



**Portland General Electric Company**  
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April 21, 2022

*Via Electronic Filing*

Public Utility Commission of Oregon  
Attention: Filing Center  
P.O. Box 1088  
Salem, OR 97308-1088

**Re: UM 2225 Investigation into Clean Energy Plans; Draft Clean Energy Plan (CEP)  
Engagement Strategy from Portland General Electric Company**

Dear Filing Center:

Enclosed for filing in the above captioned docket is Portland General Electric Company's (PGE) Draft Clean Energy Plan (CEP) Engagement Strategy. Per the work plan posted to the UM 2225 docket on April 4, 2022, PGE has developed this strategy as the starting point for refinement and expects to file an updated plan in this docket by May 18, 2022.

PGE welcomes feedback on this engagement strategy and views the input as critical to iterate toward a CEP engagement approach that aligns with stakeholder needs. We will be proactively soliciting feedback through multiple channels while we consider additional processes to share this strategy and capture input from community members and Oregon Public Utility Commission (OPUC) Staff.

- Please send comments or suggestions directly to PGE.
- This framework will be presented and discussed at PGE's Distribution System Plan (DSP) Partnership Workshop on April 27, 2022.
  - The meeting is from 9am-12pm; the CEP engagement discussion is currently scheduled for 11:20am.
  - Details and call-in information are available at [www.portlandgeneral.com/dsp](http://www.portlandgeneral.com/dsp).

This document is being filed by electronic mail with the Filing Center. Please direct questions or comments to Sam Newman at (503) 464-7805. We look forward to further engagement with Staff and stakeholders on our approach.

Sincerely,  
*/s/ Nidhi Thakar*

Nidhi Thakar  
Senior Director, Resource and Regulatory Strategy

# Conceptual Framework for Engagement

## Introduction

House Bill (HB) 2021 establishes an ambitious greenhouse gas emissions-based clean energy framework for large investor-owned electricity providers in Oregon. It identifies Clean Energy Plans (CEPs) as a new planning process for utilities to describe necessary actions to meet emission-based targets. Through Docket UM 2225, Investigation into Clean Energy Plans, the Public Utility Commission of Oregon (OPUC) Staff has asked utilities to propose planning engagement strategies that incorporate input from diverse stakeholders during CEP development. Staff has also encouraged utilities to align these plans with the spirit of the Utility Community Benefits & Impact Advisory Group (UCBIAG) and to leverage previous learnings in proposing their engagement strategies. In that spirit, PGE's framework described below builds on experience to date and provides the foundation for CEP engagement.

## Background: Building on Previous Learnings

Equity is at the center of PGE's community engagement framework. PGE created the equitable community engagement framework and action plan with diverse stakeholders and community partners during our Distribution System Plan (DSP) process.<sup>1</sup> That work serves as the foundation for the company's CEP community engagement framework. The framework includes our definition of equity, principles of equitable community engagement best practices, overview of human-centered design and planning, roadmap, maturity model, and tools, as well as links between equity, community resiliency, and sustainability. Our learnings are also informed by our experiences hosting Integrated Resources Plan (IRP) technical workshops and public meetings.

## Framework Development for Distribution System Planning

PGE's DSP process was inspired by the need to develop a 21<sup>st</sup>-century community-centered distribution system. As a pillar of the DSP, we committed to a strategic initiative for community engagement through our Empowered Communities initiative that enables equitable participation in the clean energy transition through human-centered planning and community engagement. Empowered Communities represents the company's efforts as an essential service provider to engage customers and new partners as well as understand where they live, work, learn and play. It also represents our efforts to co-develop solutions with customers and communities that provide transparency, direct community benefits and access to clean energy.

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<sup>1</sup> PGE's Community Engagement Plan can be found in Chapter 3 of the DSP:  
[https://assets.ctfassets.net/416ywc1laqmd/Ade5oN7SaTG7jQRTGcPzt/576380f14d90a976469968517b187f95/DSP\\_2021\\_Report\\_Chapter3.pdf](https://assets.ctfassets.net/416ywc1laqmd/Ade5oN7SaTG7jQRTGcPzt/576380f14d90a976469968517b187f95/DSP_2021_Report_Chapter3.pdf).

Through PGE's DSP development, we conducted a robust stakeholder and community outreach process; hosting over 20 workshops in 2021-2022.<sup>2</sup> DSP engagement has provided us learning and growing opportunities with respect to our engagement practices. Lessons learned through the DSP process to date include:

- Partnership engagement is a trust-building exercise and takes time
- Transparency is essential to the engagement process
- Traditional utility stakeholder meetings need to be supplemented by community-based outreach and engagement
- Radical transparency in showcasing internal planning processes builds trust with partners
- When inviting people to provide their feedback, it is important to be transparent about how their feedback was considered and incorporated into our processes
- Attention to building diversity, equity and inclusion (DEI) capacity on an understanding of terminology is necessary when inviting people to be part of a process to provide meaningful feedback
- Valuing the lived experiences and compensating community partners for their time and knowledge is important

Level-setting on terminology is crucial for partners to feel welcomed to participate and provide meaningful feedback. Recognizing this need, PGE's DSP team coordinated community workshop sessions for non-technical audiences to engage all partners meaningfully. During DSP Part 1, PGE partnered with community-based organizations (CBOs) to develop and facilitate a two-day pilot community workshop and to aggregate workshop feedback. We built on these learnings in our DSP Part 2 and are looking forward to applying them to CEP engagement.

The learnings from PGE's DSP process are valuable and have established a baseline from which we will leverage and evolve across all engagement processes; community engagement for CEP development will build on these best practices and move toward effective engagement across a range of PGE initiatives, including the formation of our CBIAG.

### **Process Consistency in Integrated Resource Plan Roundtable Meetings (IRP)**

For nearly three decades, PGE has provided transparency into the IRP development process and created opportunities for informal participation. Beginning In the 1990s, we held public meetings to help ensure the views of our customers and other stakeholders were well-represented in our plans. Today, the public process takes place in public roundtables hosted via live video broadcast which are archived and available on our website.<sup>3</sup>

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<sup>2</sup> OPUC's DSP guidance called for investor-owned utilities to conduct four stakeholder engagements over the development of DSP Part 1 and 2. PGE established monthly public meetings over an 18-month period where three distinct audiences were identified: technical, mixed general-technical, and non-technical, and pursued engagement with each audience in parallel. Over 18 months, PGE conducted 22 stakeholder engagements: sixteen for a diverse audience of general-technical and six for non-technical audiences.

<sup>3</sup> <https://portlandgeneral.com/about/who-we-are/resource-planning/irp-public-meetings>

In the current IRP cycle, we have planned at least 12 two-hour roundtable meetings, in which our IRP Team provides detailed descriptions of methodologies and welcomes input from participants. We recognize that these meetings impose a significant time commitment on regular attendees, and we have actively sought to iterate our approach to effectively present information and provide opportunities for participation.

In addition to utility and Staff attendees, our IRP roundtable meetings are regularly attended by more than 20 participants representing advocacy, environmental, industry, and community organizations. The IRP roundtables have provided an important venue for these participants to dig into important technical details of our IRP work and serve as a critical complement to the broader engagement to customers, communities, and the public that we have built into the DSP process.

## **Engagement Framework: Equity Lens, Resilience Focus, Human-Centered**

Community engagement is based on the belief that those impacted by a decision, program, project, or service system need to be involved in the decision-making process.<sup>4</sup> This belief underpins PGE’s community engagement framework, which draws on insights and recommendations provided by CBOs in our DSP process and best practices developed in diverse sectors and disciplines, including equity frameworks and toolkits developed by many organizations in the private, public, and nonprofit sectors.

Community engagement is a practice, not a procedure, and requires constant iteration, time, relationship and partnership management, and process improvement. PGE will use human-centered principles of collective impact in engagement processes, including developing a common agenda, defining terms, utilizing operating agreements, shared measurement, and continuous improvement and support systems. “Nothing about me without me” is our guiding principle for conducting and evolving toward equitable community engagement practices. Therefore, we commit to applying an equity lens in our decision-making and community engagement processes.

### **Applying an Equity Lens**

PGE’s community engagement framework views equity as “a process and outcome.”

- **Process Equity:** voices of traditionally excluded groups are centered, and their access prioritized to influence and participate in decision-making is welcomed. Power is shared with historically underserved communities, and it is clear about how their perspectives will shape programs, projects, and service systems objectives, design, implementation, and evaluation of success
- **Outcomes Equity:** results from a successful Process Equity as demonstrated by the tangible community and economic benefits for historically underserved communities

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<sup>4</sup> International Association for Public Participation. Pillars for Public Participation. <http://www.iap2.org/>. Accessed April 4, 2022.

However, Process Equity and Outcome Equity cannot contribute to addressing harmful impacts without applying an equity lens tool. An equity lens is a versatile tool. In PGE's DSP, we cite the Government Alliance on Race and Equity (GARE) racial equity tool as a starting point for utilizing an equity lens.<sup>5</sup> The tool has been used to think through community engagement processes, data collection, geospatial planning, policy analysis, and the performance of programs to ensure decisions lead to equitable outcomes.

Equity lens tools call for the use of data to surface how disparities are institutionalized into policies, cultures, and practices and how organizations such as PGE are conditioned not to consider traditionally underserved groups. Equity lenses can serve as a check tool by showing how a particular decision, policy, program, planning, and engagement initiative will benefit or impact people.

PGE commits to applying an equity lens because the lens provides us with a reflective framework that intentionally works to uncover potential or actual impacts of our actions. Using the lens will help us ensure we are not missing anything or anyone or creating unintentional barriers as we think through our planning and engagement activities.

The following are the types of high-level analytical and planning questions that equity lenses typically have:

- What decision is being made?
- Who is at the table?
- How are decisions being made?
- What assumptions are at the foundation of the issue?
- What data or information is available, and what is missing?
- How will resulting benefits and burdens be distributed?

Equity-related impacts or burdens are risks as well. Therefore, an equity lens can also be viewed as a risk mitigation tool. Using an equity lens and considering equity-related impacts and burdens as risks will feed into PGE's risk-based planning analysis. We believe this will also help us expand our understanding of the relationship between community, infrastructure, and resiliency.

### **Fostering Community Resiliency**

HB 2021 and Docket UM 2225 call for utilities to consider the economic, social, and technical feasibility of CEP actions. Currently, PGE's efforts on resilience have focused on the investments needed to anticipate, adapt to, withstand, and quickly recover from disruptive events. As we progress forward, we will deploy an equity lens to inform development of a shared understanding and definition of resiliency and community-based renewable energy opportunities.

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<sup>5</sup> Racial Equity Toolkit: An Opportunity to Operationalize Equity; Government Alliance on Race and Equity (GARE) (September 2015). Available at: [racialeequityalliance.org](http://racialeequityalliance.org).

To advance this work, PGE will consider how organizations have developed and used resiliency assessment tools to inform decision making. An example is Mercy Corps' Strategic Resilience Assessment (STRESS) guide, which has been deployed in various countries to understand "shocks and stresses" caused by environmental, social, and economic risks.<sup>6</sup> In addition, we will leverage resiliency frameworks developed by such organizations to:

- Consider how race, ethnicity, language, and disability, as well as sexual orientation and gender identity, intersect and impact those traditionally left out of decision-making processes, programs, projects, and service systems
- Inform how to engage with diverse communities by understanding how they live, work, and navigate their ecosystems and how they access social and economic opportunities
- Understand the resiliency capacities of people, households, communities, and systems needed to prepare, manage, and recover from shocks and stresses

### Human-Centered Planning

As described in PGE's DSP, environmental justice guides us toward a human-centered design and planning approach. "Energy justice" is a subset of environmental justice and refers more narrowly to the public policy, economic and environmental impacts of PGE's work on those it serves. Achievement of energy justice demands attention to:

- Procedural Justice. Fairly and competently incorporate marginalized perspectives by bringing community voices to the decision-making table
- Distributive Justice. Equitably distribute the benefits and burdens of energy infrastructure and systems
- Restorative Justice. Repair past and ongoing harms caused by energy systems and decisions

To embrace a human-centered approach, PGE will continue to focus on building skills and resources that help to address competency gaps in community engagement, operationalizing equity, and ensuring transparency and accountability.

### Ensuring Accountability

Without accountability, any engagement initiative is doomed to fail; with it, the creation of lasting relationships and solutions is possible. As PGE is concerned about the impact of our decisions, we seek to track and measure how engagement decisions will impact and benefit those with whom we engage. We will deploy the Results-Based Accountability (RBA) method, championed by GARE, to track and measure our engagement performance.<sup>7</sup> The RBA approach emphasizes the importance of beginning with a focus on the desired "end" condition or results

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<sup>6</sup> Levin, E., Vaughan, E., & Nicholson, D. (2017). Strategic Resiliency Assessment Guidelines. Portland, OR. Mercy Corps. <https://www.mercycorps.org/research-resources/strategic-resilience-assessment>.

<sup>7</sup> GARE developed the RBA method and provides an overview in their resource guide, "Racial Equity: Getting to Results" (2017), available at [https://www.racialequityalliance.org/wp-content/uploads/2017/09/GARE\\_GettingtoEquity\\_July2017\\_PUBLISH.pdf](https://www.racialequityalliance.org/wp-content/uploads/2017/09/GARE_GettingtoEquity_July2017_PUBLISH.pdf)

and working backward to the means. To measure the desired results, the RBA method encourages teams to answer three main questions, which we commit to asking ourselves:

- How much did PGE do?
- How well did PGE do it?
- Is anyone better off?

The above questions will allow PGE to use a “targeted universalism” as an equity approach to determine how our decisions impact or benefit those we seek to engage.<sup>8</sup> These questions will also allow us to use metrics or indicators to measure the success of engagement processes. Additionally, using the targeted universalism approach will enable us to:

- Acknowledge structural and systemic inequities
- Listen and communicate
- Use innovated and disaggregated data collection methods to understand inequalities, pursue procedural equity, and promote transparency
- Be iterative and continuously learn by tracking qualitative and quantitative data
- Budget for collaboration with CBOs to ensure community engagement processes center on the needs, strengths, and desires of impacted communities and CBO are compensated for their expertise

## **Clean Energy Plan (CEP) Engagement Strategies and Outcomes**

PGE’s community engagement framework described above informs our approach to CEP engagement. We seek to engage with those impacted (positively and negatively) by our work, emphasizing building connection and influence where it hasn’t traditionally existed. Therefore, this CEP Engagement Framework is presented as a starting point for discussion with OPUC Staff, stakeholders, and community partners. Our proposal will be refined through the process described in our cover letter, culminating in an updated engagement strategy presented to the UM 2225 docket by May 18, 2022.

The focus of the Engagement Framework is on CEP development in 2022 and is expected to go through the first quarter of 2023. Engagement related to the implementation of CEP actions or the development of subsequent CEPs is outside of the current scope and will be considered in consultation with the CBIAG (as discussed below).

### **CEP Engagement Strategies**

PGE aims to engage communities early in our decision-making process and identify which level of engagement makes sense based on the opportunity – ranging from information sharing to consultation to shared decision-making. In doing so, we will seek to:

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<sup>8</sup> Targeted universalism means setting universal goals pursued by targeted processes to achieve those goals. Within a targeted universalism framework, universal goals are established for all groups concerned. The strategies developed to achieve those goals are targeted, based upon how different groups are situated within structures, culture, and across geographies to obtain the universal goal. Targeted universalism is goal oriented, and the processes are directed in service of the explicit, universal goal.

1. Apply the Community Engagement Framework as described above, committing to operate transparently and accountably through the application of an equity lens
2. Leverage existing venues and work to efficiently use contributors' time and resources while minimizing duplicative work efforts and/or unnecessary meetings. DSP and IRP-related work groups, in particular, will be leveraged for CEP as described below.
3. Listen to community members' engagement priorities. Rather than proposing highly specific engagement agendas or tactics, we intend to seek input over the coming weeks on appropriate ways to engage and reflect on what we hear in the updated plan
4. Compensate partners for their time and expertise, in recognition that we respect and value the time, knowledge, and expertise that partners bring to our planning work

### CEP Engagement Outcomes

PGE's draft approach consists of three primary areas of community engagement:

1. Co-develop approach to community lens topics, including resiliency, community-based renewable energy, and non-energy benefits
  - We anticipate that much of this work will be led through OPUC Staff's 'Community Lens' workstream. We place high value on informing these discussions through direct input from community partners, and we will create additional opportunities for information on values and expectations from community members.
  - **Proposed engagement pathway**. This work will rely heavily on DSP Partnership Workshops and Community Workshops in which conversations on these topics are already underway.
2. Provide meaningful opportunities to review interim results and contribute to analytical methodologies
  - Due to the timing of the CEP rulemaking process, quantitative details and draft action plan recommendations are already slated for presentation through IRP roundtable meetings and DSP Partnership Workshops. We will add CEP-related items to the agendas for already-scheduled events to ensure sufficient opportunity for presentation and feedback on incremental CEP analysis.
  - **Proposed engagement pathway**: IRP Roundtable meeting series and DSP Partnership Workshops
3. Transparent development of CEP scope, contents, and document
  - We have learned from past planning efforts that draft plans should be shared and presented publicly with opportunities for public input in advance of formal filings. We anticipate sharing an outline and an initial draft of our CEP through multiple venues, including the IRP roundtable meeting series.
  - **Proposed engagement pathway**: Since these drafts will be shared later in 2022, we will review this element of the engagement strategy with the CBIAG as we develop a detailed plan.



## Alignment with Community Benefits and Impacts Advisory Group (CBIAG)

In addition to the CEP, HB 2021 also provides for the formation of CBIAG. PGE intends to move forward in 2022 to establish this group in advance of developing its first biennial Community Benefits & Impacts (CB&I) Biennial Report, expected to be filed in 2023. HB 2021 provides guidance on CBIAG scope and specifies that CBIAG members will be compensated for time and travel costs related to their participation.

PGE is readying an initial engagement process to seek input on steps we will take to initiate the CBIAG. This planning intersects with the CEP Engagement Framework in two ways:

1. CBIAG will be a future venue for CEP engagement. Once the CBIAG is established, it can be used as a channel for CEP engagement, in keeping with legislative language stating the CBIAG may “advise on other matters, including... The development and equitable implementation of a clean energy plan.”
2. Align public review of CEP Engagement Framework with input on CBIAG. By aligning these two efforts, we hope community members will understand the context for these two related efforts and we can ensure efficient use of their time.

Ultimately, we see high value for the CBIAG as an enduring body that can contribute to the development of future engagement plans, implementation of planning activities, and review of community outcomes in the spirit of this conceptual framework.

## Next Steps

PGE’s Conceptual Engagement Framework outlines our approach to meeting HB 2021 requirements with a human-centered approach and leading with an equity lens. The work requires us to co-develop solutions with communities and develop solutions that deliver value to both them and the grid. We see it as imperative to pursue the twin goals of social justice, including racial equity, and decarbonization to ensure that we address disparities and impacts within the environmental justice communities PGE serves.

Our next steps for the CBIAG and CEP will be to:

- Continue to build on previous learnings and evolve over time, leveraging our IRP and DSP experience to date
- Apply the Engagement Framework’s focus on equity, resilience and human-centered design to our engagement approaches
- Ensure accountability and measure our commitment, leveraging feedback loops on decision-making, and tracking and measuring success
- Ensure co-developed CEP engagement strategies and outcomes, leveraging a shared decision-making approaches and joint outcomes
- Develop and create of a robust and diverse CBIAG

We look forward to working with OPUC Staff, stakeholders, and partners on the development of the CBIAG and the CEP.