

March 7, 2024

**VIA ELECTRONIC FILING**

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High Street SE, Suite 100  
P.O. Box 1088  
Salem, OR 97308-1088

**Re: UM 2211 – NW Natural Comments on Phase 2 Process Proposal**

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), provides the following comments and responses to the survey questions posed in Attachment A of the Public Utility Commission of Oregon Staff's announcement issued February 13, 2024.

NW Natural responds to the Attachment A survey questions as follows:

**Equity Landscape**

1. What do you see are the most important or urgent equity issues in the provision of energy to utility customers?

NW Natural response

Addressing the need to more equitably serve customers requires examining the needed or desired energy outcomes the Commission wants to achieve. Developing the action items to implement these desired outcomes is an important task for the utilities, Commission Staff, and our stakeholders to solve together. NW Natural finds that balancing the desired outcomes with their related cost and the cost impact to others is an ongoing challenge that requires thoughtful solutions and transparent customer communication for both those benefitting from these outcomes and those shouldering the cost of providing those benefits.

Energy insecurity can be an early indicator of housing insecurity and potential homelessness. People struggling to pay energy bills and keep the lights on are also likely to be struggling to pay the rent or their mortgage. Families tend to triage when in crisis and respond to the biggest fire first.

Income, energy prices and housing quality contribute to fuel poverty and exacerbate housing instability, poor health outcomes and economic mobility. It is a destabilizing force for vulnerable households who are more likely to live in older buildings with poor heating and insulation standards—and face disproportionately high energy costs than higher income families.

It is important to identify those customers facing energy insecurity to design programs to mitigate these risks and target outreach efforts. Having this data enables NW natural to develop new programs and/or enhance existing programs that our customers want. NW Natural completed its

first Energy Burden Assessment at the end of 2022 and is in the process of starting a 2024 Energy Burden Assessment to be completed later this year.

2. Which communities are most impacted?

NW Natural response

NW Natural estimates the communities most impacted are those who historically have not (and still may not have) had a full seat/ voice in the planning environment, which may include low-income and moderate-income households, people of color, rural residents, and seniors. This includes the list indicated in our response to question 4 below. We note the difficulty in providing a response to this question as communities can be defined by geography, identity, cause, or intersections of variables, which may also change based on season or year. The Company looks forward to hearing more about impacted communities from others in the UM 2211 process.

3. What are the most important or urgent actions to improve equity outcomes?

NW Natural response

Improving equity outcomes should start with identifying gaps in knowledge or data and in the reach of existing programs. Staff's proposed data work stream outlined in the Phase 2 Process Proposal outlining a data landscape analysis and development of an ongoing data framework should include an evaluation of existing utility programs and the identification of any gaps. Additionally, a fundamental component of the energy equity work in this docket is that of energy burden – a component that is widely understood but has not been definitively quantified for the customers of Oregon's investor-owned utilities. Formulating a quantifiable view of Oregon residential energy burden that is accessible to the Commission, the utilities, and all stakeholders is needed in the UM 2211 process.

Additional actions that may improve energy outcomes include further emphasis on the procedural awareness and inclusion of policy discussions that will impact priority communities, expanding access for these priority communities in these policy discussions by increasing the availability and understandability of information, and providing additional explanation of Commission processes and expectations. These actions enable access for more voices to comfortably participate in the development of solutions for improved equity outcomes.

**Utility Programs**

3. What are the highest-impact and/or most urgent equity issues to address in utility programs and services? Responses can include gaps in existing programs and opportunities to develop new programs.

NW Natural response

Continued improvement and innovation in customer outreach and nurturing customer awareness of current programs would have the highest impact and thus presents the most urgent action item to address. NW Natural notes this outreach to expand customer awareness is ideally addressed when all involved in the UM 2211 process – utilities, Staff, and stakeholders work together to collaborate and coordinate outreach. This was exemplified during Phase 1 of this docket where utilities began to include information about other utilities' programs in their program brochures.

NW Natural is also interested in finding solutions to address the equity issues of moderate-income customers – those customers who make ends meet and do not qualify for existing low-income program – these customers may be further impacted by costs to implement UM 2211 Phase 2 programs even while they are on the verge of being energy burdened.

4. Are there specific geographic areas or distinct populations that should be prioritized?

NW Natural response

Please refer to our response in question 2 above. Priority communities can include low-income households, people of color, rural residents and seniors, low- and moderate-income renters, homes with inefficient appliances, and homes and residents in areas expected to be disproportionately impacted due to climate events.

5. How can the PUC measure progress in addressing equity issues in utility programs and services? Please feel free to suggest specific metrics.

NW Natural response

NW Natural is supportive of examining how to measure meaningful progress toward equity goals through the development of equity metrics with an emphasis on the importance of access to, and transparency of, information. This examination should be guided by procedural justice principles.

6. Staff plans to organize informational sessions on the landscape of programmatic offerings for utility customers. Please provide any priority information within these topics, any additional topics for the series, and suggestions for expert presenters:

NW Natural response

The comparative analysis of equitable rate designs and rate mitigation programs should include a comparison of costs and bill impacts to all customers, as well as a comparison to existing programs and designs. NW Natural also suggests adding an information session on the topic of procedural equity in the energy sector to provide continuing information and focus on the need to include new voices to these policy discussions and enable access for more points of view to be heard.

**Differential Rates**

7. What degree of consistency is expected across the utilities? For example, do we need to develop a standard rate design for all utilities or are there only certain elements that need to be standardized?

NW Natural response

Rates should be designed in a way that best suit the needs of the customers of each specific utility, taking into consideration the complexity of implementation. Focusing on the intended results, instead of specific elements, will foster efficient solutions that can be more easily understood by customers and implemented by utilities. Establishing the targeted outcomes for differential rates through guidelines or defined principles or outcomes would be more useful than defining a specific design or elements of design.

In addition, to the extent that addressing energy burden is a goal of differential rates, a sustainable and systemic framework needs to be established so that the Commission, utilities and all our stakeholders have a consistent understanding of the underlying data for the energy burden experienced by Oregonians in each utility's service territory. As mentioned above, establishing an accepted view of Oregon residential customers' energy burden (e.g. through a statewide study or guidance to use resources such as the United States Department of Energy's LEAD Tool) accessible to the Commission, the utilities, and all stakeholders is needed as a prerequisite step in the UM 2211 process. Once energy burdens are understood, the utilities can work with Staff and stakeholders to design rates that best meet the needs of their customers.

8. Are there customer characteristics that should be prioritized for consideration at this phase (e.g. income, energy burden, disconnections and other economic, social equity or environmental justice factors that affect affordability)?
  - a. What data sources can be used to support priority population identification?
  - b. What considerations should be made relative to data privacy and equitable data practices?

#### NW Natural response

NW Natural hopes to learn more about identifying priority communities through its 2024 Energy Burden Assessment, Staff's data landscape analysis, and any other source that helps to identify customer characteristics that should be prioritized. At the same time, we are cognizant of customer aversion and fear of providing sensitive data to utilities or state agencies, which impacts the ability to identify and implement solutions for priority communities. We look forward to addressing this issue in this UM 2211 process.

NW Natural notes that we do not collect or store customer characteristic data that is not required for utility service and that data privacy requirements for the information that the Company does collect continues to increase, which emphasizes the need for a centralized, sustainable framework for data in this UM 2211 work. For example, Senate Bill 619, which was enacted last year and becomes operative on July 1, 2024, imposes significant requirements on Oregon businesses that control or process the personal data of 100,000 or more customers, including utilities.<sup>1</sup> In addition, data privacy protection is costly, making it even more important to define a durable and sustainable data framework that is accessible for utilities, Staff and stakeholders.

9. Are there rate structures that should be prioritized for consideration in this phase of implementation? Why or why not? For example: creating separate rate class, percentage rate discounts, percentage of income plans, kWh allotments, restructured or eliminated basic charge, other or combination (an external resource with information on a few of these ratemaking tools can be found here: [https://www.iepec.org/conf-docs/papers/2007PapersTOC/papers/79\\_1081\\_ab\\_596.pdf](https://www.iepec.org/conf-docs/papers/2007PapersTOC/papers/79_1081_ab_596.pdf))
  - a. What criteria should be used to evaluate the pros and cons of different ratemaking approaches?

#### NW Natural response

Focusing on the intended results of desired differential rates (e.g. reduced energy burden and/or improved energy affordability) instead of specific designs (e.g. requiring x number of separate rate classes) will enable solutions to be streamlined and promote ease of implementation and understandability for customers. Once guiding principles or desired outcomes are established, different ratemaking approaches can be developed and evaluated based on achieving those outcomes in an efficient and effective manner. Solutions and proposals should keep those desired outcomes as its objective, without presupposing what the vehicle for those outcomes should be. Changes and updates to existing programs may well achieve those objectives and could be implemented more efficiently than creating new programs or ratemaking approaches.

10. How should the costs of differential rates be recovered?
  - a. What are the most important considerations in the way that the costs are spread across different customers?
  - b. Are there cost recovery practices that will help utilities offer more equitable rates in a cost-efficient manner?

---

<sup>1</sup> [SB0619 \(oregonlegislature.gov\)](https://www.oregonlegislature.gov)

### NW Natural response

Utilities should be allowed to recover the cost of serving all customers. To determine the allocation of costs of differential rates among customers, we will need to understand the magnitude of these costs and the potential impacts it could have on the customers that will shoulder them. It should be noted that a deliberate redistribution of costs inconsistent with cost causation principles as a departure from traditional ratemaking will also require additional transparency and communication with our customers in the interest of procedural equity considerations. Through the UM 2211 process, NW Natural also hopes to learn more about other non-traditional ratemaking approaches that may be working in other parts of the country or the world.

11. How can the PUC measure progress in addressing energy burden through differential rates?

### NW Natural response

In addition to our response in question 6 above, NW Natural posits the following categories of metrics that may be useful for the Commission to track in assessing progress in addressing energy burden through differential rates:

- Program take-up rate: Does enrollment data suggest that most/many of eligible customers are participating in the program?
- Energy Cost Savings: Are program enrollees seeing lower bills?
- Energy Burden Change: Is the program having enough of an impact on energy bills to meaningfully reduce household energy burden? Are eligible customers participating in available programs across both their gas and electric utilities?

### **Other Suggestions**

12. Do you feel you and/or your organization have sufficient capacity to engage in the proposed process?

### NW Natural response

Caring and service ethic are two of NW Natural's core values and fit squarely with addressing energy equity and energy burden as Staff has outlined in the Phase 2 Proposed Process. We also look forward to learning and hearing about best practices for staffing and resourcing these efforts.

13. Do you have any additional input for the next phase of HB 2475 implementation?

### NW Natural response

In the interest of procedural justice, it may be reasonable to perform additional outreach to ensure additional voices are heard. The UM 2211 proceeding has been open since late 2021 and advocacy groups and organizations have evolved, changed and emerged since that time. New participants may benefit from office hours or other ways to make the information in the Phase 2 Proposed Process document more accessible and digestible, as would translation into other languages, and providing definitions within the document in addition to or instead of providing links to other documents. Community Vision, one of our partners from our Community Equity & Advisory Group has shared a resource guide for accessible presentations that we have found helpful not only for our own presentations but also for our documents and summaries shared with our external stakeholders and partners. This guide is included as an attachment to these comments, with permission from Community Vision and encouragement for broad distribution.

Public Utility Commission of Oregon  
UM 2211; NW Natural Comments  
March 7, 2024; Page 6

NW Natural appreciates the opportunity to provide these comments and looks forward to actively participating in this docket. Please contact me, with a copy to the following, with any questions on this filing.

Amy Schulties  
Regulatory Affairs Consultant  
NW Natural  
250 SW Taylor Street  
Portland, OR 97204  
(503) 610-7546  
amy.schulties@nwnnatural.com

eFiling  
NW Natural  
250 SW Taylor Street  
Portland, Oregon 97204  
Fax: (503) 220-2579  
Telephone: (503) 610-7330  
eFiling@nwnnatural.com

Respectfully submitted,

*/s/ Natasha Siores*

Natasha Siores  
Senior Manager, Regulatory Affairs  
NW Natural  
250 SW Taylor Street  
Portland, OR 97204  
(503) 610-7074  
natasha.siores@nwnnatural.com

Attachment



## Community Vision Guide for Accessible Presentations - 2023

<b>Layout</b>	<ul style="list-style-type: none"> <li>● Consider using the layouts provided by Powerpoint, Google Slides, or similar platforms since these are already in order for screen readers.</li> <li>● All slides should have unique titles. Every slide should have a true “Title” text box. Note: If the title does not need to be visible in the slide, change the font color to match the background so the title is not visible.</li> <li>● In older versions of PowerPoint, text boxes that are added to slide templates will not be recognized or read by screen readers.</li> <li>● To check if every slide has a title in Powerpoint: In the View tab, select “Outline View”. A panel will appear on the left that shows the slide titles in bold next to the slide number. If you don’t see bold text for a slide, then it is missing a title. Click next to the slide number and type your title.</li> <li>● Reading order of slide elements: Make sure screen readers read the slide elements in order. Elements are always read from back to front. Check the order of your slide elements in <a href="#">Powerpoint</a> or <a href="#">Google Slides</a>.</li> </ul>
<b>Formatting</b>	<ul style="list-style-type: none"> <li>● Use a similar formatting style throughout the presentation.</li> <li>● For blocks of text over one sentence, limit characters to 80.</li> <li>● Use enough empty space to clearly define lines and paragraphs.</li> <li>● Avoid blank lines (“return” key) between paragraphs. For screen readers, each blank line is announced as “blank.” Instead, create a new text box or adjust the line spacing.</li> <li>● Use empty spacing between text, images, etc.</li> <li>● Use left align and avoid justifying text.</li> <li>● Avoid using motion or animations in slides.</li> </ul>
<b>Font</b>	<ul style="list-style-type: none"> <li>● Use large text: 18pt minimum; 24pt whenever possible so it can be read from the back of a room.</li> <li>● Avoid using all CAPS (can be difficult to read and can be read incorrectly by screen readers.)</li> <li>● Use easy-to-read sans serif fonts such as Arial, Calibri, Verdana, Helvetica, etc.</li> </ul>

<p><b>Color and Contrast</b></p>	<p>Use a contrast ratio of 3:1 for color of backgrounds, fonts, and graphics.</p> <ul style="list-style-type: none"> <li>● Check color contrast at <a href="#">WebAIM</a> or <a href="#">Colour Contrast Analyzer</a></li> <li>● Avoid stark white backgrounds. Use off-white, cream, or other light color.</li> <li>● Presenting in a dark room: use light text on a dark background.</li> <li>● Presenting in a bright room: use dark text on a light background.</li> <li>● Use of colors should not be the only way to convey meaning.</li> </ul>
<p><b>Content</b></p> <p>➤ <b>Plain Language</b></p> <p>➤ <b>Easy Read</b></p> <p>➤ <b>Hybrid</b></p>	<ul style="list-style-type: none"> <li>● Use common, everyday words whenever possible.</li> <li>● Define any words or terms that might be unfamiliar. Avoid jargon.</li> <li>● Use active voice.</li> <li>● Use clear, direct, and short sentences.</li> <li>● Consider using <b>Plain Language</b>, <b>Easy Read</b>, or a <b>Hybrid</b> approach.</li> </ul> <ul style="list-style-type: none"> <li>● Aim for 5th-6th grade reading level.</li> <li>● Can use paragraphs.</li> <li>● Sentences can have more than one idea, but keep it simple.</li> <li>● Does not require pictures.</li> </ul> <ul style="list-style-type: none"> <li>● Aim for 3rd-4th grade reading levels.</li> <li>● Formatting should include large font and lots of “white space,” with five or fewer sentences per page.</li> <li>● Use one idea per sentence.</li> <li>● Each sentence should have a picture next to it.</li> </ul> <p>Use a combination of Plain Language and Easy Read to tailor to the audience.</p>
<p><b>Cognitive Load</b></p> <p><b>Transitions</b></p> <p><b>Glossary</b></p>	<ul style="list-style-type: none"> <li>● Consider the “cognitive load” of your presentation. Make it easy for your audience to follow along with your format and ideas.</li> <li>● Provide a clear, logical order of ideas and thoughts.</li> <li>● If presentations are in a series, use similar layout, flow, verbiage, timeline, etc.</li> </ul> <p>Consider using a transition slide when introducing a new topic.</p> <p>Consider providing a glossary of terms that readers may not know.</p>



<p><b>Multimedia</b></p>	<ul style="list-style-type: none"> <li>● Use captions for audio and videos.</li> <li>● Use or create transcripts for videos.</li> <li>● Consider adding audio descriptions of visual information in videos.</li> <li>● If you are recording your presentation, ensure all media is accessible in the recording.</li> <li>● Provide live captioning during presentations though your presentation’s platform (Google Slides, Power Point, etc.)</li> </ul>
<p><b>Icons/Visuals</b></p>	<ul style="list-style-type: none"> <li>● In general, use one simple visual per slide.</li> <li>● Ensure images are legal (free or from paid subscription such as Shutterstock, Canva, etc.)</li> <li>● Avoid stacking images. These will be read out separately by a screen reader. Instead, take a screenshot of layered images and use that single image in place of stacked images.</li> </ul>
<p><b>Alt Text</b></p>	<p>Use 1-2 descriptive sentences of alt text for:</p> <ul style="list-style-type: none"> <li>● Pictures, photos, and illustrations.</li> <li>● Functional images such as icons.</li> <li>● Graphs, charts, and diagrams.</li> </ul> <p>If an image is purely decorative, mark or label as “decorative.” The <a href="#">Alt Text Decision Tree</a> is a helpful guide to decide which images need Alt Text.</p>
<p><b>Hyperlinks</b></p>	<p>Create a hyperlink using a meaningful description of the link rather than pasting the url link. If handouts of the slides are provided, consider also adding the url link.</p>
<p><b>Accessibility Checkers</b></p>	<p>Use checkers such as <a href="#">Grackle</a> for Google Slides or <a href="#">Accessibility Checker</a> for Powerpoint.</p>

## Resources

1. [Rocky Mountain ADA Center - Accessible Presentations Guide](#)
2. [W3C - Making Events Accessible](#)
3. [W3C - Planning Audio and Video Media](#)
4. [Microsoft - Make your PowerPoint presentations accessible to people with disabilities](#)
5. Born Digital, Born Accessible presentation by [Michael Cantino](#)