



Oregon Citizens' Utility Board

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Public Utility Commission
Attn: Filing Center
P.O. Box 1088
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RE: UM 1158 - CUB Comments on Staff's Draft Recommendations

The Oregon Citizens' Utility Board (CUB) appreciates the efforts of the Oregon Public Utility Commission (PUC) Staff to clarify definitions and set targets for ETO's 2023 equity metrics, and appreciates the opportunity to comment.

CUB believes PUC Staff's inaugural ETO equity metrics and targets will assist ETO in providing energy assistance to environmental justice communities. CUB expects that Metrics 1 & 2, Access to Support and Access to Information, are critical to the launch of this equity focus (and to successfully meeting Metrics 3 & 4, Energy Burden Reduction and Community Resilience). Increasing support to and engagement from communities will build trust and allow for better opportunities to reach households and offer opportunities to gather community-based data to inform efforts to reduce energy burden and bolster community resilience. Including the community perspective in the rollout of these targets will help ensure that funding being invested in these communities are making the largest community impact. CUB encourages Staff and ETO to continue to utilize the knowledge and resources of environmental justice and other community-based stakeholders that have already weighed in during this process. They have the experience and the on-the-ground resources to assist ETO and Staff to connect with members of environmental justice communities and enhance delivery of energy assistance services.

In the future, it may be helpful to develop additional metrics and targets to enhance delivery of ETO services. At the same time, it is important to recognize that this is a new process and this first year can provide a baseline to understanding best practices for targeting energy assistance in environmental justice communities. There may be insight as early as mid-year 2023 when Staff has indicated it plans to meet with ETO to review these goals. During 2023 and 2024, it may be useful for Staff to provide quarterly workshops, or something similar, to provide opportunity for feedback in this implementation process, as part of or in addition to the annual review of these equity metrics. This also provides opportunities for Staff to bring in additional environmental justice representation to enhance the process with additional perspectives.

Regarding Metric 1: Access to Support, Staff proposes a 15% increase in funding to nonprofits serving environmental justice communities. Funding is a critical component of supporting partner organizations delivering energy efficiency programs, and existing funding in Oregon has yet to be sufficient to meet the need for services. Increasing funding to nonprofit partners is a reasonable target. Stakeholders expressed interest in having a better understanding of how

exactly funds are being spent in these communities and in which communities. CUB sees this as a reasonable future target to consider in analyzing best practices to meaningfully reduce energy burden. Some stakeholders also indicated interest in tracking non-funding support in this metric, specifically mentioning capacity-building. This type of target may be worthy of further discussion and consideration.

Regarding Metric 2: Access to Information, Staff suggests increased funding for targeted outreach to environmental justice communities and proposes tracking direct outreach by the number of ETO staff, its contractors, and community ambassadors. Stakeholders also have expressed wanting to improve awareness and education to increase access to energy assistance and information, and participation in workshops, and educational opportunities. The increase in ETO staff, contractors, and ambassadors is a reasonable target to address this inaugural metric.

CUB supports stakeholder requests that ambassadors are broadly representative of the environmental justice communities in ETO's service territory and the inclusion of community members not representative of a community based organization, and expects that ETO will as well. CUB also encourages ETO accept stakeholders' offers to assist in these outreach and service delivery efforts in new and existing environmental justice communities.

With Metric 3: Energy Burden Reduction, Staff proposes a 25% increase in total assistance measures to address the barrier of accessing energy efficiency opportunities due to lack of capital. CUB appreciates this increase in funding for services, as well as the "low-cost" support. CUB encourages ETO and its partner organizations to take a close look at all funding sources available to customers and build on connection and collaboration with other programs and government agencies. There are new funding opportunities emerging that, if bundled together, could significantly address the barrier of lack of capital by turning low-cost into no cost or "almost no cost" offers, particularly the Inflation Reduction Act (IRA). CUB encourages Staff to consider a higher offer of 12-15 given the potential for more dollars to access energy burden reduction measures when IRA resources are bundled with existing program, state, and federal resources.

As Staff, ETO, and stakeholders analyze the results of these inaugural equity metrics, CUB suggests that we all consider if Metric 3's target is approaching the price barrier in the right way. The PUC and stakeholders are considering how to measure and reduce energy burden in the UM 2211 investigation. While the low-income bill discount programs that came out of that docket appear to have provided much-needed immediate relief to low-income customers, CUB believes energy efficiency has a significant role in reducing energy burden. There is opportunity to utilize data and information from UM 2211 to consider alternatives and additional energy burden reduction opportunities. For example, this metric could include a target that tracks energy burden levels in dollars or kilowatt-hours and therms.

Metric 4: Community Resilience seeks to address the barrier of limited resources and increased costs for projects to increase community energy resilience by supporting solar and solar-with-storage system projects. First and foremost, CUB encourages ETO, as part of its Metric 4 work, to engage with the individual environmental justice communities it is serving and learn the specific resiliency needs of each. CUB notes that solar and solar-with-storage projects are not

economical for all ratepayers and offers that these projects be focused on maximizing benefits for low-income communities as a whole. This may be best realized if projects are developed in community spaces or multifamily housing for low-income residents, or other low-income service providers. Accordingly, it may be worthwhile to consider changing the term “residents” to “communities” in this metric.

CUB appreciates that Staff came back with definitions to enhance Metric 4. Staff and/or ETO may want to consider existing resources that could help identify areas with limited infrastructure. For example, electric utilities have determined and mapped High Fire Risk Zones as part of their risk-based wildfire protection plans. ETO may be able to use these as a resource in identifying and prioritizing areas of limited infrastructure, as well as an indicator of social vulnerability.

Other potential data sources

CUB encourages Staff to consider existing resources available to provide information related to understanding energy burden, including in PUC dockets, from other state agencies, and utilities. National data sets show disparities by race and ethnicity that can benefit equity metric analysis. Zip Code data can help identify and target underserved environmental justice communities.

Again, CUB appreciates the work PUC Staff, ETO, utilities, and other stakeholders have put into developing these equity metrics, as well as Staff’s efforts to further define metrics and develop targets. These equity metrics will lay a useful foundation for ETO as they drive their equity work. CUB reiterates our hope that as ETO focuses services to more environmental justice communities, they take advantage of the assistance offered by environmental justice stakeholders and the opportunities to learn directly from environmental justice communities about their unique needs. We look forward to seeing these metrics implemented and grow as more is learned about how to mitigate disproportionate energy burden in Oregon’s environmental justice communities.

Respectfully Submitted,

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