



Oregon Citizens' Utility Board

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Public Utility Commission
Attn: Filing Center
P.O. Box 1088
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Via Email

Re: UM 2225 - Comments on Staff's Roadmap Acknowledgement and Community Lens Straw Proposals

The Oregon Citizens' Utility Board (CUB) appreciates the opportunity to comment on the Oregon Public Utility Commission's Staff's (Staff) Clean Energy Plan (CEP) **Roadmap Acknowledgement and Community Lens Straw Proposal** (Straw Proposal). CUB is grateful for the hard work and time that Staff has put into the UM 2225 investigation process, including workshops, questionnaires, and straw proposals. We also appreciate the engagement and input from other stakeholders and the utilities. CUB is largely in support of Staff's Straw Proposal and offers some comments for Staff's consideration. CUB continues to defer to the guidance of communities and community advocacy groups on how utilities should engage with communities. CUB supports the comments submitted by the Energy Advocates and add a few additional comments below.

Chapter 1 - Roadmap Acknowledgement Straw Proposal

CUB is in general agreement with Chapter 1 of Staff's Straw Proposal. Regarding Topic 8, Annual Update, CUB requests clarity on how the Commission expects to address utility requests for waiver of IRP updates. If utilities request IRP waivers and the Commission chooses to grant them, CUB suggests that utilities not be permitted to waive the update on CEP goal performance.

Chapter 2 - Community Lens Straw Proposal

CUB offers a general comment and a few topic-specific comments we hope add to the robustness of this chapter.

Staff may want to consider making specific guidance in its Community Lens Straw Proposal in line with the "Stakeholder CBI Proposal" included in the Straw Proposal as Attachment A. It is important that each utility meaningfully engages with Tribal communities within the utility's service territory or if outside the service territory, within its right-of-way for generation and transmission assets. Accordingly, these efforts should be documented in the CEP wherever the utility reports on its community engagement actions.

Topic 1 - Community Lens Acquisition Targets

CUB would like to see Commission guidance on whether the resiliency projects and community-based renewable energy projects (CBREs) will be considered as competing with other supply side resources or incorporated into load. Will communities and community groups be involved in this determination? Will it be left up to the utility? CUB would like to see modeling for both scenarios and utility justification for why it is considering the resource as one or the other.

Topic 3 - Community Benefits Indicators

CUB believes it is important for the utility to be as transparent and inclusive as possible with communities when developing and determining community benefits indicators (CBIs). The CBIs also should include qualitative indicators that are informed by the community in identifying the indicator and qualitative measurement scales.

Topic 5 - Resiliency-specific guidance

CUB appreciates that Staff's proposal reiterates the importance of meaningful community engagement in resilience analyses, including long term resiliency forecasts. CUB also appreciates that Staff's proposal states that utilities should consider the location-and-population risks specific to the different communities in resiliency analyses, and that long term impacts be considered. Local stakeholders are likely to provide invaluable feedback utilities could not obtain elsewhere.

CUB appreciates the many opportunities for engagement in this big investigation and Staff's acknowledgment and consideration of stakeholder feedback. Please feel free to reach out if you have any questions.

Respectfully submitted,

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