

ORDER NO. 26-105

ENTERED Apr 01 2026

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 1158

In the Matter of

ENERGY TRUST OF OREGON,

2026 Performance Measures.

ORDER

DISPOSITION: STAFF'S RECOMMENDATION ADOPTED

At its public meeting on March 31, 2026, the Public Utility Commission of Oregon adopted Staff's recommendation in this matter. The Staff 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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Commission and that, at a minimum, includes representatives of environmental justice communities.

The Oregon legislature has granted the PUC discretion to require that a portion of the funds collected in an electric company's rates under ORS 757.054(4) be paid to a nongovernmental entity for the purpose of making expenditures consistent with the provisions of ORS 757.054. The legislature has further authorized the PUC under ORS 757.612(3)(d) to require funds collected by electric companies through public purpose charges be directed to a nongovernmental entity for investment in public purposes described in ORS 757.612(1). The legislature also recognizes in ORS 757.746 that the PUC may, through natural gas tariffs, require local distribution companies to direct funds collected to a nongovernmental entity for similar purposes.

Following Commission approval in Order No. 24-243, on August 19, 2024, the Commission and Energy Trust entered into an Agreement to Direct Funding to Nongovernmental Entity (Agreement). Pursuant to Section 4.e. of the Agreement:

The PUC shall establish and update, on a periodic basis, quantifiable performance measures, including equity metrics as required under ORS 757.747, that clearly define the PUC's minimum expectations of Energy Trust's performance in administering and expending Funds directed to Energy Trust under the terms of this Agreement.

## Analysis

### *Background*

Annually, Staff proposes annual performance measures for Energy Trust, to serve as early indicators of underperformance, signaling when operational adjustments may be necessary to ensure compliance. They are intended as benchmarks to assess the overall health of Energy Trust programs. The measures apply to activities and investments within PUC oversight through ratepayer or Public Purpose Charge funding and do not apply to complementary funding sources.

In the past, performance measures were based on an annual budget and planning process. In December 2025 the Energy Trust Board of Directors approved the organization's first Multiyear Plan (MYP) covering 2026 to 2030.<sup>2,3</sup> The MYP proposes spending \$2.55 billion to achieve 285.5 aMW of electricity savings, 45.7 million annual

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<sup>2</sup> 2026-2030 Multiyear Plan, December 2025, <https://www.energytrust.org/wp-content/uploads/2025/12/Energy-Trust-2026-2030-Multiyear-Plan-with-financial-statements.pdf>.

<sup>3</sup> Docket No. ETO 1, ETO 2026 Budget Letter, the Commission adopted the recommendations of PUC Staff on Energy Trust's proposed Multiyear Plan, [ETO 2026 Budget Letter 10-16-25.pdf](#).

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terms of gas savings, and 30.1 aMW of electricity generation.<sup>4</sup> To manage the uncertainty and risk inherent in any long-term plan, Energy Trust will employ an Adaptive Management Process to monitor, assess, report and manage progress toward the key indicators described in the MYP.<sup>5</sup> If successfully implemented, Staff expects that the Adaptive Management Process will enable Energy Trust—along with Staff, utilities and stakeholders—to identify performance issues and corrective actions before exceeding performance measures. Staff seeks to balance the visibility and accountability of annual performance measures with the necessary flexibility of a multi-year planning horizon. Staff will continue to recommend ways to harmonize the Adaptive Management Process and annual performance measures in 2027-2030. This will also inform and reflect work in Docket No. AR 676, Rulemaking to Establish Multi-Year Rate Plan Framework.

In 2025, Staff proposed thirty performance measures, which were adopted by the Commission.<sup>6</sup> For 2026 Staff proposes removing one measure from the Renewable Energy category, eliminating two measures from the Market Infrastructure category that were previously consolidated, and adding one measure each to the Equity and Benefit/Cost Ratios category. Staff also proposes two measures in a new category, Adaptive Management Process and Utility Coordination.

Staff proposed draft 2026 Performance Measures on February 11, 2026.<sup>7</sup> Staff held a workshop on February 18, 2026, to review Energy Trust's preliminary 2025 operational results, discuss the draft measures, and gather stakeholder feedback.<sup>8</sup> Staff requested written comments by March 4, 2026, for inclusion in this memo. Four parties provided written comment including Avista Utilities; Portland General Electric Company (PGE) and PacifiCorp (PAC) submitting jointly (Joint Utilities); NW Natural; and the "Joint Advocates," consisting of the Green Energy Institute at Lewis & Clark Law School, Oregon Environmental Council, Northwest Energy Coalition, Mobilizing Climate Action Together, and Climate Solutions. Staff addresses feedback from this workshop and written feedback in the final proposed measures in this memo.

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<sup>4</sup> 2026-2030 Multiyear Plan, 2026-2030 Plan Projected Results, page 11, <https://www.energytrust.org/wp-content/uploads/2025/12/Energy-Trust-2026-2030-Multiyear-Plan-with-financial-statements.pdf>.

<sup>5</sup> 2026-2030 Multiyear Plan, Section VII, page 71, <https://www.energytrust.org/wp-content/uploads/2025/12/Energy-Trust-2026-2030-Multiyear-Plan-with-financial-statements.pdf>.

<sup>6</sup> Order No. 25-081, <https://apps.puc.state.or.us/orders/2025ords/25-081.pdf>.

<sup>7</sup> Docket No. UM 1158, Staff's Draft 2026 Performance Measures for Energy Trust of Oregon, February 11, 2026, <https://edocs.puc.state.or.us/efdocs/HAH/um1158hah343727058.pdf>.

<sup>8</sup> Docket No. UM 1158, Staff's and the Energy Trust's presentations for the February 18, 2026 Workshop, February 13, 2026, <https://edocs.puc.state.or.us/efdocs/HAH/um1158hah343784037.pdf>.

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### *Proposed 2026 Performance Measures*

Performance measures cover a wide range of operational aspects. Staff discusses them in the following categories: Electric and Natural Gas Energy Efficiency; Renewable Energy; Equity; Benefit/Cost Ratios; Financial Integrity, Administrative Costs, Staffing Costs, Customer Satisfaction, NEEA and Market Transformation, Market Infrastructure Investments; and Adaptive Management Process and Utility Coordination.

#### *1. Electric and Natural Gas Energy Efficiency*

Previously, electric and natural gas efficiency measures were calculated annually as 85 percent of Energy Trust's Board-approved savings goal at a levelized cost of no greater than 115 percent of the Board-approved goal. For 2026, Staff proposes calculating savings and cost targets using the utility-specific energy and expenditure curves in the MYP.

**For savings, Staff proposes maintaining 85 percent to calculate savings and using the basis of the utility-specific energy curve's annual savings target.** To illustrate, Staff uses PGE's 2026 savings which are forecast to be 30.1 aMW.<sup>9</sup> This leads to a 2026 performance measure of 25.59 aMW (30.1 x 0.85). Staff thinks this measure continues to appropriately represent minimum expectations.

**For costs, Staff proposes that Energy Trust continue to report levelized cost performance at the program level in annual reporting. For the 2026 performance measure, Staff proposes moving away from a maximum levelized cost and instead an expenditure maximum derived from the utility-specific annual expenditure curves and variances from the Adaptive Management Process.** To illustrate, Staff uses PacifiCorp's 2026 cumulative electric savings expenditure of \$136 million<sup>10</sup> and 2026 annual expenditure variance of two percent.<sup>11</sup> This leads to a 2026 performance measure of maximum expenditure of \$138.72 million (136 x 1.02 = 138.72).

Staff notes that savings targets and expenditure forecasts in the MYP exclude megaprojects<sup>12</sup> and other opportunistic cost-effective energy savings, which are to be

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<sup>9</sup> 2026-2030 Multiyear Plan, Figure 5, page 73, <https://www.energytrust.org/wp-content/uploads/2025/12/Energy-Trust-2026-2030-Multiyear-Plan-with-financial-statements.pdf>.

<sup>10</sup> 2026-2030 Multiyear Plan, Figure 11, page 77, <https://www.energytrust.org/wp-content/uploads/2025/12/Energy-Trust-2026-2030-Multiyear-Plan-with-financial-statements.pdf>.

<sup>11</sup> 2026-2030 Multiyear Plan, page 76, <https://www.energytrust.org/wp-content/uploads/2025/12/Energy-Trust-2026-2030-Multiyear-Plan-with-financial-statements.pdf>.

<sup>12</sup> 2026-2030 Multiyear Plan. In the MYP this term refers to very large industrial and commercial projects receiving a minimum of \$750,000 in incentives. They are excluded due to the uncertainty

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negotiated with utilities separately. As such, the cost-ceilings also exclude expenditures on megaprojects and related savings.

Staff initially proposed a cost-ceiling calculated as 150 percent of the utility-specific annual expenditure variance. Staff's intent was to provide additional financial flexibility for Energy Trust to accelerate savings when cost-effective opportunities arise within a multi-year planning context, while confirming that the expenditure forecasts in the MYP represent Energy Trust's maximum approved budgets. NW Natural, PGE, and PacifiCorp felt the proposed 150 percent variance encouraged budget growth and contradicted the guardrails established by the MYP and Adaptive Management Process. Utilities noted the proposal did not specify expectations for additional savings. Staff recognizes these concerns and has adjusted its proposal for 2026 to reflect a cost-ceiling aligned with the annual expenditure variances for each utility in the Adaptive Management Process. In the future, Staff will develop more sophistication in its thinking in recommending flexibility, balanced with formal cost control within the multi-year funding period, consistent with the Adaptive Management Process.

Additionally, PGE and PacifiCorp suggested that the PUC adopt a public process in Docket Nos. ETO 1 or UM 1158 to review any increase in the following year's ratepayer collections beyond the forecasted amount in the MYP. Staff notes that any increase in ratepayer collections would require utility tariff revisions and provide stakeholders the opportunity to review through a public meeting process. Additionally, Staff notes that Energy Trust will address expenditure variances with utilities in quarterly check-ins as part of the Adaptive Management Process.

NW Natural recommended retaining a maximum levelized cost as a measure, not just for reporting, as levelized cost ties more directly to the prudence of expenditures. Staff appreciates the value of the levelized cost metric but thinks the utility-specific annual expenditure curves better reflect the intent of the MYP maximum approved budgets. PGE and PacifiCorp commented that levelized costs should continue to be reported at a programmatic level. Staff agrees and requests Energy Trust continue this practice in annual reports.

Staff expects savings acquisition and expenditures will be monitored through the Adaptive Management Process. This will flag savings and expenditure variance, along with any necessary corrective action, before performance measure thresholds are reached. Variances identified through the Adaptive Management Process, rather than performance measure violations, may lead to necessary tariff or deferral revisions.

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about those projects materializing, and when, page 22, <https://www.energytrust.org/wp-content/uploads/2025/12/Energy-Trust-2026-2030-Multiyear-Plan-with-financial-statements.pdf>.

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**Table 1: Final Proposed Electric and Natural Gas Efficiency Savings and Costs Measures**

Measure	2025 Measure	Proposed 2026 Measure
<b>Electric Energy Efficiency</b>		
<b>1) PGE</b>	Minimum of 27.33 aMW at no greater than 5.4 cent/kWh.	Minimum of 25.59 aMW at no greater than \$169.51M. <sup>13,14</sup>
<b>2) PAC</b>	Minimum of 21.35 aMW at no greater than 5.2 cent/kWh.	Minimum of 19.21 aMW at no greater than \$138.72M. <sup>15,16</sup>
<b>Natural Gas Energy Efficiency</b>		
<b>1) Northwest Natural</b>	Minimum of 4.54 MM therms at no greater than 78.4 cent/therm.	Minimum of 5.95 MM therms at no greater than \$61.5M. <sup>17,18</sup>
<b>2) Cascade Natural Gas</b>	Minimum of 0.50 MM therms at no greater than 95.6 cent/therm.	Minimum of 0.58 MM therms at no greater than \$9.45M. <sup>19,20</sup>
<b>3) Avista</b>	Minimum of 0.41 MM therms at no greater than 94.2 cent/therm.	Minimum of 0.76 MM therms at no greater than \$8.4M. <sup>21,22</sup>

<sup>13</sup> 30.01 aMW x 0.85 = 25.59 aMW. \$167 million x 1.015 = \$169.51 million. 2026-2030 Multiyear Plan, page 72, Figures 5 and 6, page 73, <https://www.energytrust.org/wp-content/uploads/2025/12/Energy-Trust-2026-2030-Multiyear-Plan-with-financial-statements.pdf>.

<sup>14</sup> MYP savings targets and expenditure forecasts exclude megaprojects and other opportunistic cost-effective energy savings.

<sup>15</sup> 22.6 aMW x 0.85 = 19.21 aMW. \$136 million x 1.02 = \$138.72 million. 2026-2030 Multiyear Plan, page 76, Figures 10 and 11, pages 76-77, <https://www.energytrust.org/wp-content/uploads/2025/12/Energy-Trust-2026-2030-Multiyear-Plan-with-financial-statements.pdf>.

<sup>16</sup> MYP savings targets and expenditure forecasts exclude megaprojects and other opportunistic cost-effective energy savings.

<sup>17</sup> 7.0 MM therms x 0.85 = 5.95 MM therms. \$60 million x 1.025 = \$61.5 million. 2026-2030 Multiyear Plan, page 80, Figures 15 and 16, pages 80-81, <https://www.energytrust.org/wp-content/uploads/2025/12/Energy-Trust-2026-2030-Multiyear-Plan-with-financial-statements.pdf>.

<sup>18</sup> MYP savings targets and expenditure forecasts exclude megaprojects and other opportunistic cost-effective energy savings.

<sup>19</sup> 0.68 MM therms x 0.85 = 0.58 MM therms. \$9 million x 1.05 = \$9.45 million. 2026-2030 Multiyear Plan, page 82, Figures 17 and 18, pages 82-83, <https://www.energytrust.org/wp-content/uploads/2025/12/Energy-Trust-2026-2030-Multiyear-Plan-with-financial-statements.pdf>.

<sup>20</sup> MYP savings targets and expenditure forecasts exclude megaprojects and other opportunistic cost-effective energy savings.

<sup>21</sup> 0.89 MM therms x 0.85 = 0.76 MM therms. \$8 million x 1.05 = \$8.4 million. 2026-2030 Multiyear Plan, page 84, Figures 19 and 20, pages 84-85, <https://www.energytrust.org/wp-content/uploads/2025/12/Energy-Trust-2026-2030-Multiyear-Plan-with-financial-statements.pdf>.

<sup>22</sup> MYP savings targets and expenditure forecasts exclude megaprojects and other opportunistic cost-effective energy savings.

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## 2. Renewable Energy

There are four performance measures related to renewable energy, shown in Table 2 and discussed below. For 2026, Staff proposes removing one measure and revising two measures.

**Table 2: Final Proposed Renewable Energy Measures**

Measure	2025 Measure	Proposed 2026 Measure
1)	For project and market development assistance, report annual results, including number of projects supported, milestones met, and documentation of results from market and technology perspective.	Remove measure.
2)	For solar and storage program, obtain no less than 4.76 aMW of installed generation and 5.8 MW for the battery storage program.	For solar and storage program, obtain no less than 4.38 aMW <sup>23</sup> of installed generation and 786 battery projects. <sup>24</sup>
3)	For custom projects, report criteria for selection and how the project helps achieve sector goals.	For custom projects of all renewable technologies and storage, report criteria for selection and how the project helps achieve sector goals.
4)	Spend at least 25 percent of public purpose revenue for renewables, to provide activities, resources, and technologies for low- and moderate-income customers.	No change.

1. **Staff proposes removing the first measure to report project and market development assistance.** Energy Trust reports that project development assistance is now an integral part of everyday renewable program operation. As a result, the measure no longer represents a key indicator of performance. PGE commented that removing the measure would eliminate useful information about

<sup>23</sup> Total 2026 Renewable Generation Target of 5.37 aMW - Custom Hydro/Biopower Generation of 0.07 aMW - Custom Community Solar Generation of 0.14 aMW = Total Net-metered Solar Generation Target of 5.16 aMW.  $5.16 \text{ aMW} \times 0.85 = 4.38 \text{ aMW}$ . Based on analysis developed for estimated overall generation targets in the MYP.

<sup>24</sup>  $600 + 325 = 925$ .  $925 \times 0.85 = 786$ . 2026-2030 Multiyear Plan, Figure 8, page 74. Figure 13, page 78. <https://www.energytrust.org/wp-content/uploads/2025/12/Energy-Trust-2026-2030-Multiyear-Plan-with-financial-statements.pdf>.

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work that helps advance public policy goals around community-based renewables and resiliency. Staff appreciates this feedback and clarifies the expectation that Energy Trust will continue reporting this information in annual reports, and look for other ways to share the information with utility partners.

2. The second measure is the net-metered solar generation goal which, like savings efficiency savings targets, was previously set at 85 percent of the annual Board-approved goal. **For generation, Staff proposes maintaining 85 percent to calculate the measure, and using the basis of Energy Trust analysis for estimating overall generation targets in the MYP.** Last year Staff added a performance measure target of 5.8 MW for the residential battery program that started in 2024. **For residential battery installation, Staff proposes maintaining 85 percent to calculate the measure, and using the basis of the utility-specific, cumulative battery storage project installation curves.** For consistency with the 2025 measure, which was expressed in MW of installation, 786 installations equals approximately 9.35 MW.<sup>25</sup>

PacifiCorp and PGE suggested that the battery storage measure should include installations by utility service territory. Staff appreciates the potential value of the data and requests Energy Trust include this information in annual reports and more often as possible. The Companies further commented that the battery storage measure should reference customer enrollment in utility programs. Staff observes that implementing this comment would make Energy Trust responsible for reporting the enrollment performance of utility programs, which Energy Trust does not control. Staff believes such reporting is more appropriate for utilities to conduct and expects Energy Trust to support by providing relevant installation information. Staff strongly encourages this kind of coordination, discussed in the Utility Collaboration measure.

3. Staff added a modest revision to the third measure to include new project types and makes no changes to the fourth measure.

### 3. Equity

There are five performance measures related to equity, shown in Table 3 and discussed below. For 2026, Staff adds one measure and proposes revisions to four.

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<sup>25</sup> To date, the average system participating in the Energy Trust storage program has had nameplate storage capacity of 11.9 kW. 786 batteries x 11.9 kW x .001 MW = 9.35 MW.

**Table 3: Final Proposed Equity Measures**

Measure	2025 Measure	Proposed 2026 Measure
<b>1) Access to Support for Communities<sup>26</sup></b>	<p>Spend at least \$6 million in support (including incentives).</p> <p>Provide a narrative on the activities and outcomes of these investments. For example, report the number of participating partners (e.g., community-based organizations), the number of projects completed, and the amount of savings achieved.</p>	<p>Spend at least \$8 million (including incentives) in support of nonprofit organizations with a purpose to serve environmental justice communities, and increase assessments and projects over 2025.</p> <p>Provide narrative reporting of the activities and outcomes of these investments. In addition, provide data on the number of participating partners (e.g., community-based organizations), spending, incentive levels, number of projects completed, savings achieved, and geographic distribution by county. Break out data by low-income customers and moderate-income customers separately, as available.</p>
<b>2) Access to Information<sup>27</sup></b>	<p>Host a minimum of four roundtables (or forums) for existing community partners to provide education, training, and resources to support outreach and program delivery to environmental justice communities.</p> <p>Develop at least four community energy needs assessments for environmental justice communities to better</p>	<p>Launch a Community Partner Network to improve and formalize support for community-based organizations contracted to deliver programs to reach priority customers.</p> <p>Describe how creation of the Network builds on existing relationships and on lessons from previous outreach, engagement, and investments in</p>

<sup>26</sup> This measure continues to address performance formerly assessed through the *Market Infrastructure Investments - Partnerships with Community-based Organizations* measure.

<sup>27</sup> This measure continues to address performance formerly assessed through the *Market Infrastructure Investments - Community Engagement and Support* measure.

Measure	2025 Measure	Proposed 2026 Measure
	<p>understand how Energy Trust outreach and program services can increase access to and participation in clean energy programs.</p> <p>Explore new business relationships with at least five potential new community partners.</p> <p>Deepen business relationships with at least five existing community partners. This can be measured by organizations having increased scopes in working with Energy Trust on program outreach and delivery.</p>	<p>communities and community-based organizations.</p> <p>Report on Network enrollment and location. Report on coordination activities with other networks and organizations including Community Action Agencies</p>
<b>3) Energy Burden Reduction</b>	<p>In comparison with 2024, increase the number of customers receiving no-or low-cost offers. Furnish reports by utility service territory.</p> <p>Provide updates on program delivery to customers enrolled in utility bill discount programs.</p>	<p>In comparison with 2025, increase the number of customers receiving no-or low-cost offers.<sup>28</sup></p> <p>Report on priority customers, including participation among income-qualified customers and/or customers enrolled in utility bill discount programs. Break out data by low-income and moderate-income customers separately, as available.</p>
<b>4) Community Resilience</b>	<p>In comparison with 2024, increase the number of solar and solar plus storage projects in development or completed for low-and moderate-income customers.</p>	<p>Report the number of solar and solar plus storage projects (in development or completed) for low-and moderate-income customers. Also report on the number of projects (in development or completed) in</p>

<sup>28</sup> No-or low-cost in this context refers to offers with a customer cost less than or equal to \$500.

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Measure	2025 Measure	Proposed 2026 Measure
	<p>Report total projects and projects (completed and in development) in census tracts that are rural or have above-average energy burden.</p> <p>Report learnings from program operations and stakeholder feedback. Describe how learnings will be used to improve program offerings.</p>	<p>census tracts that are rural or have above-average energy burden. Break out data by low-income customers and moderate-income customers separately, as available.</p> <p>Develop program offers and services to help communities incorporate clean energy solutions into their community resilience planning and projects.</p>
5)	Not applicable – new proposed 2026 measure.	Complete an annual equity plan assessment, as called for in the Agreement to Direct Funding to Non-Governmental Entity.

1. **Staff proposes growth in spending and clarifying language for the first measure.**<sup>29</sup> The spending increase is the same percentage change from 2024 to 2025 and intended to increase the number of assessments and projects for low-income and priority customers.<sup>30</sup> The increase is informed by a preliminary review of 2025 spend, and a forecast of continued growth in nonprofit organization capacity and project activity in 2026. Working with community-based organizations through Community Partner Funding is a key activity in the MYP described in Appendix 3.

The Joint Advocates expressed support for the increased funds and continue to advocate for Energy Trust’s collaboration with, and support of, community-based organizations. Community Action Partnership of Oregon (CAPO) commented at the workshop that, across the equity measures, breaking out data by low-income and moderate-income customers separately would help illuminate impacts for these different types of customers. PGE and PacifiCorp supported this, noting that it may inform energy burden metrics. Staff agrees and understands that Energy Trust is currently undertaking a database project to develop the capability to provide data with this granularity.

<sup>29</sup> 2026-2030 Equity Plan, Appendix 3, page 106, <https://www.energytrust.org/wp-content/uploads/2025/12/2026-2030-Energy-Trust-Equity-Plan.pdf>.

<sup>30</sup> Working with CBOs through Community Partner Funding is a key activity in the MYP described in Appendix 3. 2026-2030 Equity Plan, Appendix 3 Table 16, page 109, <https://www.energytrust.org/wp-content/uploads/2025/12/2026-2030-Energy-Trust-Equity-Plan.pdf>.

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PGE and PacifiCorp suggested augmenting narrative reporting with quantitative reporting of spending, incentive levels, participation counts, geographic distribution by census tract, and measurable savings and bill impacts. Staff recognizes the goal to correlate infrastructure investments with savings and revises the measure accordingly. Staff understands that Energy Trust is able to report geographic distribution to the county but not census tract level. In response to reporting bill impacts, Staff notes that a new benefit/cost ratio measure proposed below will improve reporting at the program level as well as semi-annual reporting on measures covered under cost-effectiveness exceptions.

2. Staff proposes the second measure move towards a more strategic outcome for 2026, rather than the various tactical activities specified in 2025. **Specifically, Staff proposes the measure reflect the launch of a Community Partner Network to improve and formalize support for community-based organizations delivering programs to reach priority customers.**<sup>31</sup> The Network can provide structure to increase access to information by community-based organizations, their customers, and communities. Staff agrees with PGE and PacifiCorp's suggestion to include tracking of how the Network engages and coordinates with other networks, and notes the Network will primarily engage individual organizations.
3. **For the third measure, Energy Burden Reduction, Staff proposes a minor year-to-year update.** Staff expects implementation of the MYP will continue to drive increased participation. The proposal also includes a requirement to report on priority customers, and Staff has added more precise income language to this measure. The Joint Advocates requested that the measure break out energy burden data by renters, in addition to low-income and moderate-income customers. Staff understands that Energy Trust is not currently able to do so, but the database project noted previously may lead to additional reporting abilities. Staff appreciates this request, and believes it could be revisited in 2027.
4. **Changes to the Community Resilience measure contain more precise income language and a shift reflecting Energy Trust's transition from residential to community resilience, as discussed in the MYP.**<sup>32</sup> Further,

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<sup>31</sup> The Network is a key activity in support of 2026-2030 Equity Plan Long-term Outcome 5: Deepen community engagement and partnerships. 2026-2030 Equity Plan, page 22, <https://www.energytrust.org/wp-content/uploads/2025/12/2026-2030-Energy-Trust-Equity-Plan.pdf>.

<sup>32</sup> For example, 2026-2030 Multiyear Plan, Program-level Activities for the Renewable energy sector and Cross-sector activities, pages 123-28, <https://www.energytrust.org/wp-content/uploads/2025/12/Energy-Trust-2026-2030-Multiyear-Plan-with-financial-statements.pdf>.

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Staff believes changes to federal tax credits have significantly altered the solar and storage market and increased uncertainty. With the launch of the program offers and services, Staffs expects this measure may evolve again in 2027.

5. **Staff proposes a new equity measure around completion of an annual equity plan assessment.** This required assessment<sup>33</sup> will provide information about how Energy Trust is achieving equitable results across key areas.<sup>34</sup>
4. Benefit/Cost Ratios

There are three performance measures related to benefit/cost ratios, shown in Table 4 and discussed below. For 2026, Staff adds one new measure and revises two.

**Table 4: Final Proposed Benefit/Cost Ratios Measures**

Measure	2025 Measure	Proposed 2026 Measure
1)	Report benefit/cost ratios from both utility system and societal perspective annually.	Report benefit/cost ratios from both utility system and societal perspective annually at the programmatic and portfolio levels.  If the portfolio ratio falls below MYP 2026-2030 expectation of 1.0 or greater, provide explanation and actions planned to bring ratio to 1.0 or greater.
2)	Report significant mid-year changes to benefit/cost ratios in quarterly reports.	At mid-year, forecast benefit/cost ratios through the end of 2026 and compare with MYP 2026 benefit/cost forecasts.

<sup>33</sup> 2026-2030 Equity Plan, Appendix 1 Exhibit B, page 29, <https://www.energytrust.org/wp-content/uploads/2025/12/2026-2030-Energy-Trust-Equity-Plan.pdf>.

<sup>34</sup> The annual assessment will provide information about how Energy Trust is achieving equitable results in the following areas:

- a) Engagement and collaboration with communities and community-based organizations;
- b) Empowering staff, customers and communities to be involved in Energy Trust planning processes;
- c) Enhancing workforce equity so that the identities of Energy Trust staff reflect the changing population;
- d) Engagement and collaboration with small and disadvantaged businesses; and
- e) Enhancing workplace equity to build and improve an environment that promotes acceptance, inclusion and respect of all individuals.

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Measure	2025 Measure	Proposed 2026 Measure
3)	Not applicable – new proposed 2026 measure.	Report in mid-year and annual reports cumulative spending and savings covered under cost-effectiveness exceptions, for both historical results and future forecasts.

1. **Staff proposes a modest revision to the first measure to expand reporting of benefit/cost ratios to both programmatic and portfolio levels. Additionally, should a ratio fall below the MYP 2026-2030 expectation of 1.0, Energy Trust should explain corrective actions.** Staff believes this revision improves transparency and understanding of how program level fluctuations may impact portfolio level cost-effectiveness, and how year-to-year fluctuations may impact total MYP cost-effectiveness.

The Joint Advocates expressed continued support for the shift towards portfolio-level cost effectiveness. PGE and PacifiCorp commented that setting the threshold for explanation and corrective actions to 1.1, instead of 1.0, would better serve as an early warning for deterioration in cost effectiveness. Staff appreciates this idea, but finds the Adaptive Management Process quarterly reporting activities to be more effective at flagging deterioration. Moreover, setting a threshold of 1.1 would be inconsistent with how the cost effectiveness of other system resources are evaluated.

PacifiCorp commented that transparency and visibility would also be additionally improved through reporting of benefit/cost ratios at the measure level, and through standardization of cost-effectiveness workbooks. Staff appreciates the suggestion for improved transparency and visibility and notes it may be impractical as a single annual performance measure since Energy Trust has approximately 125 individual measures. Instead, Energy Trust will continue to advance transparency and visibility of measure level information through publication of Measure Approval Documents (MADs) with benefit/cost ratios, and through additional engagement with utilities. Staff is interested in learning more about workbook standardization over time and possible pros and cons of setting standards for utility and Energy Trust cost effectiveness calculations.

2. **In the second measure, Staff proposes evolving reporting to an intentional assessment of progress to increase transparency. Staff proposes a third measure to report cumulative spending and savings covered under cost-**

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**effectiveness exceptions** to improve transparency and overall visibility into non-cost-effective expenditures.

5. Financial Integrity, Administrative Costs, Staffing Costs, Customer Satisfaction, NEEA and Market Transformation, Market Infrastructure Investments

For 2026, Staff proposes minor or no change to the following performance measures in Table 5.

**Table 5: Final Proposed Financial Integrity, Administrative Costs, Staffing Costs, Customer Satisfaction, NEEA and Market Transformation, Market Infrastructure Investments Measures**

Measure	2025 Measure	Proposed 2026 Measure
<b>Financial Integrity</b>	Receive unmodified opinion from independent audit.	No change.
<b>Administrative Costs (Program Delivery Efficiency)</b>		
1)	Administrative costs must be at or below 6.5 percent of expenditures.	Administrative costs must be at or below 6.5 percent of expenditures.  Track and share actuals in mid-year reports, and actual and forecasted results in annual reports.
2)	Report the year-over-year increase in administrative costs in comparison with the increase in expenditures.	No change.
<b>Staffing Costs</b>	Total staffing costs are limited to 9.5 percent of expenditures. Report on staffing needs and performance.	Total staffing costs are limited to 9.5 percent of expenditures. Report on staffing needs and performance.  Track and share actuals in mid-year reports, and actual and forecasted results in annual reports.

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Measure	2025 Measure	Proposed 2026 Measure
<b>Customer Satisfaction</b>		
1)	At least 85 percent of responding customers are satisfied or very satisfied with their overall experience.	No change.
2)	At least 85 percent of responding customers are satisfied or very satisfied with their interaction with program representatives.	No change.
<b>NEEA and Market Transformation</b>		
1)	Report annually savings and costs.	No changes.
2)	Report annually savings strategies.	
3)	Show Energy Trust direction to NEEA through committee membership.	
4)	Summarize annually Energy Trust direction to NEEA.	
5)	Summarize annually NEEA initiatives Energy Trust opts out of and why.	
<b>Market Infrastructure Investments</b>		
<b>1) Trade Ally Network</b>	Target: In comparison with 2024, increase the number and diversity (women- and minority-owned small businesses) of active trade allies, as well as the number of projects completed and savings.	Target: In comparison with 2025, increase the number and diversity (women- and minority-owned small businesses) of active trade allies, as well as the number of projects completed and savings.
<b>2) Workforce Development</b>	Report activities (including their location) and spending.  Explain how Energy Trust efforts have helped customers gain access to a broader and more diverse network of qualified contractors.	Report activities (including their location) and spending.  Explain how Energy Trust efforts have helped customers gain access to a broader and more diverse network of qualified contractors. Discuss efforts to engage with and complement other statewide workforce

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Measure	2025 Measure	Proposed 2026 Measure
		development efforts, such as those of the Oregon Clean Energy Workforce Coalition.

1. PGE and PacifiCorp commented that the Administrative and Staffing Cost measures fail to encourage productivity gains or gains from economies of scale. The Companies suggested performance measures for administrative costs, and staffing costs, per aMW acquired. Staff recognizes and agrees with encouraging economies of scale, and has articulated this goal in Staff Memos on prior Energy Trust budgets.<sup>35</sup> Staff will look forward to learning about future internal costs savings opportunities going forward from Energy Trust, and revisiting this in future performance measure discussions with utilities and stakeholders.

PGE and PacifiCorp also suggested comparisons of Administrative and Staffing Cost actuals versus forecasted for future targeting of cost per unit over the MYP. Staff notes that the draft Administrative and Staffing Cost measures already include tracking and sharing of actuals in mid-year reports, and actual and forecasted results in annual reports.

PUC Administrative Costs differ from Energy Trust Internal Costs category used in the MYP, which encompass a larger set of expenditures as outlined in the MYP.<sup>36</sup>

2. PGE and PacifiCorp noted that the Market Infrastructure measure on Workforce Development could be improved by expanding the narrative to discuss efforts to engage and complement other statewide workforce development efforts, such as those of the Oregon Clean Energy Workforce Coalition. The joint utilities noted this could demonstrate how Energy Trust activities do not compete with such efforts. Staff agrees with this suggestion and added direction to the narrative reporting.

<sup>35</sup> Special Public Meeting Energy Trust 2025 Budget and 2025-2030 Draft Strategic Plan Presentation, November 5, 2024, Staff Memo, [https://oregonpuc.granicus.com/MetaViewer.php?view\\_id=2&clip\\_id=1409&meta\\_id=40384](https://oregonpuc.granicus.com/MetaViewer.php?view_id=2&clip_id=1409&meta_id=40384). Special Public Meeting Energy Trust 2024-25 Budget and Action Plan, November 2, 2023, Staff Memo, [https://oregonpuc.granicus.com/MetaViewer.php?view\\_id=2&clip\\_id=1239&meta\\_id=37540](https://oregonpuc.granicus.com/MetaViewer.php?view_id=2&clip_id=1239&meta_id=37540).

<sup>36</sup> Internal costs represent 6.8 percent of Energy Trust's total expenditures during the MYP. PUC administrative costs are projected to be 6.0 percent of total PUC expenditures during the MYP. 2026-2030 Multiyear Plan, pages 55 and 57, <https://www.energytrust.org/wp-content/uploads/2025/12/Energy-Trust-2026-2030-Multiyear-Plan-with-financial-statements.pdf>.

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6. Adaptive Management Process and Utility Coordination

Staff proposes two new measures for 2026 related to the adaptive management process and utility collaboration, shown in Table 6 and discussed below.

**Table 6: Final Proposed Adaptive Management Process and Utility Collaboration Measures**

Measure	2025 Measure	Proposed 2026 Measure
<b>Adaptive Management Process</b>	Not applicable – new proposed 2026 measure.	Conduct quarterly review of actual and rolling six-quarter forecast, identify and communicate any off-track corrections of savings, generation, and expenditures—per the Adaptive Management Process—with work underway to implement corrective actions if exceeded. Meet with utilities quarterly to review. Track and share actuals in mid-year reports, and actual and forecasted longitudinal results in annual reports.
<b>Utility Collaboration</b>	Not applicable – new proposed 2026 measure.	Effectively collaborate with utilities to implement key activities including maintenance of Utility Specific Action Plans (USAPs) and posting updates to Docket No. ETO 1.  Report progress on key utility initiatives from USAPs.

1. **Staff proposes a measure to reinforce minimum performance expectations for implementation of the Adaptive Management Process.** These actions are already outlined and discussed in the MYP.<sup>37</sup> Examples include a quarterly rolling forecast and variance analysis, energy savings and expenditures timing curves, corrective actions, and reporting activities. Successful execution of the

<sup>37</sup> 2026-2030 Equity Plan, Section VII, page 71, <https://www.energytrust.org/wp-content/uploads/2025/12/2026-2030-Energy-Trust-Equity-Plan.pdf>.

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Adaptive Management Process will be critical to meeting MYP savings and generation targets within budget, course correcting if needed, and building trust.

PGE and PacifiCorp suggested specific additions to Adaptive Management Process actions to address off-track expenditures (“overspend” in the comments). These included reporting of drivers, incremental savings, and marginal cost, and benefit/cost ratios of incremental savings. Staff appreciates these suggestions and believes that the Adaptive Management Process should evaluate possible improvements after learnings from the first year of implementation. Staff thinks these additions should be reconsidered in 2027.

PGE asked how Staff perceives the relationship between OPUC performance measures for Energy Trust and the organization’s Adaptive Management Process. Staff understands the relationship is nested: the Adaptive Management Process and activities occur with more precise granularity and frequency than the higher level, annual performance measures. PGE also asked about the relationship of the Adaptive Management Process and Energy Trust annual reporting. Staff confirms that mid-year and annual reporting will continue.

- 2. Staff proposes a second measure to highlight expectations for working with utilities.** Energy Trust has developed Utility Specific Action Plans (USAPs) with each utility, and Staff highlights the need for effective and ongoing collaboration with utilities while implementing these. This will help maximize the value of ratepayer funding through coordination and co-deployment of utility programs such as demand response, battery storage, and targeted-load management.

Using the earlier example of battery storage installations and customer enrollment in utility programs, Staff believes collaboration could involve helping battery incentive recipients understand the possible benefits (customer incentives and value to the grid) of enrolling in a utility program, or providing market insight and research into the overall battery storage market. PGE and PacifiCorp suggested an example of surveying customers about what influences their decisions to enroll in utility programs.

Avista Utilities commented that USAPs should include greater detail for the process of vetting megaprojects and opportunistic savings in order to ensure transparency of process and alignment of budgets over the multi-year plan. Staff

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understands that substantial Energy Trust process already exists, albeit informally. This may include technical studies leading to a range of savings/costs opportunities; meetings to firm up customer interest; and discussions with utilities to decide whether to move forward. Staff agrees with the comment, and requests that Energy Trust formalize the process for vetting megaprojects and opportunistic savings, and review the process with utilities at quarterly meetings in 2026. Staff notes the process could then be added to the Adaptive Management Process, or possibly USAPs as suggested.

*Additional Stakeholder Feedback*

Avista Utilities commented that filing Energy Trust mid-year and annual reports in Docket No. UM 1158 would create greater visibility of performance for stakeholders to provide comments and input for the upcoming year's measures. Staff agrees and will facilitate posting these reports to the dockets.

The Joint Advocates suggested 2026 performance measures should include measure-level reporting for those delivering top savings, with special interest in measure-level reporting on heat pump and furnace adoption. Staff does not believe this is appropriate for inclusion in a performance measure but sees the value of this reporting. Staff requests Energy Trust include lists of "top 5" electricity and gas savings measures in annual reports.

The Joint Advocates commented that performance measures should track and report on electric measures replacing gas equipment as available, by utility, including a variety of heat pump installations. These range from heat pumps replacing gas furnaces or those installed alongside gas furnaces to provide cooling and supplemental heating. Additional configurations noted include heat pumps installed alongside gas furnaces to provide only cooling, those replacing electric resistance heating, and gas furnaces installed replacing electric resistance or other electric heating.

Energy Trust does not offer efficiency measures applicable to the second and third examples, but does offer efficiency measures for heat pumps replacing gas furnaces, those replacing electric resistance heating, and gas furnaces installed replacing electric resistance or other electric heating. Staff appreciates stakeholder interest and while we feel it is too granular for annual performance measures, Staff requests Energy Trust work with the Conservation Advisory Council to share available data on the measures offered and make it publicly available.

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Conclusion

Energy efficiency continues to be a core, least-regrets resource for meeting least-cost, least-risk customer needs and making continual progress on State clean energy and affordability goals. Further progress in Docket No. AR 676, Rulemaking to Establish Multi-Year Rate Plan Framework, will inform PUC review of Energy Trust's performance under the Agreement. Stakeholder engagement is important to help Staff in supporting the Commission's review of Energy Trust's performance, and to help optimize Energy Trust performance under the Agreement during this critical time.

Staff thanks utilities and stakeholders for their valuable time engaging in this docket and submitting comments. Staff's proposed 2026 performance measures cover key aspects of Energy Trust operations under the Agreement, begin to adapt measures to multiyear outcomes, and represent minimum performance expectations.

**PROPOSED COMMISSION MOTION:**

Adopt Staff's proposed performance measures for evaluating the performance of Energy Trust of Oregon in 2026.

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