

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 426

In the matter of
Idaho Power Company.,
Request for a General Rate Revision.

COMMUNITY ENERGY PROJECT'S
NOTICE OF INTENT TO REQUEST
JUSTICE FUNDING CASE FUND GRANT
AND CASE CERTIFICATION;
PROPOSED BUDGET

Pursuant to HB 2475 (ORS 757.072), OAR 860-001-0800, and the Justice Funding Agreement (Agreement) adopted by the Public Utility Commission (Commission) in UM 2211 by Order 23-033 (February 7, 2023), Community Energy Project (CEP) files this Notice of Intent to Request Justice Funding Case Fund Grant, Request for Case Certification, and Proposed Budget in this matter. Pursuant to Article 6 of the Agreement, setting forth the criteria for eligibility for case fund grants, this application, (a) demonstrates that CEP meets the eligibility criteria set forth Section 6.1; and (b) demonstrates that this matter is an Eligible Proceeding as set forth in Section 6.2.

CEP is an Eligible Organization.

CEP represents low-income residential customers (low-income customers) or Environmental Justice Communities (EJ community) and CEP's participation will be primarily directed toward issues affecting those interests. CEP is a 501(c)(3) non-profit organization and has been found Eligible by the Commission under HB 2475 in Order 22-043 and in numerous orders granting funding pursuant to the Interim Funding Agreement (HB 2475) approved in that Order. The Findings in that Order remain valid:

CEP is a 501 (c)(3) community based organization that believes everyone deserves a safe, healthy and efficient home, regardless of income. CEP achieves this by providing direct in-home safety repairs, weatherization, and energy efficiency upgrades for vulnerable and underserved populations. CEP clients include seniors, people with disabilities, women, people experiencing low income, people of color, and other historically marginalized groups. CEP's work is centered in effective community engagement and includes education and training. On a three-year average, 68% of CEP clients are people of color, 95% are low-income and 74% are women. All clients have disproportionately high safety and energy bill burdens, which compromise their ability to remain housed. CEP primarily and historically serves Multnomah County, but will soon be working in Clackamas County and has a strategic goal to expand geographically. CEP programming has helped thousands of households live more comfortably and use less energy as a result of the education and services provided.

CEP represents low income customers and EJ communities in Idaho Power's service area. CEP has effectively represented low income customers and EJ communities in numerous proceedings since 2018, including: UM 1930, Community Solar Program Implementation; 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; UM 2211 - Implementation of HB 2475; 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); and UE 426 - PGE's general rate case. Idaho Power actively participated in some of these proceedings, as well.

CEP will continue to develop advocacy positions benefitting these communities: 1) through CEP's day to day interaction with its clients, while administering its projects which provide direct in-home safety repairs, weatherization, and energy efficiency upgrades; 2) through its ongoing surveys and focus groups.

CEP's request for case certification and participation in this docket will not unreasonably delay the proceedings.

UE 426 Is an Eligible Proceeding

Idaho Power Company (Idaho Power) filed a Request for a General Rate Revision which is the subject of this docket, UE 426. UE 426 is an Eligible Proceeding for Case Funds because it is a “contested case proceeding” (e.g. rate cases) listed in section 6.2 and it is not a complaint proceeding.

This filing serves as a notice of intent.

This Request for Case Fund and Budget is served on Idaho Power through direct email, all Pre-Certified Organizations, and all Parties to UE 426. We intend to request a Case Fund Grant from Idaho Power Company.

Community Energy Project’s Proposed Budget

A. Statement of Work

CEP plans to participate in many aspects of this proceeding, including meetings, hearings, and settlement conferences. CEP plans to review and analyze Idaho Power’s tariff filings, testimony, and comments; conduct research when needed; file testimony; and participate in numerous settlement conferences. CEP will be represented by an attorney, Tonia Moro, along with CEP staff. CEP will investigate issues directly related to EJ communities, including but not limited to disproportionate impacts on customer bills. We believe our participation will benefit low-income and frontline communities, and will support other EJ advocates getting more involved in PUC regulatory spaces like rate cases. HB 2475 sets forth policy and legislative intent to foster participation in PUC proceedings by EJ organizations like CEP. We believe our involvement will add to conversations happening in these spaces, and will also help other organizations understand the intricacies of rate cases and how to get involved in them in the future.

B. Eligible Expenses

Employee	Rate	Hours	Total
Executive Director	\$210	40	\$8,400
Development & Communications Coordinator	\$105	7	\$735
Program Director	\$158	20	\$3,160
Climate Justice Associate	\$105	120	\$12,600
Policy and Advocacy Manager	\$131	111	\$14,605
Attorney	\$300	35	\$10,500
Total			\$50,000

DATED this February 28, 2024.

/s/ Kate Ayres
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