

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

UM 2276

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Approval of Justice Funding
Precertification.

NOTICE TO REQUEST HB 2475
INTERVENOR FUNDING
PRE-CERTIFICATION OF VERDE

**Verde hereby submits its Notice of Request for HB 2475 Intervenor Funding
Pre-Certification.**

Background: Verde is a 501(c)(3) community-based organization that represents environmental justice communities, in particular in the Cully neighborhood, mostly in Pacific Power territory and a small corner in Portland General Electric territory, and more broadly across the state through collaborative coalition work. Verde is one of the longest-running people of color-led environmental organizations in Oregon. Verde serves communities by building environmental wealth through social enterprise, outreach, and advocacy. We reinterpret sustainability as an anti-poverty strategy. Since 2005, Verde has brought environmental infrastructure to low-income neighborhoods, engaged residents to design and implement these projects, and ensured that environmental investments contribute to community well-being.

Verde was founded in 2005 for two reasons. First, traditional sustainability, environmental, and energy advocates, despite a foundational commitment to equity, typically did not engage low-income people and people of color and the spaces they worked in were not representative of the people who were impacted by those decisions. Similarly, peer community organizations (groups that represent and organize with low-income people and people of color) did not engage with sustainability, environmental, and energy policy as a result.

Verde has worked for almost two decades to connect environmental justice communities and organizations to policy-making spaces like the Public Utility Commission (PUC) and

to ensure that those spaces are equitable and accessible. Verde was one of the primary advocates for HB 24875 and preceding bills that helped to establish this intervenor/justice funding program. To that end, Verde has engaged in (PUC processes for over five years, working to advocate for environmental justice communities in many dockets without the support of intervenor funding. It has been a long road to get here and we are proud to have helped support the creation of this program.

Organizational History: Verde truly represents the communities we serve. We have an all-women directors team with 75% women of color, 70% of Verde staff identify as BIPOC and many are bilingual, and Verde has one of the most diverse boards of any Portland-based environmental organization. Verde programs strengthen communities through three program areas:

- *Social Enterprise:* Verde Builds is a general contractor that takes on projects to create environmental infrastructure, e.g., building solar installations and installing Ductless Heat Pumps, to mitigate the effects of climate change while uplifting women and BIPOC contractors..
- *Outreach:* We directly support the community through frontline programs, e.g., Nature education, Solar education, anti-displacement, and leadership development.
- *Advocacy:* We work with coalitions and partners to promote legislation and policies that best serve our communities, e.g., securing state funding for water infrastructure and uplifting community leaders to advocate against local polluters.

In addition to its advocacy work, Verde has a licensed general contractor arm, Verde Builds, which provides heat pump and air conditioner installations, as well as other energy and green infrastructure projects, including implementation of the Living Cully Energy Plan.¹ This on-the-ground experience gives Verde a unique voice in these advocacy arenas, as well as the community organizing work we do in Cully and to bring together communities and other organizations across Oregon to inform our work with lived experience. Signature accomplishments include:

- *Cully Park:* Transformed a 25-acre landfill into a park in the under-served Cully neighborhood. Raised \$14 million over six years to build the park, engaged thousands of Portlanders in the design and build, and achieved 70% minority and woman-owned business participation.
- *Portland Clean Energy Fund:* Co-lead a campaign to establish \$40-60 million to be invested in climate projects in low-income and people-of-color communities in

¹ <https://www.livingcully.org/incoming/2018/05/LC-Community-Energy-Plan-FINAL-6.pdf>

Portland, built by minority, women-owned businesses, and social enterprises partnered with nonprofits.

- *Legislative Accomplishments:* Accomplished substantial state-level policy work through Energy Affordability, Healthy Homes, 100% Clean Energy for All, and Emergency Heat Relief.

Public Utility Commission Experience: Since 2016, Verde has brought our blend of project work, organizing, and policy and regulatory expertise to the PUC, including – but not exclusively through the following dockets:

- UM 1930, Community Solar Program Implementation
- SB 978 Process, in which we helped to lead the introduction of environmental justice ideas to the PUC
- UM 2005 - Investigation into Distribution System Planning (DSP)
- UM 2114 - Investigation into the Effects of the COVID-19 Pandemic on Utility Customers.
- UM 2211 - Implementation of HB 2475
 - AR 652 - Rulemaking Regarding Intervenor Funding
 - ADV 1365 - PGE Advice No. 22-01 Income Qualified Bill Discount
 - ADV 1390 - NW Natural's Advice No. 22-02, Residential Low-Income Bill Discount Program
 - ADV 1412 - PacifiCorp's Advice No. 22-008, Residential Low Income Bill Discount
- UG 435 - NW Natural Rate Revision
- UM 2225 - HB 2021 Investigation into Clean Energy Plans
- UM 1158 - Equity Metrics for Energy Trust of Oregon

Intervenor Funding Request:

Verde requests a total of \$56,750 equally drawn from Pacific Power and Portland General Electric funds. The funds will support **staff time** for a new **Energy Justice Coordinator** position who will take on Verde’s energy regulatory and policy work, staff time/support for the **Energy Climate and Transportation Manager** and **Transportation Justice Coordinator**, as well as **administrative support**, the ability to retain **technical assistance** as needed, and community education. More detail is provided in Appendix A (“Verde Proposed Budget”).

Projected Dockets:

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

Relevance/Eligibility: UM 2211 is a non-contested docket that addresses the implementation of HB 2475, for which Verde was a primary advocate. This includes: PGE Advice Income Qualified Bill Discount (ADV 1365), NWN's Advice Residential Low-Income Bill Discount Program (ADV 1390), and PacifiCorp Low-Income Bill Discount Program (ADV 1412).

This docket impacts energy burdened environmental justice communities, including Cully, which is a significantly energy burdened community (see above *Living Cully Energy Plan*) in both Pacific Power, Portland General Electric, and Northwest Natural service territories. These dockets involve the development and implementation of programs that affect the rights and needs of low-income and underserved communities in the energy sector. Verde can provide its expertise in both community perspectives and utility regulation to support advocacy to ensure that programs are maximally effective for the people they serve and have a minimal impact on non-participating ratepayers.

How Verde Intends to Engage: Verde plans 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.

UM 2225 - HB 2021 Implementation/AR 655 - Rulemaking Regarding Filing, Review, and Update of Clean Energy Plans:

Relevance/Eligibility: UM 2225 stems from Verde's advocacy and leadership in passing HB 2021, Oregon's 100% Clean Energy for All policy. Associated dockets, such as AR 655 and utility Clean Energy Plan proceedings will also be of interest in helping to implement the important work of HB 2021 and UM 2225.

This docket impacts environmental justice communities as the statutory language of HB 2021 indicates that it should be implemented in ways that "maximize community benefits and minimize environmental justice burdens." Verde is especially interested in helping to ensure Oregon's 100% clean work holds up to that vision and that communities across the state can benefit equitably from the transition to more renewable energy. In particular, Verde is interested in the intersections of UM 2225 and associated dockets with community solar and distribution system planning.

How Verde Intends to Engage: Verde plans to participate in this docket as a member of the Energy Advocates coalition, and advocating for communities to be meaningfully involved in utility Clean Energy Plans, including supporting a group of community members in engaging in the process, along with Community Energy Advocates, along with Rogue Climate, Coalition of Communities of Color, Oregon Just Transition Alliance, and Multnomah County.

UM 1158 - Energy Trust Equity Metrics:

Relevance/Eligibility: Derived from HB 3141, for which Verde was an advocate and participant in bill negotiations, UM 1158 is an ongoing process to determine, measure, and modify equity metrics for the public purpose charge programs administered by the Energy Trust of Oregon.

Verde utilizes Energy Trust incentives for its Verde Builds work, including heat pump installation and also serves communities in Energy Trust service territory, many of whom have not been traditionally served by Energy Trust programs. In HB 3141, Verde advocated for carve outs within renewable energy funds to support low-income communities and community energy resilience and is interested in seeing this through. Verde has also engaged in past iterations of Energy Trust metrics work.

How Verde Intends to Engage: Verde plans to participate in this docket by providing feedback on the equity metrics established by the Energy Trust.

Pacific Power and Portland General Electric Distribution System Plans

Relevance/Eligibility: Verde participated in initial distribution system planning (DSP) proceedings and successfully advocated with Community Energy Project for a more “human-centered approach”. Verde also submitted multiple comments with Coalition of Communities of Color and the Institute for Market Transformation to this end, as well as advocating for a consideration of buildings improvements as ways to reduce load and the need for distribution system upgrades.

How Verde Intends to Engage: Verde will continue to advocate for a community-oriented and community-benefiting approach to distribution system planning and will work to ensure that equity and community voices are embedded into utility distribution system plan revisions.

Pacific Power and Portland General Electric Clean Fuels Plans/Programs

Relevance/Eligibility: Verde has engaged in various transportation electrification dockets, including the Pacific Power and Portland General Electric Clean Fuels Plans and program development. We hope to continue that work and to help bring our expertise in community transportation needs and utility regulation to ensure that programs and policies both meet community and ratepayer needs.

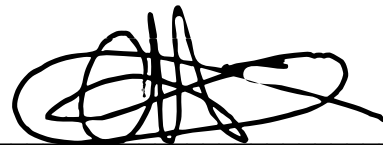
How Verde Intends to Engage: Verde will submit comments and participate in relevant dockets.

Verde also intends to be involved other dockets that impact the following items:

- ❖ Decarbonization/electrification
- ❖ Energy affordability and low income rate-payers including rate revisions
- ❖ Grid equity and grid modernization
- ❖ Community solar, community energy, distributed energy resources, and distribution system planning
- ❖ Equity metrics and diversity, equity, and inclusion broadly within PUC processes and work
- ❖ Transportation electrification
- ❖ Disconnections
- ❖ Resilience

Verde respectfully requests that this Commission grant its Notice Request for HB 2475 Intervenor Funding Pre-Certification.

Dated this 3rd day of April 2023.



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APPENDIX A
VERDE PROPOSED BUDGET

Verde Internal Expenses	Rate	Hours	Cost
<i>Staff</i>			
TBD, Energy and Climate Justice Coordinator	\$100	200	\$20,000
Indi Namkoong, Transportation Justice Coordinator	\$100	100	\$10,000
TBD, Energy, Climate and Transportation Manager	\$150	50	\$7,500
Stacie Walen, Finance Director	\$150	50	\$7,500
<u>Staffing Subtotal</u>			<u>\$45,000</u>
<i>Contracting</i>			
TBD, Technical Assistance Provider	\$150	25	\$3,750
<u>Contracting Subtotal</u>			<u>\$3,750</u>
<i>Community Resources</i>			
Lideres Verdes (Verde Community Group (Focus Group/Training)			\$3,000
Community PUC Education/Testimony Stipends and Accessibility Resources			\$5000
<u>Community Resources Subtotal</u>			<u>\$8,000</u>
Total			\$56,750