

# 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 ENERGY PROJECT'S  
STATEMENT OF ISSUES AND  
POSITIONS

The following are the remaining issues and position statements of the Community Energy Project.

- 1 Schedule 18 - Should PGE' proposed revised Income-Qualified Bill Discount (IQBD) program provide steeper discounts to achieve an average electric-heat bill which does not exceed a 6% energy burden? (CEP 100, 11-13; CEP-CAPO 200, 1-9)

CEP and CAPO continue to argue that a steeper discount is necessary to better reach a 6% energy burden goal without delay. PGE's current proposal is heading in the right direction but does not go far enough. It does not target energy burden when identifying the income tiers and discount levels provided by the proposed rate. There is already sufficient information available to know where the discount level need to be to address energy burden.

- 2 Should PGE's Low Income Needs Assessment Proposal design - terms, metrics, and objectives - be determined collaboratively and with agreement from impacted stakeholders? (CEP-CAPO 200, 13)

PGE needs to conduct a Low-Income Needs Assessment (LINA) and its findings inform efforts to reduce energy burden in advance of the 2024 heating season. Its design must be informed by, consented to, and monitored by those working with low-income communities to ensure it will generate actionable insights.

LINA findings on energy burden and stakeholder engagement on the LINA results should be shared no later than 90 days from the date the LINA is finalized.

3. Shall the Commission Host or Support Proceedings to Develop Long Term Solution to Address Energy Burden? (CEP 100, 20-21; CEP-CAPO 200, 16-17)

A process which provides meaningful information and discussion is necessary to initiate reforming residential customer rates for a longer-term solution that will limit energy burden to 6% of gross income, reduce or eliminate disconnections for non-payment, encourage electrification, and encourage efficiency. Access to raw or confidential data will be necessary to the design effort.

4. Shall the Commission Host or Support a review of its processes to better incorporate Energy Justice in decision making? (CEP 100, 21-23; CEP-CAPO 200, 17-19)

The general rate revision case process does not lend itself to integrating energy justice into decision making and a focus on overall Commission process will facilitate the employment of the relevant principles into the day to day decision making.

5. Should the Commission host or convene a multi-agency investigation to foster weatherization programs to address energy burden? (CEP 100, 16-20; CEP-CAPO 200, 19-21)

Regulatory reforms are necessary to increase low-income weatherization, to change cost-effectiveness metrics to account for non-energy benefits, and to encourage home electrification (fuel switching). As these efforts are spread across agencies, a multi-agency proceeding should be convened to identify how to better utilize weatherization programs to address energy burden as directed by HB 2475 (2021).

Respectfully submitted this 15th day of August, 2023

/s/ Tonia Moro

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