



Oregon Citizens' Utility Board

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Public Utility Commission
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RE: UM 1158 - Staff's 2024 Draft Proposed Performance Measures for Energy Trust of Oregon

CUB appreciates Staff providing the opportunity to offer written comments on its Energy Trust of Oregon's (ETO) 2024 Draft Proposed Performance Measures. CUB applauds the efforts Staff, ETO, and stakeholders have put into informing the proposed performance measures, as well as the thoughtfulness that went into revising them to better support ETO's mission. CUB provides comments on a few of the sections, with more detailed comments regarding the Equity Performance Measures in Staff's proposal.

Equity Performance Measures

While CUB is generally supportive of Staff's proposal, there are three overarching concerns we have related to the proposed 2024 Equity Performance Measures:

- (1) We feel that in order to effectively begin to measure outcomes and not just outputs, there needs to be accompanying measures around *process* for each of the four outlined metrics, particularly because these are equity metrics;**
- (2) There should be consideration around addressing the incongruence of timing for year-review efforts and year ahead proposals; and**
- (3) Adding rationale to the proposal document for each metric would help provide more context, clarity and transparency for stakeholder understanding and feedback.**

CUB appreciates staff's thoughts to move away from measuring activities (which CUB interprets as outputs via program/intervention deliverables) to measuring outcomes (which CUB understands as measuring short and medium term value) for 2024 equity metric performance measures. In CUB's view, the intention to shift from outputs to outcomes suggests an awareness of the need to assess the underlying value sought by various outlined interventions. While we agree with the necessity to move towards outcomes, and eventually even impacts (longer term value and effectiveness of programming), we feel that some of the outlined proposals are still measuring activities (or program/intervention outputs). We believe that additional measurements are also needed to better understand value.

CUB believes that part of moving from measuring outputs to outcomes also requires attention toward measuring *process*. Inequity can and does arise at different points in a program’s process—from initial development to implementation. In other words, we know that there are major equity considerations wrapped up in the “how” of programming, especially when it comes to community outreach and engagement. According to the 2019 white paper, “[*The State of Equity Measurement: a Review for Energy-Efficiency Programs*¹](#)”, funded by the Energy Trust of Oregon and authored by the Urban Institute, “*Equity should be measured for each component along an intervention: development, implementation, quality, and outcome.*” (p. 4). Process assessments, especially in considerations of access, can help to better understand outcomes, which in turn can help ensure greater value and material benefits to priority populations.

Feedback considerations are implicit to thoughtfully measuring processes. Indeed, it’s an opportunity to not only be accountable to shortcomings and learn and improve, but also an opportunity to build on existing successes. When we look at the 2023 Performance Measures compared to the proposed 2024 Performance Measures, we wonder how a feedback loop is being integrated in order to make better 2024 inputs with hopes of better 2024 outcomes. To this point, **CUB would like to see more consideration and/or discussion toward what came out of 2023 Equity Metrics for the 2024 Equity Metric development.** We understand the current timeline is not ideal for these considerations, but going forward we wonder if there is a way to adjust the timing and process surrounding the overlap of previous year wrap up/review and incoming year planning. In the spirit of considering process and feedback, we think this deserves thoughtful consideration.

We suggest that the PUC and ETO consider setting annual performance measures on a mid-year basis so that the previous year’s review could inform the next year of performance measures. For example, the 2024 Performance Measures could extend through Q2 2025. After ETO and the Commission have been able to review 2024 and Q1 & Q2 of 2025, performance measures could be set for Q3 2025 through Q2 2026, and repeat on this mid-year basis every year. Beyond processes necessary to shift the timing of setting performance measures, CUB is not aware of any reason why this time shift could not be made. We suggest that the PUC and ETO consider shifting to the timeline CUB proposes, or implement an alternative that would provide a wrap up/review of 2024 before planning and deciding on ETO’s next annual performance measures to ensure thoughtful feedback on the prior year’s metrics.

Perhaps a more immediately available adjustment to begin to address this incongruence is adding brief rationale for each proposed equity metric. We feel it could be helpful to stakeholders to be able to see the rationale behind the incoming year’s proposed performance measures. The chart outlining each metric, with performance measures of prior and incoming years side by side, is helpful as a stakeholder. We wonder if an additional column for rationale could be added. Our thought behind this is the following: given the mismatched timelines for yearly review and planning metrics for the incoming year, we recognize that there are things stakeholders cannot be privy to about process and programming that ETO staff and community ambassadors likely are, including details that are not included in quarterly PUC reporting—in other words, things which may be informing Staff’s 2024 proposals. Having access to the

¹ Martín, C., & Lewis, J. (2019). *The State of Equity Measurement: a Review for Energy-Efficiency Programs*. Urban Institute. Retrieved from <https://www.urban.org/research/publication/state-equity-measurement>.

rationale would help stakeholders give more thoughtful insight and hopefully be more efficient with time for feedback along the way. It also improves transparency and can enable a more robust process of creating each year's equity performance measures.

The forthcoming text outlines specific feedback, metric by metric, for proposed equity performance measures.

I. Access to Support for Communities

Increasing the number of participating CBO's ideally would translate into increasing the number of priority community members receiving support related to energy. *However, in the spirit of process and feedback, we would be curious to know how these relationships are working or not working for currently participating CBOs before ETO considers expanding to more partnerships.* More concretely:

- 1.) Are there established accountability and feedback mechanisms with existing CBO partners?
- 2.) If so, are they being utilized?
- 3.) Do they inform the 2024 goal of more participating CBOs?
- 4.) If there are not established accountability and feedback mechanisms with CBO partners, are efforts being made to secure them?
- 5.) Would existing CBO partners recommend working with ETO?

The dollar amount and number of participating CBOs can be a useful metric when looking at quantitative support, but in terms of an equity measurement of material support, better understanding the quality of support feels necessary. CUB has repeatedly heard that community organizations on the ground are struggling to get the resources they need to serve their communities, including but not limited to funding and workforce issues. One suggestion is to add another reporting performance measure either in this docket or elsewhere, to analyze ETO's relationships with CBOs and make recommendations for strategies to grow CBO engagement and support.

Increasing the amount of savings achieved and increasing the \$ of incentives delivered: *Will there be demographic data (such as race, geography, language spoken at home etc) tied to the savings achieved? If various priority communities are lumped together, there could of course still be equity issues at play based on race or geography, or the intersection of both, for example.* It is important to try to understand if there are differences in service application and receipt across groups beyond intention (Martín & Lewis, 2019, p. 9). This also could point to needed changes in outreach and approaches toward access to information. We also would be curious to compare this data with similar incentives offered to, and savings achieved for, non-priority populations if such data is available. Oregon investor-owned utilities have been beginning to collect data to better understand energy burden in their service territories. IOUs have been conducting low-income needs analyses and the PUC is already looking into utilizing more data as part of the UM 2211 implementation process. It could be incredibly helpful for ETO to have access to this demographic and energy-burden information to better analyze and inform its delivery of services.

II. Access to Information

Add staff to a total of 35 FTE to support targeted outreach to environmental justice communities: CUB appreciates ETO's efforts to find ways to support environmental justice communities. Going back to our earlier point regarding the timing of reviewing the previous year's results after developing the current year's performance measures, we lose the important context of what has and has not been working which can be critical information for informing how best to deliver services and support communities.

For example, what has been learned about ETO's relationship with community ambassadors from 2023? Is there existing data, qualitative or quantitative, that suggests staffing increases from 2022 to 2023 improved access to information via outreach? We wonder if the process with ambassadors to date has informed this goal. Moreover, we wonder what the intention is of hiring more staff over more community ambassadors and wonder if community ambassadors will be asked to fill some of these roles. Relatedly was there consideration of increasing or expanding capacity grants to CBOs to support those existing programs, including but not limited to education and workshops already being implemented on the ground? It would be helpful to understand this staff investment and how it will complement the work CBOs on the ground are already doing and doing well.

There is a clear focus on quantity here in order to achieve an expected value (i.e. more outreach staff = reach more people), but there does not seem to be a parallel or accompanying measure of process. Does ETO feel that their existing outreach process has been successful enough to implement at a greater scale? Has Staff considered a process-oriented measure for this metric? Perhaps adding a performance measure for a reporting requirement to ETO to conduct analyses of its outreach processes and propose strategies for best outreach practices.

Additionally, white paper, "*The State of Equity Measurement: a Review for Energy-Efficiency Programs,*" notes that in consideration of inclusion of other voices in program staffing, the exclusion of representative voices from priority communities limits both the quality of the intervention/ program and the priority community's buy-in. One of the report's posed questions related to measuring this is: *Does the composition of all operational and governance entities associated with the intervention reflect or proportionally represent the communities being served?* The authors also note the necessity of a qualitative scale for procedural reviews (an established process for feedback), which we have echoed here as well in terms of quality, feedback, and process considerations.

We also think it would be useful to measure the absolute and proportional spending of these outreach dollars to different subgroups within an outreach program that seeks to reach priority populations (Martín & Lewis, 2019, p. 9). Better understanding not just how much money is allocated to outreach, but how that money is allocated across the various priority populations, is an important measure.

Describe at least ten examples of how outreach efforts have led to new projects that delivered savings to environmental justice communities: While this is a great metric that has potential to provide a lot of interesting insight given its open-ended and qualitative nature, we also wonder if this will include the ways that ETO is coming to a better understanding of barriers

surrounding access to information about available services as well as barriers to delivery of those services. We hope and expect that ETO will work closely with CBOs in ETO's outreach strategies to thoughtfully inform their work around equity, this may include compensating CBOs for their expertise. We hope that these examples will showcase any "a-ha!" moments that could be used to strengthen and model equity work for future inputs.

III. Energy Burden Reduction

In comparison with 2023, increase the number of community partners and customers receiving no-or low- cost offers: As a necessary measure of output, we think this is important, and even more so when the second proposed metric is considered alongside it: **Report any additional demographic information for customers (e.g. income categories, race/ethnicity) if available.** Utilities are collecting some of this data as part of the UM 2211 implementation process. It could be incredibly helpful for ETO to have access to this demographic and energy-burden information to better inform its delivery of services.

In addition to these metrics for Energy Burden Reduction, CUB is wondering if/how ETO is measuring received low or no-cost offers for renters compared to homeowners in priority populations. We would like to see, if possible, this also be an aspect of demographic data from customers. Relatedly, we are curious generally how ETO is supporting renters in priority populations and wonder if there could be a commitment, if there is not one already, to having an outreach stream that intends to support them, increase access to information, and ease energy burden. *Does ETO make targeted outreach to landlords/property owners in areas where priority populations are renting? Are there efforts toward introducing incentives to property owners alongside tenant outreach in existing programs or incoming pilot programs?*

IV. Community Resilience

We appreciate and support the Performance Measures outlined in this section, with additional emphasis that demographic data here is also really crucial to get a fuller picture of outcomes. A layer of demographic data would be helpful to explore any differences across priority groups.

It would be helpful to add the necessity of data tracking around withdrawals from programming. It would be important to understand, from qualifying to implementation, if any qualifying priority households are lost along the way (Martin & Lewis, 2019, p. 10). Are there differences in the number of successful adoptions of solar and solar plus storage with the number of initial applications? (Martin & Lewis, 2019, p. 10)

Specifically in terms of Community Resiliency and the various implications of this, *particularly the necessity of a short and long term scope*, we are curious if ETO is measuring outcomes beyond energy specific outcomes. Solar and solar plus storage projects have the ability to assist with altering far-reaching financial and social conditions for priority populations (Martin & Lewis, 2019, p. 11). We understand this would require extensive analysis, but wonder if efforts could be put into place over time to better understand this.

Outcome-based Performance Measures for Market Infrastructure Investments

CUB is glad to see the increase in investments in workforce development, community-based organization partnership, community engagement and support, as well as to expand the Trade Ally network. This is particularly because rural Oregonians are some of the most energy-burdened families and we hope this additional funding will help reach more of those communities.

Administrative and Staff Costs

CUB appreciates that Staff has worked with ETO to get a better understanding of the organization's needs to more effectively run its programs. ETO's capacity to do this work is critical to maximizing service delivery, obtaining and retaining staff, as well as the need to fairly compensate their staff for the work (in particular, we are excited about ETO's no-cost, whole home retrofit service for low-to-moderate income, BIPOC, and rural customers in geographic areas that are not currently served through Community Partner Funding community-based organizations). We think it makes sense to define "administrative costs" based upon generally accepted accounting principles (GAAP), consistent with other nonprofit accounting and accounting used by utilities. CUB appreciates that Staff worked with ETO to update this performance measure and agrees with staff that it will give ETO the flexibility it needs to grow.

And while we support these changes, CUB thinks it is important to monitor if and how they meet ETO's needs. CUB thinks that it could be helpful to have this "in-depth discussion related to these performance measures"² be part of an open process subject to stakeholder engagement. CUB wants to ensure that these new measures are achieving the goal of supporting ETO in providing as robust programs as possible.

CONCLUSION

Thank you for the opportunity to provide feedback on ETO's proposed 2024 Performance Measures and thank you for all of the work from PUC staff and ETO staff toward ensuring these performance measures are reasonable and forward-thinking. The CPP and HB 2021 have increased costs for customers and we need to support ETO in delivering robust services now to help meet those goals in a least cost, least risk manner. Again, CUB appreciates the opportunity to provide these comments and appreciate your consideration.

Sincerely,

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² Staff's Draft Proposal at 7.