

February 16, 2023

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attention: Filing Center
201 High Street SE, Suite 100
P. O. Box 1088
Salem, OR 97308-1088

RE: UM 1158 / UM 2195 HB 3141 Equity Metrics – NW Natural’s Comments

Northwest Natural Gas Company, dba NW Natural (“NW Natural” or the “Company”), files herewith its comments on Staff’s Proposed Equity Metrics.

Metric 1: Access to Support for Communities: Increased support to nonprofit organizations with a purpose to serve environmental justice communities or to support nonprofit-led initiatives serving environmental justice communities. Increased support can be incentives, training, and funding for energy efficiency upgrades, solar, or solar-with-storage projects.

- NW Natural would like to see a breakdown of the baseline spending estimated at \$1.6 million. For example, how much is for ETO administration versus delivered to non-profits?
- More funding does not always translate to accessibility. We continue to see capacity constraints from CBO’s and competing sources of funding. How is the additional funding addressing capacity constraints and competing funding streams?

Metric 2: Access to Information: Increased funding to support targeted outreach to environmental justice communities, including funding for community ambassadors, education, and workshops.

- NW Natural is supportive of increased personnel for outreach but is unsure if the “number of people” is a reasonable way to measure impact. Perhaps a better measure would be the number of project referrals, as this would be measurable.

Metric 3: Energy Burden Reduction: New and expanded low-cost and no-cost offers to reduce energy burden created and launched.

- NW Natural supports having more programs that reduce energy burden. There are programs available through utilities that are currently helping reduce energy burden

through weatherization upgrades. Collaboration between Energy Trust and utilities would be fruitful so that redundancies are not created in program offerings.

Metric 4: Community Resilience: Solar and solar-with-storage-system projects supported for low and moderate-income residents in areas with limited infrastructure or high energy burden.

- NW Natural believes that natural gas backup can also be a worthwhile solution for community resilience.
- Regarding the definition for low- and moderate-income residents, NW Natural notes that our Low-Income Weatherization Program¹ defines low-income as 200% FPL.

Please address correspondence on this matter to me with copies to the following:

eFiling
NW Natural
Rates & Regulatory Affairs
250 SW Taylor Street
Portland, Oregon 97204
Phone: (503) 610-7330
Telecopier: (503) 220-2579
eFiling@nwnatural.com

If you have any questions, please contact me at (503) 610-7326.

Sincerely,

/s/ Rebecca Trujillo

Rebecca Trujillo
Regulatory Consultant
NW Natural
250 SW Taylor Street
Portland, OR 97204
(503) 610-7326
rebecca.trujillo@nwnatural.com

¹ NW Natural's Oregon Low-Income Energy Efficiency (OLIEE) Program is detailed in tariff Schedule 320.