

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UM 2276**

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON,

Approval of Justice Funding  
Precertification.

COALITION OF COMMUNITY OF  
COLOR'S  
REQUEST FOR HB 2475 INTERVENOR  
FUNDING  
PRE-CERTIFICATION 2024

Coalition of Communities of Color (CCC) hereby submits the following request for HB 2475 pre-certified intervenor funding for 2024.

Coalition of Communities of Color (CCC) is an alliance of culturally-specific community based organizations that work directly with Black, Indigenous, and people of color (BIPOC) community members on issues such as housing, education, environmental justice, and economic justice. CCC is requesting precertification funding for staff time to engage in advocacy across several issue areas and dockets, as well as to host 2 community workshops with CCC member organizations, each of which would qualify independently for this precertification funding.

The Urban League of Portland is one of the organizations with which we will be co-hosting a community workshop. The content of this workshop will build upon our July 2023 event, where we shared background information on the PUC, discussed past experiences with extreme weather events and began to build a shared understanding of the meaning of community resilience and utility reliability. We shared local and state programs for energy bill discounts and AC/heat pump deployment.

The Urban League of Portland launched in 1945 and is one of the oldest civil rights and service organizations in the Portland area. Their mission is to empower African-Americans and others to achieve equality in education, employment, health, economic security and quality of

life. Today, the organization leads many programs and provides direct services to youth and elderly community members. The organization works directly with Black Portlanders and low-income community members across all the issue areas that impact them, and for the purposes of this funding request, CCC will again be partnering with the Advocacy and Public Policy team to host a community meeting around energy and climate justice. The decisions made by the PUC directly affect the Urban League of Portland's community partners, many of whom are receiving energy assistance as residential customers, experiencing energy cost burden and health inequities, and are directly impacted by extreme weather events.

CCC has not yet confirmed a second organization to partner with but has begun reaching out to member organizations. The community workshops we have held and will hold with the support of intervenor funding help expand the network of groups and community members involved in PUC advocacy, and allows CCC and its partners to amplify community voices in our advocacy.

CCC is aiming to work closely with the staff at these organizations to shape the workshops to fit the needs and interests of their community partners, and build upon previous workshops. We expect these workshops to potentially focus on the following topics, for example:

- Available programs for low-income households, such as utility income-qualified rate discount programs through HB 2475 (UM 2211) and other local and state programs that provide families with life-saving technology such as heat pumps and air conditioning units
- Energy affordability and rate increases
- Indoor air quality
- Community resilience and accessibility of clean energy (related dockets include UM 2273, LC 80, and LC 82)
- Utility disconnection policies
- Building electrification

CCC is also requesting funding to continue to support its staff in engaging in policy development, implementation, and rulemaking at the PUC. CCC is involved in local and statewide policy development that centers the needs and priorities of low-income, communities

of color and utilizes a collaborative governance model to shape policies and co-create solutions with government entities.

Over the past 3 years, CCC has been highly involved in PUC advocacy and has gained expertise in utility regulatory policy, planning, and energy justice. We have built relationships with other community advocates and utility and PUC staff to elevate environmental justice issues within PUC and advance a people-centered approach to utility decision-making. CCC has intervened in contested cases (such as UG 435 and UM 2273) as well as non-contested cases (such as UM 2114, UM 2005, and UM 2211).

CCC is requesting HB 2475 pre-certification funding for 2024 to continue to support this work and community engagement. CCC anticipates being involved in the following issues/dockets:

**1. UM 2211 - Implementation of HB 2475 and other dockets impacting energy affordability and low-income customers** *Including ADV 1365, ADV 1390, and ADV 1412 - PGE, NW Natural, and PacifiCorp's low-income bill discount programs*

For these dockets, CCC intends to work with partners, utility staff, and PUC staff on program design and evaluation, and conducting outreach to CCC member organizations on the availability of discount programs. CCC may also contribute to written comments and participate in utility meetings. These matters are eligible proceedings because they focus on the implementation of programs that impact low-income customers.

**2. PGE's Community Green Tariff**

CCC has already joined discussions about this Green Tariff with local government entities. We plan to continue to monitor this process and participate in discussions to help ensure the design of a community tariff is inclusive and addresses community needs. This docket is eligible because it presents an opportunity to maximize co-benefits to communities, and can expand community access to clean energy.

**3. UM 2273 - Investigation into HB 2021 Implementation Including LC 80 and LC 82 - PacifiCorp and PGE's IRP/CEPs**

CCC is part of a group of energy advocates who have been very actively involved in HB 2021 implementation. CCC plans to continue our involvement by participating in coalition meetings, contributing to joint written comments, reviewing the IRP/CEPs, coordinating and facilitating a group of community members engaged in HB 2021 implementation advocacy.

**4. Weatherization and energy efficiency**

Weatherization and energy efficiency are critical priorities for CCC's community partners, as they are associated with a host of health, affordability, and climate co-benefits for frontline communities and low-income customers. Across dockets, CCC will advocate for these strategies to be appropriately valued and prioritized by utilities and the Energy Trust of Oregon.

**5. PUC accessibility and community engagement**

CCC will continue to work with other organizational and community partners to make PUC processes more accessible to the general public, more inclusive to a wider range of communities, and more equitable for those who are most impacted by the decisions made. CCC will continue to be part of a "reading group" with other advocates where we review resources to help us better understand utility regulatory processes and share knowledge.

*Budget*

We request a total of **\$54,000**. \$30,000 of this will be directed towards CCC staff time, and \$24,00 will be allocated to the 2 co-hosting organizations for their staff time and meeting logistics costs. The proposed amended budget breakdown is included in Attachment A, and the amended budget by utility is included in Attachment B.

Dated this 13th day of November 2023.

Respectfully submitted,



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ATTACHMENT A  
Coalition of Communities of Color (CCC) Proposed Budget  
2024

| <b>CCC Internal Expenses</b>                           | <b>Rate</b> | <b>Hours</b> | <b>Cost</b>     |
|--|-------------|--------------|-----------------|
| <i>Staff</i>   |             |              |                 |
| Nikita Daryanani,<br>Climate and Energy Policy Manager | \$150       | 200          | \$30,000        |
| <b>Subtotal:</b>                                       |             |              | <b>\$30,000</b> |

| <b>Organizational Pass-Throughs and Community Engagement</b>                | <b>Cost</b>     |
|---|-----------------|
| TBD   | \$10,000        |
| Urban League of Portland  | \$10,000        |
|   |                 |
| Community meeting logistics for 2 meetings                                  | \$4,000         |
| <i>I.e. Participant stipends, venue, food, childcare, translation, etc.</i> |                 |
| <b>Subtotal:</b>  | <b>\$24,000</b> |

**Total: \$54,000**

ATTACHMENT B  
Coalition of Communities of Color (CCC) Proposed Budget By Utility

|   | <b>PacifiCorp</b> | <b>PGE</b>      | <b>NW Natural</b> | <b>Total</b>    |
|---|-------------------|-----------------|-------------------|-----------------|
| Organizational Pass-Throughs and Community Engagement | \$9,000           | \$9,000         | \$6,000           | \$24,000        |
| CCC staff time  | \$13,000          | \$13,000        | \$4,000           | \$30,000        |
| <b>Total</b>  | <b>\$22,000</b>   | <b>\$22,000</b> | <b>\$10,000</b>   | <b>\$54,000</b> |