

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2276

In the matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Justice Funding Precertification Application
and Budget.

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

Community Energy Project hereby submits its Notice Request 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.

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.

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 we are experts in program rulemaking, program design, and policy development around electrification for single-family homes. We hold 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.

Description of Areas to be Investigated

UM 2211 - Implementation of HB 2475 (including 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 provides opportunities for CEP to bring our unique perspectives in low-income program implementation, as our clients are especially energy burdened. Utilities are tasked to consider feedback from stakeholders such as CEP to help create successful programs that address energy burden for low-income and underserved customers.

CEP is especially interested in the UM 2211 phase two investigation which will be beginning soon, and plans to highlight the weatherization and energy efficiency section of HB 2475 that has yet to be addressed in implementation processes.

CEP also intends to continue to participate in the following dockets for each utility program that fall under 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, the applicant plans to provide feedback on program eligibility, enrollment, verification, level of relief, outreach, engagement, timeline, and program improvements 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 82 - PAC IRP & CEP

CEP considers this docket 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. CEP plans on continuing to be engaged through the duration of PAC's IRP & CEP process at the PUC working alongside the Energy Advocates.

LC 79 - NWN IRP

CEP considers this docket 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. CEP plans on continuing to be engaged in the NWN IRP as they look to file their update in 2024.

AR 641 - Division 1 Rules

CEP considers this docket eligible because it affects how EJ advocates are able to participate in contested cases, subsequently impacting how advocates can ensure that low-income and underserved communities are not disproportionately affected by actions of utility companies. As CEP has intervened in contested cases, most recently PGE's rate case, we bring an understanding of barriers to entry along with other considerations for how to ensure contested cases are accessible for EJ advocates participation.

UM 2111 - Interconnection Process and Policies

As the Low-Income Facilitator in the Oregon Community Solar Program, CEP has seen how interconnection impacts the pace in which smaller-scale renewable energy comes online, and how it specifically affects low-income subscribers. CEP sees multiple arenas, such as HB 2021, where interconnection delays will interfere with larger goals for an equitable renewable energy future. CEP considers this docket 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.

UM 1893 - Energy Efficiency Avoided Costs for 2025

CEP considers this docket eligible because it is related to energy efficiency, an important aspect of CEP's direct in-home work with clients. CEP plans on engaging to evaluate the way the utilities and Energy Trust of Oregon are looking at energy efficiency as a resource and the equity consequences of their decisions around energy efficiency.

Energy Trust of Oregon Grant Agreement

CEP considers this docket eligible because of the impacts and/or opportunities for low-income and environmental justice communities from what is outlined in the grant agreement rules. It is

important to have EJ voices at the table when thinking about improvements that can be made to the current PUC agreement. CEP plans on engaging to evaluate the equity implications of the grant agreement, as well as other topical issues that might evolve from the investigation process.

PGE's Community-wide Green Tariff

CEP considers this docket 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. CEP has already had initial conversations with municipalities related to the green tariff and plans on staying engaged around how the process can be made more accessible, can offer technical assistance throughout the process, and how CBOs, municipalities and project managers can better connect and work together throughout the program design and implementation process.

PAC Rate Case

CEP considers this docket eligible because it affects PAC'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.

NWN Rate Case

CEP considers this docket eligible because it affects NWN'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.

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:

- CEP can coordinate other EJ groups so that more experienced advocates can help advocates that are newer to the PUC process.
- Stakeholder "Utility Policy Reading Group" to learn more about technical issues and discuss PUC engagement strategies

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

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

Budget Showing Estimated Fees and Costs

Attachment A and Attachment B submitted herewith set forth 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 November 13, 2023.

Respectfully submitted,

Charity Fain

/s/

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ATTACHMENT A

COMMUNITY ENERGY PROJECT PROPOSED BUDGET

Employee	Billable Rate	Hours	Cost
Executive Director	\$210	52	\$10,920
Development & Communications Coordinator	\$105	6	\$630
Program Director	\$158	72	\$11,376
Climate Justice Associate	\$105	315	\$33,044
Policy and Advocacy Manager	\$131	130	\$17,030
Subtotal			\$73,000
Outreach (Community Sessions 2 at \$1000 Per)			\$2,000
Total			\$75,000

ATTACHMENT B

COMMUNITY ENERGY PROJECT PROPOSED BUDGET BY UTILITY

By Utility					
PGE		PacifiCorp		NWN	
Hours	Cost	Hours	Cost	Hours	Cost
8	\$1,680	22	\$4,620	22	\$4,620
2	\$210	2	\$210	2	\$210
28	\$4,424	28	\$4,424	16	\$2,528
82	\$8,636	54	\$5,696	179	\$18,842
43	\$5,633	43	\$5,633	43	\$5,633
163	\$20,583	149	\$20,583	262	\$31,833
	667		667		667
	21,250		21,250		32,500
			Total		\$75,000

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