

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

[AR 653]

In the Matter of

Revisions to Division 21 Rules to Strengthen
Customers Protections Concerning
Disconnections

NOTICE TO PARTICIPATE & REQUEST HB 2475
INTERVENOR FUNDING OF CAPO

The Community Action Partnership of Oregon (CAPO) hereby submits its Notice to Participate & Request Funding in this docket and requests interim intervenor funding in accordance with Oregon House Bill 2475 (HB2475).

CAPO is an eligible organization for HB 2475 interim inventor funding. As an association of Oregon's 18 community action agencies, CAPO represents low-income customers all across Oregon, including customers of all six investor-owned utilities (IOUs). CAPO advocates on behalf of the community action agencies, that among other things, administer energy-assistance programs to all Oregonians below 60% of State Median Income. These programs, through contracts with Oregon Housing and Community Services, as well as with IOUs, help low-income people through bill payment assistance and weatherization. Clients include seniors, people with disabilities, people of color, and other historically marginalized groups, all with disproportionately high energy burdens. Serving more than 60,000 low-income households annually, the community action network (through CAPO) is well positioned to advocate on behalf of low-income customers.

AR 635 is an eligible proceeding pursuant to Commission Order NO. 22-043. AR 653 directly affects Avista, Cascade Natural Gas, Idaho Power, Northwest Natural Gas, PacificCorp, and PGE. AR 653 also directly affects utility customers since Division 21 regulate the rights and responsibilities of such customers. Proposed Rules in Division 21 expand/discuss protections for low-income customers of all 6 IOUs, which are represented by CAPO.

CAPO respectfully requests that this Commission grant its Notice to Participate in this proceeding as an eligible organization and its request to receive HB 2475 interim intervenor funding.

Dated this 22nd day of July 2022.



Benedikt Springer
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CAPO'S REQUEST FOR HB 2475 FUNDING GRANT
AND PROPOSED BUDGET

Pursuant to decisions deeming the Community Action Partnership of Oregon (CAPO) and these proceedings eligible, CAPO requests a grant of \$7175 from the HB 2475 Intervenor Funding Fund. CAPO has been tracking its participation in these proceedings by hours and activity and submits the following in support of the proposed budget.

Statement of Work

CAPO has and intends to participate in every procedural aspect of this proceeding, including meetings, workshops, and hearings. CAPO has and intends to review and analyze draft rules, testimony, and comments. CAPO has filed and intends to file written comments and supporting information in consultation with other participants. CAPO has testified and will testify in future public meetings.

Description of Areas to be Investigated

CAPO's investigation has and will include the following areas, among others:

- Obtain information from clients and experts on the effects of disconnection on low-income customers, including effects on life, health, and safety.
- Research models used in other jurisdictions to protect low-income customers and avoid disconnection.
- Research alternatives to disconnection while maintaining financial integrity of utility service.
- Investigate other issues raised by Commissioners and other participants.

Budget

CAPO Internal Expenses

Benedikt Springer, PhD (Utility Policy Analyst)	Rate	Hours	Cost
Participate in Public Meetings	\$ 175	10	\$1750
Other Stakeholder Meetings	\$ 175	6	\$1050
Research	\$ 175	10	\$1750
Drafting Comments	\$ 175	15	\$2625
TOTAL			\$7175

Since April 2022, CAPO's participation has used about 60% of this proposed budget.

For the foregoing reasons, CAPO respectfully requests that this Commission approve its budget and issue an order awarding it a grant from the HB 2475 fund.

Dated this 22nd day of July 2022.

A handwritten signature in black ink, appearing to read "B. Springer", written over a horizontal line.

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