

November 29, 2022

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, OR 97301-3398

Re: UM 1158—PacifiCorp’s Comments on Staff’s Proposed Equity Metrics for the Energy Trust of Oregon

PacifiCorp d/b/a Pacific Power respectfully submits these brief comments regarding the development of equity metrics for the Energy Trust of Oregon (ETO).

Theme 1: Access to information

The information gathered through the recent stakeholder engagement in docket UM 1158 is in alignment with feedback PacifiCorp has received as well. PacifiCorp agrees with the communities’ assessment that improved energy efficiency and renewable energy programs awareness and education is important and needed.

However, the Public Utility Commission of Oregon Staff’s (Staff) suggested metric to increase “funding to support community ambassador outreach to environmental justice communities” is not so much a measurement, but rather a direction to ETO. Staff further clarified that they would work with ETO in the upcoming weeks to set an appropriate funding target for the first year and PacifiCorp would appreciate being a part of this conversation.

PacifiCorp suggests that metrics or measurements could be created for ETO on number of education events or outreach opportunities, respective customers reached, and new resulting program participants. Having metrics in place that assesses access to information over time will help inform different strategies and progress towards achieving the outcome desired by communities.

Theme 2: Energy burden

Customer energy burden remains top of mind at PacifiCorp and the Company is continuing to look for ways to mitigate ratepayer impacts while providing customers assistance into bill payment and energy management programs. Staff is suggesting ETO create “new and expanded low-cost and no-cost offers to reduce energy burden.”

House Bill 3141 expanded electric Public Purpose Charge funds into Oregon Housing and Community Services (OHCS) energy programs. PacifiCorp suggests that ETO thoughtfully

enter into any new efforts in program development for low-income customers so as to not create duplicative programs.

PacifiCorp suggests that a metric or measurement could be created for ETO on number of OHCS program participants where ETO provided cost-effective incremental support and/or expansion.

Theme 4: Community benefits – access to support

PacifiCorp agrees with the approach to increase “support for nonprofits with a mission that supports environmental justice communities through incentives, training and funding for energy efficiency upgrades or solar with storage projects.” It also may warrant an additional metric or reporting as to how this affects cost-effectiveness of the work rather than just an increase or redistribution of funds to these particular organizations. Further, this metric may benefit from additional clarification as to how progress in this area may be measured. If the goal is to further non-profit organizations access to support, then a metric supporting the tracking of achievement towards that goal will bring additional accountability to the increased support that is being prescribed.

PacifiCorp appreciates the opportunity to provide these comments. Informal inquiries regarding these comments may be directed to Kari Greer, Senior Community Relations Manager, at (503) 816-9032.

Sincerely,



Matthew McVee
Vice President, Regulatory Policy and Operations