



2705 E Burnside St Suite 112,
Portland, OR 97214

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

May 27, 2022

**RE: UM 2211 – Implementation of House Bill 2475
Advocates' Comments on PacifiCorp Bill Discount Program Proposal**

Dear PUC Commissioners and Staff,

Community Energy Project (CEP) and the undersigned advocates submit the following comments regarding PacifiCorp Bill Discount Proposal under Docket No. ADV 1390. PacifiCorp has stated they acknowledge that this is an interim program and are willing to make changes when looking towards their permanent program. We appreciate the opportunity to comment on PacifiCorp' bill discount proposal pre-filing as presented on May 10, 2022.

Program Eligibility/Enrollment

We commend PacifiCorp for incorporating auto-enrollment and self-verification in the program. That said, we encourage PacifiCorp to incorporate an online tool that allows community-based organizations and community action agencies (CAA) to enroll their clients directly, as well as provide funding as needed for these organizations due to the added time-commitment. We believe that this process would maximize enrollment from low-income customers that are more likely to enroll with agencies they already have an established relationship with, as well as from customers that programs often historically struggled to enroll, such as non-English speakers, some immigrant communities, and the elderly.

We are pleased to see PacifiCorp'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, PacifiCorp's eligibility and enrollment process is more equitable, more respectful to clients, and more cost-effective than requiring income verification. We would also like PacifiCorp to ensure 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.

Post-enrollment Verification

PacifiCorp 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 PacifiCorp 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.

We request that PacifiCorp address at a future workshop how its post-enrollment verification process would recognize these barriers to income verification.

We would also like PacifiCorp to adopt a pre-qualifying process for 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. 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 being disenrolled from the program. As a result, we recommend that PacifiCorp' program includes a mechanism to identify those customers and exclude them from post-enrollment income verification.

Level of Relief

PacifiCorp plans to offer a single tier discount of 25% to households with incomes up to 60% of Oregon's State Median Income (SMI), adjusted for household size. This approach is a good first step in providing meaningful reduction in energy burden, but we believe that PacifiCorp could do more to address the significant energy burden extremely low-income customers face. This could be done by offering one or two additional tiers with steeper discounts, available to those at 10-25% SMI. Without data, it is difficult to suggest the discount amount for any additional tiers, but we hope to see PacifiCorp release more data explaining how various discount levels provide meaningful impact to households with different SMI levels, especially customers with the highest energy burden. We would also like PacifiCorp to expand eligibility requirements to include minimum wage earners in Portland working 40 hours a week (above 60% SMI).

Capping SMI requirements at 60% is problematic as many of Oregon's BIPOC communities reside in the Portland area where the minimum wage is higher due to the higher cost of living in the region. We understand that the Company is open to this change and are grateful for their willingness to engage on this issue.

It is important to highlight that PacifiCorp is proposing to increase residential bill rates by 14% in their current general rate case. The current bill discount program proposed by PacifiCorp does not address the additional burden that customers would have to face with these substantial rate increases. Given these rate increases, PacifiCorp must offer steeper discounts to offset the additional energy burden on low-income customers. Without steeper discounts, in addition to including more tiers, PacifiCorp will fail to fulfill the goals laid out by PUC staff's baseline evaluation criteria to prioritize low-income customers with the highest energy burden.¹

We would also like PacifiCorp to address in their bill discount program how they plan to approach low-income customers that are struggling to repay their arrears. Will customers struggling in arrears still be able to sign up? If so, how will enrollment work? Will low-income customers struggling to pay off their arrears receive greater discounts to appropriately address the significant energy burden they face?

Furthermore, although a percentage based tier discount approach to addressing energy burden is a great first step, we would like to see PacifiCorp and PUC staff continue to explore sustainable solutions around this issue. By only providing a percentage reduction on bills, low-income customers will continue to remain vulnerable to future rate increases.

Outreach and Communication

PacifiCorp has stated that they will seek stakeholder engagement through its Community Equity and Advisory Group (CEAG). We are glad to see PacifiCorp forming this group. We hope that PacifiCorp will consider having CEAG meetings open to the public for further transparency and for creating a space for richer participation. We would also like to hear from PacifiCorp on how they plan to incorporate feedback from the CEAG in HB 2475 and in the utility's other processes. If feedback from the CEAG is not seriously considered, it runs the risk of falling under the category of being a "check the box" exercise for community engagement. We also would like for PacifiCorp to continue considering feedback from community-based organizations outside of the CEAG after it is launched.

¹ [https://edocs.puc.state.or.us/efdocs/HAH/um2211hah114912.pdf](https://edocs.puc.state.or.us/efddocs/HAH/um2211hah114912.pdf)

We urge PacifiCorp to conduct customer surveys at enrollment, rather than after, for robust information. It would also make the survey accessible for customers without emails or access to the internet. Furthermore, the surveys should be offered in multiple languages to ensure that demographic information can be collected from as many customers as possible. Capturing data following enrollment is crucial in helping us understand how this bill discount program is positively or negatively impacting, or failing to impact, energy burdened customers. We cannot address issues that we cannot measure. Therefore, we would like the survey that PacifiCorp administers to include questions on energy affordability and demographics to ensure that PacifiCorp is meeting equity goals. In the drafting of these surveys, we ask PacifiCorp to be mindful of the time-burden on customers, and to collaborate with their CEAG, in addition to other community-based organizations that have experience conducting similar surveys. We also ask PacifiCorp to provide the adequate equity training for call centers that would be conducting the surveys during enrollment.

Timeline

PacifiCorp plans to file their interim program plan sometime in June 2022 so that the program can be effective by August 1, 2022. We commend PacifiCorp for planning to roll out the program before the heating season. Given the short timeline, however, we hope PacifiCorp is able to incorporate stakeholder feedback before filing in June. If not, we hope that PacifiCorp is open to extending their timeline if needed.

Conclusion

Overall, we appreciate the effort put forward by PacifiCorp in drafting their interim bill discount program. We hope that PacifiCorp continues to engage with stakeholders to ensure that low-income customers with the highest energy burden are provided adequate relief.

Sincerely,

Alma Pinto, Climate Justice Associate

Community Energy Project

Alessandra de la Torre, Advocacy & Programs Director

Rogue Climate

Isaiah Kamrar, Program Manager

African American Alliance for Homeownership

Marli Klass
NW Energy Coalition