



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: Advice No. 22-01 / ADV 1365, PGE Reply Comments on Income-Qualified Bill Discount Program

Portland General Electric (PGE) appreciates the time and effort that so many community and energy-focused stakeholders have put into the design and development of our interim Income-Qualified Bill Discount program (IQBD, Advice Filing 22-01 / ADV 1365). Input from stakeholders, Staff at the Public Utility Commission of Oregon (OPUC) and utility partners have been instrumental in aligning key design elements with program goals: low-barrier, efficient, and dignifying.

Throughout the process PGE has explored a range of recommendations, incorporated improvements where feasible, and continues to plan for additional enhancements following program launch. In this response to written comments from the Community Energy Project (CEP), NW Energy Coalition (NVEC) and Multnomah County Office of Sustainability (filed jointly), and the Citizens' Utility Board (CUB), PGE clarifies which recommendations can be integrated into the proposal near-term, which are target enhancements for Year 2, and which raise concerns for PGE or should be considered within the larger UM 2211 investigation process.

Enrollment

Categorical Enrollment of Energy Assistance Customers

Enrolling customers who have received assistance from the Low-Income Home Energy Assistance Program (LIHEAP) or the Oregon Energy Assistance Program (OEAP) without additional customer effort is a key program element that PGE is aggressively working towards. The Company is working to implement categorical enrollment of these customers no later than June 30, 2022. Implementing this element as part of program launch will significantly increase the number of enrollments previously projected for Year 1. With approximately 25,000 customers eligible for categorical enrollment Year 1, additional time is needed to ensure processes are in place to handle the increased volume.

PGE is also coordinating with Oregon Housing and Community Services (OHCS) to find both technical and legal solutions to sharing income and housing size information for LIHEAP/OEAP recipients to seamlessly enroll these customers in their appropriate discount tier. This data could be available by June and is expected no later than October 2022. PGE recommends that implementing categorical enrollment await these solutions to provide customers a smoother enrollment and program experience, one in which customers will not need to contact PGE to submit income and household size attestations. Additionally, this approach would be a more efficient use of program administrative dollars because these customers would be processed for enrollment only once.

If OHCS does not have the ability to share individual customer information without an adjustment to their current process (expected in October 2022), stakeholders have suggested that Energy Assistance recipients be enrolled at the lowest discount level until they submit an IQBD application declaring their eligibility for a higher discount level. PGE would be willing to accept this recommendation if OHCS determines that data-sharing would not be possible until October 2022 and if stakeholders and Staff concur that any incremental administrative costs are outweighed by the benefit to participating customers.

Third-Party Enrollment

Online third-party enrollment will allow community organizations, family members or other contacts to complete enrollment applications on behalf of eligible PGE customers. This is also a key program element that PGE is eager to implement; however, overcoming the legal complexities associated with this enhancement needs further consideration. Prior to incorporating this program element, PGE must ensure its billing system can appropriately track the third-party entity and their associated information should enrollee(s) have future concerns over the verification of need process or other terms and conditions of the program.

PGE is committed to working through these challenges with an expectation that this enrollment option will be enabled in Year 1. Until then, PGE will ensure a range of enrollment options for customers (online, by phone or by mail) and will work with community organizations to alleviate enrollment challenges as much as possible.

Post-Enrollment Verification of Need

PGE is planning to implement the first verification of need process on a randomly sampled 3% of enrolled customer in early 2023. PGE will continue to work with stakeholders on implementing a verification process that is sensitive to the hurdles some low-income customers face when required to document their household income. PGE intends to ask for average annual household income to mitigate the seasonality

of certain incomes and afford audited customers as much flexibility in documentation as possible, while demonstrating through verification that a self-certification enrollment approach can work in Oregon.

Comments filed jointly and those from CUB both ask that PGE consider pre-qualifying applicants with fixed income sources and exclude them from the verification of need process. At this time, PGE recommends that only participants who have been categorically enrolled or received LIHEAP/OEAP assistance within the 12 preceding months be excluded from the possibility of eligibility verification.

To alleviate some of the burden of re-enrollment for fixed-income participants, PGE will explore a longer enrollment renewal window for this group, given that they are expected to have consistent household income and size levels from year to year. Due to the interim nature of utility discount programs in 2022 and potential for design adjustments following UM 2211, it is impractical to extend renewal windows beyond two years at this point. We look forward to continued conversations with stakeholders and Staff in UM 2211 to incorporate options like this.

Data Tracking and Reporting

PGE is committed to providing new and cumulative enrollment counts by month, zip code, and discount level quarterly. We will also provide monthly information on average discount and bill amounts, the number of customers that have received Energy Assistance within the prior 12 months, and the number of customers in arrears.

Stakeholder comments suggest that PGE also collect demographic data at enrollment for reporting and refinement of our marketing and outreach efforts to correct for any inherent under-representation in enrollments. To this suggestion, PGE continues to voice concern over asking for this type of data at enrollment to mitigate any perception that demographic information is required for program participation.

That said, PGE is open to discussing this issue further within the UM 2211 process and would bring to that conversation the idea of using program data aggregated at the census tract level to combine with publicly available demographic data at a similar granularity if this would provide useful precision for outreach and analyses. Additionally, PGE will include demographic questions on program surveys, discussed below.

Participant Surveys

Stakeholder comments voice support for Staff's guidance that utility programs include post-enrollment surveys at 3-, 6- and 12-months following program launch (delivered in their Interim Action Proposal Update). PGE is supportive of gathering more information but would like to highlight the risk of survey/communication fatigue among early

enrollees who would be receiving four to five program communications in the first year between confirmation letters and surveys.

PGE recommends fielding surveys only at 6- and 12-months. This allows time for the implementation of categorical enrollment and for those participants to experience discounted bills before providing feedback that can be informative to the UM 2211 process. PGE will also be monitoring customer feedback on this program through post-call surveys and other points of customer contact.

Additional Recommendations

Expanded Eligibility Criteria

CUB suggests that PGE consider expanded eligibility criteria to include customers with household incomes up to 300% of the Federal Poverty Level, equating to about 85% of State Median Income (SMI). PGE considered a similar expansion in the past and estimates that increasing the eligibility criteria from 60% to 80% of SMI nearly doubles the pool of eligible customers to about 300,000 and increases the direct program costs by about 50%. (Assuming no change to the discount tiers, these additional customers would all be eligible for the lowest discount tier.)

PGE made the decision to offer deeper discounts to customers at the lowest end of the income spectrum rather than cast a wider net for program eligibility. The primary reason behind this approach is that high energy burdens (on average) are concentrated among customers with the very lowest income and energy burden appears to fall below 6% of household income as income levels reach 60% of SMI.

PGE would like to thank our community partners and OPUC Staff again for the collaborative process of developing this interim program. The Company is excited to launch its Income-Qualified Bill Discount offering and provide ongoing and dependable relief to customers in need.

Please direct questions to Ashleigh Keene at ashleigh.keene@pgn.com and all formal correspondence and requests to pge.opuc.filings@pgn.com.

Sincerely,

\s\ Robert Macfarlane

Robert Macfarlane
Manager, Pricing and Tariffs