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STATE REPRESENTATIVE
DISTRICT 5
SOUTHERN JACKSON COUNTY



HOUSE OF REPRESENTATIVES

January 10, 2022

Oregon Public Utilities Commission
puc.publiccomments@puc.oregon.gov

Re: UM 1696; Order 21-490 - *Public comment for ETO's request of OPUC to grant an exception to cost-effectiveness tests for specific use cases*

Dear OPUC Board Members,

This correspondence is to convey my strong support of Energy Trust of Oregon's request for Oregon Public Utility Commission to grant an exception to its cost-effectiveness tests for specific use cases, including residential and multifamily utility customers with low-incomes, and for those heating with supplemental heat (such as home heating oil and wood).

Oregonians utilizing inefficient radiant heating, who are impacted by poor air quality due to woodsmoke particulates and/or who need cooling technology during unhealthy heat events will benefit from this exception. This bill is a tremendous complement to LC 144 that my committee will be shepherding during the 2022 legislative session.

While Energy Trust currently offers some incentives for ductless heat pumps, if this exception is granted, it will provide significantly increased incentives for low income customers who have been underserved, and potentially reduce customer installation costs to zero. The Governor's Executive Order 20-04 and HB 2475 provide the commission direction and authority to act to take this action.

Benefits of this exception will contribute to the health and wellbeing of Oregonians, improve energy efficiencies, and reduce pollution.

Additional outcomes of this approval are: 1) ETO will gain program design and implementation experience delivering a no-cost ductless heat pump offer to low- and moderate-income customers working with community action agencies (CAAs) and community-based organizations (CBOs); 2) ETO will have the opportunity to develop a working definition to screen customers for the offer that can be implemented in practice and is not onerous or a barrier for customers to participate; and 3) it will foster the collection of feedback on customer experience and data on housing conditions from participating homes to better understand who the pilot serves well, existing conditions of participating homes and barriers to accessing benefits of DHPs.

Thank you for your thoughtful consideration. I strongly encourage your approval.

Best regards,

Pam Marsh

Pam Marsh
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Southern Jackson County