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December 3, 2021

**RE: Comments on UM 2197 – Portland General Electric Company’s Distribution System  
Plan Part 1**

Dear PUC Commissioners and Staff,

Community Energy Project (CEP) submits the following comments regarding Portland General Electric’s (PGE) Distribution System Plan Part 1 under Docket No. UM 2197. CEP’s expertise is in community engagement, education, and direct service. As such, our comments will focus on section 3.4 of the DSP plan, detailing Community Engagement.

CEP is one of the Community Based Organizations (CBOs) that worked with PGE to complete a section of the community engagement plan, and are pleased with the thoughtfulness and depth of what was produced.

As quoted in their engagement plan:

*“As an essential service provider, PGE must both engage and understand where and how customers live, work, learn and play. The work requires us to co-develop solutions with communities and develop solutions that deliver value to both them and the grid. We see it as imperative to pursue the twin goals of social justice, including racial equity, and decarbonization. These goals are needed to ensure that we address and redress disparities and impacts within the environmental justice communities PGE serves.”*

PGE took a unique approach by engaging CBO’s and even customers themselves in the development of the plan. They worked with CBO’s to generate a pilot workshop for customers, then assessed what was successful and where lessons were learned. This created a unique learning opportunity for PGE that clearly had a direct impact on the plan itself and CEP believes that what was produced was significantly better as a result. For example:

- CBO’s are interwoven in everything as community connectors, creating opportunities to contribute.
- An equity centered approach was possible due to stakeholder engagement.
- PGE considered accessibility in technical information around the DSP plan.
- PGE took CEP’s education best practices and placed them, unchanged, into the plan showing that they take CBO recommendations seriously.
- Budgeted for future CBO involvement

In their engagement plan, PGE addressed some of their lessons learned (pg. 15):

- *“We have learned that creating a collaborative environment requires building trust first.*
- *Designing programs and solutions with affected communities (instead of for them) produces better outcomes.*
- *We should collaborate and defer to our communities, where and whenever possible.*
- *PGE’s Community Engagement Plan is informed by best practices, learnings and the recommendations of Unite Oregon, Community Energy Project and the Coalition of Communities of Color based on their engagement in the first phase of the DSP.”*

We are pleased to see that many of the lessons learned from the pilot are clearly reflected in the plan and translated clearly from the intensive feedback PGE received from CBO’s involved in the process. Lessons learned have been tied with concrete plans to have even more successful pilots in the future. For instance, PGE acknowledges in the plan that they must provide more time for program delivery that takes into account CBO capacity restraints in addition to funding.

We commend PGE’s commitment to equity and want to see it used more fully. PGE debriefed extensively with CBO’s after the pilot and following presentation to utilities, but their engagement plan does not address the lesson learned: we need to have inclusive and productive spaces for CBO’s in the larger DSP arena. The plan is missing allyship opportunities with CBO’s in larger utility spaces, despite CBO’s being a core element of the engagement plan. For example, when discussing equity components of DSP, PGE can treat CBO’s as welcomed guests who have valued contributions to offer.

It is important to highlight that technical spaces can often be very dismissive of equity and justice-centered values. The value of equity in DSP must be better understood by utilities for them to value the contributions of CBO’s and frontline communities. PGE has the power to change the tone and culture of those spaces and build trust with the entities with which they want to work. This will create more desirable opportunities for a wide variety of CBO’s to work with utilities in the future.

Sincerely,

Alma Pinto, Climate Justice Associate  
Sherrie Villmark, Program Director  
Community Energy Project