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BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of	UM 2276
PUBLIC UTILITY COMMISSION OF OREGON,	ROGUE CLIMATE'S APPLICATION FOR JUSTICE FUNDING PRE-CERTIFICATION GRANT
Justice Funding Pre-certification	

Pursuant to HB 2475 (ORS 757.072), OAR 860-001-0800 (and the pending proposed amendment), 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 (initial) pre-certification grant funding application (with intent to further clarify by amendment within the next 10 days). Pursuant to section 5.2 of the Agreement, setting forth the criteria for pre-certification grants, this application, (a) demonstrates why RC meets the eligibility criteria set forth Section 5.3; (b) identifies the matters in which RC intends to participate, the nature of that participation, and why the matters are Eligible Proceedings; (c) identifies the Participating Public Utility account or accounts from which RC seeks funds; and (d) provides a [preliminary rough] budget showing estimated Eligible Expenses and estimated consultant fees, expert witness fees, or contractor costs. A more thorough proposed annual budget will be submitted confidentially and directly to the Commission and

Participating Public Utilities pursuant to 7.3 of the Agreement by April 14, 2023. RC acknowledges that such may necessitate filing an amended application but given the availability of case funds, it is anticipated that an amendment will only include a reduction in this estimated budget in favor of opting to seek case funding, instead.

A. RC Meets the Eligibility Criteria Set Forth Section 5.3

Section 5.3 criteria requires a demonstration of the following: a) that RC represents low-income residential customers (low-income customers) or Environmental Justice Communities (EJ community) and that RC's participation will be primarily directed toward issues affecting those interests; b) that RC represents a particular EJ community or low-income customers and demonstrates its ability to effectively represent them; c) that RC demonstrates it is able to effectively represent or develop advocacy positions benefitting or informed by the Environmental Justice Community or low-income customers, in the service area of each Participating Utility for which pre-certification is sought and demonstrates how it will identify the issues or advocacy positions that are important to them; and d) if applicable, that RC has demonstrated its ability to substantively contribute to the record on behalf of such interests.

RC is a 501(c)(3) non-profit organization and has been previously found Eligible by the Commission under HB 2475 in Order 22-043 and in numerous orders granting funding pursuant to the Interim Funding Agreement (HB 2475) approved in that Order. The Findings in that Order remain valid:

Rogue Climate was founded in 2013 in the Rogue Valley of Southern Oregon. This organization serves and works alongside Southern Oregon and South Coast communities most impacted by climate change, including low-income, rural, youth, and communities of color, by organizing for clean energy, sustainable jobs, and a healthy environment. Rogue Climate does so through leadership development, political education, fostering conversations, and campaigns for policies that benefit these environmental justice and low-income communities.

In addition and more specifically, RC is located and focuses its work in Coos, Jackson and Klamath Counties in PAC, Avista and NW Natural rate payer areas. Outside of RC's work in the PUC, we have run programs to reduce the price of ductless heat pumps, provided relief for communities directly impacted by wildfires, and ran campaigns to secure policies to address energy burden, extreme heat, develop resilience hubs and to address the health and safety impacts natural gas development.

RC has demonstrated it is able to effectively represent, identify and develop advocacy positions benefitting or informed by the Environmental Justice Community or low-income customers and its ability to substantively contribute to the record on behalf of such interests. RC has done so in the following dockets, among others, to date:

- UM 2207/AR 638 (Pacific Power Wildfire Protection Plans / Risk-Based Wildfire Mitigation)
- UM 2114/AR 653 (Customer Protections and Severe Weather Moratorium / Revisions to Division 21 Rules to Strengthen Customer Protections Concerning Disconnections)
- UM 2211/AR 652 (Implementation of HB 2475 / Justice Funding Agreement)
- UM 2225 (Investigation into HB 2021 Clean Energy Plans)
- UM 2178 (Natural Gas Fact Finding per EO- 20-04)

B. The Matters RC intends to Participate in, the nature of the Participation and the Reasons the Matters are Eligible Proceedings.

RC intends to participate in the following dockets and anticipated dockets and describes hereunder the nature of the intended participation and why the proceeding is an eligible proceeding

UM 2273 - HB 2021 Implementation:

Rogue Climate plans to participate in this docket by advocating for the implementation of HB 2021, which promotes equitable access to clean energy for all Oregonians. Rogue Climate believes that this docket is eligible because it aligns with the organization's mission to promote community-based solutions to energy issues, including reducing greenhouse gas emissions and ensuring equitable access to clean energy.

AR 655 - Rulemaking Regarding Filing, Review, and Update of Clean Energy Plans: Rogue Climate plans to participate in this docket as a member of the Energy Advocates coalition, which is advocating for communities to be meaningfully involved in utility clean energy plans. Rogue Climate believes that this docket is eligible because it aligns with the organization's mission to promote community-based solutions to energy issues, including ensuring that underserved communities are included in the clean energy planning process.

Rogue Climate may also be involved along with the Energy Advocates coalition in other dockets that impact the following items:

- Decarbonization/electrification
- Energy affordability and low income rate-payers
- Wildfire plans
- Equity metrics
- Disconnections
- Resilience
- C.& D. The Budget, Identifying and Describing the Utility Account or Accounts Where Funds Are Sought, and the Amount Sought for Each Fund, along with Estimated Eligible Expenses.

PacificCorp:

- Internal Staff: \$33,425
- External Council: \$16,000
- TOTAL: 49,425

For the foregoing reasons RC respectfully requests the Commission deem RC and proceedings to be eligible and approve the foregoing grant application.

This 3rd day of April, 2023

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