

**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 the 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 the implementation of the Living Cully Energy Plan.¹ This on-the-ground experience gives Verde a unique voice in these 1 advocacy arenas, as well as the community organizing work we do in Cully 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 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:

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

- 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
- LC 78 - Idaho Power's 2021 Integrated Resource Plan (IRP)
- UM 2033 - PGE Transportation Electrification Plan
- UM 2056 - Pacificorp Oregon Transportation Electrification Plan

Intervenor Funding Request:

Verde requests a total of \$52,200 drawn from Pacific Power (\$21,250), Portland General Electric (\$21,250), and Northwest Natural (\$10,000) funds. The funds will support staff time for the Energy Justice Coordinator position to focus on Verde's energy regulatory and policy work, staff time/support for the Transportation Justice Coordinator and Advocacy Manager, 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 2193

Relevancy/Eligibility: Verde considers this docket eligible because it is related to energy planning, transmission, and renewable energy, Verde's mission to promote community-based perspectives and solutions are important to these issues.

How Verde Intends to Engage: Verde plans to be engaged in UM 2193 RFP as the process continues in 2024.

PAC and PGE Transportation Electrification Plans & Implementation

Relevancy/Eligibility: Verde considers these dockets eligible because they are directly related to transportation electrification activities to assist communities, nonprofits, and residential customers. Verde has engaged in various transportation electrification dockets, including the Pacific Power and Portland General Electric Clean Fuels Plans, Transportation Electrification Plans and program development. We hope to continue our participation in upcoming work relating to reliability and affordability, 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, engage with other advocates, and participate in relevant dockets.

UM 2274

Relevancy/Eligibility: Verde considers this docket eligible because it is related to clean energy planning and decarbonization. Verde's mission to promote community-based perspectives and solutions are important to this docket because the decisions made will impact energy costs and reliability for the communities we serve.

How Verde Intends to Engage: Verde will submit comments, engage with other advocates, and participate in relevant dockets.

LC 82 - PAC IRP & CEP

Relevance/Eligibility: Verde considers this docket eligible because it is related to energy planning, which is an important aspect of Verde’s mission to promote community-based solutions to energy issues.

How Verde Intends to Engage: Verde plans to be engaged through the duration of PAC’s IRP & work alongside the Energy Advocates.

LC 79 - NWN IRP

Relevance/Eligibility: Verde 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.

How Verde Intends to Engage: Verde plans to be engaged in the NWN IRP as they look to file their update in 2024.

Energy Trust of Oregon Grant Agreement

Relevance/Eligibility: Verde 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.

How Verde Intends to Engage: Verde 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.

IRP Guideline Revisions

Relevance/Eligibility: This issue 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.

PGE's Community-wide Green Tariff

Relevancy/Eligibility: Verde considers this docket eligible because it is related to energy planning, which is an important aspect of Verde's mission to promote community-based solutions to energy issues.

How Verde Intends to Engage: Verde is exploring green tariffs and how they impact our communities and plans to engage around how the process can be made more accessible and provide insights how CBOs, municipalities and project managers can better connect and work together throughout the program design and implementation process.

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.

PAC Community Based Renewable Energy RFP

Relevance/Eligibility: This issue stems from Verde's advocacy and leadership in passing HB 2021, Oregon's 100% Clean Energy for All policy.


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.

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.

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

Dated this 13th day of November 2023.

DocuSigned by:

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APPENDIX A
VERDE PROJECTED BUDGET

Verde Internal Expenses	Rate	Hours	Cost
<i>Staff</i>			
Anahi Segovia Rodriguez, Energy Justice Coordinator	\$100	210	\$21,000
Indi Namkoong, Transportation Justice Coordinator	\$100	100	\$10,000
Cheyenne Holliday, Energy Climate and Transportation Manager	\$150	50	\$7,500
Stacie Walen, Finance Director	\$150	15	\$2,250
<u>Staffing Subtotal</u>			<u>\$40,500</u>
<i>Contracting</i>			
TBD, Technical Assistance Provider	\$150		\$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			\$5,000
<u>Community Resources Subtotal</u>			<u>\$8,000</u>
Total			<u>\$52,500</u>