

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

In the Matter of

UM 2276

**PUBLIC UTILITY COMMISSION OF
OREGON,**

**ROGUE CLIMATE'S 2023 JUSTICE FUNDING
PRE-CERTIFICATION GRANT REPORT**

Justice Funding Pre-certification

Pursuant to HB 2475 (ORS 757.072), OAR 860-001-0800, and the Justice Funding Agreement (Agreement) adopted by the Public Utility Commission (Commission) in UM 2211 by Order 23-033 (February 7, 2023), Rogue Climate (RC) submits this report regarding its pre-certification grant funding.

RC has allocated \$13,418 of the grant funds to the work to date and anticipates allocating \$ 20,866, the remainder, of the grant funds to the remaining work to the end of the year. At this time RC does not anticipate releasing any of the grant funds.

In support of its pre-certification grant, RC stated that it would engage in several specific dockets (identified below) and several other general areas of interests related to unspecified dockets, including continued facilitation of the HB 2021 Community Cohort, decarbonization/electrification, wildfire planning, grid equity and equity metrics, disconnections, and resilience. To date, RC has represented, identified and developed advocacy positions benefitting or informed by the Environmental Justice Communities or low-income customers and has substantially contribute to the record on behalf of such interests organizationally or through work and collaboration with Energy Advocates (represented by NWECA, OJTA, CCC, Verde, MCOS and others), incurring eligible expenses in the ways described below.

HB 2021 Implementation & Clean Energy Plans, generally (UM 2255, AR 655, LC 80). The AR 655 docket has had no active schedule and there hasn't been specific engagement opportunities since April. Since then, however, RC's Advocacy Director has completed the following work related to Clean Energy Plans, generally, including reviewing the plans and testimony and proceedings in LC 80. This work informs the efficacy of the rules

adopted and the need for additional policies, rules or amendments to properly implement HB 2021. This work is separate from specific work in the PAC LC 82 CEP/IRP docket proceedings discussed below. The work has included reviewing PGE's CEP, collaboration, and discussion with the Energy Advocates group, and working with the HB 2021 Cohort to obtain initial PGE CEP feedback. It has also included investigation and communications with the UCBIAGs to obtain feedback, identify current limitations and needs to advocate for improvements for Clean Energy Plan engagement.

RC anticipates continuing engagement in this work by participating in weekly Energy Advocates meetings, by participating in the bimonthly Community Advocate Cohort, by monitoring and engaging in the work of the Energy Advocates in LC 80, by attending the UCBIAG quarterly check-ins (OPUC Staff, PAC, PGE, EJ advocates) to further inform future work on policies related to HB 2021 implementation, CEPs and the UCBIAGs. Implementation of HB 2475 (Energy Affordability Act) (UM 2211, UM 2276, LC 81). RC's Advocacy Director has engaged in the following work related to the implementation of the Energy Affordability Act. She has attended Pacific Power's Oregon Low Income Discount Program Check-in and has kept abreast of the proceedings related to UM 2211 by monitoring the docket and participating in Energy Advocates conversations related to bill discount and affordability issues.

RC's Advocacy Director and Communications' Coordinator addressed energy affordability and low-income rate-payers' issues by conducting outreach to Avista residential ratepayers and training and supporting 3 community members to give verbal testimony at the public hearing in Avista's rate case (LC 81). Rogue Climate also gave verbal testimony and assisted other efforts at community outreach which informed the development of best practices in ratepayer affordability outreach.

RC will continue outreach to ensure community members are aware of programs and activities that increase or reduce energy burden and will continue taking note of what is working and what isn't to be able to inform advocacy opportunities that arise in the future for the implementation of HB 2475. This includes staying apprised of the work of Energy Advocates on utility rate cases to inform future work on energy burden issues.

Finally, since the adoption of the Agreement for HB 2475 Intervenor Funding in Order No. 23-033 in this docket, RC has utilized that assistance of counsel to participate in proceedings in AAR 652 (Rules adoption) UM 2276 (application of rules to first round of pre-certification grants) which were in separate from and addition to the

original development of the grant application. Because the proceedings aided the development of the practice related to the Justice Funding grant program RC has allocated 3,133.00 in actual attorney fees incurred between April 4, 2023, and June 1, 2023 for representation in those proceedings.

It is anticipated that this Fall a new investigation or scope of work will be initiated in UM 2211 and RC intends to engage in all aspects of those proceedings.

PacifiCorp IRP/CEP (LC 82). RC's Advocacy Director has participated in this recently initiated proceeding including beginning review of the CEP/IRP, review of Round 0 comments, attending presentations and workshops (including the Series 3rd Meeting), collaborating and meeting with the Energy Advocates and facilitating initial conversations with the HB 2021 Community Advocate Cohort. RC intends to continue participating in all facets of this proceeding. RC has recently decided to seek intervenor status in order to facilitate its participation and obtain and engage in discovery. RC also intends to obtain the assistance of counsel in this proceeding.

Wildfire Protection Plans (WPP) (Generally and UM 2207/AR 638 (Pacific Power Wildfire Protection Plans / Risk-Based Wildfire Mitigation)). RC's Advocacy Director has worked on wildfire planning through attending a recent OWEC PSPS workshop, reviewing and analyzing new WPPs and otherwise participating in the proceedings by researching and investigating the issues. She and RC's Communications Coordinator conducted community engagement and information services, including transmitting an action alert, related to Pacific Power's wildfire litigation proposal to pass off costs to ratepayers which would impact EJ communities directly, especially those suffering from energy burden. RC does not anticipate any additional work this year.

Decarbonization/electrification, grid equity and equity metrics, disconnections, and resilience.

RC is also working with a group of youth leaders and the City of Ashland to explore electrification for new residential buildings. This work relates to HB 2021's community benefits goals, to Climate Protection Programs' goals to foster projects that prioritize benefits in environmental justice communities, to fostering leadership in electrification/decarbonization efforts and to informing practices of outreach to community members.

Conclusion

In summary, Rogue Climate has allocated \$13,418 of its eligible expenses through July to the grant, intends to allocate the remainder of the grant funds - \$20,866 - to eligible expenses to the end of December and does not expect to release any of the grant funds awarded. As required by Agreement Section 6.9, this August 2023 pre-certification grant report is being served by email on PacifiCorp, the applicable participating utility.

Dated August 8, 2023.

/s/ Alessandra de la Torre
Alessandre de la Torre
Advocacy Director
Rogue Climate