

BEFORE THE
PUBLIC UTILITY COMMISSION OF

In the Matter of

OREGON [UM 2211]

PORTLAND GENERAL ELECTRIC, PACIFIC POWER,
NORTHWEST NATURAL GAS, IDAHO POWER,
AVISTA, CASCADE NATURAL GAS
Implementation of HB 2475

NOTICE TO PARTICIPATE & REQUEST HB 2475
INTERVENOR FUNDING OF CAPO

The Community Action Partnership of Oregon (CAPO) hereby submits its Notice to Participate & Request Funding in this docket and requests interim intervenor funding in accordance with Oregon House Bill 2475 (HB2475).

CAPO is an eligible organization for HB 2475 interim inventor funding. As the association of Oregon's 18 community action agencies, CAPO represents low-income customers all across Oregon, including customers of all six investor-owned utilities (IOUs). CAPO advocates on behalf of the community action agencies, that among other things, administer energy-assistance programs to all Oregonians below 60% of State Median Income. These programs, through contracts with Oregon Housing and Community Services, as well as with IOUs (and COUs), help low-income people through bill payment assistance and weatherization. Clients include seniors, people with disabilities, people of color, and other historically marginalized groups, all with disproportionately high energy burdens. Serving more than 60,000 low-income households annually, the community action network (through CAPO) is well positioned to advocate on behalf of low-income customers.

UM 2211 is an eligible proceeding pursuant to Commission Order NO. 22-043. AR 653 directly affects Avista, Cascade Natural Gas, Idaho Power, Northwest Natural Gas, Portland General Electric, and Pacific Power. UM 2211 also directly affects our clients, low-income customers with high energy burdens. Utilities are tasked to consider feedback from such populations, when designing differential rate programs.

CAPO respectfully requests that this Commission grant its Notice to Participate in this proceeding as an eligible organization and its request to receive HB 2475 interim intervenor funding.

Dated this 28th day of July 2022.



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CAPO'S REQUEST FOR HB 2475 FUNDING GRANT
AND PROPOSED BUDGET

Pursuant to decisions deeming the Community Action Partnership of Oregon (CAPO) and these proceedings eligible, CAPO requests a grant of \$16,100 from the HB 2475 Intervenor Funding Fund. CAPO has been tracking its participation in these proceedings by hours and activity and submits the following in support of the proposed budget.

Statement of Work

CAPO has and intends to participate in every procedural aspect of this proceeding, including meetings, workshops, and hearings. CAPO, through utility policy analyst Benedikt Springer, has participated in the following dockets: PacifiCorp's Advice No. 22-008, Residential Low Income Bill Discount under Docket No. UM 2211 and ADV 1412; NW Natural's Advice No. 22-02, Residential Low-Income Bill Discount Program under Docket No. UM 2211 and ADV 1390; Avista Corporation's Advice No. 22-03-G, Low-Income Rate Assistance Program under Docket No. UM 2211 and ADV 1410; Cascade Natural Gas' Advice No. 22-06-01 Arrearage Management Program under Docket UM 2211, UG 437, and ADV 1409; PGE Advice No. 22-01 Income Qualified Bill Discount under Docket UM 2211 and ADV 1365; and future Idaho Power filings under Docket UM 2211.

CAPO has and intends to review and analyze tariff filings, testimony, and comments. CAPO has filed and intends to file written comments and supporting information in consultation with other participants. CAPO has testified and will testify in future public meetings.

Description of Areas to be Investigated

CAPO's investigation has and will include the following areas, among others:

- Obtain and share information from clients and experts on experiences with energy burden and income verification.
- Share information on currently existing energy assistance programs and their potential interaction with bill discount programs.
- Research models used in other jurisdictions to reduce energy burden of low-income customers.
- Research alternative ways to preserve program integrity while minimizing participation barriers.
- Investigate other issues raised by Commissioners and other participants.

Budget

CAPO Internal Expenses

Benedikt Springer, PhD (Utility Policy Analyst)	Rate	Hours	Cost
Participate in Public Meetings	\$ 175	12	\$2100
Other Stakeholder Meetings	\$ 175	50	\$8750
Research	\$ 175	15	\$2625
Drafting Comments	\$ 175	15	\$2625
TOTAL		92	\$16100

For the foregoing reasons, CAPO respectfully requests that this Commission approve its budget and issue an order awarding it a grant from the HB 2475 fund.

Dated this 28th day of July 2022.



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