825 NE Multnomah, Suite 2000 Portland, Oregon 97232



November 20, 2020

VIA ELECTRONIC FILING

Public Utility Commission of Oregon Attn: Filing Center 201 High Street SE, Suite 100 Salem, OR 97301-3398

Re: UM 1826—PacifiCorp's 2021 Clean Fuel Plan

In accordance with Public Utility Commission of Oregon (Commission) Order No. 18-376, PacifiCorp, d/b/a Pacific Power (PacifiCorp or the Company) submits for filing its 2021 Oregon Clean Fuels Programs (2021 CFP).

PacifiCorp's 2021 CFP reflects the lessons learned from the Company's experiences in the first and second program years, as well as the insights and feedback provided by stakeholders over the last several months. The Company is confident that these proposed programs represent an appropriate balance between the Commission's Program Design Principles, stakeholder feedback, and the interests of the diverse communities PacifiCorp serves.

Informal questions may be directed to Cathie Allen at (503) 813-5934.

Sincerely,

100

Michael Wilding Director, Net Power Costs & Regulatory Policy

Enclosure



PacifiCorp's 2021 Clean Fuel Plan November 20, 2020

I. Purpose

PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) developed its Oregon Clean Fuels Programs (CFP) in response to Public Utility Commission of Oregon (Commission) Order No. 18-376, which requested utilities file a proposal CFP after the first program year that utilizes Oregon Clean Fuels funds in accordance with Commission approved principles. Order No. 18-376 established a schedule for the CFP selection process and required utilities to file their final program(s) and expenditure plans in docket UM 1826 in November 2019. In compliance with Order No. 18-376 and the schedule established in docket UM 1826, PacifiCorp submits this filing to provide an overview of PacifiCorp's planned program design and expenditure for the CFP funds in 2021.

II. Background

The Oregon CFP evolved as a product of House Bill 2186 (2009), Senate Bill (SB) 324 (2015), and the rules promulgated by the Oregon Department of Environmental Quality (DEQ) in Oregon Administrative Rules (OAR) Chapter 340, Division 253. The goal of the CFP is to reduce the carbon intensity of the transportation fuels used in the state by 10 percent from 2015 levels by 2025. Earlier in 2020 Executive Order 20-04 directed DEQ to expand the goal of the CFP to 20 percent below 2015 levels by 2030 and 25 percent by 2035. Fuel importers that do not otherwise meet the annual carbon intensity reduction standards may comply with those standards by purchasing credits from credit generators. Electricity is a transportation fuel under the CFP rules, and registered electric utilities are eligible to generate credits from residential charging of plug-in electric vehicles (EVs) in their service territories.¹ In July 2017, the Commission directed PacifiCorp to register as a generator of residential clean fuels credits before the October 1, 2017 deadline.² PacifiCorp is separately generating non-residential credits from its public charging and demonstration and development pilots, which are used to offset the costs of those programs and which are outside the scope of this document.

When the Commission determined that utility participation in residential credit generation was in the public interest, it also determined that it was appropriate to provide guidance on how credits would be monetized and how resulting revenue would be spent. PacifiCorp actively participated in docket UM 1826, where the Commission established guidance on credit monetization³ and program design principles⁴.

PacifiCorp received 12,575 credits from residential EV use in 2016 and 2017 and monetized these credits in December 2018 and January 2019 for a total of approximately \$1.5 million. In March 2019, PacifiCorp received and monetized 9,830 credits generated from residential EV charging in

³ *Id.*, Order No. 17-512 (November 3, 2017).

¹ OAR 340-253-0330 includes guidance regarding role of electricity providers as clean fuels credit generators.

² In the Matter of Public Utility Commission of Oregon, Investigation into Utility Participation in Oregon Clean Fuels Programs, Docket No. UM 1826, Order No. 17-250 (July 12, 2017).

⁴ *Id.*, Order No. 18-376 (October 1, 2018).



2018, generating a total of approximately \$1.5 million. In March 2020, PacifiCorp received 12,206 credits from residential EV charging in the year 2019. These credits have not been sold to date but are expected to bring in a revenue of about approximately \$1.57 million for a total 2021 CFP program budget.

PacifiCorp plans to sell these credits by December 2020 when sales typically increase due to the end of year compliance period for regulated fuel providers. The Company has noticed a reduction in CFP market transactions over the final half of 2020. It is unclear as to why the market has slowed down compared to previous years or if it is related to the COVID-19 pandemic.

PacifiCorp serves roughly 615,000 customers in over 200 communities across the state of Oregon. This diverse and widespread service area covers 21,292 square miles and touches each of the state's four borders. While the Company serves roughly 75,000 customers in North and Northeast Portland, the majority of PacifiCorp's customers live in smaller communities and rural areas. Multnomah County has a population density (population per square mile) of 1,700; the average population density in other Oregon counties served by PacifiCorp is only 43; 1/40th the Multnomah County value. Additionally, these counties have 20 percent lower median household income on average than Multnomah County.⁵

There are many barriers to transportation electrification regardless of where customers reside but those who live in rural areas of the state have different challenges than those who live in urban areas. The CFP programs are tailored to the unique circumstances of the PacifiCorp's Oregon service area, reflecting key differences relative to the larger urban centers where transportation electrification has been most successful.

In crafting the 2021 CFP programs PacifiCorp aimed to align the program principles with the Company's Transportation Electrification Plan and provide a more stable framework for CFP expenditures going forward. The Company also incorporated the latest data about PacifiCorp Oregon residential customers.

Grants &	Outreach &	Emerging	Portfolio
Infastructure	Education	Technology	Administration
• Accelerate the deployment of electric vehicles and charging across Oregon	•Increase awareness of TE, dispel existing misconceptions, build customer confidence	•Test new concepts that have a TE nexus and the ability to scale to larger utility programs	•Credit monetization, portfolio planning and implementation, regulatory reporting requirements

CFP Program Proposal Framework

⁵ U.S. Census Bureau, *QuickFacts: Oregon*, <u>https://www.census.gov/quickfacts/table/PST045216/41</u> (last visited Nov. 21, 2020).



III. Program Design Principles

In Order No. 18-376, the Commission identified six principles to guide utility expenditure of residential CFP credit revenue:

- 1) Support the goal of electrifying Oregon's transportation sectors.
- 2) Provide majority of benefits to residential customers.
- 3) Provide benefits to traditionally underserved communities.⁶
- 4) Programs are designed to be independent from ratepayer support.
- 5) Programs are developed collaboratively and transparently.
- 6) Maximize use of funds for implementation of programs.

Based on these principles, and in coordination with stakeholders PacifiCorp presents three program concepts that it proposes to continue in 2021.

IV. Stakeholder Process

On September 11, 2020, PacifiCorp shared a document outlining PacifiCorp's proposed 2021 CFP, addressing the Commission principles and reflecting PacifiCorp's intention to promote transportation electrification across its service territory. The proposed programs were presented at two public workshops. The first took place on September 25, 2020, and the second on October 30, 2020. The Company received minimal feedback on the proposals from stakeholders, identified in the following table, at the in-person workshops, in writing, and via phone conversations.

UM 1826 Stakeholders		
Oregon Department of Environmental Quality	Commission Staff	
Oregon Environmental Center	• Forth	
• Greenlots	ChargePoint	
NW Energy Coalition	Oregon Environmental Council	
Climate Solutions	Citizen's Utility Board	
• Chargeway	City of Portland	

Changes to the original proposal based on stakeholder feedback included ongoing focus and spending on Outreach and Education. Questions and comments mainly focused on the proposed fast charging project and the stakeholder process with the City of Portland. Additionally, stakeholder input is reflected in added flexibility in the Electric Mobility Grant to cover a wider range of costs.

V. 2021 Programs

The 2021 CFP Total Budget is forecasted to be \$1,578,000 in revenue from the sale of 2019 residential EV use credits.

⁶ As defined in Commission Order No. 18-376, p. 6, footnote 7, "Communities traditionally underserved by access to electric vehicles include but are not limited to multi-family housing, low-income communities, and areas with a low density of public charging stations."



2020 CFP Budget	
Electric Mobility Grant	\$1,025,000
Projects	Total
Electric Mobility Grant Program	\$650,000
Grant Matching	\$375,000
Infrastructure	\$400,000
Projects	
Portland Fast Charging Pod	
Outreach and Awareness	\$90,000
Projects	
Public Outreach and Education	
Statewide Education Campaign	\$65,000
Dealer Engagement	\$25,000
Contingency (unallocated)	\$63,800
4% of Credit Revenue	
Total Forecasted Budget ⁷	\$1,578,000

Forecasted Budget

PacifiCorp plans to sell these credits by December 2020 when sales typically increase due to the end of year compliance period for regulated fuel providers. The Company has noticed a reduction in CFP market transactions over the final half of 2020. It is unclear as to why the market has slowed down compared to previous years or if it is related to the COVID-19 pandemic. If CFP credit revenue is less than the conservatively forecasted amount, the Company will first utilize contingency funds, then reduce the amount of matching funds available in 2021. If CFP credit revenue is greater than the forecasted amount, the Company will increase program budgets proportionally. PacifiCorp reserves four percent of the revenue from the 2019 CFP credits for contingency should any 2021 programs exceed the proposed budgets.

A. Electric Mobility Grant Program

Program type: Grant funding for electric transportation projects that benefit residential customers and traditionally underserved communities
Term: Dependent on applicant, proposed project, and customer interest. Funds must be spent within 24 months (without preapproved exception)
Eligibility: Non-profit organizations and governmental entities representing and/or serving traditionally underserved communities; private organizations that demonstrate a project's direct benefit to PacifiCorp residential customers
Objective: Expand the number and type of electric transportation projects that benefit residential customers
Approximate program budget: \$1,025,000

⁷ These credits have not been sold to date but are expected to bring in a revenue of about approximately

^{\$1.57} million for a total 2021 CFP program budget.



	Program Design Principles			
	Design Principle	Execution		
1.	Support the goal of electrifying Oregon's transportation sectors.	Cost is continuously sited as a major barrier to transportation electrification. In providing flexible funding sources non-profits and governmental entities will increase access to electric transportation. Two important actors in transportation, public transportation and school districts, will have increased utility support through CFP spending.		
2.	Provide majority of benefits to residential customers.	Investment in traditionally underserved communities (including rural communities served by PacifiCorp across the state) through the Electric Mobility Grant Program will provide benefits to all residential customers in those communities.		
3.	Provide benefits to traditionally underserved communities.	PacifiCorp directly targeted these programs to benefit traditionally underserved communities, including communities in its rural service area, by providing both a funding source and a potential tool by which those communities may leverage state and federal grants along with other sources of grant funding.		
4.	Programs are designed to be independent from ratepayer support.	All programs will be funded through the CFP revenues. These programs do not require additional funding from ratepayer funded programs.		
5.	Programs are developed collaboratively and transparently.	PacifiCorp engaged with stakeholders throughout the process of developing these CFP programs, adjusting elements of the programs based on formal and informal stakeholder input. More detail on the stakeholder engagement process is included in Part IV above.		
6.	Maximize use of funds for implementation of programs.	PacifiCorp prioritized straightforward program mechanics and administrative efficiency in designing its CFP programs in order to maximize the use of funds available to further CFP objectives.		



Continuation of Electric Mobility Grant Program

Program	Program Costs	Est. Admin Costs	Total
Mobility Grant Continuation	\$550,000	\$100,000	\$650,000

The Electric Mobility Grant Program provides financial assistance for projects related to transportation electrification in traditionally underserved communities in PacifiCorp's Oregon service area. In 2020 the Electric Mobility Grant funded 11 projects across Oregon. These projects will support electric transportation in school districts, public transportation districts, mobility solutions, rural education projects and agricultural demonstration projects.

Eligible expenses include any transportation electrification project costs. These expenses may include project management costs, costs associated with conducting transportation needs assessments, or the incremental cost to purchase an electric vehicle. Applicants are expected to provide information supporting the alignment of their proposals with the Commission's concept of "traditionally underserved communities" described in Principle 3. The Company worked with Stakeholders to develop equitable evaluation criteria for the Electric Mobility Grant.

Criteria	Measures
 Project Feasibility Reasonableness of the project plan and timeline. Readiness of the project team. Identified potential project implementation barriers and demonstrated strategic response. 	
 Benefits provided to residential customers. Applicant financial commitment and leveraging of funds sources. Alignment of project costs with industry standards. Reasonableness of the proposed budget (i.e., risk of exceed budget). Applicant and project need for funding support. 	
Innovation & Analysis	 Creative project design, partnerships, and utilization of resources, particularly in serving underserved populations. Type(s) of data available through the project. Plan to collect and analyze data. Mechanism(s) to share data and analysis with PacifiCorp. Likelihood of stimulating the electric mobility marketplace.

Electric Mobility Grant Applicant Evaluation Criteria



Equity	 Detailed plan to directly address barriers to mobility for communities currently underserved by electric transportation. Detailed methods within plan to ensure timely input and oversight from community members. Preference will be given to applicants and projects led by and serving rural and/or frontline communities.
Educational, Environment al and Community Benefits	 Organizational and community capacity building. Community visibility. Education plan and awareness building opportunities. Exposure in communities currently underserved by EVSE. Proximity to areas with known air quality issues. Alignment with the applicant's broader environmental mission or goals. Benefits provided to underserved populations. Impact of the applicant on the community. Use of local labor and/or materials. Accessibility to the public.

PacifiCorp proposes to continue the Electric Mobility Grant Program. Any administrative funds not spent will be recirculated into the grant pool. Costs associated with studying, planning, promoting, or deploying electric transportation technology and projects are eligible for the grant. This includes staff time and grant writing assistance.

2. Continuation of External Grant Matching

Program	Program Costs	Est. Admin Costs	Total
Grant Matching	\$350,000	\$25,000	\$375,000

PacifiCorp proposes to continue Grant Matching funds by reserving up to \$375,000 for eligible projects. These funds provide financial support for customers and communities pursuing time-limited matching dollars for external grant programs, such as the Federal Transit Administration's Low or No Emission Vehicle Program or the United States Department of Energy's Advanced Vehicle Technologies Research Funding Opportunity. The customer or community must plan to perform a majority of funded electric vehicle charging at a location(s) served by PacifiCorp.

Funding commitments are contingent on the recipient successfully acquiring other funding. Should the customer or community decide not to apply for the other funding opportunity, not receive an award, or choose to not proceed with the grant award, PacifiCorp does not provide these funds. In this situation, funds will be recirculated into the larger grant funding pool to fund other projects or programs.



In exchange for matching funds, PacifiCorp may request a portion of any nonresidential CFP credits the project would generate commensurate with PacifiCorp's investment⁸. Any revenue generated from the sale of these credits will be combined with residential CFP credit revenue to fund other projects or programs. Any funds not committed by September 2021 will roll into the Electric Mobility Grant and be distributed to projects recommended for funding.

In 2020 PacifiCorp provided matching funds to five community electric transportation projects.

2020 CFP Matching Funds		
Matching Fund Recipient	External Matching Source	Matching Fund Amount
Forth- Hood River CRuSE	U.S. DOE Advanced Vehicle Technologies Research Funding Opportunity Grant	\$100,000
Portland Public Schools	PGE Electric School Bus Project	\$100,000
Native American Youth and Family Center	PGE Drive Change Fund	\$20,000
Grants Pass School District	Oregon DEQ's diesel school bus replacement program	\$190,000
Corvallis Transit System	U.S. FTA grant	\$90,000
	Total	\$500,000

B. Charging Infrastructure

Program type: Charging Infrastructure **Term:** PacifiCorp envisions planning and construction to begin in 2021 and continue through 2022 **Target audience:** PacifiCorp residential customers, particularly EV drivers **Objective:** Provide **Approximate program budget:** \$400,000

⁸ PacifiCorp recognizes that the value of CFP credits may be a critical component of project viability for a customer or community. In cases where PacifiCorp determines that the customer retaining all CFP credits is critical to project success, PacifiCorp may forego receiving a share of credits.



	Program Design Principles			
	Design Principle	Execution		
1.	Support the goal of electrifying Oregon's transportation sectors.	Fast chargers that are reliable, easy to find, and easy to use are critical to support the adoption of EVs in Oregon.		
2.	Provide majority of benefits to residential customers.	The targeted audience and beneficiaries of this program are PacifiCorp residential customers who drive EVs.		
3.	Provide benefits to traditionally underserved communities.	The proposed location will most benefit residential customers living in multi- family housing, low-income communities, and an area with a low density of public charging stations.		
4.	Programs are designed to be independent from ratepayer support.	All programs will be funded through the CFP revenues. These programs do not require additional funding from ratepayer funded programs.		
5.	Programs are developed collaboratively and transparently.	PacifiCorp engaged with stakeholders throughout the process of developing these CFP programs, adjusting elements of the programs based on formal and informal stakeholder input. More detail on the stakeholder engagement process is included in Part IV above.		
6.	Maximize use of funds for implementation of programs.	PacifiCorp will leverage current contracts and administrative efficiency to maximize the use of funds available to further CFP objectives.		

As part of PacifiCorp's docket UM 1810 Pilot Program, the Company owns and operates five fast charging pods in Oregon. These "pods" can charge up to six electric vehicles at once and consist of four Direct Current Fast Chargers (DCFCs) and one dual port Level 2 charging station. Under the settlement and resulting Commission order the Company was authorized to build up to seven fast charging pods in Oregon. Due to budget restrictions PacifiCorp was only able to move forward on construction of five locations. At the time the Company worked with the City of Portland and other stakeholders to identify potential locations for a fast charging pod in Portland but was unable to identify a location that would be open to the public 24/7 without additional parking fees. As a result, PacifiCorp moved forward with the five other locations in rural areas with even fewer fast charging options

PacifiCorp proposes to fund a sixth fast charging pod in the Company's Portland service area. To minimize cost and leverage current contracts, the Pod will share the same network, technology, and configuration as the docket UM 1826 funded pods but will be funded by CFP revenue.



1. Public Fast Chargers in Portland

Program	Program Costs	Est. Admin Costs	Total
Portland Fast Chargers	\$350,000	\$50,000	\$400,000

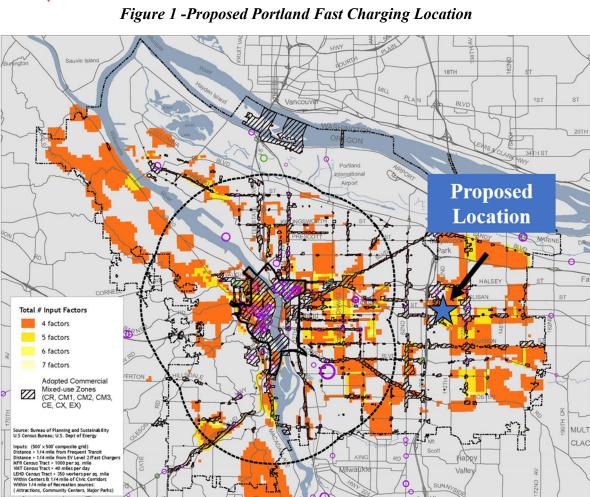
Early in 2020, the City of Portland's Bureau of Planning and Sustainability convened a working group to focus on increasing EV charging access for renters. PacifiCorp participated in four workshops alongside Portland General Electric Company (PGE), Beyond Black, Hacienda, Portland Tenants United, Verde, Forth, Oregon Environmental Council, and others. The working group identified the following strategies for improving renter EV charging access in Priority Order:

- 1.Utility Investment
- 2. Publicly owned charging stations in publicly-owned parking lots
- 3.Community Data Gathering and Understanding
- 4. Education and Outreach Targeted towards multi-unit dwelling Owners

Following the working group's suggested priorities, the City identified a potential location for public fast chargers near the Gateway area of northeast Portland and approached PacifiCorp to discuss the possibility of the Company operating public fast chargers at this site. The need for additional charging infrastructure in this area has been identified as part of Portland's Citywide EV Charging Infrastructure Location Strategy. The City is eager to work collaboratively with partners, such as PacifiCorp, to install EV charging infrastructure in strategic locations to support the City's climate, health and equity goals.

While any EV driver will be able to use the chargers, the primary beneficiary will be PacifiCorp residential customers who drive EVs. By locating the chargers in an area with higher proportions of multi-family housing and garage-free homes the chargers will particularly benefit renters and other customers without access to a dedicated parking location.





The Company proposes to use rate Schedule 60, Company Operated Electric Vehicle Charging Station Service, and the same site design as other fast charging locations in the state. Specifically, up to six electric cars would be capable of charging at one time at four DCFC and one dual-port Level 2 charger. The proposed location would follow the technology and configuration of PacifiCorp's other fast charging locations. Meaning, stations configured with connectors compatible with all makes and models of EVs. The charging pod will include the following:

- Four DCFC charging stations, rated at 62.5 kW each, with both Combined Charging System (CCS) and CHAdeMO connectors
- One, dual-port Level 2 charging station rated at 7.2 kW per port
- Total rating of 264.4 kW for the pod when including all stations and ports
- Future-proofed to increase charging speeds as EV adoption increases

In the event that the proposed location does not move forward PacifiCorp will work with the City of Portland to identify a location with similar attributes, particularly areas with higher proportions of multi-family housing and garage-free



homes; areas that enable low-income populations to gain access to EVs; and areas with fewer existing public EV chargers. The CFP credits generated by the charging stations will be used to offset any ongoing operations and maintenance costs.

C. Outreach and Education

Program type: Outreach and Education

Term: PacifiCorp envisions this funding will be available in 2021

Target audience: PacifiCorp residential customers

Objective: Increase residential customer interest in electric vehicles and awareness of benefits

Approximate program budget: \$90,000

Program Design Principles		
Design Principle	Execution	
 Support the goal of electrifying Oregon's transportation sectors. 	Approximately 75 percent of the vehicles registered in Oregon are light- duty vehicles ⁹ . Residential customers remain unaware of many of the benefits of electric vehicles. By providing relevant, targeted communications to residential customers PacifiCorp aims to increase the number of electric vehicles on Oregon roads.	
3. Provide majority of benefits to residential customers.	The targeted audience and beneficiaries of this program are PacifiCorp residential customers.	
4. Provide benefits to traditionally underserved communities.	Communications and events in communities served by PacifiCorp will include residential customers living in multi-family housing, low-income communities, and areas with a low density of public charging stations.	
5. Programs are designed to be independent from ratepayer support.	All programs will be funded through the CFP revenues. These programs do not require additional funding from ratepayer funded programs.	
6. Programs are developed collaboratively and transparently.	PacifiCorp engaged with stakeholders throughout the process of developing these CFP programs, adjusting elements of the programs based on formal and informal stakeholder input. More detail	

⁹ Oregon Department of Transportation. (2019). *DMV Facts & Statistics*. Retrieved from <u>https://www.oregon.gov/ODOT/DMV/Pages/News/factsstats.aspx</u> (Accessed November 18, 2020)



	on the stakeholder engagement process is included in Part IV above.
7. Maximize use of funds for implementation of programs.	PacifiCorp prioritized straightforward program mechanics and administrative efficiency in designing its CFP programs in order to maximize the use of funds available to further CFP objectives.

Electric transportation offers numerous benefits for both individual drivers and communities, yet most residential PacifiCorp customers are unaware of these benefits.¹⁰ PacifiCorp proposes using both broad and specific education and marketing tactics to increase electric transportation adoption in the state.

1. Continue Dealer Engagement

Program	Program Costs	Est. Admin Costs	Total
Dealer Engagement	\$25,000	\$0	\$25,000

PacifiCorp proposes to continue funding Chargeway Beacons in three rural Oregon dealerships. Chargeway is a system that uses colors to identify plug types and numbers for power levels. The higher the number, the faster you can charge at that station. This label system on charging stations and in the Chargeway app and Beacons makes it easier for customers to differentiate charging options for their needs and understand electricity as a transportation fuel.

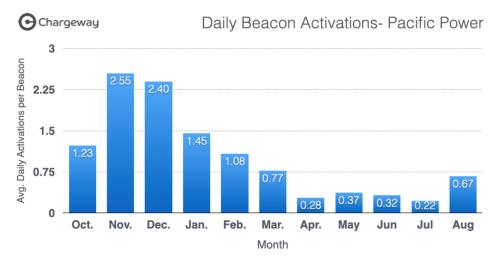
The Chargeway app is free to download for all PacifiCorp customers and shows the simple color and number icons on the station finder map to identify all charging options available for every electric car a user adds to their account. The Beacon is a six-foot interactive touch screen that shows charging locations and aides salespeople in communicating about electric fuel.

Funding for the first year of the Beacons came from the docket UM 1810 Outreach and Education self-service tool pilot program budget which has been expended. A few months into the Chargeway beacon deployment the COVID-19 pandemic shut down car dealerships across the state including the dealerships with Chargeway Beacons. As Oregon auto dealers recover, PacifiCorp proposes to fund one additional year of Beacons to better understand residential customer engagement at dealerships through the beacons.

¹⁰ Guidehouse (2019, 2020). Pacific Power 2019and 2020 General Population Baseline Residential Customer Electric Vehicle Surveys.



Figure 2-Average Daily Beacon Activations October 2019-August 2020



2. Continue Statewide Education Campaign

Program	Program Costs	Est. Admin Costs	Total
Statewide			
Education	\$65,000	\$0	\$65,000
Campaign			

PacifiCorp plans to continue coordination with PGE and other stakeholders on Oregoin' Electric, an education campaign aimed at residential customers. The primary objective in partnering on a statewide campaign is to engage communities and stakeholders around the state—including individuals, local governments, non-governmental organizations, economic development groups, transit agencies, and others—that are well-positioned to expand the adoption of electric vehicles in Oregon in support of SB 1044. That bill sets statewide goals to have 50,000 electric vehicles on Oregon roads by the end of 2020, and 250,000 by the end of 2025. PacifiCorp intends to leverage the interest and momentum from this campaign across its service territory, offering programming to its residential customer base across Oregon. This state-wide campaign is aligned with PGE to engage and educate residential customers that Electric Mobility is:

- Ready to go today
- Serves all regions (rural, urban, heavy duty, farm, on/off road)
- Has options for all people, levels of ability, income levels and businesses (public transit, urban micro mobility, agriculture, fuel savings, affordable housing pilots)
- Helps meet the state's environmental goals (air quality, reduce greenhouse gas emissions)



• An important tool to combat climate change

VI. Reporting

PacifiCorp will report to the Commission within six months following the conclusion of the programs described in this proposal. Reporting will include details related to program participation and spending, in addition to lessons learned during the development and operation of the programs. Whenever possible effort will be made to gather metrics on participation and effectiveness while minimizing administrative costs.