

April 21, 2022

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, OR 97301-3398

RE: UM 2225— PacifiCorp's Draft Community Engagement Plan

PacifiCorp d/b/a Pacific Power submits for filing with the Public Utility Commission Oregon (Commission) its Draft Community Engagement Plan in the above referenced proceeding.

PacifiCorp respectfully requests that all communications related to this filing be addressed to:

Oregon Dockets
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
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Additionally, PacifiCorp requests that all formal information requests regarding this matter be addressed to:

By email (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

Informal inquiries regarding this filing may be directed to Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934.

Sincerely,



Shelley McCoy
Director, Regulation

**PacifiCorp's
Oregon Clean Energy Plan Initial Engagement Strategy**

April 21, 2022
DRAFT

INTRODUCTION

In 2021, Governor Brown signed House Bill (HB) 2021 into law, that established clean energy targets for investor-owned utilities in Oregon with zero greenhouse gas by 2040.

Section 6 of HB 2021 requires each utility to establish a Utility Community Benefits and Impacts Advisory Group (UCBIAG). The advisory group must increase the engagement and enhance the equal protection of communities traditionally underrepresented in the utility's public processes.

On April 4, 2022, in its Work Plan Announcement, Public Utility Commission of Oregon (Commission) Staff (Staff) clarified near-term expectations for the UCBIAG. Specifically:

Staff understands that the utilities will be developing the Clean Energy Plans during most of 2022 and does not believe that there is enough time to properly stand up the Utility Community Benefits and Impacts Advisory Groups (UCBIAGs) (See HB 2021 §6) in time for this round of utility Clean Energy Plan development. Staff also understands that the utilities have been working to improve their engagement strategies for their existing planning processes. Therefore, Staff has proposed a streamlined process to provide informal feedback on ways that the utilities plan to seek input during the Clean Energy Plan development process. Staff requests that PacifiCorp and Portland General Electric file planning engagement strategies in UM 2225 for informal feedback from Staff and stakeholders. Staff encourages the utilities to align with the spirit of the UCBIAG as much as possible, leverage previous learnings that communities have already put resources into offering, and seek to coordinate engagement with other requests for customer and communities' time and input. While Staff envisions an informal feedback process for these engagement strategies, Staff can raise issues for Commission guidance during the May 31, 2022, Public Meeting if needed.¹

PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) drafted this initial Engagement Strategy, as required by docket UM 2225, to provide insight into PacifiCorp's preliminary vision and intent to use its Integrated Resource Plan (IRP) and developing Community Input Group (CIG) processes to provide meaningful engagement opportunities for the development and equitable implementation of a Clean Energy Plan (CEP).

PacifiCorp envisions a collaborative process, that recognizes the importance of defining and refining the role and objectives with equity leaders and stakeholders that represent the interests of customers or affected communities within its service area. PacifiCorp will look to representatives of environmental justice communities, low-income customers, tribes, and vulnerable customer groups to co-create CIG membership for developing the CEP, and continuing input on the Distribution System Plan (DSP). PacifiCorp also expects technical and modelling aspects of this effort to be a part of the IRP stakeholder process. In April and May 2022, PacifiCorp will solicit input and feedback on this draft Engagement Strategy from stakeholders through various existing stakeholder channels such as PacifiCorp's May DSP

¹ *In the matter of Staff's HB 2021 Investigation into Clean Energy Plans*, Docket No. UM 2225, Work Plan Announcement at 5-6 (Apr. 4, 2022) (original emphasis).

Workshop. The Company will file an updated Engagement Strategy on May 18, 2022, that will reflect insights and input gleaned from this scoping process.

PacifiCorp is dedicated to advancing equity in planning and program implementation, and is prepared for the long-term work of learning, breaking down the traditional barriers to equity and inclusion, and advancing equity in Oregon.

LEVERAGING PREVIOUS LEARNINGS

Learnings from DSP Community Engagement Activities

As a foundational piece of PacifiCorp's DSP community engagement, the Company surveyed over 4,600 Oregon customers to better understand and prioritize of the benefits associated with cleaner energy and concerns about energy transition, identify challenges facing communities and individuals, measure awareness of Company communications, and measure satisfaction with the Company's level of outreach and engagement, among other topics. Survey participants included residential and business customers, frontline customers, and stakeholders. The study was conducted using online and phone surveys in English and Spanish. The survey was conducted between February 1 and February 28, 2022, with 130 completed phone surveys, 4,497 completed web surveys and 24 interviews conducted with stakeholder groups.

Although the survey was designed to help inform PacifiCorp's DSP efforts, key findings will also guide the Company's evolving community engagement strategies on several topics, including CEP engagement.

Benefits and Concerns Findings

The top challenges facing communities within our service area are affordable housing and the high cost of living. Residential customers' primary challenges are the high cost of living, climate change, and healthcare, although noticeable differences were identified in the challenges facing communities across the state. The most important benefits participants noted related to a cleaner energy future are reducing the impact of climate change, preparing for natural disasters, decreasing reliance on fossil fuels, spending less on energy bills, and reducing the environmental impact of the electric system. Those customers located in Portland are more likely to consider the impacts of climate change and environmental issues as highly important.

Costs and potential bill increases are the primary concerns with the transition to cleaner energy. The dependability of renewable sources and the potential impact of materials required for clean energy technology also concern more than half of the surveyed participants.

Recommendations

Analysis of the survey resulted in communication recommendations, each of which can be applied to CEP community engagement. The recommendations include:

- Educate customers about the plans to move toward a cleaner and more equitable energy grid. Explain the rationale, planning process, and steps clearly and concisely.
- Focus on the key desired benefits, for example: reducing the impact of climate change, preparing for natural disasters, decreased reliance on fossil fuels, spending less on energy bills, and reducing the environmental impact of the electric system.
- It will be necessary to address the primary concerns: transition cost and the potential impact on electric bills. This aligns with one of the primary concerns both personally and for the community: high cost of living. While customers across the state, particularly those in Portland, broadly recognize the environmental/climate change and resiliency benefits, it will be necessary to alleviate concerns about impacting their monthly budget.

- The focus on transitioning to an “equitable” energy grid will require explanation. Even among stakeholders, this concept is not universally understood in the same manner, and it raises questions about what it means, how it could be done, and how much it will cost.
- Utilize a mix of communication strategies. While email is the most common by far, it is important to reach customers through various means to provide access to all, including the Pacific Power website, direct mailings, and bill inserts (possibly directing customers to the website). While not widely utilized, local organizations and communities are perceived to provide very clear and useful information. They could be a strong ally in achieving the equity portion of the DSP goal.

Learnings from Washington’s Equity Advisory Group

In May 2019, Governor Jay Inslee signed Washington State’s Clean Energy Transformation Act (CETA) into law.² The legislation combines directives for utilities to pursue a clean energy future with assurances that benefits from a transformation to clean power are equitably distributed among all Washingtonians, all at a reasonable cost. Similar to the requirement of HB 2021 to establish a UCBIAG, a key component of CETA is establishing an Equity Advisory Group (EAG) to elevate energy equity issues in the planning process by providing a seat at the table to affected communities.

Throughout 2021, the EAG’s input was critical to developing the Company’s Washington Clean Energy Implementation Plan (CEIP). In particular, the EAG’s input directly fed into the development of the identification of disadvantaged communities, the development of customer benefit indicators, and the selection of utility actions.

Disadvantaged Communities: Members of the EAG helped construct the definitions of equity that served as guiderails for this work. With these definitions in mind, the EAG provided feedback on identifying disadvantaged communities and the challenges and barriers to participation in Company programs.

Customer Benefit Indicators: The EAG helped define the benefits that disadvantaged communities could realize through a clean energy transition. The EAG provided crucial insight into the lived experiences of members to understand the relative importance and prioritization of benefits.

Utility Actions: The EAG’s ideas led to several equity-focused Utility Actions and program implementation strategies. The EAG prioritized the accessibility of utility programs, focusing on helping communities understand what programs are available and how they can take advantage of them. As part of these considerations, the EAG emphasized the need for PacifiCorp to communicate in ways that meet its communities’ language and cultural needs. EAG discussions also led to new program design considerations related to energy efficiency and an electric vehicle grants program.

With every meeting, PacifiCorp continues to learn more from its EAG. This group offers critical insight into program design and community outreach. The EAG has become a valued sounding board for PacifiCorp to directly learn more about the needs of its disadvantaged communities and allow the company to better develop culturally and linguistically responsive outreach to increase awareness of its energy and conservation programs.

CEP ENGAGEMENT STRATEGY

To meet the timeline of the first CEP filing in 2023, leveraging existing efforts, and incorporating lessons from related engagement activities, PacifiCorp is proposing a hybrid stakeholder engagement model for

² Senate Bill 5116, 66th Leg., 2019 Reg. Sess. (Wa. 2019).

CEP planning efforts. PacifiCorp's IRP has a robust and established engagement process, and the Company is currently implementing the CIG for distribution system planning purposes.

PacifiCorp proposes bifurcating the community and stakeholder outreach for the CEP between the existing IRP process and the newly formed CIG. The IRP would focus on the emissions goals outlined in HB 2021. The CIG would focus on equity and inclusion matters although overlap will certainly exist between the two advisory groups. PacifiCorp will solicit input on the CEP utilizing existing resources in a facilitated manner. The CIG will include representation from environmental justice communities and education on utility processes and operations to support thoughtful feedback for the CEP. In addition, several objectives overlap with the inclusion of new CEP items (e.g., energy burden and procurement diversity) to further support healthy and stronger communities.

When developing its Washington CEIP as required by CETA, PacifiCorp provided opportunities for the general public to engage in the process as part of its regularly scheduled EAG meetings and separate public meetings. PacifiCorp will continue to evaluate and refine how the general public can be engaged as part of the CEP development process.

CIG Process Engagement

As a first step, PacifiCorp plans to obtain input from stakeholders on this draft Engagement Strategy and will prepare an update for filing on May 18, 2022. PacifiCorp also plans to reach back out to some of the stakeholders that were part of its February 2022 DSP Stakeholder Community Engagement survey activities. Additionally, PacifiCorp will include discussion on this topic during its May 2022 DSP Workshop.

PacifiCorp is in the process of selecting members for the CIG. The content of meetings will combine and overlap equity issues for both the DSP and the CEP and can achieve the same initial goals as forming a separate stand-alone UCBAIG in HB 2021. The IRP team may present updates on the emission goals to the CIG, but ongoing stakeholder engagement for technical modeling and resource analysis for the Oregon CEP will remain within the IRP process.

Understanding that utilities are striving to identify expanded and inclusive outreach, PacifiCorp anticipates running the hybrid process through 2022 and likely beyond while also working to remain flexible as this process unfolds. If a more robust process is needed to meet the community outreach needs for HB 2021, the model is flexible and could easily be modified.

The Company is anticipating that the CIG be made up of a diverse group of 10 to 15 individuals and/or organizations representing the lived experiences, interests, and perspectives of the communities and customers within PacifiCorp's Oregon service territory. Consistent with the definition of Environmental Justice communities within HB2021, communities identified for inclusion/representation include communities of color, communities experiencing lower incomes, tribal communities, rural communities, coastal communities, communities with limited infrastructure and other communities traditionally underrepresented in public processes and adversely harmed by environmental and health hazards, including seniors, youth and persons with disabilities.

The recruitment process, which is currently under development, is intended to represent the demographic characteristics of PacifiCorp's Oregon service territory. Members will attend monthly meetings, which are expected to last three hours with one-to-two hours of accompanying preparatory work.

PacifiCorp understands the initial meetings of the CIG will require an educational component. To receive input on the programs and processes, a strong foundation of the distribution system, non-wires programs,

regulatory processes, CEP requirement and overall understanding of the electric industry will provide informed input from the group. The CIG will provide PacifiCorp a better understanding of equity values and perspectives, community needs and identify ways to conduct inclusive collaborations.

Potential term lengths for participation, participant compensation, meeting structure, and other process considerations will be a part of early discussion with the CIG.

IRP Process Engagement

The IRP process incorporates robust opportunities for stakeholder feedback through a series of public input meetings. While the CEP development process will feature distinct engagement through the CIG, the IRP public input meeting series will also include state policy updates, information about the CEP, where interested stakeholders can go for information, directions for asking questions of PacifiCorp and how answers can be obtained. The Company also anticipates leveraging the IRP communication methods to further engage the public and stakeholders regarding CEP development. These additional engagement strategies will inform development of the final preferred portfolio and CEP portion of the IRP action plan.