



May 20, 2022

VIA ELECTRONIC FILING

Oregon Public Utility Commission  
Attn: Filing Center  
P.O. Box 1088  
Salem, OR 97308-1088

RE: UG 435 – ERRATA to Charity Fain Direct Testimony by Coalition of Communities of Color, Climate Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy Project, and Sierra Club (“Coalition”)

Dear Filing Center:

Enclosed for filing in the above-referenced docket is an Errata to the Direct Testimony of Charity Fain, filed as Exhibit Coalition/300/Fain/3–4 on April 22, 2022.

The Coalition has identified a statement at lines Coalition/300/Fain/3:22 through Coalition/300/Fain/4:2 that should be updated to read:

Through its Public Purpose Charge, NW Natural generates funding for energy efficiency and home weatherization work for qualifying low-income rate payers that is disbursed through the OLIEE Program, as described in Schedule 320. NW Natural sets aside \$15,000 total for energy efficiency upgrades and weatherization for each qualifying home, but restricts what types of upgrades qualify. Of this total amount, NW Natural sets aside \$5,000 specifically for gas furnace upgrades, even when not cost effective. The OLIEE program also allows for an average of \$1,000 for home repair, and \$1,600 for program administration per home.

A redline version of the corrected testimony is attached.

Sincerely,

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1 requires that utilities use these considerations to set differential rates for low-income  
2 customers who face financial difficulties paying for gas utility service, and that the utility  
3 invest in energy efficiency measures to reduce energy consumption.

4  
5 The bill assistance proposal put forward by NW Natural provides a start in this direction,  
6 but fails to provide real relief for customers. NW Natural does not place a monetary  
7 ceiling on residential bills for low-income customers, but rather offers these customers a  
8 percentage reduction on their monthly payments. NW Natural's bill discount program  
9 would defray the cost of the proposed bill increase put forward by NW Natural in this  
10 rate case. However, low-income ratepayers already cannot afford the existing rates of  
11 NW Natural gas service. Further, because the proposed bill assistance only provides a  
12 percentage reduction, not a cap on total bill amount, low-income customers remain  
13 vulnerable to future rate increases.

14  
15 Next, I discuss the importance of investing in home weatherization for low-income  
16 Oregonians. Home weatherization is an investment in climate resilience because it  
17 makes a dwelling less vulnerable to temperature extremes. Particularly for energy  
18 insecure Oregonians, home weatherization can mean the difference between eating a  
19 healthy meal and heating one's home. Reducing the need for home heating reduces  
20 associated energy costs, lowering the financial stress on low-income ratepayers.

21  
22 ~~Through its Public Purpose Charge, NW Natural does fund some weatherization work,~~  
23 ~~but funding for incidental repairs, as described in Schedule 320, is limited to \$1,000 per~~

1 ~~home. In stark contrast, of the total \$15,000 allocated for energy efficiency upgrades,~~  
2 ~~NW Natural sets aside \$5,000 for gas furnace upgrades. Through its Public Purpose~~  
3 ~~Charge, NW Natural generates funding for energy efficiency and home weatherization~~  
4 ~~work for qualifying low-income rate payers that is disbursed through the OLIEE~~  
5 ~~Program, as described in Schedule 320. NW Natural sets aside \$15,000 total for energy~~  
6 ~~efficiency upgrades and weatherization for each qualifying home, but restricts what types~~  
7 ~~of upgrades qualify. Of this total amount, NW Natural sets aside \$5,000 specifically for~~  
8 ~~gas furnace upgrades, even when not cost effective. The OLIEE program also allows for~~  
9 ~~an average of \$1,000 for home repair, and \$1,600 for program administration per home.~~

10 Low-income ratepayers will lose out on any short-term gains in reduced bill costs  
11 associated with more efficient gas appliances as gas utility service rates continue to  
12 climb. Comprehensive weatherization makes homes more climate resilient, and provides  
13 lasting benefits to low-income customers that reduce energy consumption and total bill  
14 costs.

15  
16 Accordingly, we recommend that NW Natural use all Oregon Low-Income Energy  
17 Efficiency (“OLIEE”) funds generated through the Public Purpose Charge for home  
18 weatherization. We also recommend that the Commission allocate more for incidental  
19 repairs to housing structures that are necessary to safely weatherize a home. We also  
20 recommend that the Commission add language to Schedule 320 to promote investments  
21 in attic and wall insulation—even where these investments do not achieve the 1.0 cost  
22 efficiency ratio. Further, we recommend that the Commission eliminate use of this  
23 funding to pay for gas-powered appliances.