



# Equity Metrics for Energy Trust of Oregon UM 1158 Docket Announcement

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## Stakeholder Feedback

### Summary of Notes from Stakeholder Conversations on Draft Metrics

December 2, 2022

Staff is grateful for the many individuals and groups that have shared their time and provided input into the development of equity metrics for Energy Trust, under Docket No. UM 1158. These comments relate to Staff's draft equity metrics, available here:

<https://edocs.puc.state.or.us/efdocs/HAH/um1158hah1509.pdf>

The summary below provides: 1) Staff's understanding of key points from conversations with stakeholders and Staff from November 16– 28 2022; and 2) Staff notes from written comments submitted by parties to the UM 1158 docket. While the open comment period has closed, parties may submit written comments that will be received but not directly addressed in Staff's memo. You may also provide comment at the December 13 Public Meeting,

[https://oregonpuc.granicus.com/GeneratedAgendaViewer.php?view\\_id=2&event\\_id=721](https://oregonpuc.granicus.com/GeneratedAgendaViewer.php?view_id=2&event_id=721)

Staff is considering these comments to propose modifications to the draft metrics and inform the next stage of implementation planning. These changes will be posted next week in Staff's memo. This summary reflects Staff's understanding and is not intended to reflect comments verbatim. Staff apologizes if the following does not accurately convey a commenter's specific feedback.

### Community Energy Project

CEP is concerned that these metrics may be supporting activities that Energy Trust is already doing and would like to see these metrics going beyond the current baseline of activity. CEP also suggests considering the impact of funding from the Inflation Reduction Act when implementing these metrics.

The themes align with what they would hear from groups that they talk to. Access to information is particularly important—you can't do work in someone's home if they do not understand what you are doing.

#### **Theme 1: Access to information**

This metric may be too specific and focused on the program level. They suggest expanding to include general education and workshops. Ambassadors are a tactic that drives towards connection to education.

#### **Theme 2: Energy burden**

CEP overall supports this concept but notes that even no-cost measures may have high costs that exclude many customers from participating due to non-energy costs such as wiring, panel upgrades, and other deferred maintenance that needs to be addressed.

### **Theme 3: Community benefits—reliability and resilience**

CEP suggests this could be expanded to consider microgrids, demand response, and other DERs.

### **Theme 4: Community benefits—access to support**

CEP sees Theme 4 as addressing capacity building.

Some groups are focused on education and community engagement to address energy burden

### **Coalition of Communities of Color**

#### **Theme 1: Access to information**

CCC suggests including ambassadors that are not part of CBOs as it may be difficult for CBOs to have the time to support these efforts. It depends on scope, time commitment, and compensation. They may have leads to people in the community who could be an ambassador.

#### **Theme 2: Energy burden**

Supports this concept

#### **Theme 4: Community benefits—access to support**

This metric could support capacity building within environmental justice communities. Organizations would benefit from more awareness. CBOs with an education focus could participate as well as those organizations that may support projects.

### **Verde**

Verde supports the overall direction of metrics development and emphasizes the importance of procedural justice through the creation of these metrics.

What's the interrelation between metrics? There are opportunities to have these metrics work together.

#### **Theme 1: Access to information**

Assess the quality of access and provide accountability for getting the information out there.

#### **Theme 2: Energy burden**

Verde stressed the importance of increased funding. Are we meeting the customer where they are at? Energy burden and disconnections has been a core issue to Verde.

#### **Theme 3: Community benefits—reliability and resilience**

Resilience and reliability could help people stay connected and protect them from disconnects.

Reliability is felt very personally and combines both the utility's ability to provide service and the ability for customers to access those services without disconnection.

Verde proposes changing the language to "...supported in communities with a likelihood of service interruption due to limited infrastructure or disconnection."

#### **Theme 4: Community benefits—access to support**

Supports this concept.

Additionally, Verde proposes assessing the quality of interactions with Energy Trust. When doing so, it is important to make the process of providing feedback accessible.

### Ecumenical Ministries of Oregon

EMO is overall supportive of the direction of these metrics and had questions about definitions and specifics of these metrics.

#### **Theme 2: Energy burden**

EMO recognizes that energy burden cannot be defined solely by a customer's income, and therefore recognizes the subjectivity of low-cost offers.

#### **Theme 3: Community benefits—reliability and resilience**

EMO understands that residential is the first priority and there may be opportunities to support small businesses as well.

#### **Theme 4: Community benefits—access to support**

EMO asks if this metric would include places of worship or activities run by religious organizations to support environmental justice communities. The funds would ultimately impact environmental justice communities.

### Community Based Liaisons (CBLs)—Energy Trust Existing Buildings Program

Staff met in a virtual meeting November 28, 2022 with nine individuals experienced in equity who also serve on the Community-Based Liaison team for Energy Trust's Existing Buildings Program. These individuals were Ellsworth Lang; Fredy Salazar, TRC; Greg Delgado, Delgado Consulting; Huong Tran, Mindful Healing; Kheoshi Owens, Empress Rules Equity Consulting; Lindsey Diercksen, LD Consulting; Mustafah Finney, Rose City Alliance; Shelley Beaulieu, Dragonfly Consulting; and Victoria Lara, Lara Media.

The group provided very valuable feedback on the draft equity metrics document, identifying key gaps, concerns and opportunities for improvement. Individuals in the group expressed these points:

- The document itself is written in a way that lacks cultural sensitivity and information that would help respond more constructively to the proposal. It does not acknowledge what members see as past harm committed by Energy Trust, OPUC, and DOJ. Race is mentioned but not centered or woven through the document.
- The feedback engagements are not representative of the racial diversity of the state as a whole, nor do they provide a demographic breakdown of who provided feedback --the racial diversity, income and other demographics of participants.
- Overall, the themes generally match feedback they have gathered from other customers but lack the racial diversity of the groups that they engage with.
- The document could reflect the communities' needs and reflection however as written it speaks to a siloed approach and is rooted in anti-Blackness. Could be more impactful - how can we be more collaborative? Must take the time to build more relationships.

- The group wants to connect with those at OPUC with institutional power in order to discuss making change more holistically and structurally.
- The proposed metrics do not provide enough information. Many terms lack definition. An audit was not performed to identify Energy Trusts current metrics as a baseline and to identify metrics that were not currently being measured. An example of a baseline metric could be: amount of Energy Trust investments made to BIPOC, customers navigating low incomes and in rural areas. The proposed metrics do not address strategy, implementation, funding, budget, target numbers, or mechanism for accountability. They do not reflect cultural responsiveness.
- For the metrics, there are a variety of questions related to undefined and unspecified aspects of all four proposed metrics. How will these be defined, funded, and verified?
- It appears as if small businesses are being excluded from these metrics concepts. Nonprofits have a limited reach and the OPUC should consider the role of businesses.

Other suggestions include:

- Going directly to the environmental justice communities and asking them how they would like money to be distributed.
- Conduct an audit of Energy Trust's practices and monetary resources disaggregated by race, geographic location, age, and other metrics to identify where are the resources going, where are more resources needed? Also including Energy Trust's Board of directors, RAC, AND CAC; we need to perform an audit, leading with race for community members who were interested in joining these Boards and Councils but were rejected. We have received various reports that numerous Black and Brown people have applied but are not making it through the process. These Boards and Councils need people who have lived experience with environmental injustice because their neighborhoods have been poisoned, and not simply from a cerebral perspective. People with lived experience will have a sense of urgency that the privileged may not have.
- Audit ETO's investments in Trade Allies and consultants and center goals around that.
- Audit internal hiring practices and salaries disaggregated by intersecting identities, leading with race and set goals around that.
- A concern is only focusing on engagement and outreach through CBOs. It will be essential to focus on engaging the community more strategically instead of passing to another organization with its mission and objectives.

## Summary of Written Comments Submitted

### Avista

Theme 1: Avista is supportive of the theme and suggests expanding on the metric with multiple measurable outcomes to determine if the outreach was effective.

Theme 2: Avista is supportive of the theme and notes that these new measures should not be duplicative of other offers from different organizations.

Theme 3: Avista suggests considering the reliability and resilience benefits from natural gas.

### CUB

CUB supports the themes and proposed concepts.

CUB recommends prioritizing direct engagement with multiple environmental justice communities and representatives of those communities and also incorporating findings from the UM 2211 investigation.

## Dragonfly Consulting (also attended the meeting of Community-Based Liaisons)

Intentional funding and resources are necessary to support these metrics.

Dragonfly Consulting proposes that the OPUC re-evaluate cost-effectiveness requirements to address equity work and provides different alternatives to change the calculation:

- Lower the cost-effectiveness requirement for equity-focused offers
- Include non-energy benefits in cost-effectiveness calculations
- Use equity metrics as eligibility requirements and set a budget cap for that work.

## ETO

The proposed metrics will lead to direct benefits in 2023 but more benefits will accrue in future years.

The metrics will require additional development.

Theme 1: Energy Trust has a variety of ways that could be used to track this activity.

Theme 2: This recognizes the need to reach more people and may have overall cost considerations.

Theme 3: Battery + storage not only improves resiliency but reduces monthly bills. This metric complements the existing requirement to spend 25 percent of Energy Trust's Renewables funds on low and moderate income customers.

Theme 4: Energy Trust supports improving relationships with nonprofits which will lead to combined benefits for the customers they serve.

## Northwest Natural

Theme 1: NWN is supportive but unclear how this will be measured

Theme 2: NWN would like to see measures available to both electric and gas customers.

Theme 3: NWN suggests expanding this metric to include energy efficiency that will reduce energy bills in the winter such as high efficiency heating equipment.

## Oregon Solar + Storage Industries Association (OSSIA)

OSSIA supports the proposed metrics for Themes 1, 2, and 4. OSSIA notes that the renewables funding is a set amount that is designated for funding the above-market costs of renewables whereas it is the job of the utilities to provide reliable service. OSSIA proposes that this concept be discussed instead in relation to distribution system planning or clean energy planning.

## Pacific Power (PAC)

Theme 1: PAC notes this concept lacks a clear measurement. Alternative measures could be number of education events or outreach opportunities, customers reached, or new participants. If the OPUC proceeds with this metric, PAC would like to be part of funding discussions.

Theme 2: PAC suggests that efforts related to this metric not be duplicative of other programs included the expanded funding for OHCS to conduct weatherization through HB 3141. An alternative metric could be number of OHCS participants that Energy Trust has supported with cost-effective complementary funds.

Theme 4: PAC supports this metric and suggests additional tracking for impacts to cost-effectiveness and tracking desired outcomes.

## PGE

PGE supports the proposed themes and metrics and proposes a regular review of the metrics to ensure they are serving their intent.

Staff Contacts

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