



**Portland General Electric**  
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March 1, 2024

***Via Electronic Filing***

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

Re: UM 1158 Equity Metric Evolution

Dear Filing Center:

Portland General Electric Company (PGE) respectfully submits these comments in response to the Public Utility Commission of Oregon (OPUC or Commission) Staff's draft recommendations for changes to established equity metrics for the Energy Trust of Oregon, on docket UM 1158, and in response to House Bill (HB) 3141.

PGE appreciates OPUC Staff efforts to reflect feedback gathered through a public process and acknowledges that equity metrics are inherently difficult to quantify, and therefore, both quantitative and qualitative measures can and should be considered. PGE also appreciates that equity metric development is an iterative process to be re-evaluated annually based on learning from the prior program years.

PGE echoes the sentiment offered in its prior year comments: first, capacity building is necessary to ensure trusted delivery to underserved communities, and second, the desired outcome for all these metrics is to increase the participation of environmental justice communities in both decision-making processes and renewable energy and energy efficiency programs.<sup>1</sup>

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<sup>1</sup> Retrieved from: UM 1158 PGE Comments (February 16, 2023).  
<https://apps.puc.state.or.us/edockets/edocs.asp?FileType=HAC&FileName=um1158hac122027.pdf&DocketID=11472&numSequence=168>

## Comments

It remains unclear how our priority populations benefit directly from the proposed increased investment and its proposed use. PGE acknowledges that it takes years to build trust, capacity and develop norms of mutual commitment and understands that performance measures are therefore qualitative at the outset. However, the expected impacts of near-term actions to build Energy Trust staff and delivery capacity in terms of out-year participation and savings remain unclear and PGE sees it is reasonable to request the estimated program participation and savings from these investments. PGE has not seen what learnings resulted from the 2023 activity and how they inform what is expected for the 2024 activity and investment.

For the investment in our communities to be a reasonable use of PGE customer dollars, PGE encourages consideration of the following questions derived from Table 1 below:

- With financial support of nonprofits supporting environmental justice communities increasing from \$1.8M in 2023 to at least \$4.5M in 2024 (a 250% year over year increase), how and by when will this result in direct benefit to our priority populations? What are Energy Trust's goals in terms of increased participation and direct benefits to communities over time? How are these benefits demonstrated?
- With an increase in Energy Trust outreach staff by 35% from 2023 levels, when will this result in direct benefit to our priority populations? What were the learnings and participation for 2023 and what is expected in 2024?
- Is the increase in the number of no-or low-cost offers by 25% in 2023 translating into direct benefit for our priority populations? How do these offers complement existing low-income weatherization programs and how will these offers complement anticipated Inflation Reduction Act incentives?
- Did the effort to increase the number of CBOs in the development of solar plus storage offers in 2023 translate into direct benefit for our priority populations? What were the learnings and participation for 2023 and what is expected in 2024? Did ETO capture learnings from these efforts regarding how to better serve these customers or connect to these communities the value of solar plus storage? Given Energy Trust's distribution system connected technology (DSCT) incentives, what were the learnings and participation for 2023 and what is expected in 2024?

## Conclusion

PGE appreciates Staff's draft recommendations for equity metrics for the Energy Trust of Oregon. PGE offers that the relative priority of each metric, and appropriateness of each target, is dependent upon the anticipated community impact that each metric and target has on increasing participation and should be informed by prior year learnings. PGE requests that reporting on these efforts be

included in subsequent program years and that milestones be set in order to demonstrate need and growth. In addition, given that affordability is a key benefit to our priority populations, it is also reasonable to recommend that Energy Trust partner with other state agencies and funders to address energy burden and increased program participation more holistically. To this end, PGE looks forward to contributing to the UM 2211 scope to further a holistic and outcomes-based approach.

**Table 1: Staff Comparison of 2023 and Proposed 2024 Equity Metrics**

Metric	2023 Performance Measure	2024 Performance Measure
Equity Metric 1: Access to Support for Communities	Increased support by \$200,000 to \$1.8 million to nonprofit organizations with a purpose to serve environmental justice communities or to support nonprofit-led initiatives serving environmental justice communities.	Spend at least \$4.5 million in support (including incentives) of nonprofit organizations supporting environmental justice communities. In comparison with 2023, increase the number of participating community-based organizations, the number of projects completed, the amount of savings achieved, and \$ of incentives delivered.
Equity Metric 2: Access to Information	10 additional combined FTEs or community ambassadors focused on this effort, a roughly 35 percent increase in people over the 16.5 FTE and 12 community ambassadors in 2022.	Add staff to a total of 35 FTE to support targeted outreach to environmental justice communities. Describe at least ten examples of how outreach efforts have led to new projects that delivered savings to environmental justice communities.
Equity Metric 3: Energy Burden Reduction	10 total offers, a 25 percent increase from the 8 offers available in 2022.	In comparison with 2023, increase the number of community partners and customers receiving no-or low-cost offers. Report any additional demographic information for customers (e.g. income categories, race/ethnicity) if available.

Equity Metric 4: Community Resilience	At least 5 CBOs engaged in creating and evolving the solar plus storage offer.	Increase the number of solar and solar plus storage projects in development or completed for low-and moderate-income customers. Report total projects and projects (completed and in development) in census tracts that are rural or have above-average energy burden. Report learnings from program operations and stakeholder feedback. Describe how it will be used to improve the offering
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Sincerely,

*/s/ Riley Peck*

Riley Peck  
Senior Manager, Regulatory Strategy

