

ORDER NO. 23-485

ENTERED Dec 28 2023

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2276

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Approval of Justice Funding Precertification.

ORDER

DISPOSITION: ADMINISTRATIVE HEARINGS DIVISION'S
RECOMMENDATION ADOPTED

At its public meeting on December 28, 2023, the Public Utility Commission of Oregon adopted the Administrative Hearings Division's recommendation in this matter. The report with the recommendation is attached as Appendix A.

BY THE COMMISSION:



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 Circuit Court for Marion County in compliance with ORS 183.484.

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This is a broader type of funding and is available to groups to participate in a variety of dockets. Effectively, this funding can operate as a multisubject grant for activity at the Commission, and groups can request that all this funding be provided up front. Groups request this type of funding one time per year, with the Commission approving funding for up to five pre-certification grant requests per year.

2023 Justice Fund Grantees

For 2023 Justice Grant funding, we received five applications from the following groups: Community Energy Project (Community Energy), Rogue Climate, the Coalition of Communities of Color (CCC), the Oregon Just Transition Alliance (OJTA), and Verde. On May 18, 2023, we granted funding to all five applicants in Order No. 23-180. Below is a table of the funding granted to the five grantees.

Group	PGE	PAC	NWN	Total
<i>Community Energy</i>	62,889	21,310	37,168	121,367
<i>CCC</i>	25,500	25,500	15,000	66,000
<i>OJTA</i>	33,333	33,333	33,334	100,000
<i>Rogue Climate</i>		49,275		49,275
<i>Verde</i>	28,375	28,375		56,750

Reporting from 2023 Justice Fund Grantees

On July 20, 2023, I set a deadline for grantees to submit preliminary reports for 2023 Pre-Certification funding by August 1, 2023, which I subsequently extended to August 8, 2023. In the preliminary reports, grantees detailed how their funding was spent (or would be spent before the year ends), whether they filed a request for payment, and whether they will use or release any amount remaining.

On October 25, 2023, I requested that all 2023 Justice Fund grantees provide a supplement to their previous reports no later than November 13, 2023. Because the preliminary reports were filed long before the end of the year, the supplemental reports were intended to provide a more recent and accurate status of grantees' spending.

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Summarized and analyzed below are the preliminary and supplemental reports from the prior grantees.

1. Community Energy Project

a. Preliminary Report

On August 7, 2023, Community Energy submitted its preliminary funding report for Justice Funding awarded to pre-certified organizations.

We granted Community Energy \$121,367¹ in 2023 Justice Funding. At the time of its preliminary report, Community Energy had spent \$37,261.60 of the funding on work prior to July 31, 2023, and anticipated spending the remainder of the funding as planned in the budget. Community Energy explained that its capacity had been more limited than usual due to hiring processes, but it expected to increase activities in mid-August.

Community Energy reported having been or intending to become involved in dockets LC 79, LC 77, LC 73, UM 2225, UM 1158, AR 655, and, most extensively, UM 2211 and UE 416. Additionally, Community Energy reported intending to become involved in further dockets that impact IRP and rate case issues, energy affordability and low-income ratepayers, grid equity, equity metrics, disconnections, and resilience.

b. Supplemental Report

On November 13, 2023, Community Energy submitted its supplemental funding report for Justice Funding awarded to pre-certified organizations.

At the time of its supplemental report, Community Energy reports having spent \$96,634 year to date. Specifically, Community Energy spent \$59,372.19 since filing its preliminary report in August. Not intending to release any funding, Community Energy plans to spend the remainder of its budget—\$24,734—from November 10 to the end of the year.

As before, Community Energy reports having been heavily involved in UM 2211. In the future, Community Energy plans to address energy efficiency and lack of stakeholder engagement from utilities. Additionally, like in its preliminary report, Community Energy

¹ I note that there is a slight discrepancy in Community Energy's budget—Community Energy lists its overall budget as \$121,368 but adding the requested amounts from each utility results in a total budget of \$121,367. Earlier, we noted that Community Energy requested \$131,386 and that the requests resulted in a total of \$121,377, granting them \$121,377. This was, however, a miscalculation, and we confirm that we approved the accurate total request amount: \$121,367.

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reports involvement in UE 416 and LC 79. Unlike in its preliminary report, Community Energy also reports involvement in LC 80 and LC 82. Moreover, Community Energy plans future ways to advocate within the PUC beyond dockets, like advocating for affordable development of small-scale/community owned solar.

c. Analysis

After review of the reports and following discussion with Community Energy, I recommend the Commission find that Community Energy has met its obligations as a 2023 pre-certification fund grant recipient from PGE, NW Natural, and PacifiCorp. Community Energy has met the terms of our rules on Justice Funding, utilizing that funding for eligible expenses, as described in OAR 860-001-0870 and has met the reporting requirements of OAR 860-001-0890(8).

2. Rogue Climate

a. Preliminary Report

On August 8, 2023, Rogue Climate submitted its preliminary funding report for Justice Funding awarded to pre-certified organizations.

We granted Rogue Climate \$34,284 in 2023 Justice Funding. At the time of its preliminary report, Rogue Climate had allocated \$13,418 of the funding to the work prior to August 8, 2023 and anticipated allocating the remainder of the funds, \$20,866, to the remaining work to the end of the year. Moreover, Rogue Climate did not anticipate releasing any of the funding.

Rogue Climate reported having been or intending to become involved in HB 2021 Implementation and Clean Energy Plans (UM 2225, AR 655, LC 80), PacifiCorp IRP/CEP (LC 82), Wildfire Protection Plans (UM 2207, AR 638). Additionally, Rogue Climate reported working with youth leaders in Ashland to explore electrification for new residential buildings.

b. Supplemental Report

On November 13, 2023, Rogue Climate submitted its supplemental funding report for Justice Funding awarded to pre-certified organizations.

At the time of its supplemental report, Rogue Climate reports having spent \$27,370 year to date. Specifically, Rogue Climate spent \$13,952 since filing its preliminary report in August. Rogue Climate plans to spend \$5,414 of its budget from November 10 to the

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end of the year, and it will release \$1,500 of the funds.

Since August, Rogue Climate has monitored relevant dockets related to Clean Energy Plans, particularly in LC 80 and LC 82. Rogue Climate anticipates continuing to engage counsel in LC 82 proceedings, including reviewing filed comments and attending the upcoming hearing. Additionally, Rogue Climate reports having been involved in UM 2211 related to implementing the Energy Affordability Act. In the future, Rogue Climate will continue outreach to ensure community members are aware of programs that affect energy burden.

c. Analysis

After review of the reports, and following discussion with Rogue Climate, I recommend the Commission find that Rogue Climate has met its obligations as a 2023 pre-certification fund grant recipient from PacifiCorp. Rogue Climate has met the terms of our rules on Justice Funding, utilizing that funding for eligible expenses, as described in OAR 860-001-0870 and has met the reporting requirements of OAR 860-001-0890(8).

3. Coalition of Communities of Color (CCC)

a. Preliminary Report

On August 4, 2023, CCC submitted its preliminary funding report for Justice Funding awarded to pre-certified organizations.

We granted CCC \$66,000 in 2023 Justice Funding. At the time of its preliminary report, CCC had spent \$22,312.50 and planned to spend the remainder of the funds. Of the remainder, \$19,687.50 would fund internal expenses, \$10,000 would pass through to Latino Network for a November 2023 community meeting, \$10,000 would pass through to Asian Pacific Action Network of Oregon (APANO) for an October 2023 meeting, and \$2,000 would be reimbursed to each organization (\$4,000 total).

CCC reported having been or intending to become involved in UM 2211, UE 416, and general PUC planning. Additionally, CCC reported extensive work on HB 2021 Implementation to ensure that utility Clean Energy Plans are equitable, inclusive, and accessible.

b. Supplemental Report

On November 13, 2023, CCC submitted its supplemental funding report for Justice Funding awarded to pre-certified organizations.

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At the time of its supplemental report, CCC reports having spent \$36,769 year to date. Not intending to release any funding, CCC plans to spend the remainder of its budget—\$29,231—from November to the end of the year.

As of November 13, 2023, CCC has co-hosted two of the three anticipated community meetings. The first was held in July with the Urban League of Portland; the second, in October with APANO. The final meeting will be held on November 15, 2023, with Latino Network. CCC has yet to pass the \$10,000 and \$2,000 each to APANO and Latino Network, but it plans to do so.

As before, CCC reports having been moderately involved in UM 2211, UE 416, and general PUC planning. Most extensively, CCC has worked on HB 2021 Implementation as an intervenor in UM 2273, drafting comments and participating in frequent meetings.

c. Analysis

After review of the reports, and following discussion with CCC, I recommend the Commission find the CCC has met its obligations as a 2023 pre-certification fund grant recipient from PGE, PacifiCorp and NW Natural. CCC has met the terms of our rules on Justice Funding, utilizing that funding for eligible expenses, as described in OAR 860-001-0870 and has met the reporting requirements of OAR 860-001-0890(8).

4. The Oregon Just Transition Alliance

a. Preliminary Report

On August 5, 2023, OJTA submitted its preliminary funding report for Justice Funding awarded to pre-certified organizations.

We granted OJTA \$100,000 in 2023 Justice Funding. In its preliminary report, OJTA neither disclosed how much funding it had spent nor how much it anticipated releasing. In its original budget, OJTA had allocated \$40,000 for subgrants, but at the time of its preliminary report, OJTA was still in the process of developing the subgrants for various organizations. Thus, it explained that it could update the Commission in mid to late September once it finalized subgrant agreements. Moreover, OJTA had requested justice funding to hire a full-time staff member. However, at the time of the preliminary report, OJTA had yet to onboard a staffer and anticipated that its Advocacy and Systems Director would help with the hiring process.

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OJTA reported extensive involvement in UM 2225 as part of the HB 2021 Community Advocates program. Additionally, OJTA predicted that it may become involved in UM 2178, UG 435, LC 77, AR 655, and UM 2005—though it noted that all but UM 2005 appeared to be complete.

b. Supplemental Report

On November 13, 2023, OJTA submitted its supplemental funding report for Justice Funding awarded to pre-certified organizations.

At the time of its supplemental report, OJTA reports having spent \$74,220.62 year to date. OJTA plans to spend the remainder of the funds allocated to staff—\$18,029.38—from November 10 to the end of the year, and it anticipates releasing \$7,750 of the funds which had been allocated for Community Stipends and Outreach. Additionally, OJTA has finalized its subgrants with two organizations: Oregon Rural Action and Comunidades. OJTA was no longer able to provide a subgrant to Adelante Mujeres due to staff transitions and limited capacity, though it does not anticipate returning grant funds.

OJTA reports having been extensively involved in UM 2225, though it does not have specific plans for future involvement in the docket. Additionally, OJTA has been moderately involved in UM 2211, but it plans to become more involved in UM 2211 and NW Natural dockets. Moreover, OJTA plans future ways to advocate within the PUC beyond dockets, like advocating for installation of heat pumps and learning more about technical issues and the structure of the PUC.

c. Analysis

After review of the reports, and following discussion with OJTA, I recommend the Commission find the OJTA has met its obligations as a 2023 pre-certification fund grant recipient from PGE, PacifiCorp and NW Natural. OJTA has met the terms of our rules on Justice Funding, utilizing that funding for eligible expenses, as described in OAR 860-001-0870 and has met the reporting requirements of OAR 860-001-0890(8).

5. Verde

a. Preliminary Report

On August 8, 2023, Verde submitted its preliminary funding report for Justice Funding awarded to pre-certified organizations.

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We granted Verde \$56,750 in 2023 Justice Funding. At the time of its preliminary report, Verde had spent \$4,250 and did not anticipate releasing any of the remaining \$52,500 funds. Verde reported limited but increasing capacity since it had hired a new Energy Justice Coordinator and Energy, Climate, and Transportation Manager.

Verde reported having been or intending to become involved in dockets UM 2211, UM 2225, and UM 1158. Additionally, Verde intended to engage in Pacific Power and PGE Distribution System Plans and Clean Fuel Plans/Program, as well as dockets that impact decarbonization/electrification, energy affordability, low-income ratepayers, grid equity and modernization, community solar, community energy, distributed energy resources, distribution system planning, equity metrics and diversity, equity, and inclusion, transportation electrification, disconnections, and resilience.

b. Supplemental Report

On November 13, 2023, Verde submitted its supplemental funding report for Justice Funding awarded to pre-certified organizations.

At the time of its supplemental report, Verde reports having spent \$19,350 year to date, entirely on Staff expenses. Verde does not intend to release any funding. However, Verde notes that it was unable to spend the funds allocated for contracting due to limited time and capacity. Rather than release the \$3,750 allocated to contracting, Verde hopes to retain the funds for the next funding cycle, effectively rolling over the funding to 2024. Additionally, Verde plans to spend the entirety of its funding allocated to Staff and Community Resources—\$33,650 total—from November to the end of the year. For Community Resources, Verde plans to use the funds on a focus group style training for the Lideres Verdes Program in December 2023 and on translating PUC education and accessibility resources.

As before, Verde reports having been involved in UM 2211, UM 2225, and UM 1158, as well as the same engagement outside of dockets as delineated in its preliminary report. The bulk of the work in these dockets and on these issues seems to be in the past. In the future, Verde generally plans to continue to participate in stakeholder meetings and meet with environmental justice advocates across many dockets. In a subsequent December conversation with the Administrative Hearings Division, Verde indicated that it planned to release \$25,000 of the grant back to the program.

c. Analysis

After review of the reports, and following discussion with Verde, I recommend the Commission find that Verde has met its obligations as a 2023 pre-certification fund

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grant recipient from PGE and NW Natural. Verde has met the terms of our rules on Justice Funding, utilizing that funding for eligible expenses, as described in OAR 860-001-0870 and has met the reporting requirements of OAR 860-001-0890(8).

Applications Received and Overall Recommendation for 2024 Justice Grant Funding

For 2024 Justice Grant funding, we received four applications from the following groups: Community Energy, CCC, OJTA, and Verde.

I recommend approval of all applications by the Commission, subject to review of supplemental filings and adjustments to accommodate overall funding levels.

Amount of Overall Funding Available

Pre-certification funding is available for activity in dockets affecting and for groups representing communities in the PGE, PacifiCorp, and NW Natural service territories. There is \$85,000 available annually for each of these three utilities from the precertification fund, for a total of \$255,000.² Accordingly, the following amounts are available for pre-certification grants in 2024:

- PGE: \$85,000
- PacifiCorp: \$85,000.00
- Northwest Natural: \$85,000

Below is a table of the requests received by the four applicants and the funds remaining in each utility fund if all requests were approved:

² There are pending releases to the various funds, as described above, but at the time of this memo releases have not been completed. Accordingly, no rollover of funds has yet occurred consistent with OAR 860-001-0820.

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Group	PGE	PAC	NWN	Total Requested
<i>Community Energy</i>	21,250	21,250	32,500	75,000
<i>CCC</i>	22,000	22,000	10,000	54,000
<i>OJTA</i>	26,667	26,667	26,666	80,000
<i>Verde</i>	21,250	21,250	10,000	52,500
Total Requested	91,167	91,167	79,166	261,500
<i>Available Funds</i>	85,000	85,000	85,000	255,000
Difference	-6,167	-6,167	5,834	-6,500

Individual Proposals

1. Community Energy Project

Community Energy proposes activity involving PGE, PacifiCorp, and NW Natural. More specifically, Community Energy plans to engage extensively in UM 2211, including in the low-income program implementation, UM 2211 phase two, weatherization, and energy efficiency. Community Energy also plans to engage in the low-income bill discount programs of PGE, PacifiCorp, and NW Natural. Regarding energy efficiency, energy planning, and impacts on low-income communities, Community Energy plans to engage in dockets LC 82, LC 79, AR 641, UM 2111, UM 1893, as well as the Trust of Oregon Grant Agreement, PGE Community-Wide Green Tariff, PacifiCorp Rate Case, NW Natural Rate Case. Community Energy also notes general areas of interest in which it may engage in the future, including issues emerging from rate and planning cases, decarbonization/electrification, energy affordability, grid and energy efficiency equity, disconnections, and resilience.

Community Energy proposes the following allocations for its budget of \$75,000 between the three utilities:

\$21,250 from PGE's fund
 \$21,250 from PacifiCorp's fund and
 \$32,500 from NW Natural's fund

Based on the explanation of Community Energy's application as to why Community

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Energy is eligible for pre-certification funding under the agreement and rules, and the terms of the agreement, which explicitly list Community Energy as an entity eligible for funding, I recommend that the Commission find Community Energy eligible. Community Energy's planned activities are consistent with the agreement and rules. Community Energy's budget is reasonable and consistent with its planned activities. After investigation into Community Energy's proposal, I recommend approval with the following changes:

I recommend Community Energy receive:

\$19,812.54 from PGE's fund
\$19,812.54 from PacifiCorp's fund and
\$32,500 from NW Natural's fund

Community Energy's budget for PGE and PacifiCorp funding should be reduced consistent with the overall amount of funding available to all applicants, on a proportional basis. As described above, though \$85,000 is available for applicants for these two utility funds, we have received \$91,167 in requests. Community Energy's request represents 23.31% of PGE's and PacifiCorp's requests; accordingly, I recommend funding \$19,812.54 from each fund rather than \$21,250.

2. Coalition of Communities of Color

CCC proposes activity involving PGE, PacifiCorp, and NW Natural. More specifically, CCC plans to engage in dockets and issues associated with low-income programs, including UM 2211, UM 2273, and PGE's Community Green Tariff. Additionally, CCC plans to advocate for weatherization, energy efficiency, PUC accessibility, and community engagement.

CCC proposes two subgrants to the Urban League and a second organization that CCC has yet to confirm. CCC asserts that, consistent with agreement and rules, each organization would independently qualify for precertification funding. Each organization would receive \$10,000 for staff time and \$2,000 for logistics for co-hosting a community workshop with CCC. The workshops may focus on available programs for low-income households, energy affordability and rate increases, indoor air quality, community resilience and accessibility of clean energy, disconnection, and electrification.

CCC proposes the following allocations for its budget of \$54,000 between the three utilities:

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\$22,000 from PGE's fund
\$22,000 from PacifiCorp's fund and
\$10,000 from NW Natural's fund

Based on the explanation of CCC's application as to why CCC is eligible for pre-certification funding under the agreement and rules, and the terms of the agreement, CCC should be found eligible. I reviewed the mission, communities served, and other information regarding CCC's proposed subgrant and determine that this group would be independently eligible. CCC's planned activities are consistent with the agreement and rules. I note that CCC's community meeting budget includes limited costs associated with community meetings which are reasonable in the context of the overall workplan and overall budget. CCC's total budget is reasonable and consistent with its planned activities. CCC should supplement its application with information describing additional subgrantees as soon as that information is available. Should CCC fail to secure these subgrant relationships, CCC must file and explain an amended budget consistent with a new workplan. AHD will work with CCC and verify that CCC has completed the subgrant relationships consistent with its application and budget.

After investigation into CCC's proposal, I recommend approval with the following changes:

I recommend CCC receive:

\$20,511.81 from PGE's fund
\$20,511.81 from PacifiCorp's fund and
\$10,000 from NW Natural's fund

CCC's budget for PGE and PacifiCorp funding should be reduced consistent with the overall amount of funding available to all applicants, on a proportional basis. As described above, though \$85,000 is available for applicants for these two utility funds, we have received \$91,167 in requests. CCC's request represents 24.13% of PGE's and PacifiCorp's requests; accordingly, I recommend funding \$20,511.81 from each fund rather than \$22,000.

3. Oregon Just Transition Alliance

OJTA proposes activity involving PGE, PacifiCorp, and NW Natural. More specifically, OJTA plans to engage in UM 2211, LC 79, the Energy Trust of Oregon Grant Agreement, and the NW Natural Rate Case regarding impacts on low-income communities. Additionally, OJTA plans to engage in UM 2225 and UM 1893 regarding clean energy and energy efficiency, respectively.

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OJTA proposes subgrants to three groups: \$20,000 to Beyond Toxics, \$15,000 to Pineros and Campesinos Unidos del Noreste, and \$15,000 to Adelante Mujeres. OJTA has not clarified if these groups are independently eligible for grants, consistent with agreement and rules. OJTA intends for these grants to support engaging community members on issues such as energy affordability, access to clean energy, and community climate resilience, among others, in partnership with OJTA staff.

OJTA proposes the following allocations for its budget of \$80,000 between the three utilities:

\$26,666 from PGE's fund
\$26,666 from PacifiCorp's fund and
\$26,666 from NW Natural's fund

Based on the explanation of OJTA's application as to why OJTA is eligible for pre-certification funding under the agreement and rules, and the terms of the agreement, I recommend that OJTA be found eligible, subject to a supplemental filing describing why subgrantees are eligible for funding. Because OJTA has not yet finalized these subgrant relationships, I request that OJTA provide an update to the Commission regarding these subgrants when relationships are finalized. Should OJTA fail to secure these subgrant relationships, OJTA must file and explain an amended budget consistent with a new workplan. AHD will work with OJTA and verify that OJTA has completed the subgrant relationships consistent with its application and budget.

OJTA's planned activities are consistent with the agreement and rules. I note that OJTA's budget includes limited costs associated with community meetings, which are reasonable in the context of the overall workplan and overall budget. OJTA's total budget is reasonable and consistent with its planned activities. After investigation into OJTA's proposal, I recommend approval subject to the conditions described above and consist with the following budget adjustments:

\$24,863.11 from PGE's fund
\$24,863.11 from PacifiCorp's fund and
\$26,666 from NW Natural's fund

OJTA's budget for PGE and PacifiCorp funding should be reduced consistent with the overall amount of funding available to all applicants, on a proportional basis. As described above, though \$85,000 is available for applicants for these two utility funds, we have received \$91,167 in requests. OJTA's request represents 29.25% of PGE's

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and PacifiCorp's requests; accordingly, I recommend funding \$24,863.11 from each fund rather than \$26,666.

4. Verde

Verde proposes activity involving PGE, PacifiCorp, and NW Natural. More specifically, Verde plans to engage in UM 2211 and LC 79 regarding low-income programs and UM 2193, UM 2274, and LC 82 regarding energy and clean energy planning. Additionally, Verde plans to engage in PacifiCorp and PGE Transportation Electrification and Distribution System Plans, the Energy Trust of Oregon Grant Agreement, IRP Guideline Revisions, PGE's Community-Wide Green Tariff, and PacifiCorp's Community Based Renewable Energy RFP. Verde also notes general areas of interest in which it may engage in the future, including decarbonization/electrification, energy affordability, grid equity and modernization, equity metrics, community solar and distribution planning, transportation electrification, disconnections, and resilience. In its proposed budget, Verde specifically requests funding for education and testimony stipends. In conversations with Verde, we have requested additional information on how these stipends are intended to work, and how they are consistent with the approved funding agreement and rules. Verde provided this narrative on December 20, 2023. In that narrative, Verde explains how its leadership development program, Lideres Verdes, will operate to provide training on participation at the Commission.

Verde also describes its plans for stipends in this narrative, stating that they are related to community education, accessibility, and overall testimony/engagement with the Commission. Stipends are intended to cover or offset expenses associated with participation in unpaid activities like volunteering, community events or endeavors where compensation is deemed necessary for participation. Verde notes that community members who wish to contribute to Commission proceedings may have to take time off from work, resulting in lost wages. Verde states that individuals may also spend time away from their family and potentially require them to hire child-care services to engage in Commission activities.

Verde proposes the following allocations for its budget of \$52,500 between the three utilities:

\$21,250 from PGE's fund and
\$21,250 from PacifiCorp's fund
\$10,000 from NW Natural's fund

Based on the explanation of Verde's application as to why Verde is eligible for pre-certification funding under the agreement and rules, I recommend that the Commission

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find Verde eligible. Verde's planned activities are consistent with the agreement and rules. Verde's budget is reasonable and consistent with its planned activities. After investigation into Verde's proposal, I recommend approval with the following changes:

I recommend Verde receive:

\$19,812.54 from PGE's fund
\$19,812.54 from PacifiCorp's fund and
\$10,000 from NW Natural's fund

Verde's budget for PGE and PacifiCorp funding should be reduced consistent with the overall amount of funding available to all applicants, on a proportional basis. As described above, though \$85,000 is available for applicants for these two utility funds, we have received \$91,167 in requests. Verde's request represents 23.31% of PGE's and PacifiCorp's requests; accordingly, I recommend funding \$19,812.54 from each fund rather than \$21,250.

PROPOSED COMMISSION MOTION:

That the Commission approve the pre-certification grant requests subject to the conditions outlined in this memo.