

Oregon Citizens' Utility Board

610 SW Broadway, Suite 400
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March 18, 2024

Public Utility Commission
Attn: Public Comment
P.O. Box 1088
Salem, OR 97308-1088
puc.publicmeetings@puc.oregon.gov

RE: UM 1158 - Staff's 2024 Draft Proposed Performance Measures for Energy Trust of Oregon

Dear Chair Decker, Commissioner Tawney and Commissioner Perkins,

CUB would like to thank Staff and ETO for taking the time to discuss the proposed 2024 Energy Trust of Oregon Performance Measures with us, and for the opportunity to provide feedback. We would additionally like to thank them for their engagement with our feedback through their thoughtful responses and attention, particularly toward the Equity Metrics and their accompanying performance measures.

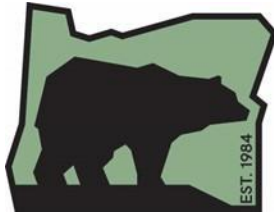
Overall, we were really interested in better understanding how previous years' *processes* were informing future year performance measures and plans. We understand that a lot of our feedback in this realm was considered to be beyond the scope of minimum performance thresholds. However, we really appreciate that Staff recognized much of this feedback suggested there is a lack of awareness of, and opportunities for, transparency regarding how ETO's performance is reviewed and how this informs program improvements. We find Staff's proposal to include a public comment period after April's 2023 annual report review very reasonable. We see this as a sensible path forward toward addressing stakeholder's ability to influence ETO planning and programming, and to touch on the incongruence of timing for reviewing and approving current year performance measures before reviewing the prior year's annual performance.

Additionally, we appreciate Staff's advice to ETO regarding engaging their advisory councils and stakeholders on what information should be included in ETO's annual report. CUB believes this could be a tenable way to address process considerations related to ETO's equity work.

Moreover, CUB is glad to see Staff support the need to understand how renters are served by ETO programs, and are pleased with the incorporation of renter/owner status in demographic data when available for Metric 1 and Metric 3.

We also appreciate feedback from the various utilities asking Staff to include reporting by utility service territory. CUB supports Staff's proposal to include this reporting for Equity Metric 1 and Metric 3.

CUB appreciates Staff's attention to the matter of expanding ETO staff for outreach, and the necessity to better understand the impacts this expanded outreach is having. We support Staff's proposal for ETO to



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provide examples in narrative form around how their outreach efforts result in savings for customers and look forward both to this and to the reporting on measurable results in 2025. Access to information is a crucial equity metric and having a more concrete understanding of what this looks like materially, we believe, is really important in the matter of equity as it greatly informs success within the other three Equity Metrics.

We look forward to continuing engagement in this process with Staff and ETO and again, really appreciate Staff's thoughtfulness in suggesting onramps to address our concerns, even when they were technically outside the scope of minimum performance thresholds. We hope that deeper and ongoing engagement with ETO and Staff will help ensure there are process considerations in the equity aspects of this work, and that they inform future planning and programming.

Thank you for your time and consideration,

Sarah Wochele, she/her

Policy Associate