



**Portland General Electric**

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January 11, 2022

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High Street, S.E.  
P.O. Box 1088  
Salem, OR 97308-1088

**RE: UM 2211, Comments on HB 2475 Implementation of Differential Rates and Programs in Oregon**

Portland General Electric Company (PGE) offers the following comments in response to the "Strategy Update and Interim Action Straw Proposal" (Proposal) submitted by Public Utility Commission of Oregon (OPUC) Staff in Docket No. UM 2211 on December 22, 2021. PGE appreciates the opportunity to share thoughts and considerations on proposed evaluation criteria for interim rates or programs.

**1. Self-certification and auto-enrollment**

In line with Staff's proposal, PGE's interim program design incorporates an enrollment process where customers self-certify their household size and annual income. PGE estimates that the benefits of low-barrier, efficient access to enrollment outweigh the potential for some overstatement of eligibility. PGE's proposal borrows from California's CARE structure by including a verification of need assessment on 3% of participants annually and would propose adjustments to enrollment procedures, if necessary.

Auto-enrollment of OEAP participants, while financially beneficial to customers, removes the element of customer choice. For some customers, automatic placement on an income-based offering will be perceived as an overreach of the utility. Placement into a specific discount tier requires that Community Action Partners (CAP) agencies share not only general eligibility information with the utility but detailed income information as well.

To the extent that NW Natural's interim proposal aligns with PGE's eligibility criteria, PGE suggests coordinating with its partner utility to help joint customers leverage both utilities' discounts.

**2. Income-based eligibility and alleviating energy burden**

PGE supports Staff's recommendation for income-tiered, percent-of-bill discounts as a sound proxy for targeted reductions in energy burden, especially when attempting to deliver programs at scale. This tiered structure enables increased discount levels for lower income households. It also provides larger discount amounts to those with larger bills within a given income tier, presumably to those with higher energy burdens.

Targeting an energy burden of 6% or lower for individual customers and allocating benefits only those customers currently above that threshold is a high bar for an easily accessible, wide-reaching program. Highly customized discounts are administratively costly to utilities

and potentially burdensome for customers, requiring customer-specific discount values that fluctuate over time.

### **3. Data collection and reporting**

PGE recognizes the importance of data-driven impact assessments and intends to report on key metrics measuring program costs and customer impacts. Useful metrics that PGE can readily provide include assistance dollars, bill and payment amounts, arrearage data, and certain demographic statistics (housing type, household size and income, preferred language, and Medical Certificate status).

### **4. Bundling with energy efficiency services and other energy assistance**

PGE concurs with Staff's recommendation that discount programs refer participants to no-cost weatherization services through OCHS and CAP agencies, and OEAP/LIHEAP funds. PGE does not recommend that such services be a requirement of ongoing participation. Many customers who will be eligible for bill discount programs do not own their own home and may not be able to implement weatherization benefits. Furthermore, weatherization services can take many months due to application backlogs among CAP agencies.

Regarding referrals to the Energy Trust of Oregon (ETO), PGE suggests not prioritizing this benefit source given the up-front costs required from customers. As ETO develops a no-cost offering specific for this population, PGE supports bundling it with other assistance referrals.

### **5. Outreach and surveys**

PGE supports Staff's criteria for outreach and engagement related to program development and recognizes that program success in this area heavily depends on partnerships with CAP agencies and other community partners. PGE recommends frequent discussions with partners during the initial program year to discuss enrollment, catch unforeseen issues quickly, and maximize outreach efforts.

Regarding Staff's proposal to survey CAP agencies and participants at 3 and 6 months of implementation, PGE views agency surveys as somewhat redundant on top of monthly meetings. For customer feedback, there is concern that the 3-month milestone may be too early to gather meaningful data. PGE proposes a survey of participants after 6 months, when more customers will have had a few months of program exposure on which respond.

PGE is grateful for the opportunity to comment on Staff's interim program evaluation criteria and participate in this ongoing effort with stakeholders, utilities and OPUC Staff to bring about needed relief to burdened customers.

Sincerely,

*\s\ Robert Macfarlane*

Robert Macfarlane  
Manager, Pricing and Tariffs