

November 28, 2022

Public Utility Commission of Oregon

Attn: Filing Center

201 High Street SE, Suite 100

Salem, OR 97301

Submitted electronically via puc.hearings@puc.oregon.gov

Re: UM 1158 Request for Comments on Equity Metrics for Energy Trust of Oregon

Energy Trust of Oregon appreciates the opportunity to offer comments on the Oregon Public Utility Commission's draft equity performance metrics to ensure Energy Trust's environmentally just investment and stewardship of ratepayer funds. Energy Trust is the independent nonprofit organization operating under a grant agreement with the OPUC to serve customers of Portland General Electric, Pacific Power, NW Natural, Cascade Natural Gas and Avista with energy efficiency and small-scale renewable energy programs. Energy Trust information, cash incentives, contractor connections and community organization partnerships help these customers use less energy and generate renewable power. We offer these comments as information. We are not recommending or advocating for particular changes or outcomes, given our non-advocacy role on OPUC matters.

Annual performance metrics set by the OPUC through docket UM 1158 have long established expectations for the outcomes of our investments, including delivering cost-effective energy efficiency, sustaining competitive leveled costs for energy savings, renewable power generation, building a pipeline of small-scale renewable projects, managing staffing and administrative costs, and other outcomes. Starting in 2019, the OPUC added diversity, equity and inclusion outcomes to these metrics. We report on progress relative to all performance metrics in annual reports to the commission.

We view the legislative (HB 3141, 2021) requirement for equity metrics as an important addition to the commission's accountability framework for Energy Trust investments. HB 3141 establishes clear direction from the state of Oregon to ensure opportunities and benefits are delivered to all customers, and reaffirms Energy Trust's own diversity, equity and inclusion priorities.

The inaugural set of equity metrics recommended by OPUC Staff reflect themes and feedback we are receiving from the communities and customer groups we have not adequately served as an organization, including customers with low and moderate incomes, rural customers and customers of color. For example, one finding from our biennial Customer Awareness and Participation Study is the need to improve access to information and increase customers' awareness of their energy-saving and renewable power options. The study is a general population survey of residential customers with additional sampling for specific demographics to better understand populations we are not serving effectively. The most recent study showed "lower program participation rates and awareness of Energy Trust among low-income groups, African American/Black and Hispanic/Latinx communities, residents of rural areas and renters. Lack of awareness and knowledge of programs were cited as key barriers. The study found these customers tend to prioritize saving money over saving energy and are most concerned with energy affordability."¹

¹ 2020 Energy Trust of Oregon Customer Insights Study Final Report, <https://www.energytrust.org/wp-content/uploads/2021/04/Energy-Trust-CIS-Final-Report-wSR.pdf>. *Customer Insights Study is the former name of the Customer Awareness and Participation Study.*

Further, reducing customer energy burdens is an area of increased focus for our energy efficiency and solar programs. With the support of the OPUC, we are beginning to develop pilots and program offers to explore their effectiveness in reducing energy burdens while delivering energy savings or generation. While some efforts that can reduce energy burdens benefit from measure-level cost-effectiveness exceptions granted by the commission (pursued under docket UM 1696), most efforts are developed within our cost-effectiveness mandate and the organization continues to deliver cost-effective programs.

We offer the commission and Staff the following observations on the equity metrics:

The equity metrics will direct Energy Trust in taking actions that can lead to direct customer benefit in 2023 but will likely have more impact in future years by laying the groundwork for developing partnerships and capacity building with organizations that can yield results over the long term. The metrics will require further discussion, definition and direction from Staff. We will share our existing and planned approaches with Staff to inform their next steps to refine the metrics and set related targets. If co-creating and/or co-delivering new offers with community groups, assessing progress to the metrics might occur on both an annual and multi-year basis to allow for the time and resources needed to work with community groups, some of which may be resource constrained.

Draft metric: Increased funding to support community ambassador outreach to environmental justice communities. Identifying and working with community ambassadors and community entities to reach customers with lower incomes, rural customers and customers of color is broadly in alignment with our current outreach strategy and ongoing engagement and delivery activities as described in our diversity, equity and inclusion plan². Depending on the final metric, we will likely need to further develop internal tracking systems to consistently identify and report on services and funding currently provided to community entities to reach customers with energy efficiency and solar opportunities. If the metric ultimately includes existing Energy Trust approaches, we could quantify progress through projects completed, savings achieved, renewable energy generated and dollars spent. Further expanding outreach beyond 2023 planned levels, or developing new activities and approaches, to achieve this metric would have budgetary and staffing resource impacts. This may require revisiting activities and actions in the organization's 2023 budget and action plan or, in consultation with our partner utilities, leveraging program reserves to bring in additional resources.

Draft metric: New and expanded low-cost and no-cost offers to reduce energy burden created and launched. We appreciate the direction to expand existing no- and low-cost offers. Increasing participation in existing offers recognizes the need to reach more people, and to expand and build additional community partnerships. Pursuing more and expanded no- and low-cost offers can put upward pressure on program delivery and incentive costs and may require OPUC consideration for efficiency incentives that are beyond what is cost-effective on the measure level Utility Cost Test.

Draft metric: Installation of solar with storage systems for low and moderate income residents supported in areas with limited infrastructure.

We appreciate the incorporation of solar plus battery storage systems into the equity metrics. Pairing solar with battery storage allows customers to benefit from a reduced utility bill each month and also benefit from resilient renewable backup power during outages. This metric also reinforces another provision in HB 3141, which is to dedicate at least 25 percent of the renewables public purpose charge funds we invest to benefit customers with low and moderate incomes. We are planning to launch a battery storage incentive in the first half of 2023, which supports achieving this metric.

² Diversity, Equity and Inclusion Plan, <https://www.energytrust.org/wp-content/uploads/2022/07/2022-DEI-Plan.pdf>

Draft metric: Increased 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.

We understand the need to support community-focused nonprofits not only as outreach partners but also as participants in our energy efficiency programs, solar program and grant opportunities to help lower their operating costs and enhance their abilities to be resources for their communities. Improving our relationships with nonprofits can also lead to benefits for our mutual customers and, in some cases, innovative ways of working together to serve those customers.

Energy Trust appreciates the opportunity to provide these comments and observations. We would like to thank Sr. Utility Analyst Anna Kim for her leadership in this metrics-setting process, as well as F.C. Hurdle Consulting and the community members for their input and involvement. Energy Trust is committed to improving our service to all customers who fund the programs and incentives we provide. We look forward to continuing to engage with the OPUC, interested community groups, our utility partners and other stakeholders as we plan for, implement and learn from these equity metrics.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael Colgrove".

Michael Colgrove
Executive Director
michael.colgrove@energytrust.org