

March 1, 2024

***VIA ELECTRONIC FILING***

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High Street SE, Suite 100  
Salem, OR 97301-3398

**Re: UM 1158—PacifiCorp’s Comments on Staff’s Draft Recommendations for Changes to Established Equity Metric for the Energy Trust of Oregon**

PacifiCorp (Pacific Power or the Company) respectfully submits these comments in response to the Public Utility Commission of Oregon (Commission) Staff’s draft recommendations for changes to established equity metrics for the Energy Trust of Oregon (Energy Trust), on docket UM 1158, and in response to House Bills (HB) 3141 and 2021. Pacific Power appreciates the dedication to fostering sustainable energy practices and its proactive approach to setting meaningful performance measures for the Energy Trust.

Pacific Power continues to navigate the intricacies of energy policy and implementation, the evolution brought by Oregon House Bills 3141 and 2021 over the past two years, has been particularly noteworthy. In response to these shifts, and as changes continue to unfold, the Company is supportive of continual reconsideration of performance metrics with Energy Trust.

Pacific Power’s ongoing initiatives to develop Community-Based Indicator (CBIs) metrics, with extensive stakeholder involvement, highlight the necessity of a cohesive strategy that evolves over time. These CBIs, while still in development in coordination with the Company’s Community Benefits Input and Advisory Group, are important for gauging community needs and it is important to ensure that metrics that overlap with Energy Trust work are coordinated. Active collaboration with Energy Trust in delivering these CBIs for energy efficiency and distributed generation is ongoing and vital. The current draft performance measures, however, lacks an acknowledgement of CBIs and a preliminary plan for integrating these efforts.

Furthermore, Pacific Power seeks to further enhance transparency and accountability in how Energy Trust resources are allocated and reported, particularly across the more rural and traditionally hard to reach communities. The Company hopes to increasingly align metrics to the following questions:

- How can we collectively track that funding, resources, and activities are effectively allocated and reported across all areas of the service territory?
- What steps can be taken to develop performance metrics that not only reflect these efforts but also highlight an allocation of Energy Trust investment and efforts that is proportional with utility funding?

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Pacific Power believes that addressing these questions, over time, and increasingly building metrics in this regard will foster a deeper understanding and acknowledgment of the unique challenges and opportunities present across the state, ultimately leading to more tailored and impactful solutions.

Pacific Power's goal is to engage in constructive dialogue, bridging any gaps and aligning our collective efforts towards innovative and effective energy solutions. Pacific Power is eager to work closely with the Commission and Energy Trust to periodically refine these measures, ensuring they accurately reflect our mutual vision for an energy-efficient and equitable future.

The Company is ready to participate in further discussions to address any concerns and advance its shared objectives.

Warmest regards,

A handwritten signature in black ink, appearing to read "Kari Greer".

Kari Greer  
Sr. Community Relations Manager