

December 22, 2021



HB 2475 Implementation of Differential Rates and Programs in Oregon

Strategy Update and Interim Action Straw Proposal

This letter serves as an update to Staff's HB 2475 implementation strategy. Our objectives in this communication are to provide:

- A background summary of HB 2475 efforts to date, including an overview of the input we've received from the environmental justice and community advocates on implementation and engagement;
- A proposed framework for utilities to file interim rates;
- An announcement that dockets have been opened for differential rates and programs and intervenor funding; and
- Information about the webpage that has been created to house information about HB 2475 in a more accessible way.

At the end of the letter, we will share next steps, including how to submit feedback on Staff's proposal.

Background

HB 2475 authority

House Bill 2475 expands PUC ratemaking authority with regard to low income customers and enables groups representing low income customers and environmental justice communities to receive intervenor funding assistance. The bill contains three primary parts:

- Differential rates¹
- Intervenor funding²
- Programs to address energy burden³

Effectively, [HB 2475](#) expands ORS 757.230, giving the PUC new authority in the classification or schedule of rates applicable to individual customers or groups of customers to consider differential energy burdens on low-income customers and other economic, social equity or environmental justice factors that affect affordability for certain classes of utility customers. The new language also includes a provision for financial assistance to organizations that provide broad customer, low-income, and/or EJ advocacy. Otherwise known as "intervenor funding",

¹ Section 2 of enrolled House Bill 2475 (HB 2475-A)

² Section 3 of enrolled House Bill 2475 (HB 2475-A)

³ Section 7 of enrolled House Bill 2475 (HB 2475-A)

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the PUC will evaluate filed agreements between prospective organizations and one or more public utility for approval, upon which financial assistance will be made available to support community representation and engagement in PUC regulatory proceedings. Additionally, the bill provides the PUC with new authority to address the mitigation of energy burdens through bill discounts or other programs, such as weatherization.

HB 2475 becomes law on January 1, 2022.

HB 2475 Implementation Process Planning workshop

On November 10, Staff met with EJ and community advocates to discuss implementation process planning. At this workshop, Staff and state agency partners covered several topics including the content and authority of HB 2475, existing energy assistance programs⁴ and useful metrics, ongoing PUC dockets where EJ community voices have been important to process planning and strategy, and most importantly paths forward and advocate priorities related to HB 2475 implementation.

Staff found that attendees were in support of interim action prior to intervenor funding and a comprehensive PUC investigation into the new authority provided under HB 2475. There was some discussion about whether or not interim action would be able to have an impact on the current winter heating season and where we could best focus our efforts in the short term, knowing a broader investigation was on the horizon. HB 2475 priorities communicated by attendees included:

- Consistency in eligibility standards across the state
- Self-verification for enrollment and other strategies to maximize and simplify enrollment
- Determining a meaningful level of relief

Stakeholders also offered Staff feedback on ways to effectively engage with the EJ and community advocates, including:

- Consolidating and streamlining engagement opportunities and requests for comment where practicable
- Providing resources that enhance understanding and accessibility in the PUC process, including:
 - Materials that can be distributed to interested parties and individuals in the community
 - Centralized tracking of dockets and individual utility filings related to HB 2475
- Recognition and explanation of feedback that is not ultimately incorporated into planning and design
- Utilize existing EJ and advocate comments to inform Staff in applicable contexts

⁴ See Appendix B

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At the conclusion of the meeting, Staff made plans to reconvene with stakeholders, as needed in order to move forward with preparing for how Staff might guide and inform interim utility filings.

Following the workshop, Staff met with the six regulated utilities to discuss utility expectations for timelines and the feasibility of implementing an interim rate or program in advance of the broad investigation and long term design. Staff found:

- The utilities are in different places in terms of their readiness to propose and implement an interim rate or program in Oregon.
- Some utilities have programs in place or under development in other states that they could potentially bring to Oregon for interim or long term proposals
- It would be impracticable for the gas utilities to have an interim design in place for the current winter heating season
- Alternatives to differential rates or programs might be a way to provide interim relief in advance of the larger investigation and implementation

Ultimately, given the extensive feedback and support for swift interim action, Staff decided, rather than a second workshop in the near term, to issue a more pointed solicitation for comment and guidance via the interim process survey.

Interim Process Survey

After the November 10 workshop Staff collected additional feedback related to interim process through a survey. We received 21 responses which were comprised of seven utility respondents and 14 respondents from stakeholder and advocate organizations. Staff has summarized some of the feedback from the survey results in the following majority responses:

- General support for the utilities to implement interim differential rates or other programs in advance of a broader HB 2475 implementation and investigation and the availability of intervenor funding.
- Parties are interested in interim funding for the purposes of HB 2475 engagement
- Interim rates or programs may vary between utilities but should include minimum requirements, standards, and/or principles determined in advance
 - Some common standards mentioned were eligibility and enrollment process but others cited included: level of discount, consideration of other characteristics, income based, inclusion of other programs, bypassibility of certain charges/fees, energy burden, and rural versus urban considerations
- In order to review interim rates, stakeholders should receive an overview of rate and/or program design with pros and cons, overview of administrative options, utility customer demographics, rate impacts, administration and implementation costs, and cost recovery information related to each filing
- The PUC should seek additional feedback through written comments, workshops and a survey once interim rates are filed and continue to monitor the implementation of rates or other programs after the fact

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Broad EJ and Advocate Community Feedback at the PUC

In addition to the feedback we received in the survey, Staff adopted direct stakeholder feedback received at the November 10 workshop and reviewed relevant comments filed in other PUC dockets by the EJ and advocate community, including Coalition of Communities of Color, Citizen's Utility Board, NW Energy Coalition, Community Energy Project, Rogue Climate, Verde, Multnomah County Office of Sustainability, Brown Hope, and many more. Staff has included a slide deck summarizing its findings in Appendix A.

Process Updates

Dockets Opened

The PUC has opened the following dockets for HB 2475 implementation which will serve as the official record.

- Docket No. UM 2211: implementation of the PUC's new authority to approve differential rates and programs under HB 2475.
- Docket No. AR 652: Rulemaking for intervenor funding expansion under HB 2475.

To receive schedule updates, meeting notices and agendas, review comments and other documents related to either docket, please send an email to puc.hearings@puc.oregon.gov and ask to be added to the service list for the docket.

In an effort to make HB 2475 materials more accessible and user friendly, the PUC is working to create a website that will house current and future information and resources related to HB 2475/UM 2211 process, communications, and implementation. The website is currently being developed and should be live in Q1 2022.

Intervenor Funding Update

The Administrative Hearings Division (AHD) is working to implement to intervenor funding expansion under HB 2475. As part of that effort, AHD has solicited feedback from advocates on their vision for future funding. AHD has also engaged all utilities in an effort to develop an interim intervenor funding agreement that would serve to provide funding for some activity next year prior to the adoption of final rules under AR 652. AHD will be reaching out to advocates in the near term regarding a series of three trainings on Commission processes, to help advocates engage better with the Commission, and to allow the Commission to learn from advocates on ways our process can better accommodate expanded participation.

For any questions about this effort, please contact Nolan Moser at 503-689-3622, or nolan.moser@puc.oregon.gov.

Interim Action Framework

Staff proposes to make space in the HB 2475 implementation process for utilities to submit proposals for interim rates in Q1 2022. Staff proposes to delay the launch of the broader HB 2475 investigation until Q2 2022 to allow the following:

- Utility Proposals Filed in Q1 2022 (informed by Staff's Straw Proposal and Baseline Evaluation Criteria discussed below)
 - Electric utilities should propose interim differential rates or programs for implementation by Q2 2022;
 - Gas utilities focus on proposing enhanced bill assistance for interim relief by Q1 2022 to address winter heating balances that will accrue before an interim rate can be put in place
- Utility Engagement Prior to Filing
 - In the interest of rolling out the interim programs expeditiously, Staff is recommending the utilities be responsible for engagement and initial design or expansion of existing programs.
 - Engagement should include representatives of the environmental justice community and communities impacted most by energy burden.
 - Engagement should include PUC Staff.
- Baseline Evaluation Criteria
 - Staff does not propose absolute standardization, but to help guide these efforts and ensure existing feedback has been incorporated, Staff is proposing a set of baseline evaluation criteria from which all interim filings will be reviewed. Before finalizing, Staff is inviting written feedback on the proposed criteria which are described in the following section.
- Review and approval process
 - Following the pre-filing engagement process, utilities should file interim proposals by March 31, 2022, with an effective date no later than May 1, 2022.
 - Each utility proposal will be given an individual docket e.g., advice filing for tariffs. Staff will endeavor to provide resources that summarize the separate utility proposals and docket activities on a centralized webpage.
 - After each utility filing, Staff will conduct the following review process (subject to modification):
 - Staff will post the review schedule to the docket
 - Initial workshop

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- Survey or written comment opportunity
- Utility reply comments
- Staff recommendation memo
- Public meeting for PUC decision to approve the interim proposal that includes a final opportunity for any stakeholder comments, if necessary.

Straw Proposal and Baseline Evaluation Criteria

Staff is endeavoring to strike a balance between swift action and ensuring rates and/or programs are meaningful to customers. Staff recognizes the importance of prompt utility filings for interim proposals, and has put together this proposal and opportunity to submit feedback as a means of expediting relief to energy burdened customer groups and streamline the review process once the filings have been made. Further, the proposed baseline evaluation criteria are intended to guide interim filings and are not meant to represent the comprehensive requirements or guidance that may come out of the full investigation.

In the various feedback forums, Staff found a variety of opinions on where proposals should initiate from: the utilities, the PUC, the EJ Community, and combinations of the three. Staff believes that providing guidance for the utilities to come forward with proposals that meet baseline evaluation criteria and capture key design elements is the most effective way to take timely and meaningful action. Further, by soliciting feedback on evaluation criteria and design elements now, we are hopeful the resulting utility rates or programs will capture insights from our diverse group of stakeholders.

Staff's approach to developing the proposed evaluation criteria was to first identify high level areas that would benefit from standardization and then reflect on known feedback and literature for practicable design elements that could be applied in interim designs. Below is a table showing Staff's current proposal for baseline evaluation criteria and key design elements in the context of interim filings.

Proposed Baseline Evaluation Criteria for Interim Rates or Programs

At minimum, Staff will review utility interim rate or program filings for inclusion of the following:					
KEY DESIGN ELEMENTS	Eligibility	Level of relief	Tracking and accounting	Bundling	Outreach and engagement
	Streamlines eligibility and certification criteria such as self-certification or auto-enrollment for recipients of energy assistance	Prioritizes lowest income <u>with the highest energy burden</u>	Specifies metrics to track impact and participation; including: -Demographic data; -Assistance dollars per customer; -Historical and ongoing bill amounts for enrolled customers, -Participant payment behavior -Historical and ongoing energy burden (customer level)	Includes a complimentary energy efficiency component (e.g., auto referral for Energy Trust or weatherization service providers)	Program marketing is transparent and informative
	Income based (e.g., a percentage of or state median income,)	Design ⁵ demonstrates a focus on reducing energy burden to less than 6 percent. ⁶	Costs (administrative and assistance dollars) are tracked in a deferral for review prior to recovery	Weatherization services extended within 60 days of enrollment ⁷	Considers joint stakeholder engagement with overlapping utilities where practicable and useful
		Includes an estimate of rate impacts on other customers and classes, and an explanation of why the cost allocation across customer classes is reasonable	Provides monthly reporting on approved performance metrics by zip code	Information sharing with ETO regarding participation	Demonstrates the Company provided meaningful engagement in advance of filing. ⁸
					Provides information regarding feedback that was received but not incorporated
					Surveys participating customers and CAP agencies at 3 and 6 months of implementation

⁵ Staff is not proposing a specific design that utilities must follow, such as a percentage discount or a fixed charge discount, rather Staff is proposing that the design focus on effectively reducing and prioritizing energy burden and focus on the 6% target

⁶ The 6% affordability threshold is based on Fisher, Sheehan and Colton’s Home Energy Affordability Gap Analysis. This affordability percentage is based on the assumption that an affordable housing burden is less than 30% of income spent on energy, and 20% of housing costs should be allocated to energy bills. This leads to 6% of an affordable housing burden spent on energy costs, or a 6% energy burden. For more information, see www.homeenergyaffordabilitygap.com/

⁷ Staff is looking for CAP agencies to weigh in on the feasibility of this metric given existing work streams and client queues.

⁸ Meaningful engagement must include equity considerations, including but not limited to a discussion about known or potential disparate impacts of the design proposal across different communities within the utility’s service territory.

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To reiterate a point made earlier in this document, the proposed evaluation criteria would primarily apply to the electric utilities for the Q1 2022 interim filings. Gas utilities may look to alternatives to differential rate design that could enhance bill assistance (such as those utilized in the UM 2114 arrearage management plans) and have the greatest effect on eligible customers. The goal would still be to combat energy burden, and gas utilities should still consider Staff's evaluation criteria and incorporate key design elements to the extent possible.

Finally, please note that Staff recommendations made on docketed utility filings, including those based on proposed or finalized evaluation criteria, will be subject to the Commissioners' final decision-making authority in the public process.

Next Steps

- Comments on baseline evaluation criteria submitted to the filing center under Docket No. UM 2211 by January 10, 2022.
- Staff to circle back with final evaluation criteria by January 31, 2022.
- Utilities will file interim action proposals by February 14, 2022.
- Staff will provide a schedule for review and comment in each utility docket when filed.
- Staff will begin scoping the broader investigation in Q2 2022 once the interim proposals are in place.

An updated GANTT chart visualizing the proposed process is included as Appendix C.

Staff recognizes this is an evolving process and that the timeline may change as we progress through the implementation strategy outlined above.

Please note, the current request for feedback is for interim action and evaluation criteria will likely evolve and expand prior to permanent action with the comprehensive investigation in 2022. Staff encourages stakeholders to share this proposal with other interested parties that may wish to engage in this process.

If you have any questions on the process or content of this proposal, please contact:

Michelle Scala
Senior Energy Analyst, Utility Strategy & Integration Division
503-689-2608
Michelle.m.scala@puc.oregon.gov

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Appendix A

Broad EJ and Advocate Community
Feedback at the PUC

procedural equity

TE Investment Framework - UM 2165

NWEC

Procedural equity is an important component to creating more equitable outcomes and we encourage consideration of the Initiative for Energy Justice's *Justice in 100 Scorecard*... We also recognize that developing these processes is a work in progress and the capacity to engage of impacted community members can be limited.

In the absence of direct engagement from impacted communities, we encourage the PUC to leverage other processes where feedback from impacted communities may be relevant and to identify existing resources.

procedural equity

TE Investment Framework - UM 2165

Climate Solutions

I recommend that the PUC follow equitable community engagement best practices that includes...compensation, child-care, meals, accessible meeting locations close to transit options, accessible virtual/off-line options, accommodations for folks with disabilities.

...community engagement is an important and necessary resource and should be valued, compensated and accommodated for accordingly.

A valuable TE investment framework process would include having community members and community-based organizations from across all IOU service territory in Oregon attending these workshops to help inform what kinds of TE investments would be most beneficial for their community and region.

energy burden

Distribution System Planning - UM 2005

Coalition of Communities of Color, Verde,
Institute for Market Transformation

We see the distribution system planning process as a critical opportunity to ensure the grid infrastructure responds to our communities needs and does not perpetuate the historical and present imbalances of benefits and burdens in our energy system.

We are heartened that a human-centered approach to DSP was internalized and integrated into the Oregon Public Utility Commission (PUC) Staff's (Staff) comments and in both the PGE and Pacific Power undertakings.

We made recommendations with regard to 1) layering hosting capacity analysis (HCA) mapping with equity indicators, 2) replacing cost-effectiveness tests for grid improvements with a community benefits test, and 3) investing in non-wires solutions (NWS) that directly reduce energy burden and improve housing quality and resiliency.

equity data and tools

Distribution System Planning - UM 2005

Coalition of Communities of Color, Verde,
Institute for Market Transformation

Factors such as these are the kinds of community data (publicly available and anonymous through the Census and other sources) that can be mapped to create a more integrated picture: ● Race/ethnicity demographics ● Total cost burden ● Energy/utility cost burden ● Housing age or other quality-related data ● Eviction rates ● Health outcomes data ● Natural disaster risk

PGE's community engagement plan is a standard: PGE included a framework for energy justice and a racial equity tool (GARE) that helped inform their community engagement plan, as well as recommendations for best practices received from Community Energy Project, CCC, and Unite Oregon. These best practices for community engagement center around accessibility, approachability, popular education, and meeting logistics.

equity indicators

Distribution System Planning - UM 2005

Coalition of Communities of Color, Verde,
Institute for Market Transformation

Pacific Power mentions their initial efforts to evaluate methods to assess energy equity in their Community Outreach and Engagement Plan, including assessing the U.S. Department of Energy's Low-Income Energy Affordability Data (LEAD) Tool and Greenlink Analytics Equity Map (GEM).

We support the utility's plans to evaluate and implement GEM in the coming year, and encourage the integration of community equity data into the HCA to provide a more human-centered locational analysis of the system and inform decisions about feeder-level investments...

energy burden

Distribution System Planning - UM 2005

Coalition of Communities of Color, Verde,
Institute for Market Transformation

The PUC should develop a “Community Benefits Test” in partnership with utilities, community-based organizations, and other stakeholders to identify, track, and achieve metrics regarding energy burden and other community benefits, as required by HB 3141 for public-purpose-charged-funded incentives, HB 2021 for clean energy investments and the charges of the Utility Equity Advisory bodies, and HB 2475 with regard to energy affordability.

The overarching message I've received is **we need to talk directly to the communities of interest**. The stakeholders we engage with believe they should not represent other stakeholder groups.

Goals need to be meaningful and demonstrate progress. Our stakeholders are not donating their time to learn where we're at, but to move us on.

When discussing a complex topic, it's a challenge to provide enough background to quickly launch into meaningful conversations. We've been working on providing materials more in advance, and spending less time in meetings laying out the context.

In general, we have been working on fewer, shorter meetings and bringing back more concrete outcomes between meetings.

diversity, equity, inclusion

Energy Trust of Oregon

Anna Kim, Staff

We believe in the potential of this program to provide benefits beyond what any other currently existing program can offer...:

Access to community-visible solar resources beyond the household level...with the potential to address many of the clean energy inequities in our state, and create potential for greater community resilience. ■ Community-wealth-building, local economic development, job training and job exposure. ■ Bill savings and bill resilience--the ability to pay a bill consistently over the long term and plan to spend savings elsewhere, without jumping through the hoops of energy assistance, which is intended solely as a crisis response. ■ Providing a guaranteed way for renters and low-income Oregonians to subscribe and participate, and non-private-entities to gain access to the market and these resources.

low-income benefits

Community Solar Program – UM 1930

Solarize Rogue , Wallowa Resources Community Solutions, NW Energy Coalition, Bonneville Environmental Foundation

The Commission recognizes that a new approach to utility regulation is not limited to the incentive structure used to encourage certain behaviors and achieve performance outcomes from the regulated utilities; it must also include designing the regulatory process itself to allow opportunities for community-based organizations, members of the public, and stakeholders new to our process to expand participation.

- CBOs stressed the importance of enabling and encouraging participation of members of the public and new stakeholders in the discussions on re-envisioning the energy system
- CBOs expressed an interest in participating in the Commission process, but had concerns around the need for technical knowledge and availability of financial resources
- The PUC will implement a strategy for engagement and inclusion in PUC processes, particularly from community-based groups new to the PUC.

SB 978 Climate and Equity

Creating opportunities to maximize engagement and public accessibility

2018 Report:

[SB978LegislativeReport-2018.pdf \(oregon.gov\)](#)

Make sure that rules and practices around utility service do not continue to deepen vulnerability but that instead they **recognize principles of equity** and advance just outcomes.

OPUC should **ensure equity in its utility payment services**. Participant testimonials included stories of Black, Brown, and Indigenous consumers experiencing discrimination when trying to work with OPUC staff on utility payment options. OPUC should conduct annual reviews of its diversity, equity, and inclusion policies, and ensure consumer surveys and focus groups are regularly facilitated and include questions about cultural competency and inclusive customer services. All equity trainings and resources for OPUC staff should be accessible in all languages.

Urgent need for exploring how to protect undocumented persons from disconnection who are disproportionately impacted by the pandemic while having access to few resources and protections, including with regard to energy assistance

DEI-Director-led workshop series should continue to serve as a space for conversations on how PUC rules and utility practices should evolve to minimize inequitable and unjust impacts. **Explicitly including this workshop series in the HB 2475 implementation process**

UM 2114 Access, Equity, and Outcomes

Recognizing disproportionate impacts in
low income and BIPOC communities;
learning how to engage

OPUC COVID-19 Impacts Website:

[Public Utility Commission : COVID-19 Impacts : Utility Regulation : State of Oregon](#)

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Appendix B

Oregon Housing and Community Services: Addressing the
Energy Burden of Low Income Oregonians

Oregon Housing & Community Services: *Addressing the Energy Burden of Low Income Oregonians*

Dan Elliott, *Senior Policy Analyst*
OHCS, Energy Services
HB 2475

November 10, 2021



OHCS VISION AND MISSION

VISION

All Oregonians have the opportunity to pursue prosperity and live free from poverty.

MISSION

We provide stable and affordable housing and engage leaders to develop integrated statewide policy that addresses poverty and provides opportunity for Oregonians.

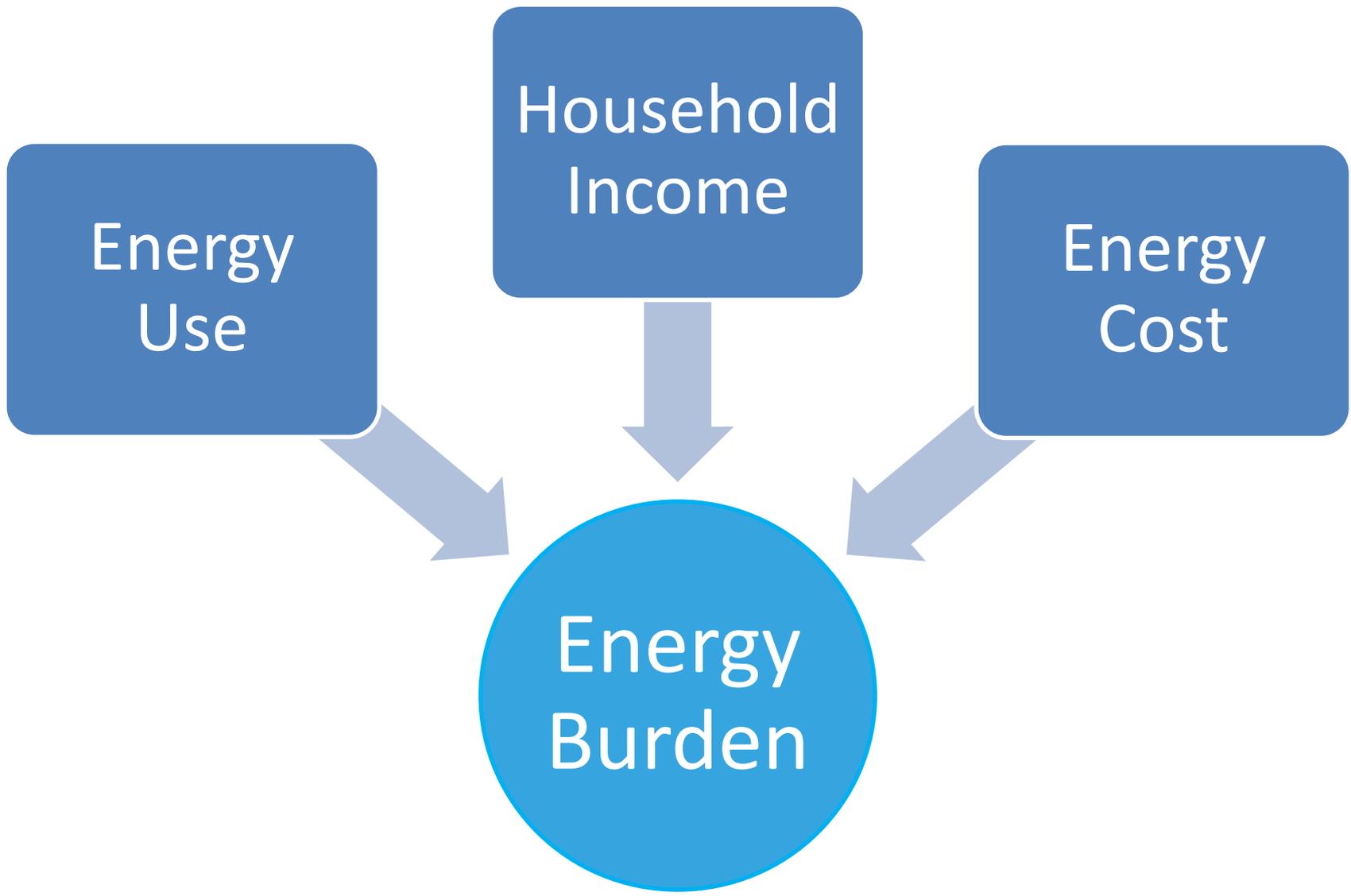


Working together to serve individuals, families and communities throughout Oregon

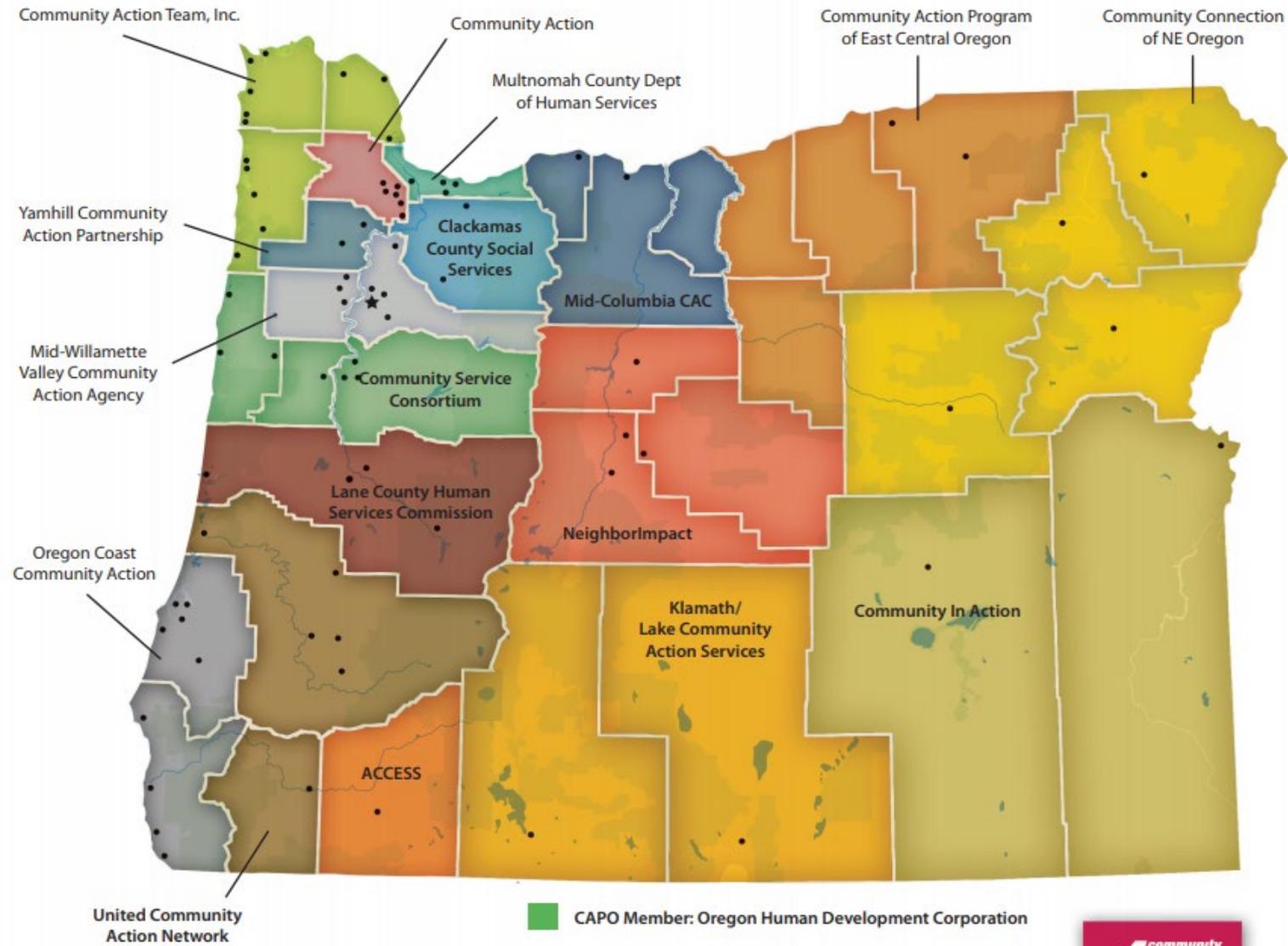
ENERGY BURDEN

If a household spends **more than 6%** of their income on energy costs, they are considered energy burdened.

If a household spends **more than 10%** of their income on energy costs, they are considered severely energy burdened.



OUR PARTNERS AND PROGRAM DELIVERY



Community Action Partnership of Oregon



Statewide Energy Assistance

- *State Administration*
 - LIHEAP – Federal Funds / All low-income households
 - OEAP – Ratepayer Funds / Pacific Power and PGE
- *Tribal Administration*
 - LIHEAP – Direct Grant from Federal Government
- *Utility Administration*
 - Natural Gas IOUs
 - IOU Arrearage Management Programs(AMP)
 - Cooperatives / Municipals / Public Utility Districts

[Click here to see additional programs.](#)

Low-Income Home Energy Assistance Program (LIHEAP)

- Bill payment assistance, energy/client education, case management, heating equipment repair/replacement, home weatherization services

Eligibility: Statewide	Funding source: Federal, US Department of Health and Human Services	Funding level 2018 FY: \$35 million	Households Served: 56,136*
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Oregon Energy Assistance Program (OEAP)

- Priority assistance directed to customers in danger of disconnection

Eligibility: PGE & Pacific Power service territory	Funding source: State, PGE & Pacific Power customers	Funding level 2018 FY: \$20 million	Households Served: 33,909*
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***Total (unduplicated) Households: 73,763**

We are only able to serve 20% of those eligible due to funding constraints.

Additional Federal/State Assistance

The CARES Act allocated an additional **\$9.5 M for LIHEAP**

ARPA included an additional **\$54.5 M for LIHEAP**

The Energy Assistance Stability Coronavirus Relief (EASCR) Program provided an additional **\$16.5 M** in utility assistance, Coronavirus Relief Funds allocated by the Emergency Board

Oregon Emergency Rental Assistance Program (OERAP) can cover utility bills as well as rent.

- The Oregon Legislature directed an additional **\$10 million for Oregon Energy Assistance Program for COVID relief.**

NEW--Infrastructure Bill passage 2022:

\$3.5 billion for low-income weatherization national program (Est \$25 million for Oregon)
\$500 million for LIHEAP national program (Est add'l \$1 million per year through 2026)

OHCS Low Income Weatherization Assistance

Current Annual Funding

Program	Source	Annual Funding
Energy Conservation Helping Oregonians (ECHO)	State	\$14.2 million
Bonneville Power Administration (BPA)	Federal	\$1.8 million
LIHEAP Weatherization	Federal	\$5.1 million
USDOE Weatherization Assistance Program (DOE WAP)	Federal	\$2.8 million
State Home Oil Weatherization (SHOW)	State	\$400,000
Oregon Multi-family Energy Program (OR-MEP)	State	\$1.75 million
Total		\$26 million



- **Executive Order 17-20, Directive 5B: Prioritizing Energy Efficiency in Affordable Housing to Reduce Utility Bills**

“ODOE, PUC, and OHCS are directed to work together to assess energy use in all affordable housing stock and develop a ten-year plan for achieving maximum efficiency...in affordable housing across the state...working with Bonneville Power Administration and the Energy Trust of Oregon”.

Maximum efficiency:

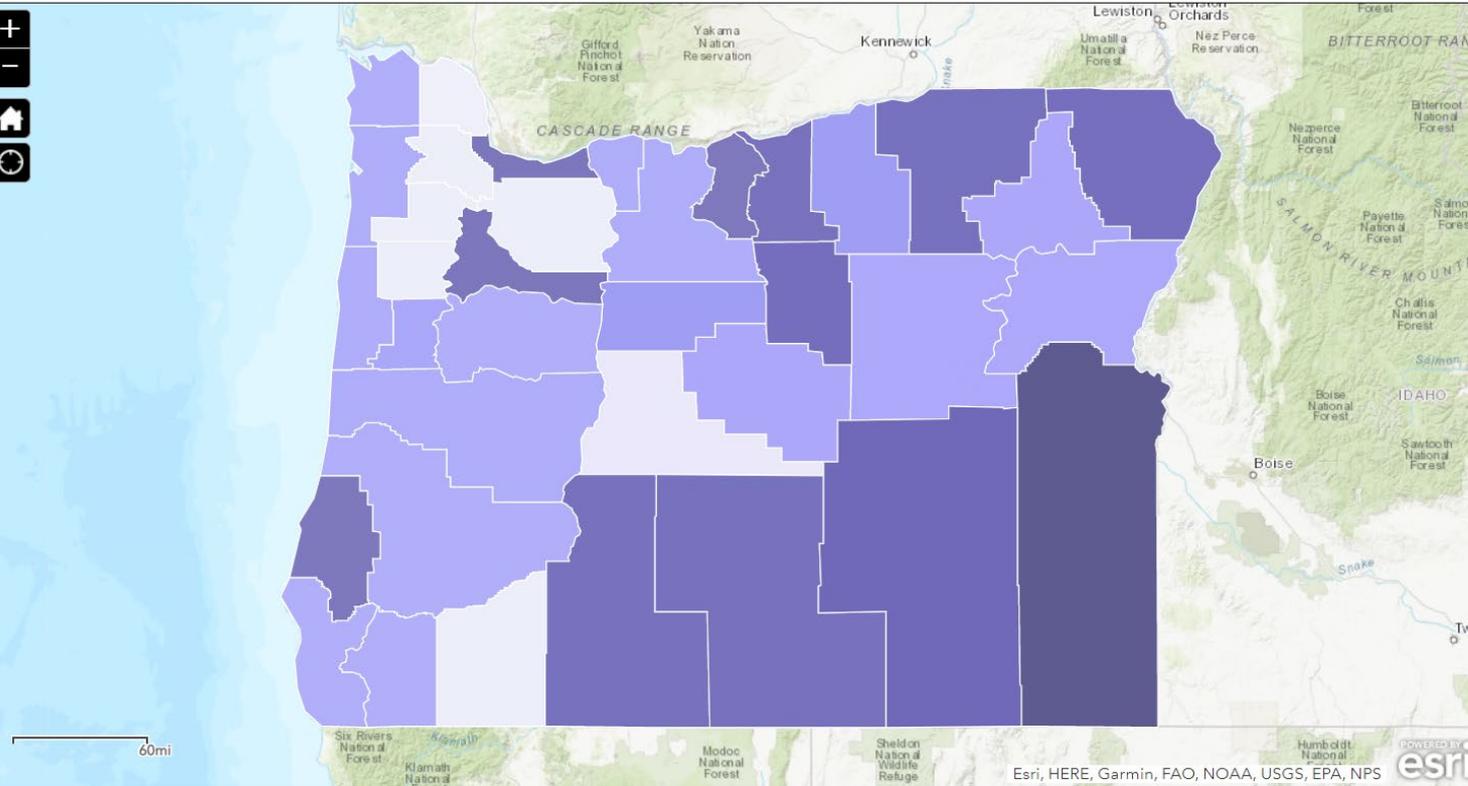
1. Reducing energy burden of low-income households
2. Improving energy efficiency of a housing stock

- **Executive Order 20-04**
- **HB 2754**

Affordable Housing Assessment Tool

How to Guide

OREGON HOUSING and COMMUNITY SERVICES Affordable Housing Assessment



Layer List

Layers

- Affordable Housing Inventory of Multifamily Properties ...
- Affordable Housing Inventory of Manufactured Home Parks ...
- High Priority Area Index - County ...
- Low Income Housing and Tenure - County ...
- Home Energy Affordability Gap - County ...
- Home Vintage and Fuel Type - County ...
- Ethnicity and Race - County ...
- Cost Effective Energy Savings in Low-Income Housing - County ...
- Cost Effective Energy Savings in OHCS Affordable Housing - County ...
- Transportation Burden - County ...
- High Priority Area Index - Census Tract ...
- Low Income Housing and Tenure - Census Tract ...
- Home Energy Affordability Gap - Census Tract ...
- Home Vintage and Fuel Type - Census Tract ...



\$113,906,237

Total potential energy cost savings through cost-effective energy efficiency in low-income communities

\$631

Average affordability gap for energy burdened households below 200% Federal Poverty Level



395,971 metric tons CO_{2e}

Total potential GHG savings through cost-effective energy efficiency in low-income communities

\$345,733,243

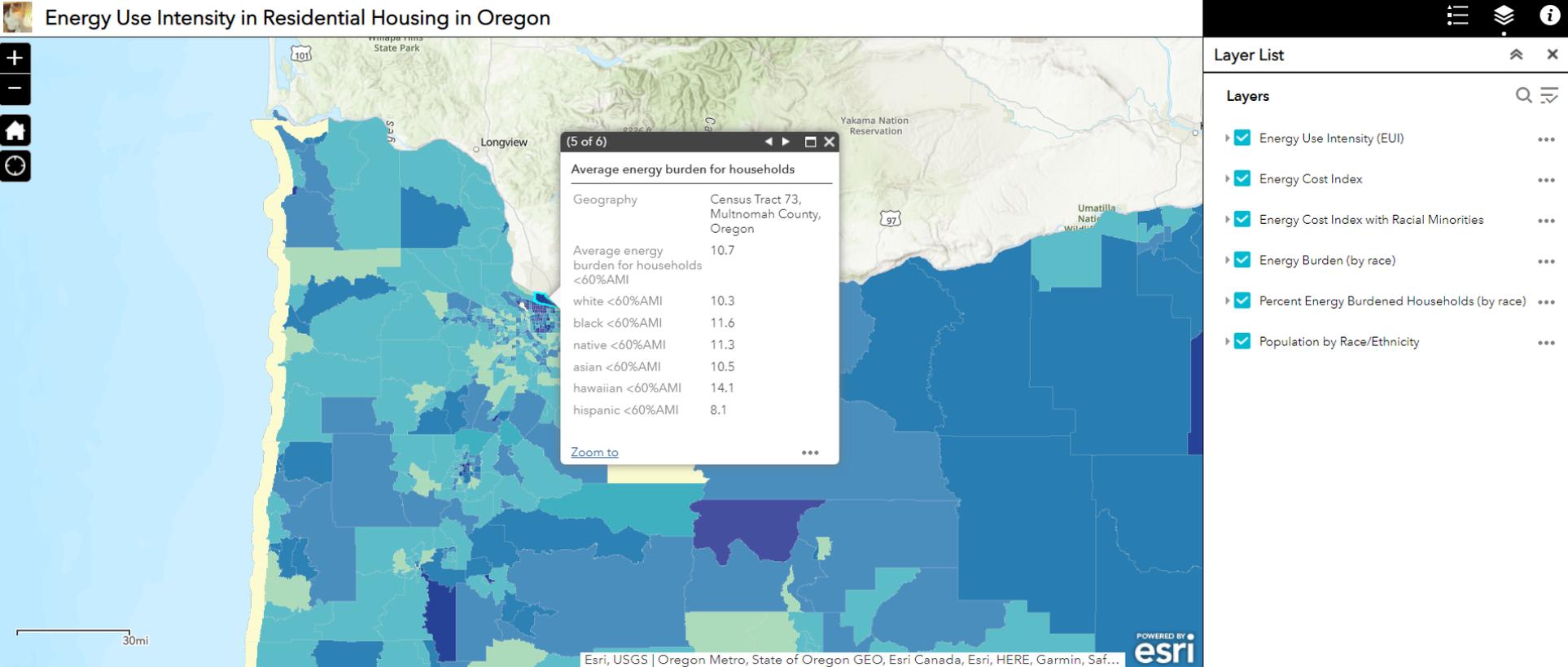
Total energy burden of low-income Oregonians



Energy Burden by Race in Oregon

EUI Burden Map

How to Guide



QUESTIONS?

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Appendix C

HB 2475/ UM 2211 Implementation Strategy
Updated GANTT Chart

HB 2475: Differential Rates

	2021		2022				2023	
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	
Related activities	UE 394 PGE rate case		UG 433 AVA rate case		PAC rate case (forecast)		UCBIAG Reports (forecast)	
	NWN rate case (forecast)		Interim intervenor funding		Long-term intervenor funding agreements			
	Workshop, Survey + Report		Review of minimum standards and interim filings					
	Establish minimum standards		Interim utility filings					
Engagement								
Interim Action								
Comprehensive investigation			Step 1: Survey of options, data, principles		Step 2: Detailed discussion of rate design(s), administrative requirements		Step 3: Tariff filings	
					Rate effective			

Engagement: Completed: implementation process workshop focused on maximizing stakeholder engagement; interim process survey.

- Solicit feedback on minimum standards and basic expectations for interim and/or permanent rate design.

Interim Action: PUC to establish minimum standards for interim differential rates or programs and direct electric utilities to file interim proposals by the first half of Q1 2022. Proposals must conform to interim principles and minimum standards and be informed by stakeholder engagement. Staff will target a rate effective date of Q2 2022. Gas utilities will be expected to provide an alternative interim approach to address energy burden in the near term, such as enhanced bill assistance. Workshops and comment opportunities will be provided, and may be combined across utilities for accessibility/efficiency.

Comprehensive investigation Launch a three-part investigation to establish differential rates, targeting permanent rates effective by January 2023. The PUC hopes that intervenor funding will be available to support participation in process.

- First step to explore options/national trends, utility customer and rate impact data (may leverage rate case and UM 2114 analysis), and priorities and principles. Result Staff white paper and/or PUC guidance to narrow principles and design paths for Step 2 (e.g., what options are in or out, expectations for standardization, and any insights from data and analysis such as considerations for eligibility, how to target relief, rate impact levels, etc.)
- Second step will consist of a detailed rate design conversation through technical and policy workshops, Staff straw proposals, comment opportunities, and culminating in PUC decision on rules or guidelines for principles and standards, plus a filing deadline for utilities.
- Third step will consist of a review and approval of utility tariff filings.

