

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

AR 652

In the Matter of Rulemaking Regarding Intervenor Funding Consistent with HB 2475	JOINT COMMENTS ON PROPOSED JUSTICE FUND RULES
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Rogue Climate, Community Energy Project (CEP), and the Oregon Citizens’ Utility Board (CUB) appreciate this additional opportunity to provide comments on the revised rules described in the Public Meeting Report dated April 14, 2023. We appreciate the AHD’s consideration of our April 6, 2023, comments, and resolutions of the prior comments. We wish to further state our hope and goal to avoid having to open a rulemaking for the next agreement. To that end, we ask that the definition of Agreement state:

“Agreement” means the prevailing Environmental Justice Communities Funding Agreement found on the Commission's intervenor funding website, located at <https://www.oregon.gov/puc/filing-center/Pages/Intervenor-Funding.aspx>

Further, we also appreciate that the AHD considered and offered an alternative definition of “low-income.” And we understand the difficulty of defining “low-income” that truly captures those households with the high energy burdens. It is our goal that the rule capture these households struggling to pay their bills, and we believe the revised definition is more inclusive of these households’ communities.

Again, Rogue Climate, CEP and CUB appreciate the efforts that the AHD, staff and all stakeholders to UM 2211 and AR 652 have put into negotiating the first Agreement. We encourage the Commission to adopt the rules as amended in the Public Meeting Report with the definition as suggested above.

Dated this 17th day of April 2023.

/s/ Tonia L. Moro
Tonia L. Moro, Representing Rogue Climate
Attorney at Law P.C.
P.O. Box 127
Talent, OR 97540
541 973 2063
Tonia@ToniaMoro.com

/s/ Charity Fain
Charity Fain
Executive Director
Community Energy Project
2705 E. Burnside, Suite 112
Portland, OR 97214
Office: (971) 544-8705
charity@communityenergyproject.org

/s/ Jennifer Hill-Hart
Jennifer Hill-Hart
Policy Manager
Oregon Citizens' Utility Board
610 SW Broadway, Ste. 400
Portland, OR 97205
T. 503.227.1984
E. jennifer@oregoncub.org