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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

In the Matter of

**UM 2114**

PUBLIC UTILITY COMMISSION OF  
OREGON,

Investigation into the Effects of the  
COVID-19 Pandemic on Utility Customers.

And

In the Matter of

**AR 653**

Revisions to Division 21 Rules to Strengthen  
Customer Protections Concerning  
Disconnections.

ROGUE CLIMATE'S  
NOTICE TO PARTICIPATE, &  
TO REQUEST HB 2475 FUNDING

Rogue Climate (RC) submits this Notice of Participation and to seek funding in the above referenced dockets. RC is a pre-certified eligible organization pursuant to Commission Order No. 22-043. RC serves 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, through education and campaigns for beneficial policies aimed at avoiding harm caused by environmental and health hazards. It is part of RC's mission to provide representation in public proceedings for environmental justice

communities. RC represents communities traditionally under-represented, including rural communities, in public processes like this one.

In November 2020 in docket UM 2114 (an Investigation into the Effects of the COVID-19 Pandemic on Utility Customers), the Commission approved a Stipulated Agreement to assist customers and utilities during the current COVID-19 pandemic and the aftermath of the pandemic which directed further investigation by the Commission's Diversity, Equity and Inclusion Director through the creation of an advisory committee to focus on low-income customers' energy burden and related social inequities and to consider other low-income, social justice and environmental justice initiatives. Order 20-401, Appx A p. 6. Subsequently, in December 2021, AR 653, a related rulemaking proceeding was opened which was and is aimed at strengthening energy utility customer low-income protections.

These proceedings are not excluded as eligible proceedings pursuant to Commission Order No. 22-043. AR 635 and UM 2214 are eligible proceedings because they directly affect energy utilities - including PacifiCorp (Pacific Power). AR 653 and UM 2114 directly affect utility customers as the draft rules and procedures direct activities related to residential consumer protections related to disconnections. The activities investigated and regulated in these proceedings will affect Pacific Power's low income and rural residential customers and the environmental justice communities which are represented by Rogue Climate.

Rogue Climate submits this Notice to seek funding in the above referenced dockets and obtain the Commission's determination that these proceedings are "eligible proceedings" pursuant to Commission Order No. 22-043. RC is a pre-certified eligible organization and for the reasons stated, AR 653, a rulemaking proceeding, and UM 2114, a related investigation

proceeding, are eligible proceedings thereunder.

For the foregoing reasons Rogue Climate respectfully requests the Commission deem the proceedings eligible, and acknowledge Rogue Climate's Notice to Participate as an eligible organization and its intent to request HB 2475 funding.

This 13<sup>th</sup> day of July, 2022

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