

March 7, 2024
Via Electronic Filing

Oregon Public Utility Commission
201 High St. SE, Suite 100
Salem, OR 97301-3398

Re: UM 2211 - Energy Justice Advocates' Responses to Questionnaire

Verde, Community Energy Project, NW Energy Coalition, Oregon Just Transition Alliance Multnomah County Office of Sustainability, and Oregon Citizens' Utility Board ("Energy Justice Advocates") appreciate Staff's efforts to thoughtfully structure this next phase of the implementation of HB 2745 (2021). We offer the comments and answers below to inform those efforts and are comfortable with organizational attribution.

Equity Landscape

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

- Rates are rising faster than wages, and at a pace above the rate of inflation. This is happening at a time when our community's dependence on utility service is increasing for a variety of reasons (e.g. we have seen an increase in the frequency of severe weather that climate change is likely to exacerbate), effectively canceling the relief of discount programs for those participating. These increases disproportionately impact vulnerable households. Additionally, many qualifying households are not enrolled in the discount programs or served by other programs that may mitigate energy burden.
- The increased frequency and severity of extreme weather events that our state has experienced over the last few years presents vulnerable community members with an impossible choice: limit your energy use, and deal with risks to life and health, or use the energy you need and face an increased and perhaps unaffordable bill. We need mechanisms to smooth those spikes so that people know they can stay safe during the event without risking disconnection or not having food at the table next month.
- Given our increased reliance on energy to live and thrive, reliability and resiliency issues are concerning, especially in rural communities.
- Utility service is a human right. In the context of increasing wealth and income gaps, climate change, and rising cost of living, disconnections at any time of the year are punitive and can be life threatening. Moreover, there is significant overlap between race and service disconnections. Oregon needs policies and protections that ensure uninterrupted, affordable access to a basic level of service with programs designed to avoid customer disconnection. Disconnections should not be a collections strategy.
- Extreme heat is a growing health risk in Oregon. It is one of the leading causes of weather-related deaths in the U.S. and is worse for residents of low-income

neighborhoods and communities of color.¹ Our community is painfully familiar with the risks that extreme heat poses to life and health.² We need stronger temperature-based shutoff protections that include the heat index. Waiting for a heat advisory is insufficient. We also need to prioritize building efficiency in affordable housing and installing efficient cooling systems, like heat pumps that can provide efficient heating and cooling. As many areas of Oregon did not need cooling until recently, we also need to proactively identify vulnerable community members' cooling needs and stand up programs to meet them efficiently. The Oregon Cooling Needs Study may offer helpful information on this issue.³

- Long-term solutions like energy efficiency and weatherization need to be prioritized in order to make long-term impacts on energy burden reduction for Oregonians. We need to ensure equitable access to these energy solutions.

2. Which communities are most impacted?

- Environmental-justice communities, including those experiencing low incomes, rural communities, communities of color, non-English speaking communities, the elderly, people experiencing disabilities, households with children and young people, as well as people with fixed, low-incomes, undocumented communities, and farm working communities. Renters are also disproportionately energy insecure.
- Our programs and processes need to be better equipped to recognize the disproportionately higher impacts on people in the intersections of these marginalized identities.

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

- Ending disconnections for vulnerable households, including households with infants and children, seniors, folks with disabilities and chronic illnesses, and people on fixed incomes.
- Capping rate increases for vulnerable households.
- Identifying measures that can reduce energy consumption and improve health for households, while centering an anti-displacement approach (build resiliency).
- Implementing stronger extreme-heat protections, especially if we cannot get a ban on disconnections outright; calendar-based moratoriums can help lessen disparate burdens on vulnerable residents and need to include heat index to account for humidity and wet bulb temperature—in other words considering how heat actually affects people. This is especially important for folks in heat islands and folks who do not have cooling in their homes.
- Establishing programs that can account for people's realities, for example, programs with considerations for gig and hourly workers' income eligibility. It would be helpful to have flexibility to allow 30-day income information for those whose income vary or who

¹ <https://newscenter.lbl.gov/2023/08/23/how-scientists-are-helping-cities-adapt-to-extreme-heat/>

² Multnomah County, *Final Report: Health Impacts from Excessive Heat Events in Multnomah County, Oregon, 2021* (Jun. 2022) available at https://multco-web7-psh-files-usw2.s3-us-west-2.amazonaws.com/s3fs-public/20220624_final-heat-report-2021_SmallFile-2.pdf.

³ Oregon Department of Energy, *Oregon Cooling Needs Study* (Dec. 2023), available at <https://www.oregon.gov/energy/Data-and-Reports/Documents/2023-Oregon-Cooling-Needs-Study.pdf>.

are seasonal workers.

- Increasing accessibility of energy efficiency programs and DERs to ensure that the home is as well weatherized as possible. This access would have multiple benefits to energy systems and community members like reducing consumption and GHG emissions, improving health outcomes (i.e. by improving indoor air quality and offering protection from extreme temperatures), and reducing energy burdens. Thanks to their system, community, and individual benefits these programs are win-win situations.
- Expanding data metrics and accessibility to said data. This includes expanding utility data reporting requirements, along with expanding data collection strategies, to better inform and understand equity outcomes—suggestions of where to do this are noted below, but include qualitative data collection and analysis alongside traditional quantitative data strategies.
- Language Justice is an important and integral part of making sure that communities know the basics that many energy practitioners and decision makers in energy take for granted. Ensuring that communities can access the web portals, printed materials, and other programs will improve outcomes and relationships.

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.

- For the purposes of this questionnaire, we assume that utility programs and services refer to customer-funded programs, but many of these lessons also apply more broadly.
- Incentives, even if “generous” do little for households without the money to cover the remaining cost of the measure. We must embrace the reality that, to realize the many energy and non-energy benefits associated with serving low, and often also moderate, income communities, we need no-cost offerings. Financing, up-front costs, and other program features that create financial risk are not going to help those who need it most and could actually cause harm.
- An anti-displacement focus in utility programs and services is crucial to not inadvertently contribute to green gentrification.
- We need to continue to grow the role that culturally-specific organizations play in identification and serving of currently and historically underserved communities.
 - We need to move from the problematic mindset that dominant institutions and actors in the energy space often bring to their relationship with community-based organizations, which assumes that value only flows in one direction—from dominant energy institution/actor to community-based organization. The value that community-based organizations bring, by virtue of the experience they have and the relationships and trust they built with the communities they serve, is often minimized or totally unrecognized.
 - We need to structure our processes and program to put community first and utilities second.
- We need to change the culture and paternalistic perspective prevalent in dominant institutions in energy that consider serving low-income customers a burden rather than a necessary step to Oregon’s energy future.
- Programs are missing critical households when they adopt arbitrary thresholds to

determine who does and does not qualify for service. For example, we worry that the discount programs' focus on 60% state median income (SMI) leaves a lot of households behind. While a move to a higher threshold and to reliance on area median income (AMI) instead of SMI would be a step in the right direction, the reality is that arbitrary thresholds leave vulnerable households behind.

- All customers receiving means-based benefits programs, like LIHEAP, SNAP, Medicaid, should be automatically eligible and enrolled in energy assistance programs, and the energy efficiency and weatherization process should remove barriers to serve them.
- We need a wider array of tools to mitigate the risk for disconnections, like arrears management programs. The PUC should consider the recommendations that UM 2114 participants offered in September 2021.⁴
- We need to structure programs in a way that allows Oregon utility customers and communities to leverage federal incentives while reducing greenhouse gas emissions and grid pressures, as well as reducing their energy burden and increasing their wellbeing. As a number of federal incentives are expected to become available in the following months, we must take measures to ensure that our current program funds can be successfully braided with those federal incentives to maximize impact on energy burdened and environmental justice communities. For example, a way to maximize the impact of some of the federal incentives is for our weatherization and conservation programs to first weatherize participants' homes to the greatest extent possible.
- We need to expand access to energy efficiency and weatherization programs, particularly in multifamily and rental housing where tenants often face barriers to participation.
- We need granular data on who is impacted and how.
- We need to factor climate resilience into program design. As we get more extreme weather, power outages, smoke events, temperature swings, etc. people will need energy to cope. For example, those with medical needs will not only need medical equipment but will also often need heating and/or cooling to sustain their health.
- We need to factor health outcomes into program design. People's homes and ways of using energy have large impacts on their health. For example, people's health can be impacted by building conditions that can cause mold or by the air quality impacts of appliances like gas appliances.
- Weatherization and energy efficiency provide crucial services to help with health and climate resilience, but there are two glaring issues: one is that the need far outstrips the available services, and the other is that the services are often not accessible to those most in need. From draconian income verification processes to lack of flexibility in funding around issues like repairs, to language barriers and lack of homeownership (and landlords not being motivated to weatherize), there are still significant groups of people that programs are not reaching.
- Ensuring that communities know about and understand how these programs can serve them is key to realizing their potential.

⁴ UM 2114, *Advocates' Recommendations* (Sep. 27, 2021), available at <https://edocs.puc.state.or.us/efdocs/HAC/um2114hac19146.pdf>.

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

- Utility data identifies the most disconnected census tracts, along with census tracts with the most arrearages and outages. This data should be prioritized, based also on vulnerability metrics, to identify priority populations. Populations with a known history of experiencing burdens from the energy system, like Tribal communities, should be prioritized, as should historically underserved communities like Black communities and farmworker communities.
 - We need greater granularity than census tract, and we also need to recognize concerns that the last census may have undercounted some communities and identify tools to address that undercount. These tools could include disconnection information, warnings sent from the utility, and low-income discount data, to name a few.
- Populations may need to be defined in areas with more extreme heat (high desert and heat island), or areas with a scarcity of services, like rural areas, areas with older housing stock, etc. If target populations, such as immigrants, are under-represented in who is being served, then they may need to be prioritized. Utilizing data collections to identifying under-representated populations or geographic areas.

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

- Apart from the traditional metrics like energy savings and enrollment, as well as post enrollment demographic survey information and customer feedback, the PUC could consider the following:
- The National Consumer Law Center has identified minimum monthly data that should be collected on general residential customers and low-income residential customers in order to understand energy affordability and energy security, beyond disconnect numbers, and by zip code level:
 - Number of customers,
 - Dollar amount billed,
 - Number of customers charged a late payment fee,
 - Dollar value of late fees collected,
 - Number of customers with an arrearage balance by vintage
 - 60 – 90 days
 - 90+ days,
 - Dollar value of arrearages by vintage
 - 60 – 90 days
 - 90+ days
 - Number of disconnection notices sent
 - Number of disconnections for nonpayment
 - Number of service restorations after disconnection for nonpayment
 - Average duration of disconnection
 - Dollar value of level of security deposits collected

- Number of security deposits collected,
 - Number of new deferred payment agreements entered into
 - Average repayment term of new deferred payment agreements
 - Successfully completed deferred payment agreements, and
 - Average repayment term of payment agreements.⁵
- The PUC should consider adding these additional metrics to its disconnection reporting rules and request monthly reporting, rather than quarterly reporting. Additionally, the PUC could ask utilities to expand on their disconnection reporting to include data that accounts for reconnections outside of the current metrics of 0-1 day and 2-7 days. Across utilities, there is a significant number of households who are not accounted for in the utility provided data: households who are not reconnected within 0-7 days. It remains unclear how long it is taking these households to be reconnected. Moreover, we would appreciate day by day data, 2-7 days without electricity or gas is a significant range, more granularity with this data would be helpful. Lastly, in terms of metrics, currently regulated utilities in Oregon have to report quarterly disconnections by month. We would like to explore in this process performance-based ratemaking with equity in a performance metric. For example, we should explore requiring that utilities reduce disconnections on a quarterly or annual basis or otherwise face financial penalty.
 - Metrics should be based on the goals of the program. If the goal is to serve frontline communities, then that goal and population should be specifically defined and we should have an evaluation method to track how the program is performing. If the reduction of energy use is the goal, there are a lot of standardized energy efficiency metrics that can be utilized. Other goals, such as climate resilience, affordability, health outcomes, may need to have new measurements determined. Qualitative measures should be used along with quantitative data as it is important to be able to utilize customers' experiences, how their lives have changed, etc. Using regular benchmarks with new strategies to get closer to ideal goals is also very important.
 - The PUC should reintroduce the enhanced reporting data from COVID reporting:
 - The number of customers, by customer class;
 - The number of customers, by customer class, assessed late payment fees or charges during the period;
 - The number of customers, by customer class, enrolled in a current Time Payment Agreement (TP A);
 - The number of customers enrolling in a new TP A;
 - The number of customers completing a TP A during the period;
 - The number of customers, by customer class, renegotiating TP As during the period;
 - The number of customers taking service at the bill payment assistance program developed in this Term Sheet;
 - The number of customers taking service at the beginning of the period under existing medical payment arrangements;
 - The number of customers enrolling in new medical payment arrangements

⁵ https://www.nclc.org/wp-content/uploads/2022/10/IB_Data_Reporting.pdf

- during the period;
- Total number of residential customers and small commercial (based on Utilities' tariffs) with arrearage balances, segmented by 30-60 days; 61-90 days; 91 + days.
- Reports will include total arrearages and average arrearages for each segment, and be broken down by zip code;
- Total number of disconnection communications delivered by vintage (15-day, 5-day, personal contact);
- Total number of service disconnections for non-payment; and
- Total number of service reconnections, segmented by 24-hour reconnect, 48-hour reconnect, less than seven-day reconnect, and more than seven-day reconnect.⁶

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:

Info Session	Proposed Topics
1	Orientation, state agency landscape, and review initial survey results
2	Energy efficiency and weatherization <ul style="list-style-type: none"> ● What are the existing programs and success indicators? How big are their waitlists? What are their equity metrics? Outreach methods? ● What successful models elsewhere can inform Oregon's journey?
3	Distributed energy resources (DER) programs, resiliency <ul style="list-style-type: none"> ● How deep is DER penetration vs. what is needed for programs' success? What are the costs and benefits?
4	Comparative analysis of equitable rate designs and rate mitigation programs <ul style="list-style-type: none"> ● What successful models elsewhere can inform Oregon's journey? ● Rate design - the pros and cons of different customer classes and information that can help us better answer the questions below.
5	Consumer protection programs
6	Technical assistance, resource hubs, workforce development and other emerging national opportunities <ul style="list-style-type: none"> ● Opportunities for involvement through the PUC

⁶ <https://apps.puc.state.or.us/orders/2020ords/20-401.pdf>

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?

- We need a deep conversation about this question. Our initial thought is that people should not be penalized for a choice they do not get to make (what utility serves them), and that someone with a particular income should not have to get a lower discount or different programs if they move to a different service territory. However, there may be valid reasons why a utility seeks to provide a deeper level of relief for a particular community. Currently, energy assistance resources vary across service territories, making it difficult to imagine an equitable standardized program. These policy decisions should be made in deep conversation with energy justice stakeholders, in accessible forums, and at the very least should be based on a commonly agreed upon set of principles that apply across utilities.
- We may also need to address concerns around utilities with varying service territories. Idaho Power's Oregon service territory is small and highly energy burdened. Since differential rates are recovered from customers, we may need to think of other strategies to ensure their customers are not further energy burdened due to decisions and programs that make sense for the other utilities.

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)?

- Yes, income only gives us so much information. Someone's experience with the energy system should be considered more broadly. For example, the type of housing is important, as is the person's level of need for electricity (i.e. medical conditions, children or elderly residents in the house).
- A community's history with disconnections also provides important information. Similarly, important information also includes environmental justice factors, such as proximity to pollution sources, exposure to extreme weather events, and vulnerability to climate change impacts. Communities facing environmental injustices may experience higher energy burdens and great challenges accessing affordable and reliable utility services. It is likely that communities can provide good qualitative data to better understand the nuances of energy affordability that varies by geographic region and utility service territory. These should be explored.

a. What data sources can be used to support priority population identification?

- [EPA EJ Screen](#)
- [Oregon Affordable Housing Assessment](#) (2018)
- [Ten Year Plan: Reducing the Energy Burden in Oregon Affordable Housing](#)
- Indiana University's [Utility Disconnections Dashboard](#)
- We can create new data sources that are community informed. That could include funded canvassing programs that rely on trusted and experienced community based programs and organizers, with attention toward cultural matching, to collect qualitative and quantitative data from customers in priority populations. Other data sources, such as zip code level data for disconnections could inform what geographic areas to prioritize.
- American Community Survey (ACS) Census data

b. What considerations should be made relative to data privacy and equitable data practices?

- When utilities are enrolling people in bill discount programs, they should offer people the opportunity to opt into (or opt out of) receiving outreach about other programs that could benefit them by reducing their energy use and increasing their health, comfort, wellbeing, and resiliency.
- Households participating in bill discount programs should be able to opt into home energy audits and services to decrease their energy use as arguably helping them conserve energy, without sacrificing wellbeing, is of high value to all customers.
- Importantly, an anti-displacement approach must be centered in these efforts.
- Oregon currently does not prohibit utilities from sharing customers consumption data with law enforcement. California passed a law prohibiting the sharing of consumer data absent a court order, but the PUC should look into this issue as we look to protections for undocumented residents.

9. Are there rate structures that should be prioritized for consideration in this phase of implementation? Why or why not?

- First and foremost, we should consider rate structures that reduce families' risk of disconnection and that reduce energy burden, not just below 6%, but bring it down to a manageable level. For example some states use the mean energy burden for energy customers in the state.
- Percentage of income payment programs (PIPPs) are a rate policy tool designed to ensure that the utility bill will not exceed an energy burden ceiling for low-income customers. This policy can be particularly helpful for low-income households as it keeps energy bills affordable regardless of increases in utility rates.
 - A feasibility study should be conducted to determine the advantages and disadvantages of implementing either a percentage of income plan or a percentage rate discount program, or some type of combination of both with a PIPP targeted for households with the highest energy burden.
- Energy burden at or just below 6% is still significantly higher than what higher and middle income households are paying for energy (usually in the 2-3% of income range). Because of this, we should look at 6% as a cap that we want to stay well below from, as

other states do (ex: CA PIPP Pilot had a 4% monthly bill cap; NV uses state's median burden).

- Tiered discount rates' percentage discounts should have a goal for energy burden reduction (similar to PIPPs), such as setting tiered discounts to 3% energy burden for financially eligible electricity and gas customers
- As energy costs increase, especially surrounding the introduction of General Rate Cases and other rate adjustment mechanisms, we need to annually revisit low income discount program percentages to ensure these programs aren't being canceled out by rate increases.
 - Capping bills at a determined percentage of one's income helps to control for big rate increases and other supply chain changes/disruptions etc that are beyond customer control. In other words, paying a percentage of income is more protective of customers than paying a percentage of the bill.
- We should consider adding an additional tier in discount rates to address people who are just outside of the programs' ceilings.
- All rate design options should be evaluated in combination with longer-term investments in improved health and safety conditions for the home, such as energy efficiency and weatherization, to produce long-lasting bill affordability for households. Weatherization and energy efficiency upgrades are critical for long-lasting affordability for low-income households given that many live in older and/or energy inefficient housing.
- We should discuss the possibility of establishing a separate rate class for low-income customers that are currently included in the utility residential rate class.
- We should explore rate stability options for low-income customers, as utility shut offs are most common after the winter high bill season for Oregon residential customers. In order to mitigate shut offs, it may be appropriate to offer additional rate stability options for low-income customers, such as fixed monthly bills and enhanced equal payment programs.
- There is a crucial need to not only address current bills, but past due bills as well. Lowering the burden of current bills does not address unaffordable payment plans.
- We should eliminate late fees as they have not been found to promote timely payment, operate more like a tax, and punish low income customers.

a. What criteria should be used to evaluate the pros and cons of different ratemaking approaches?

The impact it has regarding reducing disconnections, reducing energy limiting behaviors, and allowing people to rely on a service that is essential.⁷ Criteria should also include whether the approach:

- Serves all residential electricity customers who are eligible to participate in the Low Income Home Energy Assistance Program ("LIHEAP"), regardless of if they were actually able to enroll in LIHEAP;
- Lowers program participants' electricity burdens to an affordable level, ideally seeking to align with the energy burden percent experienced by medium to high income customers;

⁷ Howat, John, Electric Service Discount and Arrearage Management Program Design Template. National Consumer Law Center (April 2020).

https://www.nclc.org/wp-content/uploads/2022/09/WP_Program_Design_Template.pdf

- Proven to promote regular, timely payment of electric bills by program participants; Timely payment can be made when bills are truly affordable (i.e. policies like high percentage late fees are not proven to promote timely payment).
- Comprehensively addresses payment problems associated with program participants' current and past-due bills;
- Is funded through a mechanism that is reliable while providing sufficient resources to meet policy objectives over an extended timeframe; and
- Is administered efficiently and effectively.
- Ensures customers can understand and manage their bills as processes and increases become increasingly more difficult to manage and understand.
- Is data driven. For example, in UE 416, Staff used a data driven approach to compare ratemaking approaches. Traditionally as an economic regulator, the PUC has strived to set prices at the marginal cost of service for energy service. We ask the PUC to not just consider marginal cost and instead consider what is best for low income customers.

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?

- Generally, we agree with the Commission's decision in Order 23-476 that costs for programs authorized by HB 2475 should be shared equitably across all customer classes.⁸ We expect to support a same or similar equitable cost recovery mechanism for costs of differential rates.
- Costs should be spread out among all customers as widely and fairly as possible.
- Low-income programs are a necessary societal expense. These programs benefit society as a whole, and therefore all customers should contribute to their costs. Currently, large customers do not pay an equal share of low income discount programs, either through statute or tariff language. In cases where there is no statutory cap, rate mitigation for large customers should only be temporary, and should eventually shift towards all customers paying.
 - If rate mitigation for low-income costs were to occur for a group of customers, it would be most appropriate to exclude low-income customers from paying for the cost of differential rates rather than mitigating rate impacts on industrial and commercial customers who have the ability to pass costs to downstream customers of their products.

⁸ UE 416, In the Matter of PORTLAND GENERAL ELECTRIC COMPANY, Request for a General Rate Revision, Order No. 23-476 at 9-10 (Dec. 18, 2023) (the Commission found the percentage of bill basis for evaluating the relative contributions of each customer class to be reasonable).

b. Are there cost recovery practices that will help utilities offer more equitable rates in a cost-efficient manner?

- Tax revenue: Raising revenue from sales or income taxes would be much more progressive than the current system, ensuring that higher-income households pay a higher share of the costs.
- Income-based fixed charges⁹ - an equitable monthly charge based upon a household's ability to pay
- CUB has been generally okay with a balancing account - utility can collect costs and pay out the programs; if overcollect, goes to future costs of program, and if undercollect, costs recovered in future (because can't really forecast this); after the program matures, it would be good to revisit to see if put in base rates
- Cost recovery can be done in various ways. There are actual costs associated with differential rates, which customers ultimately bear. We would like to note that low-income programs reduce the company's uncollectible risk when collecting customer costs. It may be appropriate for utilities to contribute to low-income program costs when allowed by statute. From a revenue recovery perspective, it is crucial to avoid rate pancaking and to recover revenue from customers concurrently with the costs of differential rates.
- We are interested in further exploring how to design rate recovery. Rates for differential rates can be recovered from customers. The PUC has much flexibility in how it recovers costs through rate design. For example, low-income charges could be recovered volumetrically or via non volumetric rate. Low-income rate charges could be collected from something other than low-income customers. Low-income rate charges could only be collected during non-heating months.

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

- Track disconnections, arrearages, track bill discount customers' disconnections.
- Consider developing an energy burden index that incorporates inflation, unemployment, CPI, among other metrics.
- Coordinate with CAP agencies and OHCS for assistance data
- Measuring data similar to what was collected during COVID, a full list can be seen under the answer to question 5 above.

Other Suggestions:

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

- Capacity is limited in the energy justice advocacy world. We request that Staff be generous with deadline extension and be responsive to requests to modify the process when we voice concerns about capacity. We share a sense of urgency in identifying durable approaches to reducing energy burden and energy poverty in our communities. However, we believe that it is crucial to be responsive to our capacity

⁹ Borenstein, Severin, Meredith Fowlie, and James Saliee, *Designing Electricity Rates for An Equitable Energy Transition*. Page 32 - 45. (February 2021).

constraints so that we can fully participate and shape the solutions that emerge out of this process, especially given that our collective capacity constraints can put us at a disadvantage when compared to better resourced participants in these conversations.

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

- Advocates have been receiving a large number of calls from customers trying to reconcile what they are seeing on their bills vs. what they're hearing about the percentage increase from the media. Looking forward, including a discussion of bill accessibility and readability as an equity component will be important, especially as utilities ask for more increases and information varies across utilities.

Respectfully submitted,

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