

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

UM 2276

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Approval of Justice Funding
Precertification.

AMENDED NOTICE TO REQUEST HB
2475 INTERVENOR FUNDING
PRE-CERTIFICATION OF COMMUNITY
ENERGY PROJECT

Community Energy Project hereby submits this amended Notice to Request HB 2475 Intervenor Funding Pre-Certification, further clarifying and modifying its initial application filed on April 3, 2023.

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.

Since 1979, CEP has been dedicated to creating a sustainable, equitable, and green future for our clients. Forty-four years later, CEP has worked to ease the energy burden on frontline communities and has become a part of a larger movement toward electrification to decrease carbon emissions and improve air quality. CEP does this by providing direct in-home safety repairs, weatherization, and energy efficiency upgrades for vulnerable and underserved populations. We primarily serve the Metro region, but our program offerings and advocacy efforts have spread throughout the state. Our clients include seniors, people with disabilities, women, people experiencing low income, people of color, and other historically marginalized groups. CEP annually serves over 2,500 residents.

Our services include direct in-home safety repairs, weatherization, and energy efficiency upgrades for vulnerable and underserved populations. During our most recent fiscal year, 35% of our clients were renters, 29% were homeowners, and 53% of our clients were at

or below 50% Median Family Income. We prioritize the service of BIPOC individuals, seniors, and low-income individuals.

We recognize that the communities we serve understand their own needs better than anyone else can. That's why we conduct surveys and focus groups, and engage in direct conversations with clients in their homes to gather feedback and incorporate their perspectives into our work. Our clients' input plays an integral role in guiding us towards building an equitable distribution of resources.

Not only do we have on-the-ground experience with direct services for low-income households, but we are also part of advocacy circles in building electrification and energy justice. We advocate for low-income households who are energy burdened and are experts in program rulemaking, program design, and policy development around electrification for single-family homes. We are gaining expertise in Distribution System Planning, Energy 101, barriers to low-income electrification, and barriers to renters for weatherization.

CEP's unique role as a licensed general contractor providing direct whole-home upgrades in low-income households gives us a unique voice in these advocacy arenas. Our services contribute to reducing carbon emissions and empowering individuals to take action to live more efficiently and protect the environment. We bring our services to as many communities as possible by removing barriers, working with trusted partners, adapting to the varied needs of different populations, and gathering and incorporating feedback.

Since 2018, CEP has advocated on behalf of Oregon frontline communities, starting with docket UM 1930, Community Solar Program Implementation. Since then, our involvement has grown and we have been involved in the following dockets:

- UM 2005 - Investigation into Distribution System Planning (DSP)
- UM 2114 - Investigation into the Effects of the COVID-19 Pandemic on Utility Customers.
- UM Docket 2178 - Natural Gas Fact Finding per Executive Order 20-04 PUC Year One Work Plan
- 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
- UE 399 - PacifiCorp Request for a General Rate Revision
- UM 2225 - HB 2021 Investigation into Clean Energy Plans
- UM 1158 - Equity Metrics for Energy Trust of Oregon (HB 3141)

Description of Areas to be Investigated

In 2023, CEP intends to be involved in the following dockets:

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

UM 2211 is a non-contested docket that addresses the implementation of HB 2475 (Energy Affordability Act). This docket impacts our organization's clients who live in the Portland Metro region and are energy burdened as utilities are tasked to consider feedback from stakeholders, such as CEP, to create programs to address energy burden for low-income and underserved customers.

CEP also intends to continue to participate in the following dockets for each utility program that fall within UM 2211: 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). In these proceedings, CEP 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.

These types of matters are eligible proceedings because they involve the development and implementation of programs that affect the rights and needs of low-income and underserved communities in the energy sector. As a non-profit organization dedicated to serving these communities, CEP has a stake in ensuring that these programs are designed and implemented in a way that is fair, equitable, and effective. By participating in these proceedings, CEP can provide valuable feedback and advocacy to help shape policies that benefit our clients and the broader community.

LC 79 - NWN IRP Intervenor:

CEP believes that this docket is eligible because it aligns with the organization'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.

LC 77 - PAC IRP Intervenor:

CEP believes that 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.

UE 416 - PGE Request For A General Rate Revision:

CEP believes that this docket is eligible because it affects PGE's residential customers and CEP's mission to ensure that low-income and underserved communities are not disproportionately affected by the actions of utility companies.

UM 2273 - Investigation into HB 2021 Implementation Issues:

CEP plans to participate in this docket by advocating in implementation of HB 2021, which promotes equitable access to clean energy for all Oregonians. CEP believes that this docket is eligible because it aligns with the organization's mission to promote community-based solutions to energy issues, including reducing greenhouse gas emissions and ensuring equitable access to clean energy.

AR 655 - Rulemaking Regarding Filing, Review, and Update of Clean Energy Plans:

CEP plans to participate in this docket as a member of the Energy Advocates coalition, which is advocating for communities to be meaningfully involved in utility clean energy plans. CEP believes that this docket is eligible because it aligns with the organization's mission to promote community-based solutions to energy issues, including ensuring that underserved communities are included in the clean energy planning process.

UM 1158 - Energy Trust Equity Metrics:

CEP plans to participate in this docket by providing feedback on the equity metrics established by the Energy Trust, which aim to create accountability for environmental justice in Energy Trust expenditures. CEP believes that this docket is eligible because it aligns with the organization's mission to promote community-based solutions to energy issues, including ensuring that underserved communities receive equal access to energy efficiency and renewable energy programs.

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

- Issues that grow out of IRP and rate cases/revisions
- Decarbonization/electrification
- Energy affordability for low income rate-payers
- Grid equity
- Disconnections
- Community Resilience

The Budget Showing Estimated Fees and Costs

Attachment A and Attachment B submitted herewith set for the estimated fees and costs.

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

Dated this 21st day of April 2023.

Charity Fain

Charity Fain

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ATTACHMENT A

COMMUNITY ENERGY PROJECT PROPOSED BUDGET

CEP Internal Expenses	Rate	Hours	Cost
<i>Staff</i>			
Charity Fain, Executive Director	\$210	92	\$19,320
Jenna Jarvis, Development & Communications Coordinator	\$105	6	\$630
Sherrie Villmark, Program Director	\$158	112	\$17,696
Alma Pinto, Climate Justice Associate	\$105	406	\$42,630
TBD, Mid Level Advo FTE	\$131	132	\$17,292
TBD, Attorney (External Council)	\$300	66	\$19,800
Subtotal			117,368
Outreach (Focus Groups 2 at \$2000 Per)			\$4,000
Total			\$121,368

ATTACHMENT B

COMMUNITY ENERGY PROJECT PROPOSED BUDGET BY UTILITY

<u>PGE</u>	<u>PacifiCorp</u>		<u>NWN</u>		
<u>Hours</u>	<u>Cost</u>	<u>Hours</u>	<u>Cost</u>	<u>Hours</u>	<u>Cost</u>
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	42	\$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