

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 433**

In the Matter of

PACIFIC POWER, dba PACIFIC POWER,

Request for a General Rate Revision.

COMMUNITY ENERGY PROJECT, COALITION
OF COMMUNITIES OF COLOR, AND VERDE:
NOTICE OF INTENT TO REQUEST JUSTICE
FUNDING CASE FUND GRANT AND CASE
CERTIFICATION; PROPOSED BUDGET

In compliance with OAR 860-001-0800 through OAR 860-001-0900 and the Justice Funding Agreement adopted by the Oregon Public Utility Commission (Commission) in UM 2211 by Order 23-033 (February 7, 2023), the Community Energy Project (CEP), Coalition of Communities of Color (CCC) and Verde (collectively, the Joint Coalition) file this Notice of Intent to Request Justice Funding Case Fund Grant, Request for Case Certification, and Proposed Budget.

The Joint Coalition is submitting a combined request because it will be portioning attorney costs among the three groups. The Joint Coalition's request for case certification and participation in this docket will not unreasonably delay the schedule of the proceedings. The Joint Coalition further request that, if funding is approved, it receives 50 percent of the Proposed Budget in advance in order to facilitate timely participation.

1. CEP, CCC, and Verde each are eligible for a Case Fund Grant because the organizations represent the interests of environmental justice and low-income PacifiCorp ratepayers.

CEP, CCC, and Verde qualify to receive a Justice Funding Grant under OAR 860-001-0840 and the Justice Funding Agreement. All three organizations are pre-certified organizations under HB 2475.

Founded 44 years ago, CEP works to ease the energy burden on frontline communities and has become a part of a larger movement toward electrification to decrease carbon emissions. Its clients include seniors, people with disabilities, women, people experiencing low income, people of color, and other historically marginalized groups. CEP annually serves over 2,500 residents.

CCC is an alliance of culturally specific community-based organizations that work directly with Black, Indigenous, and people of color (BIPOC) community members on issues such as housing, education, environmental justice, and economic justice.

Verde is one of the longest-running people of color-led environmental organizations in Oregon. Verde serves communities by building environmental wealth through social enterprise, outreach, and advocacy. Since 2005, Verde has brought environmental infrastructure to low-income neighborhoods, engaged residents to design and implement these projects, and ensured that environmental investments contribute to community well-being.

The Joint Coalition's participation in this proceeding will be focused on issues affecting low-income, and environmental justice communities, including low-income bill discount programs, wildfire mitigation, low-income weatherization, and other equity issues. The Joint Coalition plans to address community interests per OAR 860-001-0840(1)(a) through analyses of cost allocations, impacts to low-income customers, and utility resources.

Per OAR 860-001-0840(1)(d), the Joint Coalition can effectively represent low-income and Black, Indigenous, and people of color (BIPOC) ratepayers in PacifiCorp's service territory because of its connections with communities and commitment to energy justice and equity goals. CEP, CCC, and Verde collectively hold strong relationships with other community and environmental advocates, and utility and Commission staff to elevate the priorities of low-income and environmental justice communities. All three organizations have contributed to the record on behalf of these interests by previously participating in contested cases, such as UG 435 and UM 2273, and non-contested cases, such as ADV 1390, LC 79, LC 82, UM 1893, UM 2114, UM 2005, UM 2111, and UM 2211.

2. UE 433 is an Eligible Proceeding under OAR 860-001-0830.

UG 433 is an eligible proceeding under OAR 860-001-0830(1) because it is a contested case that affects PacifiCorp, its customers, and Environmental Justice communities including low-income PacifiCorp customers who are often energy burdened.

3. This filing serves as a notice of intent.

This notice is served on April 29th, 2024, to PacifiCorp, all Pre-Certified Organizations, and all Parties to UE 433. CEP, CCC, and Verde intend to request a Case Fund

Grant from Pacific Power. As noted above, the organizations request that they receive 50 percent of the Proposed Budget in advance.

4. Proposed budget

a. Statement of Work

The Joint Coalition intends to participate in this proceeding through:

- Research and analysis of PacifiCorp filings with a focus on issues directly related to Environmental Justice communities;
- Development and filing of expert testimony at all stages of testimony;
- Active involvement in public and utility workshops;
- Attendance at settlement conferences, as needed; and
- If warranted, preparation and participation in the hearing, including pre-hearing briefing and cross-examination.

The Joint Coalition will be represented by an attorney, Jessica Bernardini, along with CEP, CCC, and Verde staff.

b. Eligible expenses for CCC

Staff	Hours	Rate	Cost
Climate and Energy Policy Manager	30	\$175	\$5,250
Lead attorney - (portion of attorney fees, costs split among intervenors)	34	\$340	\$11,560
Supervising attorney - (portion of attorney fees, costs split among intervenors)	10	\$550	\$5,500
Subtotal			\$22,310
Administrative (10%)			\$2,231
Total Request			\$24,541

c. Eligible expenses for CEP

Staff	Hours	Rate	Cost
Executive Director	25	\$210	\$5,250
Program Director	10	\$158	\$1,580
Climate Justice Associate	40	\$105	\$4,200
Lead attorney - (portion of attorney fees, costs split among intervenors)	34	\$340	\$11,560
Supervising attorney - (portion of attorney fees, costs split among intervenors)	10	\$550	\$5,500
Total Request			\$28,090

d. Eligible expenses for Verde

Staff	Hours	Rate	Cost
Energy Justice Coordinator	15	\$100	\$1,500
Lead attorney - (portion of attorney fees, costs split among intervenors)	34	\$340	\$11,560
Supervising attorney - (portion of attorney fees, costs split among intervenors)	10	\$550	\$5,500
Total Request			\$18,560

Dated this 29th day of April, 2024.

Respectfully submitted,

/s/ Nikita Daryanani

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