

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2276

In the matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Report on Justice Funding Precertification.

REPORT ON HB 2475 INTERVENOR
FUNDING PRE-CERTIFICATION FOR
COMMUNITY ENERGY PROJECT

Community Energy Project hereby submits its second report on HB 2475 Intervenor Funding Pre-Certification.

Community Energy Project (CEP) is a 501(c)(3) community-based organization that represents Oregon's frontline communities, who are vulnerable to the uncertainty posed by climate change. Our mission is to create a sustainable, equitable, and green future for our clients, who we believe deserve safe, healthy, and efficient homes, regardless of income.

As per article 5, Community Energy Project is an approved Environmental Justice Intervenor as of May 19, 2023. This reporting period is from August 1, 2023 to November 10, 2023 and includes a description of planned activity through December 31, 2023.

As listed in our application, CEP has been involved or intends to be involved in the following dockets listed below. General goals and activities have been listed under each docket that CEP has engaged in so far, along with anticipated goals and activity through the end of the funding year.

UM 2211 - Implementation of HB 2475 (ADV 1365, ADV 1390, ADV 1412):

In these proceedings, CEP has and will continue to provide feedback on program eligibility, enrollment, verification, level of relief, outreach, engagement, and timeline to ensure that these programs adequately address the energy burden faced by low-income and underserved communities. Energy Efficiency is a part of the bill that has not yet been addressed, and CEP plans to raise it in the near future. CEP also has concerns at the lack of stakeholder engagement from the utilities on the status of their programs or the process they are working on for unresolved issues, including post enrollment verification, CEP plans to highlight this in the docket soon.

Community Energy Project has:

- Has met separately with EJ advocates around low-income discount programs.
- Participates in PGE and Pacific Power CBIAG meetings (official meetings funded by stipend) and has spoken with other stakeholders, staff, and utilities in meetings about CBIAG participation.
- Wrote and submitted comments to the PUC to encourage the IOU's to resume stakeholder engagement around low-income discount programs and to highlight the energy efficiency component of the bill which has been so far neglected.
- Begun in-depth review of the NWN LINA

Community Energy Project plans to (for the rest of the funding year):

- Meet separately with EJ advocates around low-income discount programs.
- Participate in PGE and Pacific Power CBIAG meetings (official meetings funded by stipend) and has spoken with other stakeholders, staff, and utilities in meetings about CBIAG participation.
- Review and research Low-Income Needs Assessments completed by the Oregon utilities to date, and review other possible best practices for collecting assessment information.
- Research other states programs and how they have connected with weatherization and energy efficiency programs for low-income customers.
- Participate in resumed stakeholder engagement to examine outstanding issues such as post-enrollment verification, enrollment rates, marketing, etc.
- Engage in energy efficiency / weatherization discussions

LC 79 - NWN IRP Intervenor:

This docket is eligible because it aligns with CEP's mission to promote community-based solutions to energy issues and to ensure that low-income and underserved communities are not disproportionately affected by the actions of utility companies.

Community Energy Project has:

- Read NWN IRP documentation
- Met with stakeholders and finalized comments on plan

Community Energy Project plans to (for the rest of the funding year):

- Research and understanding of NWN IRP process and documentation in preparation for the 2024 updated IRP filing.
- Connect with stakeholders on a forward looking trajectory for process, plan, etc.

LC 82 -PAC IRP & CEP Intervenor:

This docket is eligible because it is related to energy planning, which is an important aspect of CEP's mission to promote community-based solutions to energy issues.

Community Energy Project has:

- Read and reviewed Pacific Power's IRP and CEP
- Participated in Energy Advocate conversations on PAC's plans
- Participated in PAC's CEP Engagement sessions
- Begun engagement with other advocates about interconnection issues we believe will affect CBRE uptake

Community Energy Project plans to (for the rest of the funding year):

- Continue work with Energy Advocates conversations and PAC IRP & CEP comments
- Join future PAC CEP engagement sessions
- Provide feedback to PAC on plan components that connect with our work and communities
- Learn more and raise questions about equitable interconnection

LC 80 - PGE IRP & CEP Intervenor:

This docket is eligible because it is related to energy planning, which is an important aspect of CEP's mission to promote community-based solutions to energy issues.

Community Energy Project has:

- Read PGE IRP & CEP documentation
- Participate in Energy Advocate conversations on PGE's plans
- Participated in PUC meetings on PGE's IRP & CEP
- Participated or watched recordings of PGE's learning labs

Community Energy Project plans to (for the rest of the funding year):

- Continue joining Energy Advocates conversations and working with them on PGE IRP & CEP comments.
- Continue participating in and watching PGE learning labs
- Provide feedback to PGE on plan components that connect with our work and communities.

UE 416 - PGE Request For A General Rate Revision:

This docket disproportionately impacts customers with an already high energy burden. CEP has focused on minimizing the impact of a rate increase on lowest-income customers along with deepening discounts for customers in PGE's Low-Income Discount Program.

Community Energy Project has:

- Hired and worked with an attorney
 - Correspondence with PUC: Filed intention to intervene, confidentiality notices, etc.
 - Reviews of docket, relevant documents, PGE testimony, additional party filings, tariff schedules, etc.
 - Research on similar LID programs and energy burden in other states and utility territories, CEP's documentation
 - Participation in stakeholder meetings, internal meetings, coordination
- Filed formal testimony
- Worked with CUB, conducted outreach to CEP followers and participants through newsletter and social media to encourage PGE customers to share comments
- Participated in relevant portions of meetings with PGE, Staff, and stakeholders
- Met with other consumer advocate stakeholders (CUB, CAPO) and staff to craft relevant arguments and learn about terms and processes
- Participated in settlement discussions and negotiations

Community Energy Project plans to (for the rest of the funding year):

- Monitor further proceedings in the docket on Schedule 118 discussions.
- Will write up recommendations to the PUC on procedural justice in rate cases

General PUC Planning

Community Energy Project spends time planning future ways to advocate within the PUC beyond specific dockets already in motion. Examples of arenas and topics include:

- The Building Resilience Coalition is reviewing PUC related policies, CEP is monitoring this process and looking at potential barriers impacting low-income and frontline communities.
- Interconnection and small-scale/ community owned solar - interconnection creates large, expensive bottlenecks in the development of community-owned solar, as shown in the Oregon Community Solar Program.
- Stakeholder "Utility Policy Reading Group" to learn more about technical issues and discuss PUC engagement strategies

The Budget Showing Estimations and Spending

Attachment A and Attachment B submitted herewith set for the estimated fees and costs, Attachment C shows spending from August 1 through October 2023. CEP plans to utilize the remainder of the intervenor funds by the end of the funding period.

Dated November 13, 2023.

Respectfully submitted,

Charity Fain
/s/ _____
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ATTACHMENT A

COMMUNITY ENERGY PROJECT PROPOSED BUDGET

PUC Intervenor UM 2211 2023 Funding			
Employee	Billable Rate	Hours	Cost
Executive Director	\$210	92	\$19,320
Development & Communications Coordinator	\$105	6	\$630
Program Director	\$158	112	\$17,696
Climate Justice Associate	\$105	406	\$42,630
Policy and Advocacy Manager	\$131	132	\$17,292
Attorney (External Council, TBD)	\$300	66	\$19,800
Subtotal			\$117,368
Outreach (Focus Groups 2 at \$2000 Per)			\$4,000
Total			\$121,368
Year to Date Spend			\$96,634
Planned Spending Nov-Dec			\$24,734

ATTACHMENT B

COMMUNITY ENERGY PROJECT PROPOSED BUDGET BY UTILITY

By Utility					
PGE		PacifiCorp		NWN	
Hours	Cost	Hours	Cost	Hours	Cost
40	\$8,400	14	\$2,940	38	\$7,980
2	\$210	2	\$210	2	\$210
62	\$9,796	19	\$3,002	31	\$4,898
160	\$16,800	88	\$9,240	158	\$16,590
50	\$6,550	35	\$4,585	47	\$6,157
66	\$19,800				
380	\$61,556	158	\$19,977	276	\$35,835
	1,333		1,333		1,333
	62,889		21,310		37,168
			Total		121,368

ATTACHMENT C

COMMUNITY ENERGY PROJECT INCURRED EXPENSES BY UTILITY

PGE						
	August	Sept	Oct	Total Hours	Rate	Total Cost
Executive Director	2.24	2.84	3.86	8.94	\$ 210	\$ 1,877.40
Education Director	2.69	3.95	3.22	9.86	\$ 158	\$ 1,557.88
Climate Justice Associate	33.50	60.00	64.50	158.00	\$ 105	\$ 16,590.00
Policy and Advocacy Manager	3.64	7.29	6.23	17.16	\$131	\$ 2,247.96
Communications				0.00	\$105	\$ -
Attorney				0.00	\$300	\$ -
Total	42.07	74.08	77.81	194.0		\$ 22,273.24
PAC						
	August	Sept	Oct	Total Hours	Rate	Total Cost
Executive Director	1.71	2.58	3.38	7.67	\$ 210	\$ 1,610.70
Education Director	2.64	3.92	5.24	11.80	\$ 158	\$ 1,864.40
Climate Justice Associate	7.50	18.00	16.00	41.50	\$ 105	\$ 4,357.50
Policy and Advocacy Manager	2.32	8.72	9.07	20.11	\$131	\$ 2,634.41
Communications					\$105	
Attorney					\$300	\$ -
	14.17	33.22	33.69	81.1		\$ 10,467.01
NWN						
	August	Sept	Oct	Total Hours	Rate	Total Cost
Executive Director	8.24	12.84	16.86	37.94	\$ 210	\$ 7,967.40
Education Director	9.36	12.50	17.62	39.48	\$ 158	\$ 6,237.84
Climate Justice Associate	16.00	12.00	11.50	39.50	\$ 105	\$ 4,147.50
Policy and Advocacy Manager	5.64	27.33	30.23	63.20	\$131	\$ 8,279.20
Communications					\$105	\$ -
Attorney					\$300	\$ -
	39.24	64.67	76.21	180.12		\$ 26,631.94
Total						\$ 59,372.19

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