

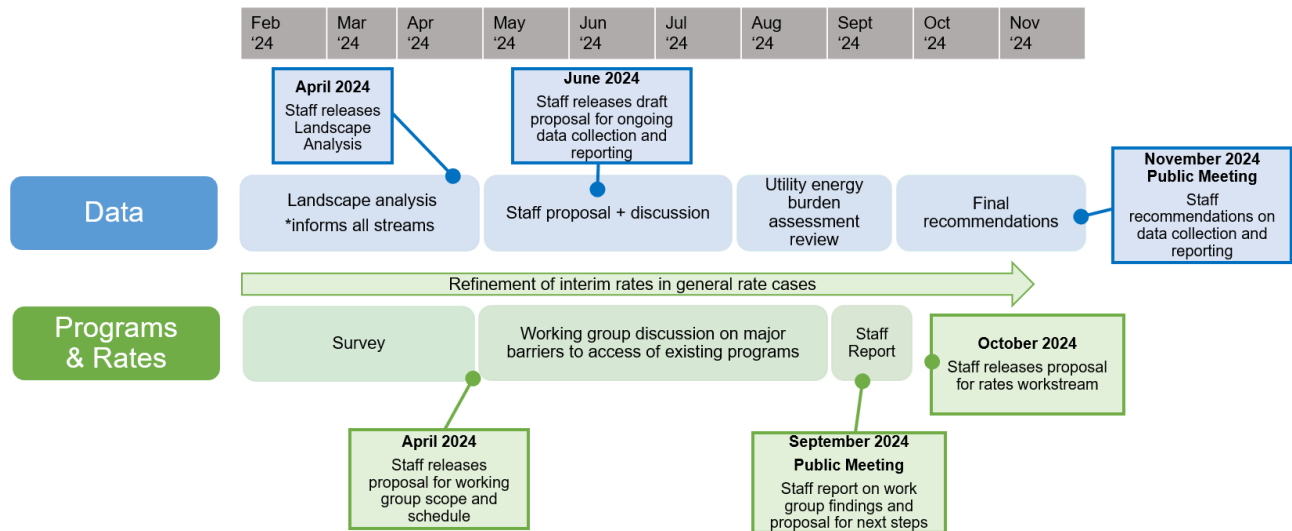
# Docket No. UM 2211: HB 2475 Implementation of Differential Rates and Programs in Oregon

## Phase 2 Survey Synthesis and Updates

This announcement describes the Oregon Public Utility Commission (OPUC or Commission) Staff’s updates for the next phase of implementation of the Energy Affordability Act ([HB 2475](#)) within [Docket No. UM 2211](#) following survey responses from advocates and utilities. Staff filed a [Proposed Process](#) on February 13, 2024 which included an ask for survey responses from advocates and utilities. A synthesis of the survey responses is included in this document as [Attachment A](#).

Staff has utilized results of the questionnaire to inform its areas of focus for HB 2475 implementation in 2024. Staff appreciates the time and energy respondents put into their questionnaires and highlights that to streamline our near-term opportunities, we include a bucket for additional topics and key questions that will be addressed during additional phases of implementation in this process. These items are not meant to be a comprehensive representation of Staff-led efforts under HB 2475 authority, which we expect to be ongoing and incremental over time and evolve alongside the changing energy landscape. Staff is open to additional adaptations based on ongoing stakeholder engagement. As such, goals for each workstream may evolve to incorporate feedback and reflect community priorities.

Figure 1. UM 2211 Phase 2 Process



The proposed process identified three workstreams, for each workstream we refine the proposed plan as follows:

## Data Work Stream

- Survey responses confirmed the importance of cataloguing currently available data to understand what we have access to, what we can learn from it, and what gaps may be present, which will be presented as a component of Staff's landscape analysis at the end of April.
  - Survey response also affirmed the importance for discussion of the gaps and opportunities to collect and publish additional data.
- Following the release of the landscape analysis, Staff plans to develop an initial set of goals to guide future design and implementation of rates and programs under HB 2475.
  - For example, survey responses highlighted a goal of discussing energy burden. Staff believes this portion of the data workstream may result in a recommendation to the Commission for an initial energy burden metric(s) that future rates and programs will be designed to reach.

## Program & Rates Work Stream

### Programs Focused Areas:

- Staff plans to focus the programmatic discussions in 2024 on identifying major barriers to access of existing program efforts in the state.
  - Based on survey responses, Staff plans to focus initial discussions on weatherization, energy efficiency, and current utility bill discount programs.
    - Time permitting, we will also be discussing DERs (net metering, community solar, solar and solar + storage).
    - CBRE processes are also digging into DERs, community solar, resiliency, and similar topic areas.
- Staff plans to convene a series of discussions with a range of parties that may include program implementors such as Energy Trust of Oregon, Community Action Agencies, Community Based Organizations and Portland Clean Energy Fund; electric and natural gas utilities; community-based organizations; consumer advocates; and other government agencies such as Oregon Department of Energy, Oregon Department of Housing Services, and Local governments. Staff plans to focus on the following topics provided in feedback from the survey to start our conversations:
  - Reaching priority communities
    - Renters
    - Tribal
    - Rural
    - EJ communities
  - Accessibility (financial, cultural, linguistic, etc.)
  - Pairing energy assistance with energy efficiency

- Expanding low and no-cost opportunities
- Braiding funds across programs

### Rates Focused Areas:

- Staff proposes initiating rates conversations following additional data review and programs focused engagement.
  - A timeline that allows for utilities to finalize Low-Income Needs Assessments (LINA) and Energy Burden Assessments (EBA).
  - Further program discussions as detailed above will lead to stronger rates discussions.
- Staff believes near-term opportunities are available within the currently filed rate cases to increase bill discount amounts.
- Following this additional time, Staff plans to host discussions beginning in Q1 2025 focusing on setting goals and refining desired results and outcomes of programs.
  - Staff will release an updated process for the rates focused work stream in October 2024 following the utilities completed EBA and LINAs.

### Future Topics & Key Questions

Following the survey responses, there are additional topics highlighted under each of the work streams that will be considered during additional phases of this implementation process. Some of these included:

- **Data Work Stream**
  - While Staff believes the data focused responses from surveys will be covered in the current data landscape, we acknowledge that additional topics may arise during the process that may be addressed in future iterations of implementation.
- **Program Work Stream**
  - Certain activities focused on community health and wellbeing
    - Extreme weather disconnection review and reform
    - Additional protections for extreme weather conditions
    - Overall disconnection reform conversations
  - Development of new resiliency and reliability programs.
- **Rates Work Stream (to be launched in late 2024)**
  - Differential rate design requirements:
    - Rate designs e.g., bill discount, percentage of income;
    - Eligibility criteria;
    - Level of rate relief;
    - Outreach, bundling, and enrollment practices.
    - Analyzing current differential rate design programs to better inform Oregon's work.
  - Policies for the creation of new rate classes.



- Policies for the recovery of costs to implement differential rates.

## Conclusion

Staff is interested in engaging stakeholders throughout this process and intends to remain flexible to the needs of participants as it advances phase two of HB 2475 implementation. We appreciate the tremendous amount of time that has been dedicated to this effort over the last several years and continue to express gratitude for your continued engagement. We also welcome new voices, particularly those who are from an/or represent impacted and environmental justice communities. As such, we encourage our existing stakeholders to help bring new participants into the UM 2211 process. Thank you!

### **If you have questions about the work plan, please contact:**

Michelle Scala at [michelle.m.scala@puc.oregon.gov](mailto:michelle.m.scala@puc.oregon.gov) or 503-689-2608.

Kate Ayres at [kate.ayres@puc.oregon.gov](mailto:kate.ayres@puc.oregon.gov) or 503-510-9611.



## New to the Process?

### What is HB 2475?

HB 2475, or, the “Energy Affordability Act”, is a 2021 legislative measure that took effect January 1, 2022, and allows the PUC to consider customer characteristics that affect affordability when approving programs<sup>1</sup> and energy rates<sup>2</sup> charged by regulated utilities. Generally, this authority makes it so the rates that make up monthly utility bills for residential customers can be designed in a way that considers those customers’ *ability to pay*. HB 2475 also enables groups representing low-income customers and environmental justice communities to receive intervenor funding assistance to participate in PUC processes.<sup>3</sup>

### What is UM 2211?

UM 2211 is the docket number, or case number, used to easily locate all related filings on Staff’s work to implement HB 2475. You can navigate directly to Docket No. UM 2211 to view the schedule and filings at: <https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=23122>. You can also access the docket from the PUC’s website by selecting eDockets and entering UM 2211 to search by docket number.

### How Can I Participate and Stay Informed?

Staff will promote diverse, equitable, and inclusive engagement opportunities throughout the entirety of this process. We invite anyone interested in learning more about PUC processes and how we as regulators can help reduce energy burden across the state to sign up to receive notifications for Docket No. UM 2211. Register by contacting the PUC.<sup>4</sup>

Once registered, you will receive emails when new documents are filed to Docket No. UM 2211 or there is a change to the schedule. The types of information that may be posted in this docket include differential rate and bill assistance proposals from regulated utilities, engagement notifications, public comment, and more. By signing up to receive notifications, you are not obligated to participate, but you will have the opportunity to receive timely updates on what events are coming up, what progress has been made, related dockets to follow, and what opportunities there may be to engage in the process.

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<sup>1</sup> Section 7 of enrolled House Bill 2475 (HB 2475-A).

<sup>2</sup> Section 2 of enrolled House Bill 2475 (HB 2475-A).

<sup>3</sup> Section 3 of enrolled House Bill 2475 (HB 2475-A).

<sup>4</sup> Interested individuals may contact the Oregon PUC at: [puc.hearings@puc.oregon.gov](mailto:puc.hearings@puc.oregon.gov) and express their interest in being added to the service list for Docket No. UM 2211 or reach out directly to Staff using the contact information listed at the end of this publication.



Other PUC resources that are not specific to UM 2211, but may help new and interested participants in our processes, can be found here:

- Trainings on PUC processes and how to get involved:  
<https://www.oregon.gov/puc/news-events/Pages/Trainings.aspx>
- Get involved:  
<https://www.oregon.gov/puc/news-events/Pages/Get-Involved.aspx>
- Types of PUC events and what to expect:  
<https://www.oregon.gov/puc/news-events/Pages/About%20PUC%20Events.aspx>

## Background

The initial implementation efforts for HB 2475 focused on getting near-term relief in place based on basic minimum standards for rate and program design, prior to a longer-term investigation into HB 2475 implementation policies. Following the HB 2475 effective date in January 2022, monthly bill discount programs based on household income were proposed and put into effect by Portland General Electric (PGE), PacifiCorp (Pacific Power), Northwest Natural Gas Company (NW Natural), Avista Utilities (Avista), and Cascade Natural Gas Company (Cascade).

### HB 2475 Baseline Evaluation Criteria

As a reminder, the baseline evaluation criteria finalized by Staff on February 1, 2022, provided guidance to the regulated utilities on what Staff initially identified as key features that should be pursued in the interim bill assistance proposals under HB 2475. The criteria focus on eligibility, level of relief, tracking and accounting, bundling (with energy efficiency programs), and outreach and engagement. For those interested in reviewing the baseline evaluation criteria, please follow the link here:  
<https://edocs.puc.state.or.us/efdocs/HAC/um2211hac17313.pdf>.

Staff notes that due to the desire for the interim programs to go into effect quickly, the baseline evaluation criteria did not compel the utilities to any specific course of action, and in some cases, program designs deviated from the guidance provided by Staff. Staff expects the upcoming phase of HB 2475 implementation to evolve and update interim guidance.

### HB 2475 Interim Relief

Initial HB 2475 implementation discussions indicated that providing relief to residential customers quickly should be the near-term priority. This prompted the interim guidance and programs ahead of the broad investigation. Staff provided guidance to the regulated utilities, advising that electric utilities should target having an interim differential rate in place in time for when “summer cooling season” begins and monthly bills tend to increase as a result. Natural gas utilities were asked to have their rates ready by the



Fall to be responsive to the “winter heating season” but should provide some sort of bill assistance before then to address winter heating bills from the 2021-2022 season.

### Differential Rates vs. Bill Discounts vs. Energy Assistance

**Differential Rates** – The term “differential rates” is based on the language in HB 2475 and describes a rate that a utility charges for electric or natural gas service that is specifically designed to increase affordability for a certain category of customers. An example of this is where a household with limited income is billed by the utility at a lower rate for their energy use than a household with high income. Differential rates assign a price for your energy use somewhat based on your ability to pay.

**Bill Discounts** – The interim programs currently in effect under HB 2475 for participating utilities are considered bill discount programs. They also operate under the authority provided by HB 2475 where the Commission can authorize utility programs that are designed to increase affordability for customers experiencing high energy burdens. Here customers remain on their same rate schedule, but a percentage of bill discount is applied to reduce the monthly amounts due. This is shown on the bill. The discounts currently vary across utilities and between income brackets, giving larger discounts to households with less income.

**Energy Assistance and Low-Income Energy Efficiency**– Energy assistance in the context where it is distinguished from differential rates and bill discounts is typically regarded a grant-based program administered by the state using funds collected through a public purpose charge or federal funding. These programs have been around longer than the HB 2475 programs. Energy assistance resources are available for customer utility bills and weatherization services. They include but are not limited to: Low-Income Housing and Energy Assistance Program (LIHEAP), Oregon Energy Assistance Program (OEAP). Utilities will also provide assistance via ratepayer funded grant and/or energy efficiency programs such as Oregon Low-Income Gas Assistance (OLGA), Oregon Low-income Energy Efficiency (OLIEE), Oregon Low Income Bill Assistance (OLIBA), Oregon Low Income Energy Conservation (OLIEC), Oregon Low Income Energy Efficiency Program (AOLIEE), and Project Share.

### Informal Rulemaking

Informal rulemaking<sup>5</sup> at the Oregon PUC is a way for the Commission to create rules that govern how the regulated utility companies operate. Here are some features of the process:

- Staff will draft proposed regulation language and necessary information (e.g. summaries, the need for the rule, and financial impact).

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<sup>5</sup> <https://www.oregon.gov/puc/forms/Forms%20and%20Reports/Internal-Operating-Guidelines.pdf#page=10>.



- Organize workshops with stakeholders to gather feedback.
- Use workshops to educate stakeholders about the rules, address issues, review drafts, and discuss alternatives.
- Hold internal meetings to consider feedback and revise draft rules, deciding if further input is needed.
- The informal phase ends when Staff is prepared to present recommended rules to the Commission.
- Staff recommends whether to proceed with a formal rulemaking at a Public Meeting, including a full report of the informal phased.
- Commissioners consider public input before making a decision.
- If moving to a formal rulemaking, rules are published, and the Commission notifies interested parties and legislators.

In the context of this process, the informal rulemaking would conclude with a proposal for the commission to open a formal rulemaking in order to adopt new or modified administrative rules for programs and policies that relate to energy justice.

### Receiving Updates

Please make sure you are signed up to receive notifications for Docket No. UM 2211 and be on the lookout for an email from Staff where you can provide your individual or organization's insights on moving forward with the HB 2475 investigation. You can request to be added to the UM 2211 service list by emailing at [puc.hearings@puc.oregon.gov](mailto:puc.hearings@puc.oregon.gov). Be sure to note UM 2211 in the request.



**Attachment A: Survey Synthesis**

Equity Landscape

<b>Q1: What do you see as the most important or urgent equity issues in the provision of energy to utility customers?</b>	
<b>EJ Advocates</b>	<ul style="list-style-type: none"> <li>• Affordability</li> <li>• Qualifying households not enrolled or being served by other programs.</li> <li>• Extreme Weather (Community health)</li> <li>• Reliability &amp; Resilience</li> <li>• Energy Efficiency and Weatherization</li> <li>• Service Disconnections</li> </ul>
<b>PGE</b>	<ul style="list-style-type: none"> <li>• Reliability</li> <li>• Affordability</li> </ul>
<b>PAC</b>	<ul style="list-style-type: none"> <li>• Energy Burden</li> <li>• Community Health and wellbeing</li> </ul>
<b>Idaho Power</b>	<ul style="list-style-type: none"> <li>• Idaho Power customers have highest poverty rate in state</li> </ul>
<b>NWN</b>	<ul style="list-style-type: none"> <li>• Energy insecurity</li> </ul>
<b>Avista</b>	<ul style="list-style-type: none"> <li>• Affordability</li> <li>• Energy burden</li> </ul>
<b>Cascade</b>	<ul style="list-style-type: none"> <li>• Program penetration.</li> <li>• Qualified customers that are not enrolled in programs</li> </ul>
<b>Energy Trust of Oregon</b>	<ul style="list-style-type: none"> <li>• Affordability                             <ul style="list-style-type: none"> <li>○ Rates affordability</li> <li>○ Utility bill affordability</li> <li>○ Project affordability</li> </ul> </li> <li>• Accessibility</li> </ul>

<b>Q2: What communities are most impacted?</b>	
<b>EJ Advocates</b>	<ul style="list-style-type: none"> <li>• EJ Communities</li> <li>• Renters</li> <li>• Those facing disproportionately higher impacts</li> </ul>
<b>PGE</b>	<ul style="list-style-type: none"> <li>• Communities with high energy burdens</li> <li>• EJ communities</li> </ul>
<b>PAC</b>	<ul style="list-style-type: none"> <li>• A variety of issues impact all communities</li> </ul>
<b>Idaho Power</b>	<ul style="list-style-type: none"> <li>• Customers that fall outside of 60% SMI that are still impacted but do not qualify for other assistance programs. We should consider the additional burden these customers face</li> </ul>
<b>NWN</b>	<ul style="list-style-type: none"> <li>• Those that have not and still do not have a full seat/voice in the planning environment</li> </ul>
<b>Avista</b>	<ul style="list-style-type: none"> <li>• Energy burdened communities</li> </ul>



	<ul style="list-style-type: none"> <li>• Communities that have historically been unable to participate in utility programs due to access or other barriers.</li> <li>• Renters</li> </ul>
<b>Cascade</b>	<ul style="list-style-type: none"> <li>• Cascade has identified top vulnerable counties in their service territory:             <ul style="list-style-type: none"> <li>○ Malheur</li> <li>○ Jefferson</li> <li>○ Umatilla</li> <li>○ Klamath</li> <li>○ Morrow</li> </ul> </li> </ul>
<b>Energy Trust of Oregon</b>	<ul style="list-style-type: none"> <li>• Areas with:             <ul style="list-style-type: none"> <li>○ greater environmental burden</li> <li>○ lower public infrastructure investments</li> <li>○ older housing stock</li> <li>○ low rates of homeownership</li> <li>○ limited access to contractors</li> </ul> </li> <li>• Legacy exclusionary zones</li> <li>• People with limited resources</li> <li>• People who don't own or live in single-family homes</li> </ul>

- EJ Advocates comments defined environmental-justice communities as “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.”
- NWN clarifies that those who have not and still do not have a full seat/voice in the planning environment may include low-income and moderate-income households, people of color, rural residents, and seniors. The Company also notes that answering this question can be challenging due to communities being defined by geography, identity, cause, or intersections of variables, which may also change based on season or year.
- Avista broadens their definition of energy burdened communities stating they can include a broad array of populations including those on fixed incomes, disability, or those employed yet chronically impoverished, among many others.
- Cascade identified these priority counties utilizing Center of Disease Control and Prevention (CDC) and the Agency for Toxic Substances and Disease Registry (ATSDR) Social Vulnerability Index (SVI). The resources map communities utilizing sixteen census variables.

<b>Q3: What are the most important or urgent actions to improve equity outcomes?</b>	
<b>EJ Advocates</b>	<ul style="list-style-type: none"> <li>• Ending disconnections and capping rate increases for vulnerable households.</li> <li>• Reducing energy consumption and improving health</li> <li>• Stronger extreme heat protections</li> <li>• Establishing programs that better account for peoples realities (i.e. gig workers, hourly workers, seasonal workers)</li> </ul>

	<ul style="list-style-type: none"> <li>• Increasing accessibility to energy efficiency and DERs</li> <li>• Expanding data metrics and accessibility to data including expanding utility reporting and including qualitative data alongside traditional data collection.</li> <li>• Language justice to ensure communities can access web portals, printed materials, and other programs to improve outcomes and relationships with customers/communities.</li> </ul>
<b>PGE</b>	<ul style="list-style-type: none"> <li>• Customer survey responses show affordability as top concern             <ul style="list-style-type: none"> <li>○ Recommend a holistic approach that includes:                 <ul style="list-style-type: none"> <li>▪ Maintains continuity for participants</li> <li>▪ Emphasizes effective community outreach</li> <li>▪ Identify where improvements can increase accessibility and participation of EJ communities</li> </ul> </li> </ul> </li> </ul>
<b>PAC</b>	<ul style="list-style-type: none"> <li>• Compiling data from Energy Burden Assessments</li> <li>• Adapt programs for greater accessibility</li> <li>• Elevate transparency on issues</li> </ul>
<b>NWN</b>	<ul style="list-style-type: none"> <li>• Identifying gaps in knowledge or data</li> <li>• Identifying gaps in current programs</li> <li>• Formulating a quantifiable view of Oregon’s energy burden</li> <li>• Enabling access to more voices to participate             <ul style="list-style-type: none"> <li>○ Broadening awareness and inclusion of policy discussions that impact priority communities</li> <li>○ Increase availability and understandability of information and provide explanation of Commission process and expectations.</li> </ul> </li> </ul>
<b>Avista</b>	<ul style="list-style-type: none"> <li>• Foundational definitions of equity, environmental justice, and other identified communities</li> <li>• Improve access and eliminate barriers             <ul style="list-style-type: none"> <li>○ Analyze the barriers currently being faced by priority communities</li> </ul> </li> </ul>
<b>Cascade</b>	<ul style="list-style-type: none"> <li>• Program penetration.</li> <li>• Qualified customers that are not enrolled in programs</li> </ul>
<b>Energy Trust of Oregon</b>	<ul style="list-style-type: none"> <li>• Programs that lower or remove out of pocket costs.</li> <li>• Programs that support efficiency, health benefits and resiliency</li> <li>• Improving awareness of customers options and how programs complement one another.             <ul style="list-style-type: none"> <li>○ Direct engagement with communities and the organizations that serve them</li> <li>○ Messaging in multiple languages and mediums</li> <li>○ Messaging that communities relate to, understand and that addresses their needs</li> </ul> </li> <li>• Lowering eligibility and participation barriers:             <ul style="list-style-type: none"> <li>○ A holistic and supportive approach throughout upgrade and application processes</li> <li>○ Workforce development</li> <li>○ Integration of trusted resources into program delivery</li> </ul> </li> </ul>



	<ul style="list-style-type: none"> <li>• Increasing access to distributed solar generation and storage</li> <li>• Expanding access to support low-and-medium income access to solar and storage systems.</li> </ul>
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Utilities Programs

<p><b>Q3: 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.</b></p>	
<b>EJ Advocates</b>	<ul style="list-style-type: none"> <li>• Incentives are not enough to help customers who can't cover the remaining costs</li> <li>• Anti-displacement focus is crucial for utility programs and services</li> <li>• Growing the role the culturally-specific organizations play in identifying and serving currently and historically underserved communities</li> <li>• Current thresholds for qualifying customers leave households behind</li> <li>• All customers receiving means based benefit programs (LIHEAP, SNAP, Medicaid) should be auto-enrolled and auto-eligible for energy assistance programs.</li> <li>• Need a wider array of tools to mitigate disconnection, like arrears management programs</li> <li>• Structuring programs that allows customers and communities to leverage federal incentives and reduce GHG emissions and grid pressures</li> <li>• Expand access to energy efficiency and weatherization</li> <li>• More granular data on who is impacted and how</li> <li>• Factoring health outcomes and climate resilience into program design.</li> <li>• Ensuring communities know about and understand how the available programs can serve them.</li> </ul>
<b>PGE</b>	<ul style="list-style-type: none"> <li>• Improved awareness and enrollment in existing programs</li> </ul>
<b>PAC</b>	<ul style="list-style-type: none"> <li>• Need for increased transparency</li> <li>• Targeted outreach and accessibility for those not currently enrolled</li> </ul>
<b>Idaho Power</b>	<ul style="list-style-type: none"> <li>• Energy efficiency and weatherization</li> <li>• Education</li> <li>• Understanding the barriers that agencies face in utilizing funds</li> </ul>
<b>NWN</b>	<ul style="list-style-type: none"> <li>• Improvement and innovation in outreach and customer awareness of current programs</li> <li>• Finding solutions to address equity issues for moderate-income customers who do not qualify for existing programs</li> </ul>
<b>Avista</b>	<ul style="list-style-type: none"> <li>• Accessibility, including transparency and education in programs and services</li> </ul>



	<ul style="list-style-type: none"> <li>Working with external partners to eliminate barriers             <ul style="list-style-type: none"> <li>Lack of access to energy efficiency and weatherization services to renters</li> </ul> </li> <li>Weatherization</li> <li>Statewide navigation for available resources that can help pay for health, safety and repairs issues</li> <li>Increasing pathways for customers to receive efficiency services without risking becoming ineligible for later participation</li> </ul>
<b>Cascade</b>	<ul style="list-style-type: none"> <li>Improve connections and relationship with state food assistance programs to increase EDP enrollments</li> <li>Utilities should work on further identifying vulnerable populations to understand inequities customers experience.</li> </ul>
<b>Energy Trust of Oregon</b>	<ul style="list-style-type: none"> <li>Expanding low-cost and no-cost offerings</li> <li>Pairing energy assistance with energy efficiency</li> <li>Shifting from transactional engagement to relational engagement</li> <li>Continuing to explore and evolve relationships with new and existing community-based orgs and nonprofits involved in program design, delivery, and evaluation</li> </ul>

<b>Q4: Are there specific geographic areas or distinct populations that should be prioritized?</b>	
<b>EJ Advocates</b>	<ul style="list-style-type: none"> <li>Utilizing utility data to identify most disconnected census tracts, along with most arrearages and outages.             <ul style="list-style-type: none"> <li>Prioritizing based on vulnerability data</li> </ul> </li> <li>Areas of extreme heat</li> <li>Utilizing data to highlight under-represented groups of people to help prioritize.</li> </ul>
<b>PGE</b>	<ul style="list-style-type: none"> <li>Most appropriate at a program level to identify target groups like building type, income level, bill payment histories, etc.</li> </ul>
<b>PAC</b>	<ul style="list-style-type: none"> <li>Identified in CBIAG presentation:             <ul style="list-style-type: none"> <li>Elderly</li> <li>Rural &amp; Isolated Communities</li> <li>Low-Income earners</li> <li>Children and youth entering adulthood</li> <li>Non-English and limited English proficiency</li> <li>Those with Mental and Physical Health concerns</li> <li>Unhoused</li> <li>Multifamily housing</li> <li>People with aging homes</li> <li>Renters</li> <li>Undocumented</li> </ul> </li> </ul>
<b>NWN</b>	<ul style="list-style-type: none"> <li>See answer 2</li> </ul>
<b>Avista</b>	<ul style="list-style-type: none"> <li>Rural areas</li> </ul>



	<ul style="list-style-type: none"> <li>• Sees “distinct populations” as more relevant than geographic areas</li> <li>• A map set utilizing factors agreed upon by stakeholders may be helpful (similar to Justice40)</li> </ul>
<b>Cascade</b>	<ul style="list-style-type: none"> <li>• Tribal communities             <ul style="list-style-type: none"> <li>○ Cascade has struggled with uptake from this customer group</li> </ul> </li> </ul>
<b>Energy Trust of Oregon</b>	<ul style="list-style-type: none"> <li>• Renters</li> <li>• People experiencing fixed, low to moderate incomes</li> <li>• Customers of color</li> <li>• Rural</li> <li>• Communities for which English is not a first language</li> <li>• Tribal governments and communities</li> <li>• People with disabilities</li> <li>• Small businesses</li> </ul>

<b>Q5: How can the PUC measure progress in addressing equity issues in utility programs and services? Please feel free to suggest specific metrics.</b>	
<b>EJ Advocates</b>	<ul style="list-style-type: none"> <li>• Energy savings and enrollment</li> <li>• National Consumer Law Center monthly customer data</li> <li>• Monthly disconnection reporting with additional data metrics</li> <li>• Metrics should be based on goals of program</li> <li>• Qualitative measures</li> <li>• Reintroducing the PUC’s enhanced data reporting during COVID-19</li> </ul>
<b>PGE</b>	<ul style="list-style-type: none"> <li>• By program and holistically             <ul style="list-style-type: none"> <li>○ Assessing factors that are reasonably responsive to program influence</li> <li>○ Incorporating qualitative information from customer experience data</li> <li>○ Track actions and outcomes that evolve over time</li> <li>○ Allow for refinement over time as equity metrics develop</li> </ul> </li> <li>• CBIs</li> </ul>
<b>PAC</b>	<ul style="list-style-type: none"> <li>• Structured and meaningful data architected with ETO and utilities, including agreed upon metrics and analytics processes</li> <li>• Expects to use CBIs to expand through stakeholder feedback process for specific actions to monitor progress</li> </ul>
<b>NWN</b>	<ul style="list-style-type: none"> <li>• Through the development of equity metrics with an emphasis on the importance of access to, and transparency of, information.</li> </ul>
<b>Avista</b>	<ul style="list-style-type: none"> <li>• Look to further discussions</li> <li>• Ways to measure progress in addressing energy burden should be considered.</li> </ul>



<b>Cascade</b>	<ul style="list-style-type: none"> <li>• Reviewing the number of enrolled participants in EDP living within vulnerable populations</li> <li>• Review program penetration for zip codes identified as disadvantaged communities</li> <li>• Availability of program materials in various communication channels and in multiple languages.</li> </ul>
<b>Energy Trust of Oregon</b>	<ul style="list-style-type: none"> <li>• Starts with a shared understanding of current state of all program activities, designs, modeling tools and how they fit together</li> <li>• Evaluating and tracking qualitative measures through community stories</li> <li>• Census data is not enough</li> <li>• Metrics should be based on goals of program</li> <li>• Impact of efficiency programs (lasting deep savings)</li> <li>• Support for CBOs including capacity building, training, education</li> <li>• Culturally responsive communication and outreach</li> <li>• Rural workforce development and diverse business support</li> </ul>

<b>Q6: 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:</b>	
<b>EJ Advocates</b>	<ul style="list-style-type: none"> <li>• Energy efficiency and weatherization:             <ul style="list-style-type: none"> <li>○ Evaluating successful models elsewhere that Oregon can learn from</li> <li>○ What are existing programs and success indicators? Wait times? Outreach Methods? Equity Metrics?</li> </ul> </li> <li>• DERs             <ul style="list-style-type: none"> <li>○ How deep is DER penetration vs what is needed for success? Costs and Benefits?</li> </ul> </li> <li>• Equitable Rate Design             <ul style="list-style-type: none"> <li>○ What are other successful models?</li> <li>○ Rate design training, understanding the pros and cons of different customer classes and more info</li> </ul> </li> <li>• Technical Assistance             <ul style="list-style-type: none"> <li>○ Opportunities for involvement through the PUC</li> </ul> </li> </ul>
<b>PGE</b>	<ul style="list-style-type: none"> <li>• No additional input at this time</li> </ul>
<b>PAC</b>	<ul style="list-style-type: none"> <li>• Adding a session to discuss connecting equity outcomes to portfolios in IRPs.</li> <li>• Encourage Staff to consider inviting a broad range of experts to present</li> </ul>
<b>NWN</b>	<ul style="list-style-type: none"> <li>• Equitable rates design should include a comparison of costs and bill impacts to all customers, as well as a comparison to existing programs and designs</li> </ul>



	<ul style="list-style-type: none"> <li>• Suggests and additional topic of procedural equity in the energy sector</li> </ul>
<b>Avista</b>	<ul style="list-style-type: none"> <li>• No additional input at this time</li> </ul>
<b>Cascade</b>	<ul style="list-style-type: none"> <li>• Dr. H. Gil Peach is well versed on various low-income bill assistance programs and is able to speak on the benefits and challenges of different approaches.</li> </ul>
<b>Energy Trust of Oregon</b>	<ul style="list-style-type: none"> <li>• Info session 1 - It would be useful to create a summary of the current investments the state is making today and from recent years to improve efficiency in low-income households.</li> <li>• Info session 2 – Ensuring a review of all funding programs available</li> <li>• Info session 3 – ETO could speak to equitable solar investments, solar+storage efforts and a recent solar ambassadors approach</li> <li>• Info session 4 – ETO could speak to approaches in it’s Solar program.</li> </ul>

Differential Rates

<b>Q7: 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?</b>	
<b>EJ Advocates</b>	<ul style="list-style-type: none"> <li>• Need deeper discussion around this             <ul style="list-style-type: none"> <li>○ Customers should not be penalized for choices they do not get to make</li> <li>○ Understanding the nuance of when a customer moves from one utility territory to another, etc.</li> </ul> </li> <li>• Need to address concerns around utilities with varying service territories – like Idaho Power.</li> </ul>
<b>PGE</b>	<ul style="list-style-type: none"> <li>• PGE sees benefits to continued consistency in overall approach in areas of administration, marketing, data reporting, performance assessment, and customer experience for shared customers.</li> <li>• For granular details, believe in an approach where the utility, along with community groups and regulatory stakeholders can define details.</li> </ul>
<b>PAC</b>	<ul style="list-style-type: none"> <li>• Does not have a particular position at this time</li> <li>• Notes that different utilities have different service territories and characteristics and a one-size-fits-all approach may not be in the public interest</li> </ul>
<b>Idaho Power</b>	<ul style="list-style-type: none"> <li>• Have their own specific characteristics as a service territory</li> </ul>
<b>NWN</b>	<ul style="list-style-type: none"> <li>• Rates should be designed to best suit the customers in each utilities service territory</li> <li>• Focusing on the intended results and targeted outcomes rather than specific elements</li> </ul>





	<ul style="list-style-type: none"> <li>Establishing an accepted view of Oregon residential customers energy burden to best meet needs of customers.</li> </ul>
<b>Avista</b>	<ul style="list-style-type: none"> <li>Overly prescriptive may not be in the public interest due to unique natures of each utility.</li> <li>Support the general baseline consistencies</li> <li>Highlight the difference between gas and electric utilities</li> </ul>
<b>Cascade</b>	<ul style="list-style-type: none"> <li>Believes it would be a mistake to prescribe a standardized rate design for all utilities</li> <li>Believe in the ability to tailor programming to customers specific in service territory</li> <li>Highlight the difference between gas and electric utilities</li> </ul>

<b>Q8: 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)?</b>	
<b>EJ Advocates</b>	<ul style="list-style-type: none"> <li>Income only gives so much data                             <ul style="list-style-type: none"> <li>Type of housing</li> <li>Medical conditions, children in the home</li> </ul> </li> <li>Communities history with disconnection</li> <li>Data Sources:                             <ul style="list-style-type: none"> <li>EPA EJ Screen</li> <li>Oregon Affordable Housing Assessment</li> <li>Indiana University’s Utility Disconnection Dashboard</li> <li>New data sets that are community informed</li> </ul> </li> <li>Considerations that should be made:                             <ul style="list-style-type: none"> <li>Offering opt in or out receiving outreach to other programs, home energy audits</li> <li>Anti-displacement approach</li> <li>Who utilities can share data with</li> </ul> </li> </ul>
<b>PGE</b>	<ul style="list-style-type: none"> <li>Customer type, household size</li> <li>Electricity dependent household needs</li> <li>Household income and size</li> <li>Consideration and additional factors that affect affordability should be limited to marketing and providing enrollment support</li> <li>Data sources:                             <ul style="list-style-type: none"> <li>What other non-utility data sources are available for other income-qualified and equity-focused program.</li> </ul> </li> <li>Other Considerations:                             <ul style="list-style-type: none"> <li>Data security</li> </ul> </li> </ul>
<b>PAC</b>	<ul style="list-style-type: none"> <li>Does not have a recommendation at this time</li> </ul>
<b>Idaho Power</b>	<ul style="list-style-type: none"> <li>Understanding demographics of utility specific customers usage to understand how differential rates will impact differing customer segments</li> </ul>



<b>NWN</b>	<ul style="list-style-type: none"> <li>• NWN’s EBA, Staff’s landscape analysis and other sources to help identify customer characteristics that should be prioritized.</li> <li>• Data privacy is costly, concerns with data storage</li> </ul>
<b>Avista</b>	<ul style="list-style-type: none"> <li>• Income and energy burden should be highest priority</li> <li>• Data:             <ul style="list-style-type: none"> <li>○ Justice40 and low-income needs assessment</li> <li>○ Income data and how that can be stored securely</li> </ul> </li> <li>• Other considerations:             <ul style="list-style-type: none"> <li>○ How to ensure data is secure</li> </ul> </li> </ul>
<b>Cascade</b>	<ul style="list-style-type: none"> <li>• Income, energy burden, and disconnections</li> <li>• Do not believe the Company should ask and store demographic information</li> </ul>

<b>Q9: Are there rate structures that should be prioritized for consideration in this phase of implementation? Why or why not?</b>	
<b>EJ Advocates</b>	<ul style="list-style-type: none"> <li>• Consider rate structures that reduce risk of disconnection and energy burden (below 6% to a manageable level)</li> <li>• A feasibility study on PIPP programs</li> <li>• Energy burden at 6% is well above higher and middle income percentage. Reevaluating that number</li> <li>• As energy costs increase, especially from GRCs, need to reevaluate bill discount programs</li> <li>• Adding tiers for those outside of the programs ceiling</li> <li>• Evaluating design options in combination with longer term investments in health and safety conditions in a home</li> <li>• Look into establishing a separate rate class for low-income customers</li> <li>• Analyze rate stability options for low-income customers</li> <li>• Addressing past due bills and the unaffordability of payment plans.</li> <li>• Eliminating late fees</li> <li>• Criteria that should be evaluated:             <ul style="list-style-type: none"> <li>○ Reducing energy limiting behavior and # of disconnections</li> <li>○ Serves all eligible customers even if they can’t receive LIHEAP</li> <li>○ Lowers program participants energy burden</li> <li>○ Promoting timely payment of bills that are truly affordable</li> <li>○ Ensures customers can understand and manage bills</li> <li>○ Data driven approach</li> </ul> </li> </ul>
<b>PGE</b>	<ul style="list-style-type: none"> <li>• Do not view separation of a new rate class as a rate structure but an approach to cost allocation             <ul style="list-style-type: none"> <li>○ Caution if this approach would lead to its intended effect of reducing costs for that group</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>• Criteria:             <ul style="list-style-type: none"> <li>○ Consideration of rate and bill discount should weigh the balance of feasibility and precision</li> <li>○ Permanent bill discount programs should consider effectiveness in improving affordability, total cost, continuity with current programs, and factors related to efficiency including customer experience, admin, and alignment with other programs</li> </ul> </li> <li>• Pros and cons             <ul style="list-style-type: none"> <li>○ A choice to expand program design would need to be weighed against affordability generally</li> <li>○ Enrollment and reenrollment are areas to further refine in this process.</li> </ul> </li> </ul>
<b>PAC</b>	<ul style="list-style-type: none"> <li>• Does not have recommendations at this time</li> </ul>
<b>Idaho Power</b>	<ul style="list-style-type: none"> <li>• Before developing new programs should be looking at the effectiveness of current programs</li> </ul>
<b>NWN</b>	<ul style="list-style-type: none"> <li>• Focusing on the desired results rather than specific designs (reducing energy burden rather than rate classes)</li> <li>• Once guiding principles or desired outcomes are established, different ratemaking approaches can be developed.</li> </ul>
<b>Avista</b>	<ul style="list-style-type: none"> <li>• Without having an assessment of the state, it would be premature to consider additional rate structures</li> <li>• Basing off of whether intended metrics are being met</li> </ul>
<b>Cascade</b>	<ul style="list-style-type: none"> <li>• Believe it would be premature to prescribe new rate structures or rate classes at this time because bill discount programs have the ability to grow into more effective tools</li> <li>• Auto enrolling customers in all income qualifying state programs into the bill discount program</li> </ul>

<b>Q10: How should the costs of differential rates be recovered?</b>	
<b>EJ Advocates</b>	<ul style="list-style-type: none"> <li>• Shared equitably across all customer classes as widely and fairly as possible</li> <li>• Large customers should share an equal share of the programs</li> <li>• If rate mitigation were to occur, should remove low-income customers from paying for differential rates</li> <li>• Cost recovery:             <ul style="list-style-type: none"> <li>○ Tax revenue</li> <li>○ Balancing account</li> </ul> </li> </ul>
<b>PGE</b>	<ul style="list-style-type: none"> <li>• Automatic Adjustment Clause for current process with possible changes</li> <li>• Open to discussions as long as they're based on data that is available.</li> </ul>
<b>PAC</b>	<ul style="list-style-type: none"> <li>• costs of differential rates should be equitably recovered from all customers in the state.</li> </ul>



<b>Idaho Power</b>	<ul style="list-style-type: none"> <li>to the extent possible, costs should be recovered from the customers who cause the costs, which further helps to send price signals to each customer class.</li> <li>Understand that recovering a portion of the costs from other customer classes is consistent with the intent of HB 2475</li> </ul>
<b>NWN</b>	<ul style="list-style-type: none"> <li>should be allowed to recover the cost of serving all customers.                             <ul style="list-style-type: none"> <li>Need to understand the magnitude of the costs and potential impacts it could have on the customers that shoulder the costs.</li> </ul> </li> <li>Hope to learn more about non-traditional approaches in this process</li> </ul>
<b>Avista</b>	<ul style="list-style-type: none"> <li>costs of differential rates should be spread equally based on the cost of service for each customer class</li> </ul>
<b>Cascade</b>	<ul style="list-style-type: none"> <li>Two possible ways:                             <ul style="list-style-type: none"> <li>From all customers</li> <li>From all non-participants</li> </ul> </li> </ul>

<b>Q11: How can the PUC measure progress in addressing energy burden through differential rates?</b>	
<b>EJ Advocates</b>	<ul style="list-style-type: none"> <li>Track disconnections, arrearages</li> <li>Consider developing an energy burden index</li> <li>Coordinate with CAP agencies and OHCS on data</li> <li>Measure data similar to covid tracking</li> </ul>
<b>PGE</b>	<ul style="list-style-type: none"> <li>Periodic program evaluations</li> </ul>
<b>PAC</b>	<ul style="list-style-type: none"> <li>EBA will help measure progress</li> </ul>
<b>NWN</b>	<ul style="list-style-type: none"> <li>Program take-up rate, energy cost savings, energy burden change</li> </ul>
<b>Avista</b>	<ul style="list-style-type: none"> <li>Commission should track participation in programs, the number of eligible customers, the number/percent of customers facing high energy burden, total assistance needed to address energy burden, the \$ of assistance being provided</li> </ul>
<b>Cascade</b>	<ul style="list-style-type: none"> <li>Number of EDP program participants, program penetration, the number of disconnects for non-payment among low-income</li> </ul>

<b>Q12: Do you feel you and/or your organization have sufficient capacity to engage in the proposed process?</b>	
<b>EJ Advocates</b>	<ul style="list-style-type: none"> <li>Capacity is limited                             <ul style="list-style-type: none"> <li>Hope that Staff will be generous with deadline extensions and responsive to requests to modify the process</li> </ul> </li> </ul>
<b>PGE</b>	<ul style="list-style-type: none"> <li>Have capacity to engage but concerns over the workload in data workstreams                             <ul style="list-style-type: none"> <li>Focus on the availability and potential usefulness of data being collected</li> </ul> </li> </ul>



<b>PAC</b>	<ul style="list-style-type: none"> <li>• PAC is committed</li> </ul>
<b>Idaho Power</b>	<ul style="list-style-type: none"> <li>• Yes</li> </ul>
<b>NWN</b>	<ul style="list-style-type: none"> <li>• Yes</li> </ul>
<b>Avista</b>	<ul style="list-style-type: none"> <li>• Yes</li> </ul>
<b>Cascade</b>	<ul style="list-style-type: none"> <li>• Yes</li> </ul>
<b>Energy Trust of Oregon</b>	<ul style="list-style-type: none"> <li>• Yes</li> </ul>

<b>Q13: Do you have any additional input for the next phase of HB 2475 implementation?</b>	
<b>EJ Advocates</b>	<ul style="list-style-type: none"> <li>• Including a discussion on bill accessibility and readability as an equity component will be important as we see more customers call in with uncertainties on their bills.</li> </ul>
<b>PGE</b>	<ul style="list-style-type: none"> <li>• Rather than structural changes would like to see an emphasis on promoting awareness and enrollment, consideration and adjustments from EBA                             <ul style="list-style-type: none"> <li>○ Reviewing post enrollment verification to see if changes are needed</li> </ul> </li> <li>• Promoting a holistic approach to serving energy burdened customers</li> </ul>
<b>PAC</b>	<ul style="list-style-type: none"> <li>• Cautious to move forward with certain program changes without EBA data and other data metrics</li> </ul>
<b>Idaho Power</b>	<ul style="list-style-type: none"> <li>• Concerned that considering changes while in the process of implementation may lead to customer confusion/inefficiencies</li> </ul>
<b>NWN</b>	<ul style="list-style-type: none"> <li>• In the interest of procedural justice, may need to bring in more voices                             <ul style="list-style-type: none"> <li>○ This may include new processes, like office hours and other education and support opportunities to bring new groups into the process.</li> </ul> </li> </ul>
<b>Energy Trust of Oregon</b>	<ul style="list-style-type: none"> <li>• Admin of programs should change and evolve based on collaboration, input, and accountability</li> <li>• This process should include how information flows between participating agencies</li> <li>• When programs change, the market (contractors, customers, delivery entities) are impacted, we should be more proactive about coordinating to ease these burdens.</li> </ul>