



Oregon Citizens' Utility Board

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April 21, 2023

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

RE: UM 2035 – CUB Comments in response to Staff's Report on Idaho Power's TE Plan

The Oregon Citizens' Utility Board (CUB) appreciates the opportunity to comment on Staff's Report on Idaho Power's draft Transportation Electrification (TE) Plan. CUB generally supports Staff's report and offers the following comments to ensure that Idaho Power's efforts are accessible and equitable to all customers across its Oregon service territory.

Equity and Outreach

HB 2165 highlighted the importance of equity, education and outreach when looking at TE investment and infrastructure development. CUB believes that ensuring opportunities are accessible, distributed across Idaho Power's service territory, and include multiple community contacts and connections will lead to better education and outreach activities and better understanding of barriers not known to the Company.

With this, CUB is interested in how the Company is viewing community connections and outreach given the implementation of HB 2165. This legislation, along with other legislative implementation processes at the PUC and within the utility, direct the Company to include and evaluate new opportunities, barriers, and areas of consideration. CUB would like to hear how this has informed Idaho Power's outreach efforts or if the Company sees additional opportunities coming from these new directives.

Education and Outreach Activities

CUB agrees with Idaho Power and Staff that education and outreach efforts within the Company's service territory are a necessary step in TE activities. CUB believes investment in these efforts will help the Company further promote EV awareness, educate customers, and further understand barriers to EV adoption within these communities. CUB agrees with Staff that the Company's description of planned outreach and activities is very general but is pleased to hear that it will be working with Forth on best practices to reaching its Oregon customers.

CUB hopes that these outreach and education activities will look at tracking the types of customers the Company is reaching at these activities to better understand the gaps in its service territory that may need additional connection. CUB encourages Idaho Power to utilize community organizations and individuals to help with setting up and hosting educational events, as well as helping to define and highlight local barriers that may be less noticeable to the Company. CUB is especially interested in the Company reaching out to community groups that

are often left out of TE conversations to help host and connect education and outreach activities with underserved communities, communities of color, low-income communities, renters, and other underrepresented communities.

Language Accessibility

CUB encourages Idaho Power to ensure that outreach and education activities and materials are accessible to customers within its service territory. CUB encourages Idaho Power to ensure that program materials, webinar events, in person events, and other activities or inserts are printed and available in Spanish and/or any other major language within Idaho Power's service territory. CUB would also like the Company to consider working on a TE program website that could be offered in Spanish, as having online accessibility is important when delivering equitable programs.

Conclusion

CUB appreciates the work that Idaho Power has completed in this draft TE Plan and Staff's report. We generally support Staff's report but encourage the Company to consider CUBs comments to ensure that outreach and education activities are equitable and accessible for all of the Company's service territory and allow for the Company to understand the barriers of a variety of underserved communities to better tailor their programming and understand how to move towards infrastructure investment. We look forward to continuing to work with the Company, advocates, and Staff to address questions, concerns, and opportunities available to strengthen the Company's transportation electrification activities. We recognize this is an evolving and iterative process and look forward to further discussions and conversations around Idaho Power's TE plan.

Respectfully submitted,

/s/Kate Ayres

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