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**RE: UM 1696 – Energy Trust of Oregon Cost Effectiveness Exception Request for Electric Measures**

Dear PUC Commissioners and Staff,

Community Energy Project (CEP) submits the following comments regarding Energy Trust of Oregon Cost Effectiveness Exception Request for Electric Measures under Docket No. UM 1696. CEP serves over 1,200 households per year that are low income, BIPOC, seniors, people with disabilities, and immigrants with the belief that everyone deserves a safe, healthy, and efficient home regardless of income. Our programming has helped thousands of Oregonian households live more comfortably and safely, use less energy, save money, and better understand their home. We do this by providing direct services such as weatherization, energy efficiency upgrades and critical home repairs, as well as educational workshops.

CEP supports PUC staff recommendations to grant an exception to its cost-effectiveness tests for specific use-cases: for residential and multifamily utility customers with low-incomes and for those heating with supplemental heat (e.g. home heating oil and wood). This would allow ETO to work with CEP and other community-based organizations (CBOs) and community action agencies (CAAs) to deliver a no-cost ductless heat pump offer to low- and moderate-income customers. This exception would (1) significantly improve energy efficiency performance leading to higher Home Energy Scores (HES), (2) have a positive impact on the comfort and liveability of households, and (3) help us address some of the climate injustices that impact the frontline communities we serve.

HES modeling data shows that just adding a single head heat pump as supplemental heat for existing baseboard, oil or wood heated homes has a positive impact on the comfort of the house and significantly improves the final HES score. Furthermore, ductless heat pumps use 30-40% less energy than induction heating systems, saving our clients money on their electricity bill every year. With Energy Trust's funding, CEP has been able to install 117 heat pump water heaters since 2018, saving our clients an average of \$165 per household per year.<sup>1</sup> If this exception is granted by the Commission, Energy Trust will be able to provide significantly increased incentives to our customers potentially reducing customer installation costs to zero.

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<sup>1</sup> Note that these are conservative numbers from Energy Trust's calculations--the Energy Guide label predicts closer to double these savings.

Lastly, the impacts of the climate crisis is already here: in the past year alone, our region has experienced record-breaking heat-waves and cold snaps. Our clients urgently need access to ductless heat pumps in these extreme weather conditions to survive. Furthermore, energy efficiency leads to additional environmental benefits including cleaner air and less induced demand on finite resources such as fuel and water extraction from natural lands. Simply put, homes are more resilient and less of a burden on the environment when they use less energy.

In conclusion, we urge the PUC to approve staff recommendations to grant ETO an exception to its cost-effectiveness tests for specific use-cases to allow for increased incentives for ductless heat pumps.

Sincerely,

Alma Pinto, Climate Justice Associate  
Charity Fain, Executive Director  
Community Energy Project