



# Oregon Citizens' Utility Board

610 SW Broadway, Suite 400  
Portland, OR 97205

(503) 227-1984  
[www.oregoncub.org](http://www.oregoncub.org)

March 10, 2022

Public Utility Commission  
Attn: Filing Center  
P.O. Box 1088  
Salem, OR 97308-1088

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

The Oregon Citizens’ Utility Board (CUB) appreciates the opportunity to comment on PGE’s interim bill discount to income-qualified residential customers. One of the main purposes of the Energy Affordability Act (HB 2475) is to provide low-income residential customers relief from their disparate energy burden by acknowledging income within the context of rate design (e.g., discount for customers with low incomes). CUB wants to emphasize the importance of continuing to investigate a range of options for ratemaking, including but not limited to percent of income payment plans, discount programs, and other approaches to reduce energy burden, while the longer-term investigation into statewide bill affordability and energy burden is ongoing. CUB appreciates that PGE is committed to assessing program functionality and customer impacts during this interim phase. These analyses are critical to informing the longer-term program, which may diverge from the interim program.

CUB appreciates the Oregon Public Utility Commission (PUC) Staff’s synthesis of feedback received and is in general agreement with their baseline evaluation criteria for interim action. We have provided our comments on PGE’s interim proposal by those categories.

### **Eligibility**

CUB recognizes and appreciates the efforts PGE has taken to address eligibility for their interim program and would encourage PGE to continue to strive to make enrollment as accessible as possible for low-income customers. We believe self-verification of income at enrollment is a critical component of early enrollment in the interim program. CUB encourages PGE to continue to be innovative in finding ways for customers to access their interim program, including offering the option for community-based organizations (CBOs) or public benefits programs to submit eligible customers to the utility. Their assistance could be a critical component of enrolling low-income customers who are least likely to access the program due to language barriers, ability, or other lack of capacity.

CUB also believes auto-enrollment is a critical component of the differentiated rate program, particularly in the interim, as this increases the ease of accessibility for low-income customers and provides immediate assistance to those who really need the help. CUB believes an equitable utility low-income assistance program prioritizes getting the benefits to the customers that are most in need of energy assistance (EA). It is our preference that PGE establishes auto-enrollment by income

tier for the interim program; if that is not possible to achieve by the interim program start date, PGE should establish auto-enrollment for energy assistance recipients at the discount levels that match the EA guidelines and move those customers to their appropriate discount tier at a later date.

CUB encourages PGE to continue to consider the barriers that exist for customers that receive housing voucher assistance or who live in buildings where utilities are incorporated into their monthly costs. We believe CBOs and public benefits programs will be helpful in assisting customers with these types of barriers.

CUB is interested in continuing conversations about income verification processes. While we see the value of waiting for a decision on income-verification until PGE's interim income-qualified program is finalized, if post-enrollment verification is necessary, CUB echoes stakeholder comments that PGE's approach to income-verification recognizes that not all customers who are low-income can provide the necessary documentation. CUB appreciates that PGE commented in a workshop that they are open to considering pre-qualifying certain customers, such as those on fixed income programs such as Social Security. CUB also would like the utility to consider the possibility of CBOs or public benefits programs to pre-qualifying residential customers by verifying income on behalf of the customer. CUB encourages PGE to continue to examine ways to streamline eligibility and ease of enrollment.

### **Level of Relief**

CUB would also like to highlight that, as the focus of these programs should be getting assistance to customers shouldering greater energy burdens, the interim plans should not set a precedent for what the long-term programs will look like. CUB would like to continue consideration of other means of providing equitable relief to low-income residential customers, including evaluating discounts as a percentage of household income. Ohio has implemented a Percent of Income Payment Plan (PIPP) that provides discounts based on a household's monthly income. The program leads to greater discounts proportional to a customer's income. CUB also encourages PGE to consider expanding their eligibility criteria to include customers up to 300% of the Federal Poverty Level. This criterion may better encompass customers living in the Portland Metro area with higher costs of living that maybe less likely to qualify for the current eligibility requirements.

### **Tracking and Accountability**

CUB believes collecting optional data on customers enrollment demographics may be important to strengthening the permanent low-income discount program. It will allow PGE to better understand who is accessing the differentiated rates, which in turn can inform PGE's outreach efforts to better ensure that those with the lowest incomes are accessing the program. This data can inform PGE's ongoing outreach plan to reach those that may not be represented well in the demographic data. CUB encourages PGE to look at collecting demographics at different stages in the program process, including but not limited to at sign up, three-, six-, and twelve-month surveys as recommended by PUC staff, and re-enrollment. It could be helpful to ask customers where they heard about the program and who aided them in enrollment, perhaps by allowing the option to select multiple CBOs, programs, or agencies identified throughout the stakeholder process as well as an "other" option for customers to choose. In order to help alleviate barriers to participation in the surveys, the questions could be prefaced with a statement assuring customers that the questions are for informational purposes to help PGE reach more customers in need.

## **Bundling**

CUB appreciates PGE's commitment to the partnership and referral approach to Community Action Program weatherization services, state and federal EA, and other cost-free benefits (such as SNAP or TANF). CUB encourages PGE to share information with EA partners about the program and seek their advice on how PGE can build an auto-enrollment program that is easy for them to utilize and addresses any potential barriers. This information sharing should also allow for partners to be trained on any new processes that will allow them to help bring customers into the program.

## **Outreach and Engagement**

As stated earlier, CUB encourages PGE to use demographic data to inform and narrowly tailor ongoing outreach and engagement efforts. We encourage PGE to connect with other public benefit programs, low-income housing programs, food banks, school lunch programs to assist with outreach to and enrollment of residential customers.

This interim effort is a good start to getting to the intent of HB 2475's efforts to meaningfully alleviate the disparate energy burden placed on low-income customers in the immediate future. It is important to remember that the investigation is ongoing, and this interim program does not set a precedent for the final Income-Qualified Bill Discount program. The information gathered from the interim program, ongoing stakeholder input, and further research will assist the investigation in crafting a final plan that uses best practices towards equitable reduction of the energy burden currently experienced by low-income residential customers. CUB appreciates the interim program that PGE has laid out, and hopes that the utility will continue to push themselves as they develop a long-term program that fully encompasses the needs of lowest-income customers and provides them with the highest level of benefit. CUB thanks PUC Staff for its guidance in developing these innovative and important programs.

Respectfully submitted,

*/s/Jennifer Hill-Hart*

Jennifer Hill-Hart  
Policy Manager  
Oregon Citizens' Utility Board  
610 SW Broadway, Ste. 400  
Portland, OR 97205  
T. 503.227.1984  
E. [jennifer@oregoncub.org](mailto:jennifer@oregoncub.org)

*/s/ Kate Ayres*

Kate Ayres  
Policy Advocate  
Oregon Citizens' Utility Board  
610 SW Broadway, Ste. 400  
Portland, OR 97205  
T. 503.227.1984  
E. [kate@oregoncub.org](mailto:kate@oregoncub.org)