

December 14, 2007

Public Utility Commission of Oregon
550 Capitol St. NE #215
P.O. Box 2148
Salem, OR 97308-2148

Re: Comments for Regular Agenda Item # 4, December 18, 2007 Public Meeting (Intervenor Funding Agreement)

Dear Commissioners:

The Community Action Partnership of Oregon ("CAPO") is the statewide representative of Oregon's Community Action Agencies and low income customers of Oregon's investor-owned utilities. CAPO is a frequent participant in proceedings before the Commission. We offer these comments on the renewed Intervenor Funding Agreement ("Agreement") pending before the Commission as Regular Agenda Item # 4 for the Public Meeting scheduled for December 18, 2007.

CAPO was a party to the negotiations over the Agreement, and sought to carve out independent eligibility to receive intervenor funding grants to address regulatory issues which may uniquely impact low income residential customers. Such cases include (a) proceedings on the funding and management of low-income arrearage management, bill payment assistance, weatherization funds and related programs and issues; (b) cases which involve disconnect/reconnect policies and automated meters; and (c) rate design and certain issues arising in merger/acquisition cases. In these cases, the potential impacts of the Commission's decisions pose specific and unique consequences for the hundreds of thousands of low income customers of Oregon's investor-owned utilities.

We appreciate the recognition among the parties to the Agreement that certain proceedings before the Commission raise issues which may uniquely impact low income customers. However, in our discussions with PacifiCorp, Portland General Electric, NW Natural, and the Industrial Customers of Northwest Utilities, it was strongly suggested that CAPO's ability to receive intervenor funding grants fall within the "umbrella" of the Citizen's Utility Board of Oregon's funding eligibility.

CAPO recognizes and appreciates CUB's role as the primary representative of residential customers in Oregon. We have an outstanding working relationship with CUB. CAPO therefore cautiously supports approval of the Agreement now pending before the Commission, and looks forward to working within the model suggested by the parties, as the need arises, to ensure that the interests of low income customers in Oregon are adequately represented before the Commission.

CAPO will continue to independently petition the Commission to intervene, and to actively participate, in matters before the Commission that impact the low-income customers of Oregon's investor-owned utilities.

Sincerely,

Jim Abrahamson
Oregon Energy Partnership Coordinator

cc:

Bob Jenks, CUB
Mary Ann Hutton, ICNU
Andrea Kelly, PacifiCorp
Randy Dahlgren, PGE
Alex Miller, NW Natural