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February 16, 2023

Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
P.O. Box 1088
Salem, OR 97308-1088

Re: UM 1158 Implementation of HB 3141

Dear Filing Center:

Portland General Electric Company (PGE) respectfully submits these comments in response to the Public Utility Commission of Oregon (OPUC or Commission) Staff's draft recommendations for additional definitions and targets for equity metrics for the Energy Trust of Oregon, on docket UM 1158, and in response to House Bill (HB) 3141.

PGE appreciates OPUC Staff efforts to reflect feedback gathered through a public process, the inclusion of representatives of environmental justice communities in the multi-workshop process and supports Staff's recommendation for Energy Trust of Oregon to define definitions, baselines, and targets across the four metrics. PGE also acknowledges equity metrics are inherently difficult to quantify, and therefore, both quantitative and qualitative measures can and should be considered.

Drawing on learnings from Chapter 3: Empowered Communities, within the PGE 2021 Distribution System Plan¹ filing ("Part 1 Plan"), PGE favors the identification of goals, objectives, and desired outcomes for achieving the goals. In the Part 1 Plan PGE applied the GARE Racial

¹ UM 2005 Distribution System Plan, Part1. Retrieved from:
https://assets.ctfassets.net/416ywc1laqmd/Ade5oN7SaTG7jQRTGcPzt/576380f14d90a976469968517b187f95/DSP_2021_Report_Chapter3.pdf

Equity Tool² to promote results-based accountability (RBA), an approach that emphasizes the importance of beginning with a focus on the desired “end” condition. Per HB 3141, the OPUC “shall establish, and update no less than once every four years, equity metrics for the purpose of assessing, addressing, and creating accountability for environmental justice in the expenditure and investment of funds collected pursuant to ORS 757.054 through natural gas tariffs or through public purpose charges pursuant to ORS 757.612 and paid to a nongovernmental entity.”³ In these comments, PGE will seek to connect the stated goal -- to assess, address, and create accountability for environmental justice -- with the objectives, in this case, the equity metrics provided, and the desired outcome of those metrics.

Comments

There are numerous capacity building categories, all of which are intended to build the organizational skills and resources needed to address a specific community’s identified needs. Based on an assessment of those needs PGE understands the desired outcome for all these metrics to be to increase participation of our environmental justice communities in both decision-making processes and renewable energy and energy efficiency programs. It is with this in mind that PGE provides feedback on the proposed definitions, baselines, and targets. PGE offers that the relative priority of each metric, and appropriateness of each target, therefore is dependent upon the anticipated community impact that each metric and target has on ultimately increasing participation.

Metric 1: Access to Support for Communities

PGE supports the proposed operational definition of support as financial in nature, inclusive of grant, contract, and incentive activities, provided to environmental justice non-profits to support capacity building. In addition, as supported by workshop stakeholder feedback, PGE would appreciate more granularity with respect to how much of each activity contributes to the 2022 baseline.

PGE offers that financial support be allocated based on anticipated community impact. It is unclear if a 15% increase in financial support will yield program or project-based access to capacity

² Racial Equity Toolkit: An Opportunity to Operationalize Equity; Government Alliance on Race and Equity (GARE) (September 2015). Retrieved from: https://racialequityalliance.org/wp-content/uploads/2015/10/GARE-Racial_Equity_Toolkit.pdf

³ HB 3141 (September 25, 2021). Retrieved from: <https://olis.oregonlegislature.gov/liz/2021R1/Measures/Overview/HB3141>

building or technical support. If the desired outcome of this metric is to increase participation in communities represented by these non-profits, then it is appropriate to also seek to quantify what financial support is delivered and who does it benefit directly.

PGE supports environmental justice non-profit capacity building as these organizations require more resources to engage with the communities they represent. This engagement should build trust and foster awareness of the Oregon energy ecosystem and ultimately yield an increase in participation if the renewable energy and energy efficiency program offerings are deemed relevant to our communities. Given community engagement is upstream it should be prioritized relative to other metrics, however, the appropriateness of the proposed target should consider the impact of the activities supported by the funding.

Metric 2: Access to Information

PGE supports targeted outreach to environmental justice communities, however, it is unclear how increasing the number of contracted community members differs from providing financial support to environmental justice non-profits. Conceivably both pathways fund workshops and direct engagement to build trust and foster awareness of the Oregon energy ecosystem, processes, and programs. If the desired outcome is to increase participation in relevant renewable energy and energy efficiency program offerings it seems prudent to determine which pathway yields the greatest community impact.

It is unclear if a 35% increase in the number of community ambassadors and Energy Trust staff will generate more participation in renewable energy and energy efficiency programs. Expanding reach, though laudable, may benefit from an articulation of what and where information is delivered and who does it benefit directly. For example, PGE does not yet have a solid understanding of which customers are internet or wifi enabled. It is unclear how increasing the number of community ambassadors will address this barrier to participation.

Given internet connectivity, education and awareness are prerequisites to participation, this metric should be prioritized however, the appropriateness of the proposed target should consider the impact of metric #1 activities and align on a common outcome. In addition, operational efficiencies may be reached by collaborating with utility partner community engagement staff in a manner as to complement, not duplicate, efforts especially as it pertains to the House Bill (HB 2021) Community Benefit and Impact Advisory Group (CBIAG).⁴

⁴ HB 2021. (September 25, 2021) Retrieved from:
<https://olis.oregonlegislature.gov/liz/2021R1/Measures/Overview/HB2021>

Metric 3: Energy Burden Reduction

PGE supports the proposed operational definition of expanded low-cost and no-cost offers as our intent should not be to increase cost or debt burden on already energy burdened customers. PGE also acknowledges, and desires to better understand the economic ramifications of, provisioning low-cost and no-cost offers on the Energy Trust portfolio if these programs are not deemed cost-effective.

PGE is interested to baseline participation in the available Energy Trust offers to inform a target that is based not on number of offers but rather number of customers enrolled in low-cost and no-cost programs. PGE supports more specific participation-based baselining to inform 2023 targets, similar to the proposed 2022 baseline activity for Strategic Energy Management for affordable multifamily housing providers which specifies “3 housing organizations served across 12 sites with approximately 1000 tenants.” In addition, if the metric seeks to reduce energy burden it benefits from defining and baselining the number of energy burdened customers so that activities may demonstrate a reduction in that population. Conceivably, an increase in program participation will yield a decrease in consumption and a commensurate decrease in utility bill.

As stated in comments on docket UM 2211, PGE supports Staff’s recommendation for Energy Trust of Oregon to “work with utilities to identify and target customers that have difficulty paying their bills with tailored energy saving opportunities.” Such opportunities include bundling with thermostats, peak time rebates and community solar, all of which fall under the operational definition provided. PGE looks forward to exploring the creation of additional low-cost and no-cost programs for residential and multi-family customers with Energy Trust within its 2024 utility-specific action planning process, the result of HB 3141.

Metric 4: Community Resilience

PGE supports the desire to study, scope or build projects that provide services for low-to-moderate income customers during outage, however, it is unclear if engaging 5 community-based organizations is the appropriate target for doing so or how this engagement may differ from that contemplated in metrics #1 and 2. If this metric's desired outcome is to increase participation, it is appropriate to baseline solar plus battery pairings to inform a participation-based target and/or quantify what is delivered and who does it benefit directly.

PGE looks forward to sharing its battery pilot learnings to inform a solar plus battery offering and sees value in aligning the operational definition of community resilience with that discussed in the context of HB 2021 (UM 2225) community benefit indicators.

Given there is currently no distribution system connected technology (DSCT) program, inclusive of battery storage and inverters, this metric would benefit from further development in 2023 and therefore the appropriateness of the target appears unclear. Funding put toward research into community resiliency hubs, as contemplated in HB 2021 (UM 2225), may serve as a tangible next step.

Conclusion

PGE appreciates Staff's draft recommendations for additional definitions and targets for equity metrics for the Energy Trust of Oregon. PGE offers that the relative priority of each metric, and appropriateness of each target, therefore is dependent upon the anticipated community impact that each metric and target has on increasing participation.

Sincerely,

/s/ Jason Salmi Klotz

Jason Salmi Klotz
Manager, Regulatory Strategy and Engagement

