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August 4, 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 Oregon Clean Energy Plan Updated Engagement Strategy

PacifiCorp d/b/a Pacific Power submits for filing with the Public Utility Commission of Oregon (Commission) its Oregon Clean Energy Plan Updated Engagement Strategy in the above referenced proceeding.

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

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Additionally, PacifiCorp requests that all formal information requests regarding this matter be addressed to:

By email (preferred): datarequest@pacificorp.com

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

Sincerely,

Shelley McCoy
Director, Regulation



Oregon Clean Energy Plan Updated Engagement Strategy

**PacifiCorp’s
Oregon Clean Energy Plan Updated Engagement Strategy**

August 4, 2022

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BACKGROUND

In 2021, Governor Brown signed House Bill (HB) 2021 into law. HB 2021 requires retail electricity providers to reduce greenhouse gas emissions associated with electricity sold to Oregon consumers to:

- 80 percent below baseline emissions levels by 2030;
- 90 percent below baseline emissions levels by 2035; and
- 100 percent below baseline emissions levels by 2040.

HB 2021 also requires PacifiCorp to submit a Clean Energy Plan (CEP) that is based on, or included in, an Integrated Resource Plan (IRP) filed no earlier than January 1, 2022. PacifiCorp's CEP must:

- Include annual goals/actions that make progress towards the clean energy targets;
- Include an examination of resiliency opportunities based on industry resiliency standards established by the Oregon Public Utility Commission (OPUC);
- Examine the costs and opportunities of offsetting energy generated from fossil fuels with community-based renewable energy; and
- Result in an affordable, reliable and clean electric system.

Section 6 of HB 2021 requires each utility to establish a Utility Community Benefits and Impacts Advisory Group (CBIAG) to help inform a biennial report to the OPUC on benefits and impacts. 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 a docket UM 2225 Work Plan Announcement, OPUC Staff (Staff) clarified near-term expectations for the CBIAG. 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 (CBIAGs) (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 CBIAG 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

On April 21, 2022, PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) filed an initial Engagement Strategy as required by docket UM 2225, to provide insight into PacifiCorp's preliminary vision on engaging stakeholders in the Oregon clean energy planning process. In that document, the Company described its intent to use its IRP and developing Community Input Group (CIG) processes as

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).

described in its Distribution System Planning Part 1 filing to provide meaningful engagement opportunities for the development and equitable implementation of its CEP.

To allow for a robust and inclusive planning process, Staff provided time for stakeholder review of the Company's initial strategy, and for the Company to continue to refine its approach for stakeholder engagement. This document, although by no means final, incorporates stakeholder input received to date and reflects the Company's ongoing efforts to build a framework for active and thoughtful engagement.

Throughout spring and early summer of 2022, PacifiCorp solicited input and feedback on its draft CEP Engagement Strategy from stakeholders through various existing stakeholder channels including PacifiCorp's May and June Oregon Distribution System Planning (DSP) Workshops, the June IRP Workshop, and various UM 2225 workshops sponsored by the Oregon PUC. On May 26, 2022, PacifiCorp provided an overview of its initial Engagement Strategy to a group of Joint Advocates², and also responded to questions. That same group submitted formal comments on PacifiCorp's initial engagement strategy directly to PacifiCorp on May 20, 2022, and to the OPUC on June 8, 2022. These comments are found in Appendix A.

The Joint Advocates focused on several consistent themes, and commented that PacifiCorp should:

- Clarify the Company's intent to utilize the CIG in place of the CBIAG;
- Make the Equity Advisory Group (EAG) membership list and CIG/CBIAG recruitment process fully transparent;
- Develop a framework for meaningful tribal engagement and include a broad cross-section of Tribal Communities in the CIG/CBIAG;
- Outline a compensation framework that recognizes the significant constraints on time and resources experienced by stakeholders, particularly Environmental Justice Communities and Community-Based Organizations; and
- Articulate how feedback, ideas, concerns, priorities, needs, and other outputs from the CIG/CBIAG will be incorporated into the planning process.

On July 18, 2022, Staff also provided additional considerations for utilities to include when updating their planning engagement strategies, including that utilities should:

- Consider how they utility can consolidate information about utility engagement processes in a single, accessible public place for stakeholders.
- Attempt to map out stakeholder feedback being collected in different planning venues (e.g., distribution system planning, integrated resource planning, Clean Energy Plan, and other relevant planning activities). Include how that information is going to flow between plans and other activities for the next filings.
 - Specify what information will be collected in non-technical spaces and how it will be collected.
 - Explain how the Company will prioritize engagement practices to support key CEP analyses e.g., input on community benefits metrics and the implementation of House Bill 2021 §4(4)(c) and §4(4)(d) or key CEP analyses.
- Provide answers to stakeholders' key questions about the formation of advisory groups to inform the first CEP, including recruitment, work plans and logistics, and accessibility.

² The "joint advocates" included Climate Solutions, NW Energy Coalition, Green Energy Institute, Sierra Club, Spark Northwest, Oregon Solar + Storage Industries Association, Oregon Citizens' Utility Board, Renewable Northwest, Community Energy Project, and Metro Climate Action Team.

- Describe the utility’s tribal outreach strategy for the first CEPs (and associated plans).

This updated engagement strategy provides additional detail on how PacifiCorp is planning to address each of these themes, with the acknowledgement that planning and community engagement processes are iterative and will continue to be refined over time with subsequent engagement strategies.

VISION FOR STAKEHOLDER ENGAGEMENT IN THE OREGON CLEAN ENERGY PLAN

For many years, PacifiCorp has been on a consistent trajectory to economically develop clean energy resources, powering both jobs and innovation across our service territories. For example, the Company's 2021 Integrated Resource Plan (IRP) accelerates a clean energy future by leveraging the abundant diversity of resources that are available across its multi-state system. The IRP continues PacifiCorp's growth into a grid powered by clean energy resources, including wind, solar, storage, advanced nuclear, battery and pumped hydro storage, demand response and energy efficiency programs.

In addition to PacifiCorp's robust existing IRP processes, the Company is dedicated to advancing stakeholder engagement and equity in planning and program implementation, and is prepared for the long-term work of breaking down the traditional barriers to participation and advancing equity and inclusion in Oregon.

As defined in Section 1(5), an Environmental Justice Community includes 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. Similar definitions are found in HB 4077 (2022) for Environmental Justice issues, and in HB 2165 (2021) related to alternative fuels transportation. In addition to engaging with CBOs as part of its existing advisory groups, PacifiCorp will look to representatives of environmental justice communities to help develop the CBIAG and for providing input on the DSP and other energy planning activities such as its Transportation Electrification Plan (TEP).

In its April 2022 initial engagement strategy, PacifiCorp outlined a process of using the CIG, as introduced in its UM 2005/UM 2198 DSP Part 1 filing, to serve as the foundation for the CBIAG for the following reasons:

- The vision, structure, and composition for the two groups are consistent;
- A strategy to form the CIG had already been scoped as part of DSP Part 1, and the DSP had completed initial research in the similar engagement issues;
- There was recognition of the potential resource burden that participation in multiple advisory groups could require of CBOs and non-traditional stakeholders; and
- It would be more efficient and less burdensome to establish one equity advisory group, rather than two separate advisory groups with substantially similar missions.

The formation of the CIG, as envisioned by DSP, was in its early stages when the Oregon PUC launched the UM 2225 CEP investigation to level-set expectations for HB 2021, and coordinate engagement with other requests for customer and community input. Over the last few months, PacifiCorp has reviewed the timing and intent for community engagement and plans to move directly to standing up the CBIAG, by incorporating stakeholder feedback and leveraging its previous work related to the DSP and other learnings as described in the next section of this strategy.

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 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 in 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 organizations.

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. A summary of the survey results was provided to stakeholders in the May 5, 2022 DSP meeting and is available at the following link: [PacifiCorp DSP 2022 Survey Results - Presentation \(5.5.22\)](#)

Findings - Benefits and Concerns

According to the survey results, the top challenges facing communities within the Company's 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 for survey participants and for the broader community: high cost of living. Customers across the state recognize that concerns of cost instability temper environmental/climate change and resiliency benefits engagement.
- 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.³ 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 at a reasonable cost. Similar to the requirement of HB 2021 to establish a CBIAG, a key component of CETA requires PacifiCorp to establish a WA equity advisory group (EAG) to elevate energy equity issues in the planning and implementation process by providing a seat at the table for 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 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 increasingly 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.

The EAG has become a valued sounding board for PacifiCorp to directly learn more about the needs of its disadvantaged communities and better develop culturally and linguistically responsive outreach to increase awareness of its energy and conservation programs.

³ Senate Bill 5116, 66th Leg., 2019 Reg. Sess. (Wa. 2019).

OVERVIEW OF PACIFICORP'S OREGON SERVICE TERRITORY

Pacific Power efficiently delivers reliable, safe energy to 243 communities across Oregon, Washington and northern California.

In Oregon, PacifiCorp not only serves two of Oregon's largest metropolitan areas (Portland and Medford) but is also the state's largest rural electric services provider. From coastal communities including Astoria, Lincoln City and Coos Bay, to high desert cities such as Bend and Prineville, the company's geographical service is diverse and spans the entire state.

The following table shows the average number of customers per customer class within PacifiCorp's Oregon service area, as of June 2022.



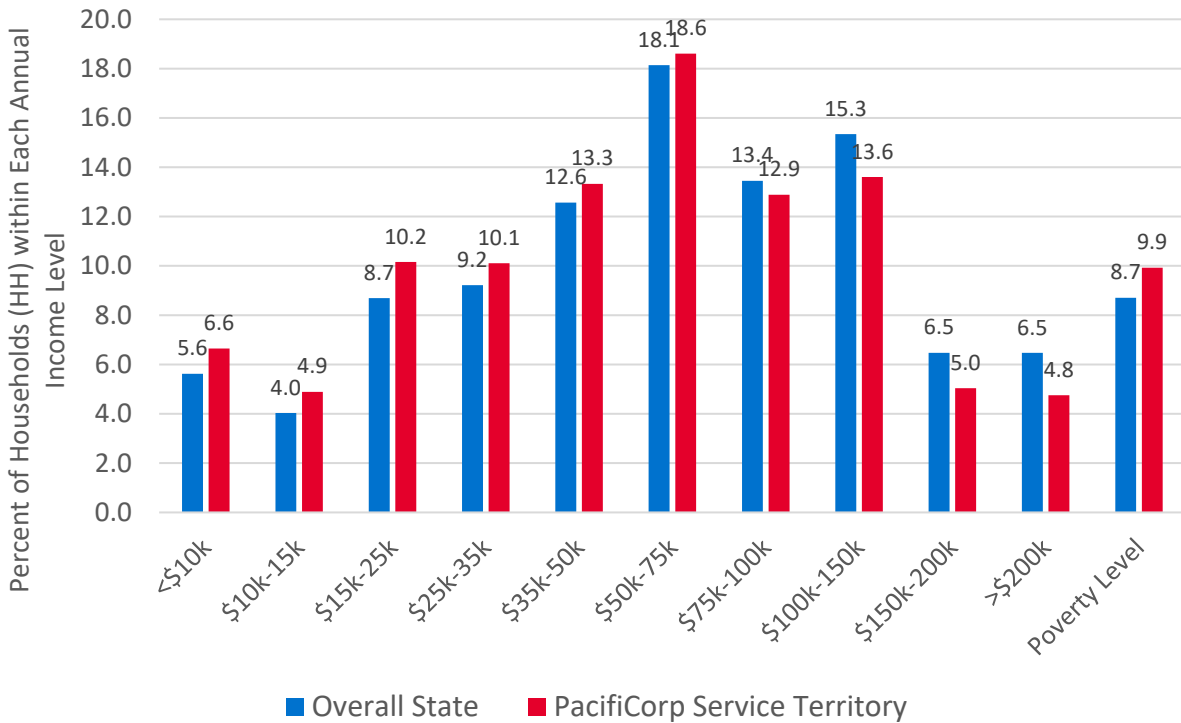
Residential	534,091
Commercial	71,383
Industrial AND Irrigation	9,071
Other Sales and Public Street Lighting	504
Total	615,049

Leveraging United States Census Bureau's American Community Survey (ACS) data,⁴ PacifiCorp has conducted a preliminary analysis of some aspects of the residential customer demographics that make up the Company's Oregon service area. The analysis proportioned the demographics at the household- and customer-level within each census tract based on its overlap with PacifiCorp's service area and then compared the averages to those at the overall state level. The Company plans to seek stakeholder input on the customer characteristics and data sources used in the analysis and will provide further updates on these statistics via discussions with the CBIAG.

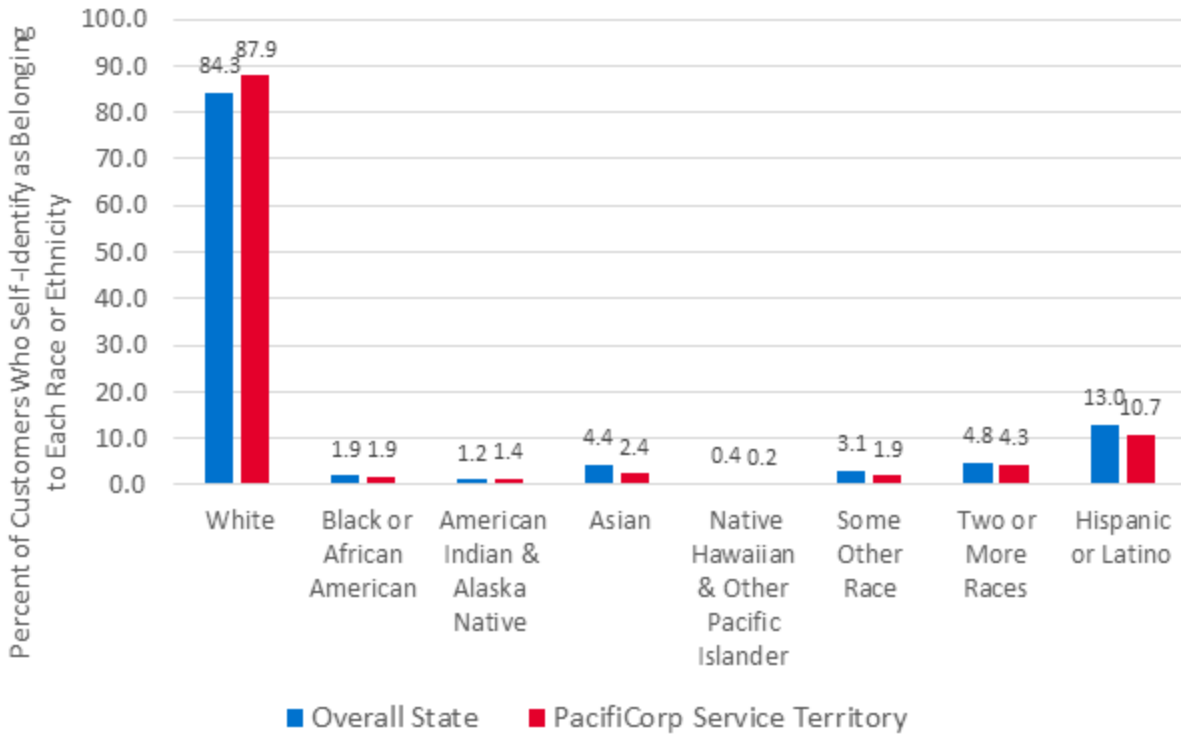
Relative to Oregon's statewide average, income within PacifiCorp's Oregon service area is lower and poverty is higher. Additionally, the proportion of population within PacifiCorp's service that is white and speaks English at home is higher than the statewide average and is inversely lower in terms of proportions of Black, Indigenous, and People of Color (BIPOC) and non-English speakers. See figures below.

⁴ US Census Bureau. 2019 American Community Survey. Tables DP02, DP03, and DP05. Available online: <https://www.census.gov/programs-surveys/acs>

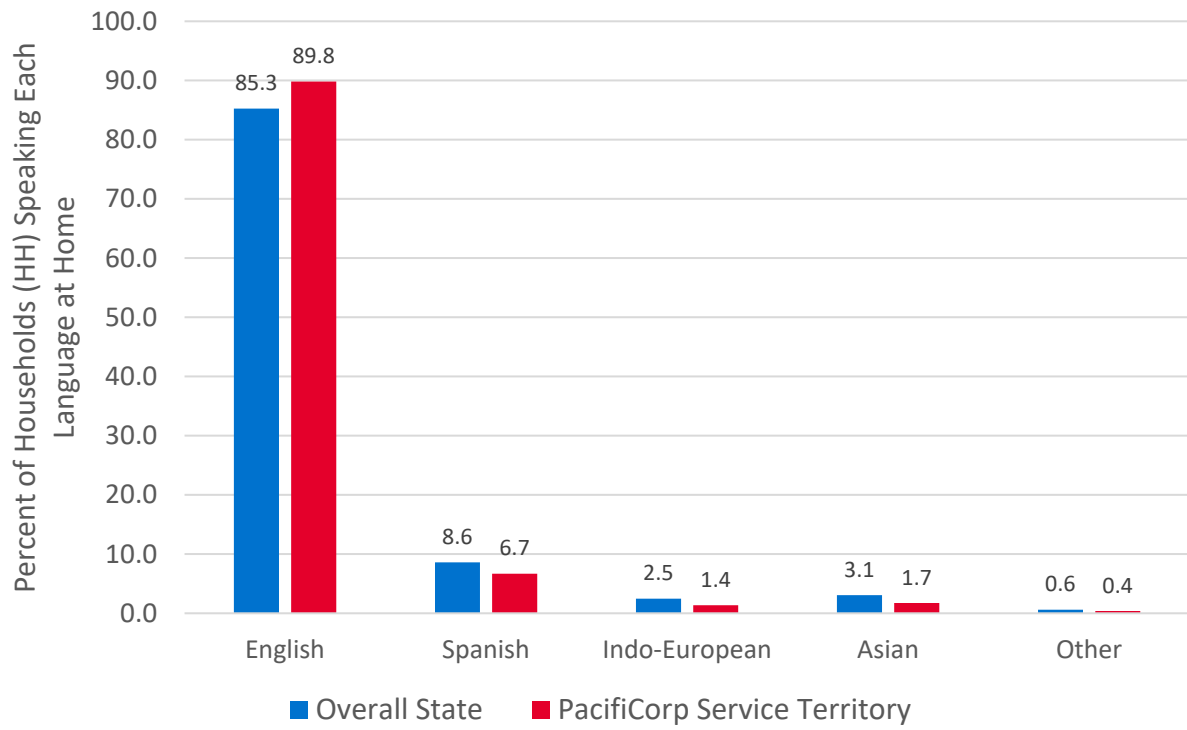
Income & Poverty - Oregon



Race & Ethnicity - Oregon



Language Spoken - Oregon

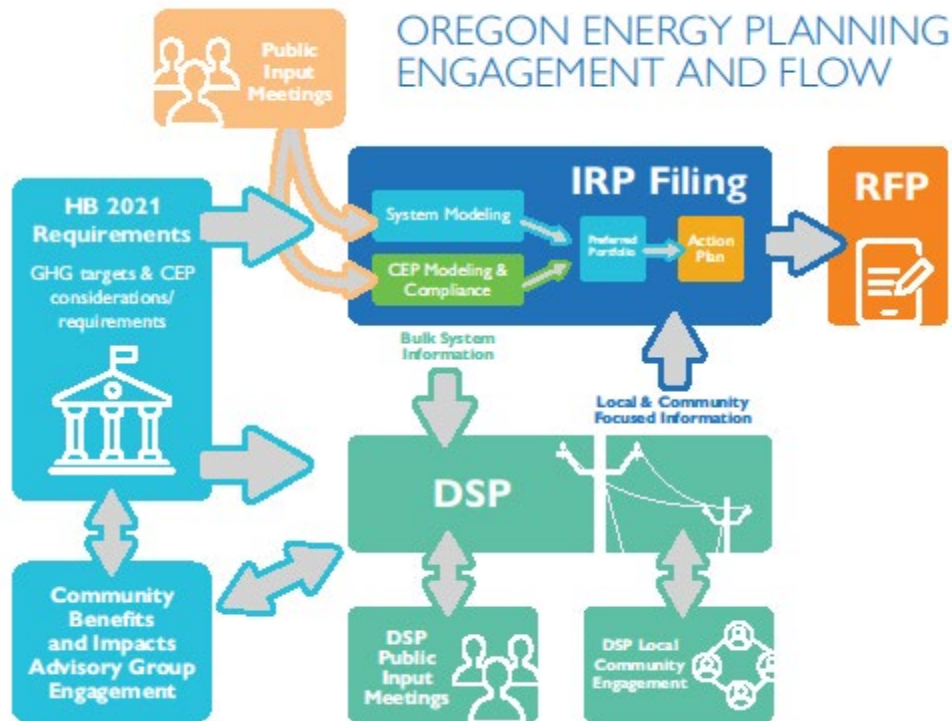


THE ROLE OF ADVISORY GROUPS

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 stakeholder engagement model for CEP planning efforts that expands existing advisory groups while starting to form the CBIAG. PacifiCorp has historically considered input throughout the planning process from the Company’s existing IRP public input process. Most recently, PacifiCorp has expanded its public input process for DSP consistent with UM 2005. These processes will continue to inform how the Company approaches long- and intermediate-term planning. Input from these stakeholders will inform the strategy to reach the Oregon emission, impact, and equity goals considered in the development of the 2023 CEP.

The CEP, as part of the IRP, will focus on the Oregon-specific emissions goals outlined in HB 2021. DSP will focus on Oregon DSP activities. The CBIAG will focus on equity and inclusion matters although overlap will certainly exist between the advisory groups. PacifiCorp will solicit input on the CEP utilizing existing resources in a facilitated manner.

The relationship between stakeholder engagement in each of the planning efforts is illustrated below.



Integrated Resource Planning

IRP Public Input Meetings

The IRP development process incorporates robust opportunities for stakeholder feedback through a series of public-input meetings. The IRP is developed through a comprehensive analysis and public input process resulting in the selection of a least-cost, least-risk preferred portfolio. While the CEP development process will feature distinct engagement through the DSP and CBIAG efforts, the IRP public-input meeting series is another forum that discusses state-specific policy updates that will include information about the CEP and help to inform where interested stakeholders can go for additional information. These additional engagement strategies will provide for broader understanding of IRP outcomes and the CEP's inclusion within the IRP.

Specifically, beginning in September 2022, the Company will host CEP discussions as part of its 2023 IRP public-input meetings. Future topics will include discussions of where the IRP filing, IRP modeling and the CEP intersect. The IRP public-input process and preferred portfolio outcome informs the CEP and ultimately, PacifiCorp's progress toward achieving the clean energy targets identified in HB2021. In addition to identifying state-specific targets for energy efficiency and demand response programs, the CEP will include any proxy supply-side resource selections needed in long-term planning to align with achieving CEP targets.

Distribution System Planning

DSP-Specific Workshops

The Company has hosted DSP-specific workshops to provide opportunities for stakeholders to be engaged, solicit feedback, and gain additional understanding of the Company's DSP process to increase transparency on how the Company plans, invests, and implements solutions on its distribution system. In Part 1 and Part 2, the Company hosted DSP-specific workshops to incorporate stakeholder feedback into current planning opportunities to gather feedback on the Company's DSP process and non-wire solutions (NWS).

The company foresees a continuation of DSP-specific workshops to continue after the filing of the company's DSP Part 2 report. PacifiCorp expects these workshops will be similar to workshops that were provided as part of Part 1 and Part 2 and will include updates on different items presented in the DSP report. Additionally, as PacifiCorp continues to evolve the distribution planning process it will use these workshops to solicit feedback from stakeholders to improve the DSP process and enhance discovery of community needs, opportunities, and priorities.

DSP-Specific Local/Small Community Workshops

In addition to the larger workshops noted above, the DSP efforts also tested smaller, location-specific engagement. This started with engagement around a potential non-wires alternative assessment in Klamath Falls, Oregon. The level of engagement from the Klamath Falls local community workshop provided valuable insight on the local community's interests and concerns that are valuable to the distribution planning studies and process. PacifiCorp will utilize its Regional Business Managers, local planning engineers and the DSP team to facilitate meetings with individuals or organizations at various points in the DSP process. The company anticipates that the outreach and engagement with the local community related to DSP may vary depending on the type of project, community preferences, and current activities and needs in the DSP process.

Transportation Electrification

Currently, PacifiCorp is initiating its work on updating its transportation electrification plan (TEP) in Oregon. As part of that process, PacifiCorp aims to engage stakeholders iteratively throughout the rest of 2022, both at the local level with customers, as well as at the state level with state, regional and national stakeholders. Engagement with these interested parties will be held via a virtual platform as well as through localized engagements throughout the service area. To date, one virtual session has been hosted for the larger stakeholder group with additional sessions planned for August and September. Six local engagements are also being planned within the company's Oregon service territory.

The goal of the engagement sessions with local community members is to gain an understanding of the barriers to TE that exist from a localized perspective and what potential program offerings or program improvements could help reduce or eliminate those barriers. Stakeholder sessions are structured to encourage discussion and gather information that will help PacifiCorp produce a TEP that is collaborative, innovative, timely and feasible.

After the draft TEP has been developed and circulated, transportation electrification stakeholder discussions will continue through the CBIAG to gather additional insight on new program development and feedback on customer programming. When needed, these meetings will be expanded to include those individuals that were part of the original TE plan development through a virtual engagement or local engagement process.

Other Engagement Considerations

The Company anticipates that key topics requiring stakeholder engagement will continue to emerge. As key topics for stakeholder engagement are identified, the Company will discuss and determine the most effective means of obtaining stakeholder feedback while respecting concerns regarding stakeholder fatigue and availability. For example, PacifiCorp is currently discussing stakeholder feedback on local needs and opportunities for resiliency including community-based renewable energy. PacifiCorp may rely on existing resources such as the advisory groups mentioned above, direct coordination with communities through the Company's Regional Business Managers, or the CBIAG. Prioritizing topics with stakeholder input throughout these engagement efforts is critical to these efforts and will inform scheduling and agendas in the advisory groups.

ESTABLISHING AND SUPPORTING A COMMUNITY BENEFITS AND IMPACTS ADVISORY GROUP

When PacifiCorp filed its INITIAL engagement strategy with the Commission on April 21, 2022, the Company proposed a hybrid stakeholder engagement model that:

- Relied on existing engagement processes related to the IRP process; and
- Developed new processes through the formation of an Oregon equity advisory group (initially contemplated as the CIG).

This remains the Company’s vision for moving forward with the formation of a single state-wide engagement group that represents the lived experiences and perspectives of communities and customers within our service territory—whether called the CIG, the CBIAG, or an Oregon Equity Advisory Group. The formation of this group is intended to conclude with an advisory group working on the elements identified for the CBIAG as described in HB 2021.

PacifiCorp is currently identifying and reaching out to a broad list of potential participants to appropriately reflect representatives of environmental justice communities within the Company’s Oregon service territory. The Company is also initiating processes to broaden engagement with frontline communities, Tribes, equity and environmental justice organizations, CBOs and others in Oregon to gauge their interest in membership. While efforts are underway, the engagement strategy will continue to be refined over time as the Company receives additional input from stakeholders.

Through the CBIAG, PacifiCorp plans to continue seeking direct stakeholder feedback to build an inclusive and accessible process for consultation and collaboration. This includes:

- Increasing participation from communities that have not traditionally participated in utility planning processes;
- Providing the Company with a better understanding of community needs and perspectives;
- Identifying barriers to participation and input on how to address these barriers;
- Acting as a conduit to exchange information and ideas between the Company and stakeholder communities; and
- Assisting with community outreach.

Identifying Community Benefits and Impacts Advisory Group Members

PacifiCorp anticipates that the CBIAG will consist of a diverse group of 10 to 15 individuals and/or organizations that represent 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 HB 2021, 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.

PacifiCorp is in the process of reaching out to CBOs that have been identified as potential members of the CBIAG based on the following membership principles:

- Include representatives of environmental justice communities, low-income customers, tribes, and vulnerable customer groups.

- Members will represent communities that are not typically represented in the energy planning process.
- Include participants from organizations across the Company's service area;

PacifiCorp initially reviewed the comments and feedback from the 24 stakeholder organizations that were interviewed in February 2022 as part of the DSP/clean energy benefit survey to identify CBOs that were representative of environmental justice communities in PacifiCorp's Oregon service territory. Working with the company's regional business managers who are actively and consistently engaged in the communities served in Oregon, PacifiCorp expanded the CBIAG recruitment process with the intention of building a membership that represents the demographic and geographic characteristics of PacifiCorp's Oregon service territory. As part of this outreach, stakeholders are being asked for suggestions on CBIAG priorities and important perspectives to consider as CBIAG discussions are designed and facilitated. They are also being asked for additional recommendations and referrals for potential CBIAG members that have direct knowledge and experience with Environmental Justice communities.

To date, outreach has occurred with the following organizations who have expressed some level of interest in participating as a group member:

- Access Helps
- AllCare Health
- Capeco
- Clatsop Community Action
- Coalicion Fortaleza
- Community Energy Project
- Consejo Hispano
- Ecumenical Ministries of Oregon
- Family Access Network
- Josephine County Feed Bank
- Klamath & Lake Community Action Services
- Mid-Willamette Valley Community Action
- Multnomah County
- NeighborImpact
- Oregon Coast Community Action
- Rural Development Initiative
- United Community Action Network

Although many of these groups have indicated that they would be interested in participating in the CBIAG, some are concerned about the level of time commitment, and need to further consider potential involvement based on resource issues. PacifiCorp is continuing the process of reaching out to stakeholders to gauge their level of interest as the Company continues to develop an initial list of potential CBIAG members, and welcomes additional input on potential participation as this process continues to unfold. As part of this outreach, stakeholders are being asked for suggestions on CBIAG priorities and important perspectives to consider as CBIAG discussions are designed and facilitated. They are also being asked for additional recommendations and referrals for potential CBIAG members that have direct knowledge and experience with Environmental Justice communities.

Tribal Engagement

As highlighted in the June 8, 2022, comments from the Joint Advocates on Preliminary Utility Engagement Strategies, PacifiCorp agrees that robust consultation with sovereign Tribal governments and communities is critical to understanding each Tribe's concerns and perspectives. As such, PacifiCorp plans to directly engage Tribal communities located within/connected to the company's service area in conversations about the most effective means of obtaining their input when planning for a clean energy future.

PacifiCorp plans to continue building upon existing relationships between RBMs and Tribal governments and communities while deepening our understanding of how to further engage Tribes in the energy planning process. As the scale of service and associated relationships varies between PacifiCorp and the Tribes that it serves, understandably there will likely be varied levels of engagement.

By expanding our engagement with Tribal leaders, PacifiCorp hopes to initially improve our understanding in the following areas:

- Each Tribe's desired level of participation in the utility planning processes;
- Barriers to participation in energy planning process;
- Preferences for engagement (*e.g.*, as part of advisory groups or alternative approaches); and
- Preferences for multi-modal communication.

Building an Inclusive and Accessible Process of Consultation and Collaboration

For the engagement of the CBIAG to be meaningful, the collaboration process must support full and authentic participation. As such, PacifiCorp plans to develop processes to address the following potential barriers to CBIAG and public participation:

- Methods and channels used within meetings should foster inclusive and clear communication. Anticipated communication methods and channels include:
 - PacifiCorp's CEP webpage (to be developed);
 - Email distribution lists including CEP stakeholders, which members of the public can join by emailing oregoncep@pacificorp.com;
 - Preparation of pre-meeting materials that outline meeting objectives and discussion topics;
 - Direct e-mail communication with CBIAG members including transmittal of pre-meeting materials prior to scheduled CBIAG meetings;
 - Spanish translation of select CBIAG materials that are posted on the CEP website;
 - Conference calls with CBIAG members (*e.g.*, when requested by CBIAG members), in cases where a CBIAG member was unable to attend a scheduled CBIAG meeting ; and
 - Cross-channel communication between the CBIAG, the IRP Public Process, and DSP Public Process to remind and notify stakeholders regarding the opportunity to participate in CEP development;
- Timing and schedules of meetings will be determined in collaboration with CBIAG members. In addition to inclusive scheduling, PacifiCorp will use the publicly facing CEP webpage to include the following information in advance of upcoming meetings:
 - meeting times;
 - meeting lengths;
 - meeting frequency; and
 - meeting location and/or format (*e.g.*, in-person or virtual).

- Feedback on language considerations and translation support from its CBIAG members to determine whether this support needs to be expanded.
- CBIAG meetings will be open to the public for observation (with anticipated opportunity for public comments during the meetings). Active participation in discussion and breakout rooms will be limited to CBIAG members. Following each CBIAG meeting, meeting notes will be posted on the Company's CEP website for public review and comment.
- PacifiCorp is piloting a program to compensate CBIAG members for their time and participation.
- Other tools, aspects, or accommodations in our process that would address barriers to participation that may exist from language, cultural, economic, or other factors or would otherwise support an inclusive environment and full participation by all CBIAG members.
- CBIAG meetings may include technical subcommittees, and opportunities for public comments or other public participation.
- We anticipate meetings will be facilitated by a third party consultant and will be held online to ensure everyone from around the state has an opportunity to participate.
- PacifiCorp understands that the initial meetings of the CBIAG will require an educational component focused on a common understanding of equity values, perspectives, and community needs and viewpoints. To receive input on the programs and processes, PacifiCorp will need to provide the CBIAG with an overall understanding of the electric industry including CEP requirements and regulatory processes.

Developing the Community Benefits and Impacts Advisory Group Collaboration and Meeting Schedule

Based primarily on PacifiCorp's direct experience in forming the Washington Equity Advisory Group, combined with the need for customer engagement on the Oregon Clean Energy Plan and DSP, PacifiCorp envisions a CBIAG that:

- Has an approximate membership size of 10-15 entities or individuals, although this number may change based on community needs.
- Asks for a one-year commitment from members.
- Anticipates monthly meetings with approximately 10 meetings per year.
- PacifiCorp is planning to pilot a program to provide compensation CBIAG members for their time and participation.⁵

⁵ The Company anticipates an initial opt-in member compensation program where member participants are compensated approximately \$400 per meeting. This compensation pilot would help mitigate the resource concerns that participants have historically encountered when participating in utility resource planning processes. Especially when meetings are anticipated to be 3 hours long, with 1-2 hours of time devoted to prepare for each meeting.

Clarifying How PacifiCorp Will Use the Community Benefits and Impacts Advisory Group

The Company understands there are many ways that the CBIAG can support PacifiCorp's long-term commitment to equity and an equitable transition to clean energy in the state of Oregon by providing input on planning work in Oregon through an open and transparent development process.

Biennial Report

As outlined at Section 6(2)(a) of HB 2021, the advisory group will to provide input on the development of a biennial report that assesses community benefits and impacts, including a description of the following:

- Energy burden and disconnections for residential customers and disconnections for small commercial customers;
- Opportunities to increase contracting with businesses owned by women, veterans or Black, Indigenous, or People of Color;
- Actions within environmental justice communities within the Company's service territory intended to improve resilience during adverse conditions or facilitate investments in the distribution system, including investments in facilities that generate non-emitting electricity;
- Distribution of infrastructure or grid investments and upgrades in environmental justice communities in the Company's service territory, including infrastructure or grid investments that facilitate the company's compliance with the clean energy targets set forth in section 3 of HB 2021;
- Social, economic, or environmental justice co-benefits that result from the electric company's investments, contracts or internal practices;
- Customer experience, including a review of annual customer satisfaction and clean energy benefit surveys;
- Actions to encourage customer engagement; and
- Other items as determined by the company and the CBIAG.

Identification of Metrics

PacifiCorp is currently identifying metrics that could track and report progress on the community benefits and impacts outlined in the previous section. While quantifying data is an important part of this initial planning process, the Company will need input and feedback from the CBIAG when making determinations as to the specific methods and appropriate metrics that PacifiCorp should implement to assess progress.

Other Areas for Collaboration

There are also specific topics where the Company may inform, consult, involve, or otherwise engage the CBIAG. Given the breadth of opportunity to collaborate with the CBIAG, while acknowledging that we will have limited time to work with them, we anticipate that we will seek input from the CBIAG on the following:

- Identification of data or resources to support the CBIAG;
- Identification of environmental justice communities and associated community mapping in PacifiCorp's service territory;
- Identification and prioritization of customer benefits and impacts;
- Communication strategies to effectively reach environmental justice communities;
- As Trusted Messengers, assistance with the distribution of an annual Clean Energy Survey to encourage participation;
- Insight on energy planning initiatives.

PUBLIC ENGAGEMENT METHODS

The company will maintain an email distribution list of CEP stakeholders, which members of the public can join by emailing oregoncep@pacificorp.com. This list will be used to promote feedback opportunities or other relevant information regarding the CEP.

Consolidated Information Hub

PacifiCorp is developing a consolidated information hub for the CEP where interested parties can access details on engagement opportunities, stakeholder comments and company responses, key issues, definitions and other related materials. This dedicated webpage will host embedded links to resources and other information broken out by specific topics related to the CEP including DSP, the IRP process, and transportation electrification.

Surveys and Outreach

As described in the previous section on leveraging previous learnings, PacifiCorp conducted a state-wide survey in February 2022⁶ to gain customer input on the transition to a clean energy future. The survey was an effective tool to gauge the baseline level of understanding of distribution planning and other processes, and the benefits and challenges for moving toward a clean energy future from the Company's residential and business customers, frontline customers and stakeholders across the Company's Oregon service territory.

PacifiCorp anticipates conducting an Oregon-specific survey annually. The objective is to identify and improve communication and engagement strategies across the wide range of customers and stakeholders, and to track benefits and challenges over time. The survey may be modified based on feedback provided by advisory groups or other stakeholders.

⁶ [PacifiCorp DSP 2022 Survey Results - Presentation \(5.5.22\)](#)

APPENDIX A

June 8, 2022

Caroline Moore
Oregon Public Utility Commission
Via email to Caroline.F.Moore@puc.oregon.gov

Re: Comments on Preliminary Utility Engagement Strategies (UM 2225)

The Joint Advocates (Climate Solutions, NW Energy Coalition, Green Energy Institute, Sierra Club, Spark Northwest, Oregon Solar + Storage Industries Association, Oregon Citizens' Utility Board, Renewable Northwest, Community Energy Project, and Metro Climate Action Team) thank the PUC for a robust and inclusive planning process in the UM 2225 docket. We are particularly appreciative of the significant time and resources staff have devoted to this important endeavor, and of staff's staunch commitment to the success of HB 2021. The Joint Advocates have submitted feedback to PGE and PacifiCorp on their preliminary strategies. We are grateful for the additional opportunity to submit these comments directly to the PUC.

Introduction

The importance of community engagement in implementing HB 2021 cannot be overstated. As Representative Pham, who serves on the House Energy and Environment Committee, said at the end of the 2021 legislative session, "The impacts of climate change are felt most by low-income and BIPOC communities - legislation we passed this year recognizes that we need to protect and support those communities as we shift away from fossil fuels." Community engagement is at the heart of HB 2021. The statute's community engagement directive does not focus simply on education and dialogue with communities, but rather on concrete equity outcomes. This work will be challenging. The process we devise now will need to be robust and flexible enough to see the strategies through.

The PUC is in a unique position to oversee the development and execution of these engagement plans. As the lead agency tasked with implementing HB 2021, the PUC will manage all aspects of resource planning through the IRPs and CEPs. Outputs from the iterative public engagement process will ultimately flow into the IRPs and CEPs. Thus, the standards developed by the PUC for acknowledgement of IRPs and CEPs, together with its review of the UCBIAG Biennial Reports, puts the agency in a position to oversee public engagement plans and ensure they are successful throughout their implementation.

Key Feedback on Preliminary Utility Engagement Strategies

Our feedback to PGE and PacifiCorp (included herein as Appendices A and B respectively) was intended to assist the utilities in developing engagement strategies that are robust, equitable, transparent, and ultimately positioned to succeed. We commend both utilities for quickly developing these plans in what has been a condensed process, and for giving stakeholders several opportunities to provide feedback. Representatives of both PGE and PacifiCorp presented to our group, and we appreciated the open and candid discussions that followed.

We include below an abridged list of key points from our feedback to PGE and PacifiCorp on their preliminary engagement strategies.

1. **Standing Up the UCBIAGs** - We support PGE's decision to stand up its UCBIAG this year to inform its 2023 CEP. We understand PacifiCorp's decision to form a Community Inputs Group ("CIG") in lieu of a formal UCBIAG this year due to the condensed timeline, but we request clarification about the long-term relationship between the CIG and prospective UCBIAG.
2. **Recruitment** - It is necessary to undertake consultation with stakeholders, with possibly the formation of an external advisory group, that could assist the utilities in identifying and recruiting UCBIAG members, in order to mitigate bias. We also recommend creating an option to join UCBIAGs that is open to the public through self-certification and unsolicited applications. UCBIAG membership should be determined by an open, accessible, and transparent process. Details about compensation, time commitment, and specific roles and responsibilities should be made available at the onset of recruitment.
3. **Transparency** - It is necessary that details of engagement plans, outreach, and UCBIAG outputs be provided to stakeholders. We also recommend that UCBIAG committee members be involved in developing meeting agendas and that recordings, notes, and attendee lists of all UCBIAG related meetings and workshops be made publicly available after each UCBIAG meeting.
4. **Role of the UCBIAGs** - Community benefits identified through the stakeholder engagement process should be incorporated into IRPs and CEPs along with the traditional cost-effectiveness methodology. If community feedback is not able to be incorporated, the utilities should provide stakeholders with an explanation as to why.
5. **Accessibility** - The utilities should consider hosting workshops and meetings with language interpretation, to ensure non-English speaking communities can participate. Partnering with community-based organizations to host community workshops for stakeholders on the IRP, CEP, and DSP processes should be considered.
6. **Compensation** - We urge the utilities to recognize the significant constraints on time and resources experienced by stakeholders, and to offer adequate compensation that recognizes the time, skills, lived experience, and unique perspectives offered by UCBIAG members.
7. **Tribal Engagement** - In recognition of the unique concerns and perspectives held by Tribal Communities, we recommend robust consultation with these communities by reserving seats on the UCBIAGs for them, pursuing additional avenues for consultation, and bearing in mind that Tribal Communities are not monolithic and have individual cultures, histories, traditions, and perspectives.
8. **Multi-modal Communications** - We recommend, particularly in relation to communications with Tribal Communities, that several modes of communication be employed, including but not limited to phone, email, postal mail, attendance at tribal council meetings, and social media. Multiple modes of communication will increase the likelihood that Tribal Communities will be aware of and able to actively participate in these processes.

9. **Unique Status of the UCBIAGs** - We support the development of multiple conduits for engagement, including through DSP and IRP roundtables and workshops, but we ask that the utilities recognize HB 2021's particular emphasis on equity and the UCBIAG as the primary vehicle for ensuring equitable outcomes in HB 2021 implementation.

PUC Oversight of the Public Engagement Process

We will respond to staff's questionnaire on acknowledgement more fully in a separate filing, but it is important to reference acknowledgement here, specifically in relation to the public engagement strategies. The PUC has historically applied a reasonableness standard to IRP acknowledgement. CEPs must now be acknowledged as well. In light of HB 2021's focus on equity, a reasonable CEP will detail the various public engagement processes, the feedback provided and community benefits identified, and the rationale for whether to incorporate this into planning decisions. Therefore, we suggest that the thoroughness of the public engagement aspects of CEPs should be an additional consideration for acknowledgement.

Furthermore, the UCBIAG Biennial Reports, in addition to their role in assessing the utility's benefits and impacts, provide an excellent opportunity to take stock of the UCBIAGs themselves, and to assess their success against a set of concrete metrics. We see significant value in a process that allows the PUC and stakeholders to provide feedback on these reports, continually assess the progress of the UCBIAGs, and offer suggestions for areas of improvement.

Thank you again for the opportunity to provide these comments. As always, feel free to reach out should you have any questions.

Joshua Basofin, Clean Energy Policy Manager
Climate Solutions

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NW Energy Coalition

Carra Sahler, Staff Attorney
Green Energy Institute at Lewis & Clark Law School

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Jennifer Hill-Hart, Policy Manager
Oregon Citizens' Utility Board

Diane Brandt, Oregon Policy Manager
Renewable Northwest

Alma Pinto, Climate Justice Associate
Community Energy Project

Metro Climate Action Team Steering Committee: Brett Baylor, Rick Brown, Pat DeLaquil, Dan Frye, Debby Garman, KB Mercer, Michael Mitton, Rich Peppers, Rand Schenck and Jane Stackhouse

APPENDIX A

Advocate Comments on PGE's Conceptual Framework for Engagement

The signed organizations thank Portland General Electric (PGE) for the opportunity to submit comments on its Conceptual Framework for Engagement. We also appreciate the utility's willingness to collaborate with advocates and community-based organizations to strengthen its approach to community engagement and look forward to continuing to work with PGE to develop and implement this framework.

HB 2021 is the product of the Oregon Clean Energy Opportunity campaign, a broad statewide coalition of advocates led by environmental justice communities and driven by a vision of a just, equitable, clean energy grid that provides benefits to Oregonians without causing harm to the communities most harmed by energy decision-making. We believe accessible and transparent engagement with Tribal and environmental justice communities is critical to the implementation of the vision.

To this end, we offer the following recommendations and notes on PGE's Community Engagement Framework:

Utility Community Benefits and Impacts Advisory Group (UCBIAG)

Recruitment

UCBIAG membership should be determined by an open, accessible, and transparent process wherein interested parties may apply and application information is available to the public in PGE's service territory. The formation of this advisory group presents an opportunity to engage new stakeholders in utility planning processes, so this opportunity should be circulated widely and with particular consideration to outreach to Tribal and sovereign nations.

Details about compensation, time commitment, and specific roles and responsibilities should be made available to those interested in participating at the start of any application or recruitment process. Additionally, the groups who led the Oregon Clean Energy Opportunity campaign have access to community networks that PGE may want to leverage when conducting outreach about the UCBIAG membership opportunities.

Role and Function

While HB 2021 names the UCBIAG as an important tool for incorporating community input into the IRPs and DSPs, it is important that this group is not the only venue for community feedback, but also helps shape and guide engagement. The UCBIAG's work will be most valuable if it integrates the input PGE gains from engaging with community members and advocates across issue areas and dockets. Further, the UCBIAG must be viewed as a critical structure, as essential to PGE's planning and decision-making as other traditional analytical tools. Community benefits identified through the stakeholder engagement process should be incorporated along with the traditional cost-effectiveness methodology. Under this method, the community benefits would be appropriately valued. Additionally, the UCBIAG's work can

highlight the benefits to specific actions the utility takes as it relates to community resiliency, especially on the survivability aspect described in previous comments.

Compensation

HB 2021 directs utilities to provide compensation to UCBIAG members for their time and travel expenses. It is crucial for participants' time, expertise, lived experience, and input to be valued, especially for environmental justice communities. Compensating members fairly helps build groups' capacity to engage in this work and strengthen PGE's operations and progress towards achieving the goals of HB 2021.

We ask that PGE include in its Community Engagement Strategy more specific details about the compensation structure, including amount and process to access funds. As previously mentioned, this information must be made available during the recruitment and application process so that groups and individuals can adequately assess their capacities.

Engagement Processes and Accessibility

We appreciate PGE acknowledging the importance of being "transparent about how feedback was considered and incorporated into" the utility's processes. We'd like to add that if community feedback is not able to be incorporated, PGE should provide stakeholders with an explanation as to why. Often, it is unclear how or if stakeholder input provided verbally (during workshops or meetings) is recorded, so PGE should illustrate how the suggestions/feedback/questions/concerns received were considered by the utility. Such transparency helps establish a continuous feedback loop between the utility and its stakeholders, and may also be useful in the development of the biennial energy reports. Recordings, notes, and attendee lists should be made publicly available after each UCBIAG meeting.

In addition to being transparent, meaningful community engagement must be accessible. PGE's partnership with community-based organizations to host community workshops for stakeholders on the DSP process has been helpful, and should be considered for other dockets and processes, such as IRP. Additionally, the utility should consider hosting workshops and meetings with language interpretation, to ensure non-English speaking communities can participate.

We also believe PGE should develop a concrete plan to conduct outreach to and engage Tribal communities in their processes. This should be a high priority for the utility. As Section 2 of HB 2021 requires "meaningful consultation with federally recognized Indian tribes," PGE's Community Engagement Framework should include in-depth strategies for Tribal engagement.

Thank you for your consideration of these comments.

APPENDIX B

Comments on PacifiCorp's Oregon Clean Energy Plan Initial Engagement Strategy

The Joint Advocates (Climate Solutions, Rogue Climate, Oregon Citizens' Utility Board, NW Energy Coalition, Verde, The Sierra Club, Coalition of Communities of Color, Renewable Northwest, Oregon Solar + Storage Industries Association, Community Energy Project, Green Energy Institute at Lewis & Clark Law School, and Oregon Environmental Council) thank PacifiCorp for the opportunity to submit comments on its Clean Energy Plan Initial Engagement Strategy ("The Strategy").

Introduction

Passage of HB 2021 was the result of a consensus reached by a broad group of Oregon stakeholders, including utilities, direct access providers, Community-Based Organizations, labor, and environmental groups. Collectively, we envisioned a just and equitable clean energy transition in Oregon - one that not only puts the state on a path to 100% clean energy, but in the process engages communities that have been historically marginalized in decisions regarding energy infrastructure. We sought to give voice to these communities in order that everyone would realize the economic, environmental, and public health benefits of a clean energy transition.

HB 2021 enshrined those values and principles into law. The legislature stated in Section 2 of the Act that, as a matter of policy, implementation of HB 2021 be done in a manner that minimizes burdens for Environmental Justice Communities. We are now in the implementation phase, and it is our duty to carry out these principles.

The primary mechanism in HB 2021 for inclusion of Environmental Justice Communities is through the Utility Community Benefits and Impacts Advisory Groups ("UCBIAGs"). By conceiving of these groups in Section 6 of the Act, the legislature created a framework not simply for dialogue with Environmental Justice Communities, but for incorporating their *active participation* in the process, utilizing their lived experience, and benefiting from their expertise, all of which are necessary components for HB 2021 implementation.

With this context in mind, we offer the following points as feedback on The Strategy.

Development of the CIG and UCBIAG

The Strategy identifies a Community Inputs Group ("CIG") as the primary mechanism for community engagement in lieu of forming the UCBIAG prior to submission of the 2023 IRP:

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).

As an initial matter, we request clarification of this statement and raise the following questions:

1. Is PacifiCorp's intent to utilize the CIG in place of the UCBIAG, or is the CIG an interim group that will be replaced by the UCBIAG at a later time?
2. During the recruitment process, will PacifiCorp identify a long list of groups and individuals being considered for seats on the CIG/UCBIAG? Which groups and individuals has PacifiCorp sought advice from on recruitment efforts?
3. What lessons have been gleaned from the recruitment, formation, and facilitation of the EAG in Washington that are being integrated into development of the CIG/UCBIAG?

Best practices for recruitment should include:

1. Making the EAG membership list and CIG/UCBIAG recruitment process fully transparent.
2. Informing stakeholders as to the details of engagement plans, outreach, and educational outputs of the groups as they evolve.
3. An option to join the CIG that is open to the public to self-certify and apply in addition to the recruitment process.
4. Formation of an advisory group including both PacifiCorp staff and stakeholders that, in order to mitigate bias, jointly reviews applications and votes on CIG/UCBIAG membership.

Tribal Engagement

Tribes are included in the definition of Environmental Justice Communities under HB 2021, but Section 2 of the Act also identifies the importance of tribal consultation:

That, under existing federal and state law, the state engages in meaningful consultation with federally recognized Indian tribes. This includes consultation on the siting, permitting and construction of new energy facilities...

Tribes are in a unique position as major landowners in the state and may have concerns about impacts to sites with significant traditional, cultural, and religious importance. For these reasons, we encourage PacifiCorp to include in The Strategy a description of its efforts to implement robust engagement with Tribes. We also recognize that there are several federally recognized and non-federally recognized Tribes calling Oregon home. They are not monolithic. Therefore, it is appropriate to include a broad cross-section of Tribal Communities in the CIG/UCBIAG in order to cultivate diverse perspectives.

We suggest that PacifiCorp include multi-modal communications in its outreach efforts to tribes, including phone, email, postal mail, social media, and other communications. Multiple follow ups will likely be necessary as well.

In order to respect the capacity of tribal governments and community members to engage, both inside and outside of a CIG/UCBIAG group, we ask that PacifiCorp develop a framework for

meaningful tribal consultation. What are PacifiCorp's current plans for meaningful tribal engagement? We suggest the company explore a variety of avenues, both formal and informal, for receiving feedback and input, and provide leadership opportunities to Tribal Communities to engage in and inform the IRP/CEP process.

Compensation

We ask that PacifiCorp recognize the significant constraints on time and resources experienced by stakeholders, particularly Environmental Justice Communities and Community-Based Organizations. Compensation will help alleviate those constraints. HB 2021 allows for compensation for time and travel. We encourage PacifiCorp to outline a compensation framework in The Strategy. A framework for compensation is mutually beneficial. It facilitates active and continuous participation of these groups and ultimately makes the CIG/UCBIAG stronger and more effective, which helps PacifiCorp fully discharge its obligations under HB 2021.

Relationship of the CIG/UCBIAG to IRP and DSP Engagement

We agree with the predicate in The Strategy that multiple routes for public engagement are necessary in developing the IRP/CEP. However, the CIG/UCBIAG must be given space to act independently and autonomously. The input provided by the CIG/UCBIAG should be considered an essential value along with the traditional cost-effectiveness model. The CIG/UCBIAG is not simply a venue where members can be educated or ask questions. HB 2021 lays out a set of specific issues within the group's purview, as well as any other issues to be determined.

The Strategy lacks an articulation of how feedback, ideas, concerns, priorities, needs, and other outputs from the CIG/UCBIAG will be incorporated into the planning process, including the IRP/CEP. Stakeholder time is valuable and scarce. A schematic illustrating the flow of outputs from the CIG/UCBIAG into the planning process will help build confidence among members and ensure their work is being fully utilized. It will also help PacifiCorp and members in developing the Biennial Energy Reports, which must assess community benefits and impacts.

Thank you again for the opportunity to provide these comments.