



Portland General Electric
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portlandgeneral.com

November 28, 2022

Via Electronic Filing

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

Re: UM 1158 Equity Metrics for Energy Trust of Oregon

Dear Filing Center:

Portland General Electric Company (PGE) respectfully submits these comments in response to the recommendations put forth in Public Utility Commission of Oregon (OPUC or Commission) Staff's proposed equity themes and metrics per the HB 3141 direction to establish additional performance measures to assess and create accountability for environmental justice in the expenditure of energy conservation funds.

PGE supports these proposed equity themes and metrics that have emerged from community engagements and other conversations around equity accountability. PGE also acknowledges that accountability to the communities we serve may come in the form of both qualitative and quantitative measures of success. PGE would like to revisit the metrics and the effectiveness of the outlined activities, thereby providing regular assessments of whether the practices are meeting with the intent.

Regarding other concepts to explore, PGE offers for consideration, that equity performance measures include Energy Trust program or measure participation by dwelling type to inform ways in which to expand reach and engage tenants and landlords alike.

Additionally, with new sources of local, state, and federal funding to support low-income customer participation it may also prove beneficial to consider how best to coordinate delivery of Energy Trust programs and measures in partnership with existing public purpose charge funded weatherization and bill assistance, and utility ratepayer funded bill discount and bill relief programs.

Sincerely,

/s/ Jason Salmi Klotz

Jason Salmi Klotz
Manager, Regulatory Strategy and Engagement