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March 14, 2022

RE: UM 2211/ADV 1373 - Current NW Natural Residential AMP Expansion Proposal

Dear PUC Commissioners and Staff,

Due to the short turn-around comment period, Community Energy Project (CEP) and the Multnomah County Office of Sustainability submit the following comments regarding the current NW Natural Residential AMP Expansion Proposal (UM 2211/ADV 1373) in bullet point format. We may submit expanded comments by Friday, March 18. We recommend the following design changes:

Stakeholder engagement:

- NW Natural and all utilities should hold more robust stakeholder processes with multiple channels for engagement. This is especially important when seeking feedback from stakeholders focused on environmental justice and low-income issues because we are asked to be in many places and processes and often have one limited staff to do so.
- Arrears management programs originated from a shared desire to help customers dealing with the impacts of the COVID-19 pandemic and related economic downturn. Stakeholders in the UM 2211 service list received an email about NW Natural's filings 13 days before the utility filed this document. We appreciate the utility's desire to move quickly in anticipation of exhausting its approved AMP funds, but even additional opportunities for engagement would provide time for more thoughtful feedback. Since we often work on a coalition model, we need more time for questions, signatures, the vetting process, etc. It is important for utilities and Staff to account for that need in designing their engagement processes.
- The utility says it is "in the process of developing a low-income bill discount program that is estimated to be filed in 2022 with the program in place for the next heating season." We appreciate NW Natural's plans to develop an interim low-income bill discount program in time for the next heating season. We ask that this ongoing process to develop a low-income bill discount program engages stakeholders early and often.

General feedback on arrears management programs:

- The coalition of advocates that have worked on UM 2114 and other issues that impact low-income and environmental justice communities have historically supported expanding AMP in recognition of the ongoing nature of COVID-19 and related crises.

- We have concerns about the focus on match programs, and how customers who can pay can access more funds compared to customers who cannot pay a match. This puts customers with balances higher than \$300 and more dire financial circumstances at an additional disadvantage. The low-income focused instant grant could offset that concern, but not as currently designed.

Low-income instant grant option:

- We support creation of the instant grant option as well as NW Natural's plans to allocate a portion of the \$3.1 million exclusively for low-income customers. We also support automatically applying these grants to customers who have received energy assistance since January 1, 2019.
- We ask that tariff language allows enrollees to self-certify that they are low income so that they are able to receive access to the \$1200 grant instead of being limited to the \$300 grant (or to having to disclose details about their crisis to show that they meet the \$1000 crisis grant threshold). This would ensure that any past or present recipients of energy assistance since 2019, those who are auto enrolled, and those who self-certify will have access to the necessary assistance.
- Restricting the grants to people who have qualified for NW Natural's program is concerning for various reasons:
 - It would likely exclude many people who need and qualify for that aid. At a state level, we have heard from Oregon Housing and Community Services (OHCS) that only about 20% of people who qualify for energy assistance do obtain it. Even if NW Natural's customers receive assistance at a higher level, that level is unlikely to be 100% of eligible recipients.
 - Many qualifying customers must choose between electric utility assistance and gas utility assistance, and will choose electricity.
 - Undocumented customers are likely underrepresented in the pool of prior recipients of energy assistance from NW Natural. The utility addressed likely barriers of access to undocumented customers needing energy assistance only last year. As a result, we expect that the pool of prior energy assistance recipients from NW Natural does not accurately represent undocumented customers in need of energy assistance.

Sincerely,

Alma Pinto, Climate Justice Associate
Community Energy Project

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