

December 13th, 2022

Oregon Public Utility Commission (OPUC)

Via e-mail only to: PUC.FILINGCENTER@puc.oregon.gov

RE: UM 1158 Written SBUA Comments for Equity Performance Measure Recommendations for the Energy Trust of Oregon

SBUA like ETO serves all small businesses state wide and also can concentrate on reporting, and efforts on specific environmental justice communities. SBUA provides perspectives of a small business advocate of latino/hispanic background and as a former resident of Northeastern Oregon agricultural community who has spoken with small business owners within this area of the state. Small businesses are an important part of the fabric in every local community throughout the state and SBUA suggests that ETO use available tools to consider more explicitly small businesses within the equity metric measurement.

Small Business Utility Advocates notes the impact of HB 3141 as it targets determining equity and renewable energy metrics. HB 3141 requires the establishment of equity metrics to assess and create accountability for environmental justice communities in Energy Trust services such as investing 25 percent of public purpose revenue (\$3.8 million) on renewable energy activities for low and moderate income ratepayers. SBUA also has a long history of translating energy and utility related information into understandable and brief language, usually English but sometimes Russian and Spanish, for the busy small business owner. We have focused on diversity of industry but are exploring avenues to expand our language diversity as part of our equity efforts.

SBUA appreciates the comments by Ecumenical Ministries of Oregon and Community-Based Liaisons, that explicitly inquired regarding the role small businesses in this matter. SBUA supports small business being a specific part of the metrics of equity metrics. Ever since SB 978 and before, SBUA has recommended metrics to measure the impact on small businesses of implementing Oregon's energy policy, beginning with COBID certified firms.

More recently, the Commission has implemented reporting creating a new source of data regarding small commercial customers of utilities. Like other stakeholders SBUA appreciates putting the monthly utility data reports from UM 2114 (COVID Impacts) to good use. SBUA has shared its own related data compilation with parties of this docket and various utilities, however SBUA has not met with ETO to discuss these identified small commercial customer zip codes impacted by persistent arrearages. Although SBUA has been present for ETO public meetings, one on one engagement could serve as a benefit to ETO regarding small commercial customer

data that has been captured through SBUA work in rate cases. Also SBUA would suggest ETO consider how to best utilize new revised rules for requiring reporting on items such as disconnections and developing possible metrics focusing on small commercial customers.

Respectfully Submitted,

Guillermo Castillo, guillermo@utilityadvocates.org

