

August 4, 2026

Public Utility Commission of Oregon
201 High St. SE, Suite 100
Salem, Oregon 97301-3398

RE: AR 676 Informal Phase - Energy Advocates' Feedback on Staff's Draft Phase 2 Workplan

On behalf of Climate Solutions, NW Energy Coalition, Oregon Citizens' Utility Board, the Oregon Solar + Storage Industries Association (OSSIA), and Oregon Just Transition Alliance (collectively, the "Energy Advocates"), we submit these comments in response to Staff's Draft Phase 2 Workplan and July 29th Kick-Off Workshop.

- **Tracks:** We appreciate Staff organizing the work streams of Phase 2 into three tracks and identifying the topics to be discussed in workshops. We are hopeful that this will help advocates to follow and engage in this phase of the work.
- **Information in advance of workshops:** There was a great deal of conversation at the kickoff meeting about what should be shared in advance of workshops and a desire to have something to start from and respond to. While we agree that it is helpful to have shared information for stakeholders to digest before workshops and guide discussion, we do not think it's necessary for Staff to share a straw proposal in advance of each workshop. In Phase 1, we appreciated that Staff took the time to first educate and lay out options (the place we start from and respond to), and then solicit input from all stakeholders in order to later make their informed recommendations to the Commission as strong as possible. Staff's approach in Phase 1 has value from a procedural equity perspective, as it supported capacity building efforts that better allowed stakeholders to analyze straw proposals by the time that Staff issued those.
 - Instead of starting with proposals, **we support continuing the types of pre-reads that were used in Phase 1**, which helped stakeholders not only come to workshops with some shared understanding of the topics to be discussed, but gave us something to start from and respond to. Starting with pre-reads provides foundational information on the topic at hand for the workshop, information about national best practices, and lessons learned from other jurisdictions.
- **Utility-Led Proposals:** In response to being asked to offer straw proposals ahead of workshops by utilities, Staff asked utilities whether they were interested or able to proactively share ideas on the topics outlined for Phase 2. This is understandable because usually Staff are making proposals in response to stakeholder engagement. We believe Staff's draft workplan offers various opportunities for utilities to share their ideas as part of their feedback and engagement in the process. We are hesitant to be in a position where Staff and other stakeholders are responding to utility-driven proposals and prefer

that Staff continue to drive this process. This is in alignment with the intentions of the FAIR Energy Act.

- **Starting Place:** Staff led a robust Phase 1 process that has given us a strong foundation for Phase 2. We are committed to advancing the framework the Commission landed on in Phase 1 – specifically, an index-based mechanism that can meaningfully drive cost containment outcomes. During the 7/28 workshop, however, we heard some interest from utility representatives in seeing a variety of costs be utility-forecasted rather than index-based. We have some concerns about this line of thinking, and we hope that Staff will be judicious in their consideration of suggestions by utilities to veer from a stringent index-based formula – avoiding exceptions unless absolutely necessary.

Thank you for the opportunity to share this feedback, we look forward to continuing to engage in this process.

Respectfully submitted this 4th day of August 2026,

/s/ Claire Prihoda
Climate Solutions

/s/ Charlee Thompson
NW Energy Coalition

/s/ Sarah Wochele
Oregon Citizens' Utility Board

/s/ Alyssa Forest
Oregon Solar + Storage Industries Association

/s/ Jamie Pang
Oregon Just Transition Alliance