

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UG 490**

In the Matter of) COMMUNITY ENERGY PROJECT,
) COALITION OF COMMUNITIES OF
NORTHWEST NATURAL GAS COMPANY,) COLOR, AND VERDE: NOTICE OF
dba NW NATURAL,) INTENT TO REQUEST JUSTICE
) FUNDING CASE FUND GRANT AND
Request for a General Rate Revision.) CASE CERTIFICATION; PROPOSED
) BUDGET

In compliance with OAR 860-001-0800 through OAR 860-001-0900 and the Justice Funding Agreement adopted by the Oregon Public Utility Commission (Commission) in UM 2211 by Order 23-033 (February 7, 2023), the Community Energy Project (CEP), Coalition of Communities of Color (CCC) and Verde file this Notice of Intent to Request Justice Funding Case Fund Grant, Request for Case Certification, and Proposed Budget.

The organizations are submitting a combined request because they are splitting a portion of expert witness fees among the three groups. Other parties intervening in UG 490 are also contributing toward the cost of the expert witness. This request will not unduly delay the schedule of the proceedings. The organizations further request that, if funding is approved, they receive 50 percent of the Proposed Budget in advance in order to facilitate their participation.

1. CEP, CCC, and Verde are eligible for a Case Fund Grant because they represent the interests of environmental justice and low-income NW Natural ratepayers.

CEP, CCC, and Verde qualify to receive a Justice Funding Grant under OAR 860-001-0840 and the Justice Funding Agreement. All three organizations are pre-certified organizations under HB 2475.¹

Founded 44 years ago, CEP works to ease the energy burden on frontline communities and has become a part of a larger movement toward electrification to decrease carbon emissions. Its clients include seniors, people with disabilities, women, people experiencing low income, people of color, and other historically marginalized groups. CEP annually serves over 2,500 residents.

CCC is an alliance of culturally specific community-based organizations that work directly with Black, Indigenous, and people of color (BIPOC) community members on issues such as housing, education, environmental justice, and economic justice.

¹ Or. Public Util. Comm'n Order No. 23-485, UM 2276 (Dec. 28, 2023), <https://apps.puc.state.or.us/orders/2023ords/23-485.pdf>.

Verde is one of the longest-running people of color-led environmental organizations in Oregon. Verde serves communities by building environmental wealth through social enterprise, outreach, and advocacy. Since 2005, Verde has brought environmental infrastructure to low-income neighborhoods, engaged residents to design and implement these projects, and ensured that environmental investments contribute to community well-being.

CEP, CCC, and Verde's participation in this proceeding will be directed at public utility issues affecting their communities, including low-income bill discount rates, fixed charges, advertising and lobbying expenses, procedural equity, and line extension allowances. CEP, CCC, and Verde plan to address community interests per OAR 860-001-0840(1)(a) through analyses of cost allocations, impacts to customers, and utility resources.

Per OAR 860-001-0840(1)(d), CEP, CCC, and Verde can effectively represent low-income and BIPOC ratepayers in NW Natural's service territory because of their continued ties and commitment to furthering goals of equity. CEP, CCC, and Verde's involvement in the community include building relationships with community advocates, utility, and Commission staff to elevate low-income and environmental justice issues. CEP, CCC, and Verde continue to advocate for environmental justice and low-income ratepayers through a variety of platforms and issues. All three organizations have substantively contributed to the record on behalf of those interests by participating in contested cases (such as UG 435 and UM 2273) as well as non-contested cases (such as ADV 1390, LC 79, LC 82, UM 1893, UM 2114, UM 2005, UM 2111, and UM 2211).

2. UG 490 is an Eligible Proceeding under OAR 860-001-0830.

UG 490 is an eligible proceeding under OAR 860-001-0830(1) because it is a contested case that affects NW Natural, its customers, and Environmental Justice Communities including low-income NW Natural ratepayers who are often energy burdened.

3. This filing serves as a notice of intent.

This notice is served on March 14, 2024, to NW Natural, all Pre-Certified Organizations, and all Parties to UG 490. CEP, CCC, and Verde intend to request a Case Fund Grant from NW Natural. As noted above, the organizations request that they receive 50 percent of the Proposed Budget in advance.

4. Proposed Budget

a. Statement of Work

CEP, CCC, and Verde intend to participate in this proceeding, including internal meetings, testimony review and drafting, and hearings. They have, and will continue to, review and analyze NW Natural's proposed tariff revision, testimony, discovery requests, and comments, and draft

briefs and responses where appropriate. CEP, CCC, and Verde also intend to consult an expert witness.

As mentioned, CEP, CCC, and Verde intend to continue to investigate NW Natural’s proposed revenue increase, reflected in rate schedule changes that increase natural gas distribution rates. This includes review and analysis of the requested revenue requirement through the bill discount rate, Climate Protection Plan (CPP) costs (or the equivalent proxy), memberships and dues, advertising and lobbying expenses, fixed costs, return on equity, and line extension allowances. Addressing these issues will contribute to a more equitable solution that accounts for deficiencies and, in turn, benefits low-income NW Natural ratepayers and other Environmental Justice Communities.

b. Eligible Expenses for CEP²

Personnel	Hours	Rate	Cost
Executive Director	20	\$210	\$4,200
Development and Communications Director	2	\$105	\$210
Program Director	10	\$158	\$1,580
Climate Justice Associate	30	\$105	\$3,150
Advocacy and Engagement Coordinator	10	\$105	\$1,050
Portion of Expert Witness (split among intervenors)			\$3,333
Total Request			\$13,523

² Note that CEP’s Pre-Certification Request reflected an expectation of participating in NW Natural’s rate case, but in expending the pre-certification funds CEP finds that it will be participating in NW Natural’s IRP update and phase 2 of the HB 2475 implementation process. See CEP’s Notice to Request HB 2475 Pre-Certification Funding, UM 2276 at 4 (Nov. 13, 2023), <https://edocs.puc.state.or.us/efdocs/HNA/um2276hna111037.pdf>. The amount requested here is in addition to the pre-certification funding request.

c. **Eligible Expenses for CCC**

Personnel	Hours	Rate	Cost
Climate and Energy Policy Manager	25	\$175 ³	\$4,375
Portion of Expert Witness (split among intervenors)			\$3,333
Subtotal			\$7708
Administrative (10%)			\$770
Total Request			\$8,478

d. **Eligible Expenses for Verde⁴**

Personnel	Hours	Rate	Cost
Portion of Expert Witness (split among intervenors)			\$3,333
Total Request			\$3,333

Dated this 14th day of March, 2024.

Respectfully submitted,

/s/ Jaimini Parekh

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³ Note that the billing rate for CCC's Climate and Energy Policy Manager has increased from \$150 to \$175 for this request. The November 13, 2023, Request for HB 2475 Pre-Certification Request reflected a \$150 billing rate. See CCC Request for Precertification Funding, UM 2276 (Nov. 13, 2023), <https://edocs.puc.state.or.us/efdocs/HAQ/um2276haq95236.pdf>.

⁴ Verde intends to submit a separate request amending its pre-certification funding request to compensate it for its participation in UG 490. It does not make a separate funding request for its staffing needs here.

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