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RE: UM 2198 – PacifiCorp’s Oregon Distribution System Plan Report Part 1

Dear PUC Commissioners and Staff,

Community Energy Project (CEP) submits the following comments regarding PacifiCorp’s Oregon Distribution System Plan Part 1 under Docket No. UM 2198. CEP’s expertise is in community engagement, education, and direct service. As such, our comments will focus on chapter 3 of their DSP plan, detailing Community Outreach and Engagement. While CEP commends PacifiCorp’s efforts for public participation in the Community Outreach and Engagement section of their DSP plan, there are still gaps in realistically achieving the goals they have outlined—specifically in regard to their Oregon Based Community Input Group (CIG), outreach methods, and adequately acknowledging and addressing barriers in how they engage with CBO’s and the community.

Oregon Based Community Input Group (CIG):

The CIG is a core element of the outreach plan; therefore, it is crucial to ensure that this group represents a broad base of PacifiCorp’s customers. In PacifiCorp’s plan, their Regional Business Managers (RPM) team, along with “stakeholders” and “expert advisors”, are tasked with overseeing the CIG. We are pleased to see the inclusion of relevant stakeholders and expert advisors in this process, but key players in these groups and their roles have not yet been identified. We are concerned about PacifiCorp’s RPM’s ability to create a diverse and equitable group, not only community members with business connections. CEP would like PacifiCorp to address these concerns and justify why RPM’s are the best partners for reaching the desired representatives apart from RPM’s “frequent interaction” with community stakeholder groups in their “daily business” as described in pages 78-79 of the plan.

Outreach:

PacifiCorp’s outreach methods consist mainly of contacting DSP stakeholders through email, their informational DSP website, and tools that range from fact sheets, interactive voice response, and social media. Having a dedicated DSP website is a great opportunity to provide education to the public on definitions and opportunities for involvement. However, a website is not enough and the existing page is far too technical for community members who have no experience with DSP.

CEP also has concerns about PacifiCorp’s outreach methods outlined in their plan to engage with stakeholders. Addressing stakeholders that already are included in DSP conversations through

emails is not expansive enough, and fails to address the community directly. CEP would like to see PacifiCorps reach out to new audiences, not just simply engage with established audiences through existing business ties and stakeholder groups able to follow highly technical workshops.

Community Input Barriers:

PacifiCorp plans to collect customer surveys, which is a good opportunity to gather feedback from community members, but we would like to see PacifiCorp engage with CBO's to help reach desired outcomes (especially around education, transcreation, and distribution methods) to create effective surveys. PacifiCorp should have a goal of reaching a representative percentage of Spanish-speakers to complete the survey.

Additionally, PacifiCorps plans to include public meetings and workshops to collect community input. It is important for these meetings to be structured in a way that is accessible for customers and stakeholders. The workshop series PacifiCorps have provided so far have been extremely technical and lengthy and not made for the general audience, such as customers or CBO's new to the DSP arena. We hope to see PacifiCorps improve in this area in future community engagement to gather input. We do not believe that this problem lies with customers' "perception that input will not be considered by the utility" (pg. 80), but rather that PacifiCorps does not know how to make the topic of DSPs relevant or accessible. We highly recommend working with groups experienced in community education (the taking of technical information and making it accessible to the general public) to help be more successful.

CEP also believes that PacifiCorp failed to address the issue of digital divide under the potential barriers they identified for public participation on pages 79-80. The "sharing information and seeking input" (pg. 75) section on PacifiCorp's plan only lists email as communication, limiting customer interaction and even some CBO's. How is the digital divide being addressed? Customer experiences may vary based on factors such as internet access, which is impacted by income, age, language, literacy levels, and more.

Overall, CEP appreciates PacifiCorps efforts in their initial plans to engage with stakeholders and the communities they serve. That said, we believe there could be improvements in how PacifiCorp collaborates with community members and CBO's to adequately address concerns and gather constructive feedback in their DSP process.

Sincerely,

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