



2705 E Burnside St Suite 112,
Portland, OR 97214

Tele 503.284.6827
Fax 503.284.9403
www.communityenergyproject.org
Tax ID# 94-3040817

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**RE: Comments on ADV 1365 – Portland General Electric Company’s Advice No. 22-01
Income Qualified Bill Discount**

Dear PUC Commissioners and Staff,

Community Energy Project (CEP) and the undersigned advocates submit the following comments regarding Portland General Electric (PGE) Company’s Advice No. 22-01, Income Qualified Bill Discount under Docket No. ADV 1365.

We appreciated PGE’s proactive and thoughtful approach in drafting their Income Qualified Bill Discount Program. We hope PGE’s approach will set a precedent for other utilities in their rate design process to help reduce energy burden for low-income and underserved customers.

We start by commending PGE for their active engagement with, and funding for, stakeholders throughout the design process, as well as for its plans to maintain stakeholder engagement through the launch of their program. Importantly, stakeholders generally experienced PGE’s engagement process as a genuine effort to seek feedback and shape the program accordingly. Through the process, PGE modified important program characteristics based on stakeholder feedback by, for example, increasing discount levels, adapting income thresholds to cover all minimum-wage earners, and bumping those with medical certificates to the next discount level. As other utilities look to PGE’s model, we encourage similar openness to meaningfully including stakeholder feedback. Otherwise, stakeholder engagement can feel more of a “check the box” exercise.

We are pleased to see PGE’s simplified intake process through incorporating self-verification of income. The income verification process can often be burdensome and systematically exclude significant numbers of eligible individuals in frontline communities needing assistance. By having a simple self-verification process that is accessible online, by phone, or mail, PGE’s eligibility and enrollment process is more equitable, more respectful to clients, and more cost-effective. PGE has also expressed during stakeholder meetings that enrolling in the program would be a no-risk venture for low-income customers—meaning customers would not have to pay back discounts if they were for some reason to unenroll from the program. We support that approach.

PGE has also put forward a thoughtful and thorough outreach plan that considers digital and language barriers. PGE will be presenting their more detailed outreach plan to stakeholders on March 17. We look forward to working with them in further collaboration in the creation of a truly successful outreach campaign.

Overall, PGE has been proactive and ambitious with the launch of a pilot program in a timely way. PGE has stepped out of their comfort zone by seriously considering stakeholder recommendations such as auto-enrollment. We encourage PGE to continue its innovative and proactive approach to implementing this crucial program through its approach to auto-enrollment. Consistent with its responsiveness to stakeholder feedback, PGE is considering how to reduce barriers to access to its discount program by adopting auto-enrollment of those receiving other kinds of assistance. We understand that PGE is trying to identify a mechanism to auto-enroll energy assistance (EA) recipients in the right discount tier, and we support this effort. Should this mechanism not be ready by program launch, we encourage PGE to enroll EA recipients in the program at the discount level that matches EA guidelines. PGE will already have information of what PGE customers have received EA. PGE could then move those customers into a higher discount tier as PGE learns more about their income either from the customer or from other entities like Oregon Housing and Community Services (OHCS).

We look forward to working with PGE to creatively solve some of the issues not yet worked out. For instance, there are still concerns that stakeholders share around post-enrollment verification and the need for in-depth conversation around capturing demographics. PGE plans to require post-enrollment verification of need from a randomly selected 3% of the customers enrolled in the program. We want to make sure that PGE adopts an approach to income verification that recognizes that not all customers who are low-income can provide the necessary documentation due to some of the following reasons:

- Not have access to the paperwork required
- Have no income at all, or cannot prove income
- Work seasonally - if one makes most of their annual income within a few months, they may be eligible or ineligible depending on when verification occurs
- Have language barriers
- Have low literacy
- Be navigating the immigration process
- Be current victims of domestic violence
- Have special needs but not have an advocate to help them in the process.

PGE has stated they are open to pre-qualifying certain customers, such as customers on a fixed income, so that they would not have to be a part of the post enrollment verification process. We want to hold PGE accountable to further discussion around this issue. It is important to ensure that customers whose income is unlikely to change do not have to go through the logistical burden of income verification, and the associated risk of qualified people being disenrolled from the program. As a result, we recommend that PGE's program includes a mechanism to identify those customers and exclude them from post-enrollment income verification.

Lastly, we would also like PGE to explore the need for in-depth conversation around capturing demographics at enrollment. PGE has expressed that they do not want people to feel as if they have to share their demographic information to qualify and receive benefits, so they plan to only

ask for demographic information in optional follow-up surveys. There will likely be inherent bias in the outcomes of information if only follow-up surveys are utilized in ways we do not yet understand. We would like to recommend the gathering of demographic data at enrollment in order to be sure that we are reaching our most vulnerable communities. Considering that the first year is being treated in some ways as a pilot, if gathering this data creates a barrier as PGE fears, this can be something revisited later.

Sincerely,

Alma Pinto, Climate Justice Associate
Sherrie Villmark, Program Director
Community Energy Project

Jeff Bissonnette, Consultant
Marli Klass, Energy and Environmental Justice Policy Associate
NW Energy Coalition

Silvia Tanner, Senior Energy Policy and Legal Analyst
Multnomah County Office of Sustainability