



Oregon Citizens' Utility Board

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November 28, 2022

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

RE: UM 1158 - CUB Comments on Equity Metrics for Energy Trust of Oregon

The Oregon Citizens' Utility Board (CUB) appreciates the efforts of the Oregon Public Utility Commission (PUC) Staff recommendations for equity metrics for Energy Trust of Oregon (Energy Trust), as required by HB 3141 (2021).

CUB appreciates that PUC Staff has incorporated feedback from a public process, as well as from UM 2114 conversations and themes, to develop these proposed equity metrics. We appreciate their commitment to engaging with a broader range of environmental justice and low-to moderate-income communities and advocates to help inform future equity metrics.

Draft Metrics

CUB supports the themes and proposed metrics presented by PUC Staff. We recognize that these proposed metrics promote access to information by targeting outreach to environmental justice communities in order to create stronger connections and access to information and resources. CUB agrees that no-cost and low-cost offers to reduce energy burden are important to ensure that low-income customers are not disproportionately impacted by energy costs. This metric aligns with the efforts to reduce energy burden in UM 2211, the docket investigating the implementation of the Energy Affordability Act (HB 2475).

CUB agrees that connecting underserved communities to resources like energy efficiency, and solar and energy storage systems will provide resiliency and reliability, while also helping Energy Trust, utilities, and the PUC understand the unique challenges and needs facing these communities.

CUB supports the metric focused on serving nonprofit organizations with a mission of supporting environmental justice communities. It is important to partner with community organizations that are familiar with and trusted by the communities they serve, and agree this should help Energy Trust connect with some of these communities.

Other Concepts to Explore

CUB appreciates PUC Staff thinking ahead to 2024 and believes the presented concepts are a good place to start. When exploring 2024 activities, CUB encourages PUC Staff and Energy

Trust to prioritize direct engagement with multiple environmental justice communities and representatives of those communities and also incorporating findings from the UM 2211 investigation. This should highlight gaps in access to energy efficiency resources, as well as strategies to meaningfully reduce energy burden. It is our hope that data collected from the utilities' interim low-income bill discount programs provide useful direction for future metrics.

Again, CUB appreciates the work PUC Staff has put into developing equity metrics. We look forward to seeing these metrics implemented and grow as more is learned about how to mitigate disproportionate energy burden.

Respectfully Submitted,

/s/Kate Ayres

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