

ORDER NO. 24-476

ENTERED Dec 31 2024

**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 31, 2024, the Public Utility Commission of Oregon adopted Administrative Hearings Division's recommendation in this matter. The report with the recommendation is attached as Appendix A.

BY THE COMMISSION:



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**Alison Lackey**  
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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The second is pre-certification grant funding and is the subject of this recommendation. 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.

*Applications Received and Overall Recommendation for 2025 Justice Grant Funding*

For 2025 Justice Grant funding, we received three applications from the following groups: Community Energy Project, Coalition of Communities of Color, and Verde. I recommend approval of all applications by the Commission.

*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, plus rollover funds from prior years, for a total of \$358,816.55 in available funds.<sup>1</sup> Accordingly, the following amounts are available for pre-certification grants in 2025:

- PGE: \$102,264.04
- PacifiCorp: \$99,300.00
- Northwest Natural: \$156,622.51

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

<b>Group</b>	<b>PGE</b>	<b>PAC</b>	<b>NWN</b>	<b>Total Requested</b>
<i>CEP</i>	58,000	56,000	136,000	250,000
<i>CCC</i>	16,558	16,558	9,050	43,500
<i>Verde</i>	14,500	21,250	10,000	45,750
Total Requested	89,058	93,808	156,384	339,250
Rollover	17,264.04	14,300	71,622.51	103,186.55

<sup>1</sup> This includes a pending release of \$25,000 to the PacifiCorp and PGE funds from Verde from its 2023 precertification grant, which results in a \$12,500 rollover of 2023 funds for each of those funds. Verde Letter of Intent to Return Intervenor Funds (Nov. 26, 2024)

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Funds				
2025 Funds	85,000	85,000	85,000	255,000
Total Available Funds	102,264.04	99,300	156,622.51	358,186.55
Remaining Funds	13,206.04	5,492	238.51	18,936.55

### *Individual Proposals*

#### 1. Community Energy Project

Community Energy proposes activity involving PGE, PacifiCorp, and NW Natural. More specifically, Community Energy plans to continue engaging extensively in docket UM 2211, including on the low-income bill discount programs, weatherization, and energy efficiency. Community Energy plans to engage on other matters including energy planning dockets, general rate cases, and wildfire mitigation plans. CEP plans to continue participating on Energy Trust of Oregon's Conservation Advisory Council and Community Benefit Indicators Advisory Groups. 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, grid equity, net metering, and community resilience. CEP's budget includes \$8,000 for community engagement, in the form of four focus groups.

Community Energy proposes the following allocations for its budget of \$250,000 between the three utilities:

\$58,000 from PGE's fund  
 \$56,000 from PacifiCorp's fund and  
 \$136,000 from NW Natural's fund

Based on the explanation of Community Energy's application as to why Community 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 of Community Energy's grant request as proposed.

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## 2. Coalition of Communities of Color

CCC proposes funding to support its staff activity in matters involving PGE, PacifiCorp, and NW Natural. More specifically, CCC plans to engage in dockets and issues associated with low-income programs, including docket UM 2211 (HB 2475 implementation), PGE, NW Natural, and PacifiCorp's bill discount programs, the utility reports on residential disconnections, and continue involvement in HB 2021 implementation. Additionally, CCC plans to continue to advocate for weatherization, energy efficiency, PUC accessibility, and community engagement. CCC also proposes to use \$4000 of its budget for community engagement in the form of two community workshops.

CCC proposes the following allocations for its budget of \$43,500 between the three utilities:

\$16,558 from PGE's fund  
\$16,558 from PacifiCorp's fund and  
\$9,050 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. 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.

After investigation into CCC's proposal, I recommend approval of CCC's grant request as proposed.

## 3. Verde

Verde proposes activity involving PGE, PacifiCorp, and NW Natural. More specifically, Verde plans to continue engaging in docket UM 2211 on the company's bill discount programs including eligibility, enrollment, verification, level of relief, outreach, engagement, and timeline. Verde states that it will engage on PacifiCorp and PGE's transportation electrification plans and implementation, distribution system planning, and the integrated resource plan guideline revision proceeding. Verde also notes general areas of interest in which it may engage in the future, including decarbonization/electrification, energy affordability, rate revisions, grid equity and modernization, equity metrics, community solar, disconnections, and resilience. In its proposed budget, Verde specifically requests \$3000 in funding for community

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engagement and education, including for its leadership development program, Lideres Verdes, which provides training on participation at the Commission.

Verde proposes the following allocations for its budget of \$45,750 between the three utilities:

\$14,500 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 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 of Verde's grant request as proposed. As noted above, Verde submitted a notice of a pending release of \$12,500 to each the PacifiCorp and PGE funds from its 2023 precertification grant. After re-allocating those released 2023 funds to Verde's 2025 budget, results in a remaining payable grant amount of \$2,000 from the PGE fund and \$8,750 from the PacifiCorp fund.

**PROPOSED COMMISSION MOTION:**

That the Commission approve the pre-certification grant requests as outlined in this memo.