

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 2114, AR 653

In the Matters of

PUBLIC UTILITY COMMISSION OF  
OREGON,

Investigation into the Effects of the  
COVID-19 Pandemic on Utility Customers  
(UM 2114)

And

Revisions to Division 21 Rules to Strengthen  
Customer Protections Concerning  
Disconnections (AR 653).

ORDER

**DISPOSITION: MOTION TO DESIGNATE PROCEEDING AS ELIGIBLE FOR  
HB 2475 FUNDS GRANTED; PROPOSED BUDGET FOR HB 2475  
GRANT APPROVED**

On July 13, 2022, Rogue Climate filed a notice of participation and request for House Bill (HB) 2475 funding and a proposed budget in dockets UM 2114 and AR 653. No response to the filing was made. Rogue Climate's proposed budget shows eligible expenses of \$7,350, and it seeks an HB 2475 Funding Grant of \$7,350. I grant the requests of Rogue Climate, and its proposed budget is approved.

The Commission Approved Form of Interim Funding Agreement in Order No. 22-043 defines "Eligible Dockets" as a proceeding before the Commission to review:

1. Non-complaint contested cases, rulemakings, and non-contested dockets that affect the applicable utility and its low-income residential customers and environmental justice communities,
2. Named, non-docketed Commission led processes addressing issues that affect the applicable utility and its low-income residential customers and environmental justice communities, or
3. An Integrated Resource Plan.

Participating utilities, including PacifiCorp, are directly affected by both docket UM 2114 and docket AR 653. Docket UM 2114 involves an investigation into the effects of the COVID-19 pandemic on customers of PacifiCorp and other public utilities. This investigation coincides with docket AR 653, an ongoing rulemaking regarding revisions to Division 21 rules with the purpose of strengthening protections of customers facing disconnections.

Rogue Climate claims these proceedings will likely have a substantial impact on PacifiCorp, dba Pacific Power's and other utilities' customers because the rules will determine how disconnections will affect their low income and rural residential customers as well as the environmental justice communities Rogue Climate represents. Rogue Climate represents Southern Oregon and South Coast communities, including low-income, rural, youth, and communities of color, many of which may be affected by the rulemaking. Therefore, the activities investigated and regulated throughout these proceedings will directly impact PacifiCorp's low-income and rural residential customers, as well as other environmental justice communities Rogue Climate represents.

Rogue Climate asserts that it is eligible for funding because it is a pre-certified eligible organization pursuant to Commission Order No. 22-043. Rogue Climate argues that it serves the Southern Oregon and South Coast communities mostly 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 Rogue Climate's mission to provide representation in public proceedings for environmental justice communities. Rogue Climate represents communities traditionally under-represented, including rural communities, in public processes like this one.

I agree that Rogue Climate qualifies as an eligible organization under Order No. 22-043. I find that docket UM 2114 qualifies as an eligible proceeding because the proceeding is anticipated to have a substantial impact on PacifiCorp's low-income residential customers and environmental justice communities. Docket AR 653 will create changes in rules which directly impact low-income residential customers and environmental justice communities represented by Rogue Climate. Accordingly, the motion should be granted, and these dockets certified as eligible proceedings.

The Interim Agreements for HB 2475 Intervenor Funding, approved by the Commission in Order No. 22-043, provide that pre-certified intervenors must submit a proposed HB 2475 Grant Funds budget to the Commission that contains, at a minimum, the following information:

1. A statement of work to be performed by the Recipient for which the Recipient is seeking funding;
2. A description of the areas to be investigated and addressed by Recipient;
3. A budget showing estimated attorney fees, which may include the cost for appropriate support staff and operational support; and

4. A budget showing estimated consultant fees and expert witness fees, which may include the cost for appropriate support staff and operational support.

Once a proposed budget is received, the Commission decides whether HB 2475 Grant Funds are available for use based on factors identified in the Interim Agreements for HB 2475 Intervenor Funding. The Commission has the authority to accept, deny, or partially deny the request, and may place reasonable conditions on the grant, and may delegate this responsibility to the Chief Administrative Law Judge, consistent with Order No. 21-213.

Rogue Climate's proposed budget includes the requisite information and reflects the current schedule adopted in these dockets.

In light of the issues being addressed, the complexity of the issues, and the significant policy decisions to be made, Rogue Climate's proposed budget is reasonable and should be approved.

**ORDER**

IT IS ORDERED that:

1. These proceedings are designated as proceedings eligible for HB 2475 Funds.
2. Rogue Climate is certified to receive funds in these dockets.
3. Rogue Climate's proposed budget for an HB 2475 Funding Grant is approved.
4. An HB 2475 Funding Grant is approved up to \$7,350 for activity in dockets UM 2114 and AR 653.

Made, entered, and effective Oct 10, 2022.



A handwritten signature in blue ink, appearing to read "Nolan Moser".

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Nolan Moser  
Chief Administrative Law Judge

A party may request rehearing or reconsideration of this order under ORS 756.561. A request for rehearing or reconsideration must be filed with the Commission within 60 days of the date of service of this order. The request must comply with the requirements in OAR 860-001-0720. A copy of the request must also be served on each party to the proceedings as provided in OAR 860-001-0180(2). A party may appeal this order by filing a petition for review with the Court of Appeals in compliance with ORS 183.480 through 183.484.