



Portland General Electric

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

RE: UM 2211, Comments on HB 2475 Implementation of Differential Rates and Programs in Oregon

Portland General Electric Company (PGE) offers these *revised* comments to our initial response to the "Strategy Update and Interim Action Straw Proposal" (Proposal) submitted by Public Utility Commission of Oregon (OPUC) Staff in Docket No. UM 2211. PGE appreciates the opportunity to share thoughts and considerations in greater detail on proposed evaluation criteria for interim rates or programs.

1. Self-certification and auto-enrollment

In line with Staff's proposal, PGE's interim program design incorporates an enrollment process where customers self-certify their household size and annual income. This is consistent with California's CARE program which has been highly successful in enrolling eligible utility customers and has experienced very low rates of fraud. PGE's proposal also borrows from the CARE structure by including a post-enrollment verification of need on 3% of participants annually (selected randomly). Similarly minimal fraud issues are anticipated in Oregon, but enrollment procedures could be adjusted in the future if necessary.

Self-certification poses some challenges to auto-enrollment of OEAP participants. Every enrolled customer will need to provide household size and income, and a verbal, digital or written signature acknowledging the application's declarations. This precludes the use of auto-enrollment, but PGE anticipates close coordination with Community Action Partner (CAP) agencies and other CBOs to create a low-barrier, efficient enrollment experience for customers.

To the extent that NW Natural's interim proposal aligns with PGE's eligibility criteria, we would suggest coordinating with our partner utility to help joint customers leverage both utilities' discounts.

2. Income-based eligibility and alleviating energy burden

PGE supports Staff's recommendation for income-tiered, percent-of-bill discounts as a sound and efficient proxy for targeted reductions in energy burden, especially when prioritizing low barriers to enrollment so as to deliver programs at scale. This tiered structure enables increased discount levels for lower income households and can take into account household size when an income/household size matrix like Oregon's State Median Income chart is used to determine eligibility for the tiers. Using a percent of bill discount as opposed to a fixed dollar amount provides larger discount amounts to those with larger bills within a given

income tier, presumably to those with higher energy burdens. Together, these program design elements provide an efficient, low-barrier means to provide greater levels of assistance to those with greater need.

Targeting an energy burden of 6% or lower for individual customers and allocating benefits only to those customers currently above that threshold is a high bar given that PGE does not have access to data today that would allow that calculation. PGE's opinion is that highly customized discounts are administratively costly to implement and potentially burdensome for customers, requiring customer-specific assessments of income and expenses to be calculated prior to program enrollment. That is likely inconsistent with delivering a low-barrier enrollment experience and hitting ambitious enrollment goals.

3. Data collection and reporting

PGE recognizes the importance of data-driven impact assessments and intends to report out on key metrics measuring program costs and customer impacts. Useful aggregated data that PGE can readily provide include assistance dollars, bill and payment amounts, arrearage data and certain customer demographic information (housing type, household size and income, preferred language, and Medical Certificate status). PGE proposes to share data with staff and stakeholders on a quarterly basis in year one and annually thereafter.

4. Bundling with energy efficiency services and other energy assistance

PGE concurs with Staff's recommendation that discount programs refer participants to no-cost energy services like weatherization and OEAP/LIHEAP benefits. PGE does not recommend that such services be a requirement of ongoing program participation. Many customers who will be eligible for bill discount programs do not own their own home and may not be able to implement weatherization benefits.

Rather than referrals to the Energy Trust of Oregon (ETO), PGE suggests that the appropriate referral is to the no-cost weatherization program administered by OHCS and CAP agencies. Customers who qualify for PGE's proposed bill assistance program would qualify for free services, which is a better resource than the incentive programs administered by the ETO requiring out-of-pocket expenditures by the customer. PGE is interested in exploring free welcome bundles with the ETO, similar to those previously provided to CAP agencies for customers receiving LIHEAP or OEAP funds. Such bundles might include LED bulbs, low-flow shower heads or other items that can bring immediate energy savings to renters or homeowners alike.

5. Outreach and surveys

PGE supports Staff's criteria for outreach and engagement related to program development and recognizes that program success in this area heavily depends on partnerships with CAP agencies and other community partners. PGE recommends frequent (monthly) discussions with partners during the initial program year to discuss enrollment, catch unforeseen issues quickly and maximize outreach efforts.

Regarding Staff's proposal to survey CAP agencies and participants at 3 and 6 months of implementation, PGE views agency surveys as somewhat redundant on top of monthly meetings. For customer feedback, there is concern that the 3-month milestone may be too early to gather meaningful data. PGE proposes a survey of program participants after 6

months, when more customers will have had a few months of program exposure on which respond.

PGE is grateful for the opportunity to comment on Staff's proposal and participate in this ongoing effort with stakeholders, utilities and OPUC Staff to bring about needed relief to burdened customers.

Sincerely,

\s\ Robert Macfarlane

Robert Macfarlane
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