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via puc.filingcenter@puc.oregon.gov

Public Utility Commission
Attn: Filing Center
P.O. Box 1088
Salem, OR 97308-1088

RE: UM 2211 - CEP's comments on Re-engagement with Stakeholders for Low-Income Bill Discount Programs

Community Energy Project (CEP) offers the following comments on the Oregon Public Utility Commission's (PUC) Low-Income Bill Discount program investigation in UM 2211. While CEP appreciates investor-owned utilities efforts to provide relief to low-income customers, it is important to ensure that utilities are properly complying with the Energy Affordability Act (HB 2475), and are meaningfully re-engaging with stakeholders to effectively reduce the inequitable energy burdens of its most vulnerable customers.

CEP highlights that PAC, PGE and NWN have ceased engagement over the last year, resulting in a lack of updates on enrollment levels or the ability to address any program concerns as we approach the one year mark of these programs. CEP also has concerns with Idaho Power's proposal to move their low-income bill discount program into their upcoming rate case filing. A siloed rate case process will limit stakeholder engagement opportunities that would help further define program details. Moving Idaho Power's low-income bill discount process into an advice filing, like the other utilities have done, will allow for stakeholders to help inform a stronger bill discount for Idaho Power's Oregon customers. In that regard, we strongly urge the PUC and utilities to reconvene with stakeholders in order to effectively assess the efficacy of these programs, address new and unresolved program components, and to ensure that environmental justice communities are prioritized.

CEP highlights the importance of comprehensively monitoring and evaluating how and whether the programs are effectively and equitably reducing energy burdens while keeping costs low for the rest of its customer base. Creating equitable programs requires understanding the demographics and experiences of customers, and regularly engaging with the stakeholders who work directly with energy burdened customers. Utilities must defer to the knowledge and expertise of low-income and environmental justice advocates for the sake of maximum program integrity. In addition to the lack of recent stakeholder engagement from utilities to report on the status of their programs, CEP also has concerns about the lack of discussion around lingering unresolved components, including post enrollment verification processes.

CEP uplifts the need to address the outstanding components of the Energy Affordability Act. We urge the PUC to begin engagement with stakeholders and utilities around the weatherization components of the bill that have yet to be addressed in implementation proceedings.

Weatherization plays an integral role in creating affordable, healthy and safe homes and is essential to energy affordability and integration of renewable energy required in additional bills.

CEP emphasizes the importance of addressing the outstanding components of the Energy Affordability Act and reiterates the importance of ongoing stakeholder input and engagement that will assist in equitably reducing burdens faced by low income and environmental justice communities, aligning with the intent of HB 2475.

We appreciate the opportunity to provide comments.

Respectfully submitted,

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