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October 29, 2020

Megan Walseth Decker, Chair
Letha Tawney, Commissioner
Mark Thompson, Commissioner

VIA EMAIL: Comments regarding Distribution System Planning Guidelines in Docket No. UM 2005

Dear Commissioners,

Community Energy Project (CEP) is a Portland-based nonprofit that has been serving frontline communities for over 40 years. We work with over 1,500 low-income households annually around energy conservation and safety, and we are the Low-Income Facilitator for the Oregon Community Solar Program.

We start with our appreciation for the opportunity to comment on the draft DSP Guidelines. As a new agency to this topic, we found the workshops this spring and summer to be of great value. Additionally, we'd like to recognize the Staff's organization and helpfulness during the process. We also want to recognize that the draft guidelines were written in a clear manner that helped to educate us on the anticipated processes over the next few years.

Since many of the technical aspects of the draft guidelines are in areas that CEP has less expertise, we will leave commenting on those areas to other stakeholders. CEP will focus our comments on issues related to community engagement.

Guiding Goals and Principles

CEP is very encouraged to see the long-term goal of "Be customer-focused and promote inclusion of underserved populations, including frontline, environmental justice communities;" We also support the guiding principles.

3.4 Community Engagement Plan

CEP is excited to see this section and encouraged by the recommendations that utilities work with CBOs directly to create a human centered approach to engagement. With that approach in mind, we do encourage utilities to think more creatively about how this work is conducted. It will take time to build trust and foster solid relationships to truly co-create in this space.



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Within this context, we have the following specific comments:

- We question why there are only two workshops required for Stage 1. We question how you can have robust engagement and co-creation of plans in two meetings. While we recognize time constraints for plan development, two workshops does not create much opportunity for real work. We worry that this will result in large meetings where plans are presented, while leaving little space to truly understand the content or make any changes.
- We encourage the utilities to connect early with CBOs to creatively draft their engagement plans and to execute the plans. CBO's time and expertise should be fairly compensated.
- We support the Commission's plan to create educational materials for DSP. We suggest you work with CBOs that have expertise not just in the subject matter, but also in how to develop community education materials that are accessible to wide audiences and easily translatable into multiple languages. As with other areas, the CBOs should be financially compensated for their time and expertise.
- Lastly, we join the NWECA in asking that the PUC more clearly offer guidelines to ensure that community engagement plans outline how utilities will engage target communities well before final decisions about project locations or specifics are made.

Again, we are very excited to see the framing and approach to community engagement in these guidelines. The overall process is heading in a positive direction, and we look forward to continued involvement as the DSP plans are drafted and implemented.

Sincerely,
Charity Fain
Executive Director
Community Energy Project