

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 416

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Request for a General Rate Revision and
2024 Annual Power Cost Update

COMMUNITY ACTION PARTNERSHIP
OF OREGON's
POSITION STATEMENT

The following are the remaining issues and position statements of the Community Action Partnership of Oregon (CAPO).

CAPO has not taken any specific position on **Issues 1 through 9** since we did not possess sufficient resources for detailed analysis. However, all the issues implicate questions of procedural, recognition, and distributive justice. For instance, CAPO suggests that a more balanced number of perspectives can be represented in cross-utility rulemakings than in general rate cases or worse, single ratemaking mechanisms. The implication is that questions surrounding PCAM and AACs might be better resolved through making general, transparent rules. CAPO would be happy to elaborate on such energy justice implications for Commissioners.

(CAPO 100, Springer 1-42)

10) A. What should be PGE's authorized Return on Equity (ROE)?

CAPO has not proposed a specific number. However, CAPO argues that traditional methods of assessing reasonable ROE are somewhat circular and overstate the actual risks that are involved in holding stock in a regulated utility company. Hence, CAPO argues that the authorized ROE should be substantially lower than what PGE proposes.

(CAPO 100, Springer 34f.)

11) A. What changes does the Commission think are appropriate design parameters for the Income Qualified Bill Discount Program.

CAPO argues that steeper discounts are necessary to target a 6% energy burden goal as suggested by law and PUC guidance. The current design over-allocates help to those who are not energy-burdened while helping those with very low incomes insufficiently. CAPO also argues that sufficient information is already available to deem CAPO’s proposed changes necessary.

Specifically, CAPO and CEP propose the following design:

Household Income as % of SMI	Current Discounts	CEP/CAPO Proposal
46-60	15%	15%
31-45	20%	20%
16-30	25%	40%
6-15	25%	75%
0-5	25%	90%

Additionally, expand eligibility for minimum wage single family households in the Portland Metro area, removing the dollar amount in the tariff to adjust for raising minimum wage.

(CAPO 100, Springer 22-33; CEP-CAPO 200, Fain-Springer 1-10)

11) B. Should PGE conduct or contract for a Low Income Needs Assessment Study suitable and if so, what requirements should apply, i.e., date by which study is completed?

PGE needs to conduct a Low-Income Needs Assessment (LINA) and its findings must inform actions on issues like energy burden, disconnections, low-income energy efficiency, and rate design. Its design must be informed by, consented to, and monitored by those working with low-income communities to ensure it will generate actionable insights. The LINA should be completed in 2024 and results publicly shared.

(CAPO 100, Springer 23; CEP-CAPO, Fain-Springer CEP-CAPO 200, 11-13)

12. A. Should the Commission initiate a proceeding (which authorizes discovery or discovery like access to data) to reform residential customer rates to limit energy burden in the long run?

Yes. CAPO believes the Commission should initiate a proceeding to reform residential customer rates with the goals of limiting energy burden to 6% of gross income, reducing or eliminating disconnections for non-payment, encouraging electrification, and encouraging energy efficiency. Access to raw or confidential data will be necessary for this proceeding to succeed.

(CAPO 100, Springer 7-21; CEP-CAPO 200, 16-17)

12. B. Should the Commission initiate an investigation to determine criteria/metrics/processes all utilities shall employ to comprehensively integrate energy justice into decision making and, specifically, all facets of a general rate case?

Yes. The general rate revision case process does not lend itself to integrating a larger variety of perspectives, including energy justice considerations, into the determination of rates that are in the public interests. CAPO makes some suggestions on how processes can be made more accessible and recommends the Commissions initiate a proceeding to make reforms.

(CAPO 100, Springer 37-41, CEP-CAPO 200, Fain-Springer, 17-19)

12. C. Should the Commission convene a multi-agency (including OHCS, ETO, ODOE) proceeding to identify how to better utilize weatherization programs to address?

Yes. Current low-income weatherization efforts are spread across too many agencies, contractors, and subcontractors. Regulatory reforms outside of a general rate case are necessary to align, not only PGE's, but all programs better.

(CEP-CAPO 200, Fain-Springer 19-21)

Respectfully submitted this 15th day of September, 2023

/s/ Benedikt Springer
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