> |           |           |           |           |           |           |           |           |           |           |           |           |
| Spokane           | 31        | 34        | 41        | 48        | 56        | 63        | 71        | 70        | 61        | 49        | 38        | 30        |
| Seattle           | 42        | 44        | 47        | 51        | 57        | 62        | 66        | 67        | 62        | 53        | 46        | 41        |
| <b>Avg</b>        | <b>37</b> | <b>39</b> | <b>44</b> | <b>50</b> | <b>57</b> | <b>63</b> | <b>69</b> | <b>69</b> | <b>62</b> | <b>51</b> | <b>42</b> | <b>36</b> |

Table 5: Chicago Site Hotel #1 Temp Correction Modifications

|   | Jan       | Feb       | Mar       | Apr       | May       | Jun       | Jul       | Aug       | Sep       | Oct       | Nov       | Dec       |
|---|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|
| Chicago Site #1 Makeup Temp                           | 32        | 38        | 47        | 59        | 70        | 80        | 84        | 83        | 76        | 64        | 49        | 37        |
| Weather spark Chicago data                            | 27        | 30        | 39        | 49        | 59        | 70        | 76        | 75        | 67        | 55        | 43        | 32        |
| Difference Between Makeup temp and Weather spark data | 5         | 8         | 8         | 10        | 11        | 10        | 8         | 8         | 9         | 9         | 6         | 5         |
| Oregon Weather spark data                             | 38        | 40        | 44        | 48        | 55        | 60        | 67        | 67        | 61        | 51        | 43        | 37        |
| Idaho Weather spark data                              | 27        | 31        | 39        | 47        | 55        | 63        | 70        | 69        | 60        | 48        | 36        | 27        |
| Montana Weather spark data                            | 25        | 28        | 36        | 45        | 53        | 61        | 69        | 68        | 58        | 46        | 33        | 24        |
| Washington Weather spark data                         | 37        | 39        | 44        | 50        | 57        | 63        | 69        | 69        | 62        | 51        | 42        | 36        |
| Oregon (Corrected)                                    | <b>43</b> | <b>48</b> | <b>52</b> | <b>58</b> | <b>66</b> | <b>70</b> | <b>75</b> | <b>75</b> | <b>70</b> | <b>60</b> | <b>49</b> | <b>42</b> |
| Idaho (Corrected)                                     | <b>32</b> | <b>39</b> | <b>47</b> | <b>57</b> | <b>66</b> | <b>73</b> | <b>78</b> | <b>77</b> | <b>69</b> | <b>57</b> | <b>42</b> | <b>32</b> |
| Montana (Corrected)                                   | <b>30</b> | <b>36</b> | <b>44</b> | <b>55</b> | <b>64</b> | <b>71</b> | <b>77</b> | <b>76</b> | <b>67</b> | <b>55</b> | <b>39</b> | <b>29</b> |
| Washington (Corrected)                                | <b>42</b> | <b>47</b> | <b>52</b> | <b>60</b> | <b>68</b> | <b>73</b> | <b>77</b> | <b>77</b> | <b>71</b> | <b>60</b> | <b>48</b> | <b>41</b> |

### Cost and Number of Dryers in NEEA Territory

The approach explained above was how each hotel was essentially moved from MN or Illinois to each of the 4 NEEA states to determine how much energy use each location would have in baseline and modulating mode in the 4 NEEA states. The other question is how much each state's energy rates would affect the savings and payback periods for each state and what is the potential impact in terms of customers and potential therm savings in each state. The energy costs used for each state were obtained from EIA average commercial natural gas prices from

each state for the last 6 months<sup>6</sup>. Energy costs were converted to a cost per therm and the average of the 6 months was used for calculations. The energy cost rates used are provided in Table 6. A detailed table with the number of estimated commercial dryers in each state and utility was obtained by NEEA using CBSA 4 2019 and is provided in Appendix A: Commercial Dryer Market Estimate From CBSA 4 2019. A summary of the overall natural gas commercial dryers by sector across the 4 NEEA states is provided in Table 7.

*Table 6: EIA commercial Natural Gas Prices*

|            | 22-Jul<br>(\$/therm) | 22-Aug<br>(\$/therm) | 22-Sep<br>(\$/therm) | 22-Oct<br>(\$/therm) | 22-Nov<br>(\$/therm) | 22-Dec<br>(\$/therm) | Average<br>(\$/therm) |
|------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|-----------------------|
| Idaho      | \$0.73               | \$0.75               | \$0.80               | \$0.75               | \$0.75               | \$0.78               | \$0.76                |
| Montana    | \$1.40               | \$1.41               | \$1.38               | \$1.29               | \$1.10               | \$1.02               | \$1.27                |
| Oregon     | \$1.13               | \$1.12               | \$1.08               | \$1.01               | \$1.14               | \$1.16               | \$1.11                |
| Washington | \$1.09               | \$1.06               | \$1.10               | \$1.00               | \$1.08               | \$1.15               | \$1.08                |

*Table 7. Commercial Natural Gas Dryers across 4 NEEA States*

| Building Type    | Number of Natural Gas Dryers |
|------------------|------------------------------|
| Assembly         | 3,451                        |
| Hospital         | 172                          |
| Lodging          | 7,796                        |
| Mixed Commercial | 34,073                       |
| Office           | 27                           |
| Other            | 25                           |
| Residential Care | 1,506                        |
| Retail/Service   | 3,121                        |
| <b>Region</b>    | <b>50,171</b>                |

---

<sup>6</sup> [https://www.eia.gov/dnav/ng/ng\\_pri\\_sum\\_dcu\\_SMT\\_m.htm](https://www.eia.gov/dnav/ng/ng_pri_sum_dcu_SMT_m.htm)

## Results and Discussions

Results of the energy savings and payback periods for all 20 dryers from the previous Illinois and Minnesota studies applied to all 4 NEEA states are provided in Table 10 - Table 13. A summary of the average savings for the 4 states are shown in Table 8. The average therms savings only had a small variance with the changing weather data of the 4 states. The payback period and savings varied the most from state to state based on the large difference between natural gas prices between the states with Montana paying back the quickest at 3.94 years and \$291 in annual gas savings and Idaho with the lowest gas prices paying back in 6.59 years with \$175 in annual gas savings. All of the savings are with an estimated Modulating dryer valve kit installed cost of \$1150, which is the latest cost data we had from the manufacturer EZ Efficiency.

*Table 8: Summary Annual Therm and Cost savings for 4 NEEA States*

| State             | Annual Baseline Gas Use (Therm)) | Annual MV Gas Use (Therm) | % Savings     | Annual Savings (Therm) | Annual Cost Savings (\$) | Payback Period (Years) |
|-------------------|----------------------------------|---------------------------|---------------|------------------------|--------------------------|------------------------|
| <b>Idaho</b>      | 1,930                            | 1,701                     | 12.88%        | 229                    | \$174.50                 | 6.59                   |
| <b>Montana</b>    | 1,936                            | 1,706                     | 12.93%        | 230                    | \$291.66                 | 3.94                   |
| <b>Oregon</b>     | 1,922                            | 1,694                     | 12.85%        | 229                    | \$253.25                 | 4.54                   |
| <b>Washington</b> | 1,921                            | 1,693                     | 12.83%        | 228                    | \$246.26                 | 4.67                   |
| <b>Average</b>    | <b>1,927</b>                     | <b>1,699</b>              | <b>12.87%</b> | <b>229</b>             | <b>241</b>               | <b>4.94</b>            |

The savings estimates can be applied across the expected numbers of dryers for each state to arrive at a maximum potential therms savings for each state and for NEEA territory as a whole. The CBSA 4 2019 data obtained for NEEA was used to estimate the number of commercial dryers for each state in NEEA territory, which shows over 50,000 commercial dryers across the 4 states. An adoption rate can then be assumed to determine the potential therm savings of the technology as it becomes more adopted in each state and across NEEA territory as a whole. Table 9 provides the number of dryers in NEEA territory as well as the estimated annual therm savings with varying adoption rates. With just a 10% adoption rate across the 4 states the technology has the potential for over 1 million therms of savings and up to over 4.5 million therms of savings at a 40% adoptions rate across the 4 states.

*Table 9: Statewide Annual Energy Saving Estimates*

| State             | Commercial Gas Dryers | Adoption Rate Annual Energy Savings (Therms) |                  |                  |                  |                  |
|-------------------|-----------------------|--|------------------|------------------|------------------|------------------|
|                   |                       | 10%  | 20%              | 40%              | 60%              | 80%              |
| <b>Idaho</b>      | 6,274                 | 143,675                                      | 287,349          | 574,698          | 862,048          | 1,149,397        |
| <b>Montana</b>    | 4,188                 | 96,324                                       | 192,648          | 385,296          | 577,944          | 770,592          |
| <b>Oregon</b>     | 14,311                | 327,722                                      | 655,444          | 1,310,888        | 1,966,331        | 2,621,775        |
| <b>Washington</b> | 25,399                | 579,097                                      | 1,158,194        | 2,316,389        | 3,474,583        | 4,632,778        |
| <b>Average</b>    | <b>50,171</b>         | <b>1,148,916</b>                             | <b>2,297,832</b> | <b>4,595,664</b> | <b>6,893,495</b> | <b>9,191,327</b> |

Table 10: Idaho State Modulating Valve Savings and Payback Period

| Modulating Valve Long Term Monitoring Savings - Idaho |                   |                                 |                           |               |                        |                          |                        |
|---|-------------------|---------------------------------|---------------------------|---------------|------------------------|--------------------------|------------------------|
| MN Sites  |                   | Annual Baseline Gas Use (Therm) | Annual MV Gas Use (Therm) | % Savings     | Annual Savings (Therm) | Annual Cost Savings (\$) | Payback Period (Years) |
| <b>Laundromat</b>                                     |                   |                                 |                           |               |                        |                          |                        |
|   | Dryer#1 (30 lb)   | 1,522                           | 1,291                     | 15.19%        | 231                    | \$175.86                 | 6.54                   |
|   | Dryer #2 (30 lb)  | 688                             | 600                       | 12.76%        | 88                     | \$66.78                  | 17.22                  |
|   | Dryer #3 (45 lb)  | 1,672                           | 1,352                     | 19.16%        | 320                    | \$243.64                 | 4.72                   |
|   | Dryer #4 (45 lb)  | 604                             | 452                       | 25.08%        | 151                    | \$115.17                 | 9.98                   |
| <b>Dry Cleaner</b>                                    |                   |                                 |                           |               |                        |                          |                        |
|   | Dryer #1 (50 lb)  | 781                             | 794                       | -1.75%        | -14                    | -\$10.40                 | -110.54                |
| <b>University</b>                                     |                   |                                 |                           |               |                        |                          |                        |
|   | Dryer #1 (75 lb)  | 496                             | 457                       | 7.76%         | 38                     | \$29.27                  | 39.29                  |
| <b>Hotel #1</b>                                       |                   |                                 |                           |               |                        |                          |                        |
|   | Dryer #1 (75 lb)  | 1,516                           | 1,232                     | 18.70%        | 283                    | \$215.56                 | 5.34                   |
|   | Dryer #2 (75 lb)  | 1,865                           | 1,588                     | 14.84%        | 277                    | \$210.54                 | 5.46                   |
| <b>HealthCare</b>                                     |                   |                                 |                           |               |                        |                          |                        |
|   | Dryer #1 (75 lb)  | 1,511                           | 1,259                     | 16.65%        | 252                    | \$191.37                 | 6.01                   |
|   | Dryer #2 (75 lb)  | 1,191                           | 1,037                     | 12.93%        | 154                    | \$117.17                 | 9.81                   |
| <b>Hotel #2</b>                                       |                   |                                 |                           |               |                        |                          |                        |
|   | Dryer #1 (120 lb) | 1,989                           | 1,928                     | 3.07%         | 61                     | \$46.46                  | 24.75                  |
|   | Dryer #2 (120 lb) | 3,038                           | 2,941                     | 3.20%         | 97                     | \$73.89                  | 15.56                  |
| <b>IL Sites</b>                                       |                   |                                 |                           |               |                        |                          |                        |
| <b>Laundromat</b>                                     |                   |                                 |                           |               |                        |                          |                        |
|   | Dryer#1 (30 lb)   | 1,903                           | 1,697                     | 10.80%        | 205                    | \$156.29                 | 7.36                   |
|   | Dryer #2 (30 lb)  | 1,163                           | 1,007                     | 13.36%        | 155                    | \$118.16                 | 9.73                   |
|   | Dryer #3 (45 lb)  | 2,035                           | 1,321                     | 35.09%        | 714                    | \$543.17                 | 2.12                   |
|   | Dryer #4 (45 lb)  | 1,320                           | 1,070                     | 18.90%        | 249                    | \$189.68                 | 6.06                   |
| <b>Hotel #1</b>                                       |                   |                                 |                           |               |                        |                          |                        |
|   | Dryer #1 (170 lb) | 4,070                           | 3,687                     | 9.41%         | 383                    | \$291.36                 | 3.95                   |
| <b>Hotel #2</b>                                       |                   |                                 |                           |               |                        |                          |                        |
|   | Dryer #1 (75 lb)  | 1,990                           | 1,908                     | 4.11%         | 82                     | \$62.15                  | 18.50                  |
| <b>HealthCare</b>                                     |                   |                                 |                           |               |                        |                          |                        |
|   | Dryer #1 (75 lb)  | 4,738                           | 4,176                     | 11.86%        | 562                    | \$427.34                 | 2.69                   |
|   | Dryer #2 (75 lb)  | 4,519                           | 4,222                     | 6.59%         | 298                    | \$226.55                 | 5.08                   |
| <b>Average</b>  |                   | <b>1,930</b>                    | <b>1,701</b>              | <b>12.88%</b> | <b>229</b>             | <b>\$174.50</b>          | <b>6.59</b>            |

Table 11: Montana State Modulating Valve Savings and Payback Period

| Modulating Valve Long Term Monitoring Savings - Montana |                   |                                 |                           |               |                        |                          |                        |
|---|-------------------|---------------------------------|---------------------------|---------------|------------------------|--------------------------|------------------------|
| MN Sites  |                   | Annual Baseline Gas Use (Therm) | Annual MV Gas Use (Therm) | % Savings     | Annual Savings (Therm) | Annual Cost Savings (\$) | Payback Period (Years) |
| <b>Laundromat</b>                                       |                   |                                 |                           |               |                        |                          |                        |
|   | Dryer#1 (30 lb)   | 1,522                           | 1,291                     | 15.19%        | 231                    | \$292.72                 | 3.93                   |
|   | Dryer #2 (30 lb)  | 688                             | 600                       | 12.76%        | 88                     | \$111.15                 | 10.35                  |
|   | Dryer #3 (45 lb)  | 1,672                           | 1,352                     | 19.16%        | 320                    | \$405.54                 | 2.84                   |
|   | Dryer #4 (45 lb)  | 604                             | 452                       | 25.08%        | 151                    | \$191.71                 | 6.00                   |
| <b>Dry Cleaner</b>                                      |                   |                                 |                           |               |                        |                          |                        |
|   | Dryer #1 (50 lb)  | 781                             | 794                       | -1.75%        | -14                    | -\$17.32                 | -66.41                 |
| <b>University</b>                                       |                   |                                 |                           |               |                        |                          |                        |
|   | Dryer #1 (75 lb)  | 503                             | 464                       | 7.62%         | 38                     | \$48.48                  | 23.72                  |
| <b>Hotel #1</b>   |                   |                                 |                           |               |                        |                          |                        |
|   | Dryer #1 (75 lb)  | 1,516                           | 1,232                     | 18.70%        | 283                    | \$358.79                 | 3.21                   |
|   | Dryer #2 (75 lb)  | 1,865                           | 1,588                     | 14.84%        | 277                    | \$350.43                 | 3.28                   |
| <b>HealthCare</b>                                       |                   |                                 |                           |               |                        |                          |                        |
|   | Dryer #1 (75 lb)  | 1,535                           | 1,267                     | 17.44%        | 268                    | \$339.04                 | 3.39                   |
|   | Dryer #2 (75 lb)  | 1,191                           | 1,037                     | 12.93%        | 154                    | \$195.03                 | 5.90                   |
| <b>Hotel #2</b>   |                   |                                 |                           |               |                        |                          |                        |
|   | Dryer #1 (120 lb) | 2,007                           | 1,937                     | 3.48%         | 70                     | \$88.44                  | 13.00                  |
|   | Dryer #2 (120 lb) | 3,067                           | 2,976                     | 2.97%         | 91                     | \$115.23                 | 9.98                   |
| <b>IL Sites</b>   |                   |                                 |                           |               |                        |                          |                        |
| <b>Laundromat</b>                                       |                   |                                 |                           |               |                        |                          |                        |
|   | Dryer#1 (30 lb)   | 1,903                           | 1,697                     | 10.80%        | 205                    | \$260.14                 | 4.42                   |
|   | Dryer #2 (30 lb)  | 1,163                           | 1,007                     | 13.36%        | 155                    | \$196.68                 | 5.85                   |
|   | Dryer #3 (45 lb)  | 2,035                           | 1,321                     | 35.09%        | 714                    | \$904.10                 | 1.27                   |
|   | Dryer #4 (45 lb)  | 1,320                           | 1,070                     | 18.90%        | 249                    | \$315.71                 | 3.64                   |
| <b>Hotel #1</b>   |                   |                                 |                           |               |                        |                          |                        |
|   | Dryer #1 (170 lb) | 4,100                           | 3,721                     | 9.24%         | 379                    | \$479.66                 | 2.40                   |
| <b>Hotel #2</b>   |                   |                                 |                           |               |                        |                          |                        |
|   | Dryer #1 (75 lb)  | 2,001                           | 1,915                     | 4.31%         | 86                     | \$109.22                 | 10.53                  |
| <b>HealthCare</b>                                       |                   |                                 |                           |               |                        |                          |                        |
|   | Dryer #1 (75 lb)  | 4,738                           | 4,176                     | 11.86%        | 562                    | \$711.30                 | 1.62                   |
|   | Dryer #2 (75 lb)  | 4,519                           | 4,222                     | 6.59%         | 298                    | \$377.10                 | 3.05                   |
| <b>Average</b>  |                   | <b>1,936</b>                    | <b>1,706</b>              | <b>12.93%</b> | <b>230</b>             | <b>\$291.66</b>          | <b>3.94</b>            |

Table 12: Oregon State Modulating Valve Savings and Payback Period

| Modulating Valve Long Term Monitoring Savings - Oregon |                   |                                 |                           |               |                        |                          |                        |
|--|-------------------|---------------------------------|---------------------------|---------------|------------------------|--------------------------|------------------------|
| MN Sites   |                   | Annual Baseline Gas Use (Therm) | Annual MV Gas Use (Therm) | % Savings     | Annual Savings (Therm) | Annual Cost Savings (\$) | Payback Period (Years) |
| <b>Laundromat</b>                                      |                   |                                 |                           |               |                        |                          |                        |
|  | Dryer#1 (30 lb)   | 1,522                           | 1,291                     | 15.19%        | 231                    | \$256.08                 | 4.49                   |
|  | Dryer #2 (30 lb)  | 688                             | 600                       | 12.76%        | 88                     | \$97.24                  | 11.83                  |
|  | Dryer #3 (45 lb)  | 1,672                           | 1,352                     | 19.16%        | 320                    | \$354.78                 | 3.24                   |
|  | Dryer #4 (45 lb)  | 604                             | 452                       | 25.08%        | 151                    | \$167.71                 | 6.86                   |
| <b>Dry Cleaner</b>                                     |                   |                                 |                           |               |                        |                          |                        |
|  | Dryer #1 (50 lb)  | 781                             | 794                       | -1.75%        | -14                    | -\$15.15                 | -75.91                 |
| <b>University</b>                                      |                   |                                 |                           |               |                        |                          |                        |
|  | Dryer #1 (75 lb)  | 486                             | 447                       | 7.97%         | 39                     | \$42.94                  | 26.78                  |
| <b>Hotel #1</b>  |                   |                                 |                           |               |                        |                          |                        |
|  | Dryer #1 (75 lb)  | 1,516                           | 1,232                     | 18.70%        | 283                    | \$313.88                 | 3.66                   |
|  | Dryer #2 (75 lb)  | 1,865                           | 1,588                     | 14.84%        | 277                    | \$306.57                 | 3.75                   |
| <b>HealthCare</b>                                      |                   |                                 |                           |               |                        |                          |                        |
|  | Dryer #1 (75 lb)  | 1,487                           | 1,252                     | 15.85%        | 236                    | \$261.03                 | 4.41                   |
|  | Dryer #2 (75 lb)  | 1,191                           | 1,037                     | 12.93%        | 154                    | \$170.62                 | 6.74                   |
| <b>Hotel #2</b>  |                   |                                 |                           |               |                        |                          |                        |
|  | Dryer #1 (120 lb) | 1,969                           | 1,918                     | 2.62%         | 52                     | \$57.17                  | 20.11                  |
|  | Dryer #2 (120 lb) | 2,990                           | 2,883                     | 3.59%         | 107                    | \$118.91                 | 9.67                   |
| <b>IL Sites</b>  |                   |                                 |                           |               |                        |                          |                        |
| <b>Laundromat</b>                                      |                   |                                 |                           |               |                        |                          |                        |
|  | Dryer#1 (30 lb)   | 1,903                           | 1,697                     | 10.80%        | 205                    | \$227.58                 | 5.05                   |
|  | Dryer #2 (30 lb)  | 1,163                           | 1,007                     | 13.36%        | 155                    | \$172.07                 | 6.68                   |
|  | Dryer #3 (45 lb)  | 2,035                           | 1,321                     | 35.09%        | 714                    | \$790.95                 | 1.45                   |
|  | Dryer #4 (45 lb)  | 1,320                           | 1,070                     | 18.90%        | 249                    | \$276.20                 | 4.16                   |
| <b>Hotel #1</b>  |                   |                                 |                           |               |                        |                          |                        |
|  | Dryer #1 (170 lb) | 4,024                           | 3,635                     | 9.68%         | 389                    | \$431.32                 | 2.67                   |
| <b>Hotel #2</b>  |                   |                                 |                           |               |                        |                          |                        |
|  | Dryer #1 (75 lb)  | 1,973                           | 1,898                     | 3.79%         | 75                     | \$82.84                  | 13.88                  |
| <b>HealthCare</b>                                      |                   |                                 |                           |               |                        |                          |                        |
|  | Dryer #1 (75 lb)  | 4,738                           | 4,176                     | 11.86%        | 562                    | \$622.28                 | 1.85                   |
|  | Dryer #2 (75 lb)  | 4,519                           | 4,222                     | 6.59%         | 298                    | \$329.90                 | 3.49                   |
| <b>Average</b>   |                   | <b>1,922</b>                    | <b>1,694</b>              | <b>12.85%</b> | <b>229</b>             | <b>\$253.25</b>          | <b>4.54</b>            |

Table 13: Washington State Modulating Valve Savings and Payback Period

| Modulating Valve Long Term Monitoring Savings - Washington |                   |                                 |                           |               |                        |                          |                        |
|--|-------------------|---------------------------------|---------------------------|---------------|------------------------|--------------------------|------------------------|
| MN Sites   |                   | Annual Baseline Gas Use (Therm) | Annual MV Gas Use (Therm) | % Savings     | Annual Savings (Therm) | Annual Cost Savings (\$) | Payback Period (Years) |
| <b>Laundromat</b>  |                   |                                 |                           |               |                        |                          |                        |
|  | Dryer#1 (30 lb)   | 1,522                           | 1,291                     | 15.19%        | 231                    | \$249.40                 | 4.61                   |
|  | Dryer #2 (30 lb)  | 688                             | 600                       | 12.76%        | 88                     | \$94.70                  | 12.14                  |
|  | Dryer #3 (45 lb)  | 1,672                           | 1,352                     | 19.16%        | 320                    | \$345.52                 | 3.33                   |
|  | Dryer #4 (45 lb)  | 604                             | 452                       | 25.08%        | 151                    | \$163.33                 | 7.04                   |
| <b>Dry Cleaner</b>   |                   |                                 |                           |               |                        |                          |                        |
|  | Dryer #1 (50 lb)  | 781                             | 794                       | -1.75%        | -14                    | -\$14.75                 | -77.95                 |
| <b>University</b>  |                   |                                 |                           |               |                        |                          |                        |
|  | Dryer #1 (75 lb)  | 485                             | 446                       | 8.00%         | 39                     | \$41.85                  | 27.48                  |
| <b>Hotel #1</b>  |                   |                                 |                           |               |                        |                          |                        |
|  | Dryer #1 (75 lb)  | 1,516                           | 1,232                     | 18.70%        | 283                    | \$305.69                 | 3.76                   |
|  | Dryer #2 (75 lb)  | 1,865                           | 1,588                     | 14.84%        | 277                    | \$298.57                 | 3.85                   |
| <b>HealthCare</b>  |                   |                                 |                           |               |                        |                          |                        |
|  | Dryer #1 (75 lb)  | 1,480                           | 1,249                     | 15.61%        | 231                    | \$249.26                 | 4.61                   |
|  | Dryer #2 (75 lb)  | 1,191                           | 1,037                     | 12.93%        | 154                    | \$166.16                 | 6.92                   |
| <b>Hotel #2</b>  |                   |                                 |                           |               |                        |                          |                        |
|  | Dryer #1 (120 lb) | 1,963                           | 1,915                     | 2.48%         | 49                     | \$52.45                  | 21.93                  |
|  | Dryer #2 (120 lb) | 2,987                           | 2,879                     | 3.62%         | 108                    | \$116.66                 | 9.86                   |
| <b>IL Sites</b>  |                   |                                 |                           |               |                        |                          |                        |
| <b>Laundromat</b>  |                   |                                 |                           |               |                        |                          |                        |
|  | Dryer#1 (30 lb)   | 1,903                           | 1,697                     | 10.80%        | 205                    | \$221.63                 | 5.19                   |
|  | Dryer #2 (30 lb)  | 1,163                           | 1,007                     | 13.36%        | 155                    | \$167.57                 | 6.86                   |
|  | Dryer #3 (45 lb)  | 2,035                           | 1,321                     | 35.09%        | 714                    | \$770.29                 | 1.49                   |
|  | Dryer #4 (45 lb)  | 1,320                           | 1,070                     | 18.90%        | 249                    | \$268.98                 | 4.28                   |
| <b>Hotel #1</b>  |                   |                                 |                           |               |                        |                          |                        |
|  | Dryer #1 (170 lb) | 4,019                           | 3,629                     | 9.71%         | 390                    | \$420.84                 | 2.73                   |
| <b>Hotel #2</b>  |                   |                                 |                           |               |                        |                          |                        |
|  | Dryer #1 (75 lb)  | 1,971                           | 1,897                     | 3.75%         | 74                     | \$79.82                  | 14.41                  |
| <b>HealthCare</b>  |                   |                                 |                           |               |                        |                          |                        |
|  | Dryer #1 (75 lb)  | 4,738                           | 4,176                     | 11.86%        | 562                    | \$606.03                 | 1.90                   |
|  | Dryer #2 (75 lb)  | 4,519                           | 4,222                     | 6.59%         | 298                    | \$321.28                 | 3.58                   |
| <b>Average</b>   |                   | <b>1,921</b>                    | <b>1,693</b>              | <b>12.83%</b> | <b>228</b>             | <b>\$246.26</b>          | <b>4.67</b>            |

## Conclusions

---

GTI Energy has previously completed a demonstration of 4 test sites (8 dryers) in the Chicago area as well as 5 sites (12 dryers) in Minnesota using the modulating dryer technology across 20 total dryers. Initial demonstrations in the Chicago area indicate average savings of 14% on natural gas used for drying. The additional Minnesota study found 12% savings on natural gas use. GTI analyzed this data across 20 dryers and two field demos to see what the savings and payback periods would look like if the results were applied to the 4 states in NEEA territory. The results showed an average annual savings of 229 therms per dryer. The average payback period across the 4 states was 4.94 years with Montana having a payback in as little as 3.94 years with higher natural gas costs and Idaho taking 6.59 years with lower natural gas costs.

If these annual savings are applied to the 4 NEEA states, they have the potential to provide large annual therm savings across the more than 50,000 commercial dryers believed to be installed in NEEA territory. The Technology at only 10% market penetration would achieve over 1 million therms of annual savings and at 40% penetration would achieve over 4.5 million therms of annual savings. Providing rebates on the technology through energy efficiency programs would reduce the annual payback times and help to increase that market penetration rate and the overall therm savings that can be achieved.

## Appendix A: Commercial Dryer Market Estimate From CBSA 4 2019

| Area                | Company                                   | 2020 RES NG Customers | Gas Dryers - Commercial (Region) | Assembly     | Grocery  | Hospital   | Lodging      | Mixed Commercial | Office    | Other     | Residential Care | Restaurant | Retail/Service | School   | Warehouse |
|---------------------|---|-----------------------|----------------------------------|--------------|----------|------------|--------------|------------------|-----------|-----------|------------------|------------|----------------|----------|-----------|
| <b>Idaho</b>        | <b>Total of All Companies (ID)</b>        | <b>428,374</b>        | <b>6,274</b>                     | <b>431</b>   | <b>0</b> | <b>21</b>  | <b>975</b>   | <b>4,261</b>     | <b>4</b>  | <b>4</b>  | <b>189</b>       | <b>0</b>   | <b>391</b>     | <b>0</b> | <b>0</b>  |
| Idaho               | 17606391ID (INTERMOUNTAIN GAS COMPANY)    | 347,807               | 5,094                            | 350          | 0        | 17         | 791          | 3,459            | 3         | 3         | 153              | 0          | 317            | 0        | 0         |
| Idaho               | 17611024ID (QUESTAR GAS COMPANY)          | 2,066                 | 30                               | 2            | 0        | 0          | 5            | 21               | 0         | 0         | 1                | 0          | 2              | 0        | 0         |
| Idaho               | 17614616ID (AVISTA UTILITIES)             | 78,501                | 1,150                            | 79           | 0        | 4          | 179          | 781              | 1         | 1         | 35               | 0          | 72             | 0        | 0         |
| <b>Montana</b>      | <b>Total of All Companies (MT)</b>        | <b>283,469</b>        | <b>4,188</b>                     | <b>287</b>   | <b>0</b> | <b>14</b>  | <b>651</b>   | <b>2,844</b>     | <b>2</b>  | <b>2</b>  | <b>126</b>       | <b>0</b>   | <b>261</b>     | <b>0</b> | <b>0</b>  |
| Montana             | 17603147MT (CUT BANK GAS CO)              | 1,257                 | 19                               | 1            | 0        | 0          | 3            | 13               | 0         | 0         | 1                | 0          | 1              | 0        | 0         |
| Montana             | 17605164MT (ENERGY WEST MONTANA INC)      | 26,721                | 395                              | 27           | 0        | 1          | 61           | 268              | 0         | 0         | 12               | 0          | 25             | 0        | 0         |
| Montana             | 17609755MT (NORTHWESTERN ENERGY)          | 176,890               | 2,613                            | 180          | 0        | 9          | 406          | 1,775            | 1         | 1         | 78               | 0          | 163            | 0        | 0         |
| Montana             | 17611861MT (SACO MUNICIPAL GAS SVC)       | 129                   | 2                                | 0            | 0        | 0          | 0            | 1                | 0         | 0         | 0                | 0          | 0              | 0        | 0         |
| Montana             | 17612243MT (SHELBY GAS ASSOCIATION)       | 1,129                 | 17                               | 1            | 0        | 0          | 3            | 11               | 0         | 0         | 1                | 0          | 1              | 0        | 0         |
| Montana             | 17627001MT (MONTANA DAKOTA UTILITIES CO)  | 76,917                | 1,136                            | 78           | 0        | 4          | 177          | 772              | 1         | 1         | 34               | 0          | 71             | 0        | 0         |
| Montana             | 17674356MT (ENERGY WEST WEST YELLOWSTONE) | 426                   | 6                                | 0            | 0        | 0          | 1            | 4                | 0         | 0         | 0                | 0          | 0              | 0        | 0         |
| <b>Oregon</b>       | <b>Total of All Companies (OR)</b>        | <b>776,811</b>        | <b>14,311</b>                    | <b>985</b>   | <b>0</b> | <b>49</b>  | <b>2,223</b> | <b>9,720</b>     | <b>8</b>  | <b>8</b>  | <b>429</b>       | <b>0</b>   | <b>890</b>     | <b>0</b> | <b>0</b>  |
| Oregon              | 17601966OR (CASCADE NAT GAS CORP)         | 67,590                | 1,245                            | 86           | 0        | 4          | 193          | 846              | 1         | 1         | 37               | 0          | 77             | 0        | 0         |
| Oregon              | 17610351OR (NORTHWEST NATURAL GAS CO)     | 616,999               | 11,367                           | 782          | 0        | 39         | 1,766        | 7,720            | 6         | 6         | 341              | 0          | 707            | 0        | 0         |
| Oregon              | 17611125OR (AVISTA UTILITIES)             | 92,222                | 1,699                            | 117          | 0        | 6          | 264          | 1,154            | 1         | 1         | 51               | 0          | 106            | 0        | 0         |
| <b>Washington</b>   | <b>Total of All Companies (WA)</b>        | <b>1,232,852</b>      | <b>25,399</b>                    | <b>1,748</b> | <b>0</b> | <b>87</b>  | <b>3,947</b> | <b>17,250</b>    | <b>14</b> | <b>13</b> | <b>762</b>       | <b>0</b>   | <b>1,581</b>   | <b>0</b> | <b>0</b>  |
| Washington          | 17602004WA (CASCADE NAT GAS CORP)         | 195,229               | 4,022                            | 277          | 0        | 14         | 625          | 2,732            | 2         | 2         | 121              | 0          | 250            | 0        | 0         |
| Washington          | 17603907WA (ELLENSBURG CITY OF)           | 3,988                 | 82                               | 6            | 0        | 0          | 13           | 56               | 0         | 0         | 2                | 0          | 5              | 0        | 0         |
| Washington          | 17603995WA (ENUMCLAW CITY OF)             | 4,552                 | 94                               | 6            | 0        | 0          | 15           | 64               | 0         | 0         | 3                | 0          | 6              | 0        | 0         |
| Washington          | 17614608WA (PUGET SOUND ENERGY)           | 791,612               | 16,309                           | 1,122        | 0        | 56         | 2,534        | 11,076           | 9         | 8         | 490              | 0          | 1,015          | 0        | 0         |
| Washington          | 17616582WA (NORTHWEST NATURAL GAS CO)     | 81,564                | 1,680                            | 116          | 0        | 6          | 261          | 1,141            | 1         | 1         | 50               | 0          | 105            | 0        | 0         |
| Washington          | 17616595WA (AVISTA UTILITIES)             | 155,907               | 3,212                            | 221          | 0        | 11         | 499          | 2,181            | 2         | 2         | 96               | 0          | 200            | 0        | 0         |
| <b>Total Region</b> |   | <b>2,721,506</b>      | <b>50,171</b>                    | <b>3,451</b> | <b>0</b> | <b>172</b> | <b>7,796</b> | <b>34,073</b>    | <b>27</b> | <b>25</b> | <b>1,506</b>     | <b>0</b>   | <b>3,121</b>   | <b>0</b> | <b>0</b>  |

---

**END OF REPORT**