



## Native American Youth and Family Center

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September 11, 2014

Oregon Public Utility Commission  
3930 Fairview Industrial Dr SE  
Salem, OR 97302-1166

RE: Second Round Comments –UM1622 Gas Cost Effectiveness Measures

Portland, OR is home to the 9th largest urban Indian population in the United States with more than 40,000 American Indian, Alaska Native, and First Nations peoples. NAYA is an urban Indian center organized forty (40) years ago to address the needs of the Portland Metropolitan area Native American/Alaska Native community members, <http://nayapdx.org>. NAYA is a culturally specific Native/Indigenous service provider that provides services to anyone who enters the doors. NAYA also serves community members representing underserved communities of color and works with low income under-represented community members from throughout Portland, but specifically from the Cully neighborhood. Cully is Portland's most diverse and largest neighborhood and is characterized by concentrated poverty, racial segregation, and poor environmental quality. NAYA is very concerned with economic insecurity issues, and opportunities that lend themselves to avenues to achieve greater measure of economic prosperity and improved livability. NAYA offers the following preliminary comments on the issues associated with UM 1622 in advance of the September 30th public meeting.

NAYA is concerned that the OPUC bases their ongoing investments in energy efficiency with little to no workforce or wage standards. These standards include skills certification, contractor selection criteria, and compensation standards. They are common in other industries, including healthcare, architecture, engineering, and other construction fields and are effective in establishing a high bar for performance in a particular field. An California PUC commissioned study (May 2014) on Workforce Issues and Energy Efficiency lends support to the premise marrying the goals of achieving energy savings and addressing workforce issues to secure involvement of workers from disadvantaged communities in rewarding careers in EE. By establishing and enforcing criteria for contractor and worker eligibility in incentive programs, high road standards lead to quality work, increasing energy savings and more effectively utilizing ratepayer subsidies.

The energy efficiency industry, utility ratepayers, and Oregon communities could benefit from more rigorous training, wage, and utilization standards for activities where ratepayer funds are invested rather than a race to the bottom. It is important to consider all of this in the "cost effectiveness" discussion.

Thank you for this opportunity and for advancing this important discussion in the State of Oregon. NAYA offers these comments with the hope that this discussion will evolve toward an approach that best serves the interests of the ratepayer, which include low income communities and communities of color. We look forward to participating in the future discourse.

Sincerely,

Key España Deputy Director  
Native American Youth and Family Center