BEFORE THE

PUBLIC UTILITY COMMISSION OF OREGON

UM 2389

In the Matter of PUBLIC UTILITY COMMISSION OF OREGON, Justice Funding Precertification Application and Budget	NOTICE AND APPLICATION TO REQUEST HB 2475 INTERVENOR FUNDING PRE-CERTIFICATION OF OREGON JUST TRANSITION ALLIANCE

SUBJECT: Pre-certification application for 2027

Oregon Just Transition Alliance, a fiscally sponsored project of Community Initiatives, hereby submits its Notice and Application to Request HB 2475 Intervenor Funding Pre-Certification for 2027 in the amount of $60,413. We submit this application pursuant to Section *5.2 of the Environmental Justice Communities Funding Agreement effective January 1, 2026, (See Order No. 25-409)* in time for the due date of November 17th, 2026, specified by the written from ALJ Mapes on October 12, 2026.[1]

A. Why OJTA meets the eligibility criteria set forth in OAR 860-001-0840:

OAR 860-001-0840 notes that nonprofits must meet the following criteria:

a) A primary purpose of the organization is to represent utility customers' interests on an ongoing basis;
b) The organization represents the interests of a broad class of customers and those interests are primarily directed at public utility rates or terms and conditions of service affecting those customers, and not narrow interests or issues that are ancillary to the representation of those customers as consumers of utility services;
c) The organization demonstrates that it is able to effectively represent the particular class of customers it seeks to represent;
d) The organization's members are customers of one or more of the utilities that are parties to the applicable agreement and contribute a significant portion of the overall support and funding of the organization's activities in the state; and
e) The organization has demonstrated in past Commission proceedings the ability to substantively contribute to the record on behalf of customer interests.

[1] https://edocs.puc.state.or.us/efdocs/HDA/um2389hda349909029.pdf.

Oregon Just Transition Alliance (OJTA) is a movement of about a dozen community based organizations facing environmental racism, climate change, and economic exploitation – the frontlines of injustice and the frontlines of change. OJTA was founded in 2017 by OPAL Environmental Justice which has since dissolved, to move Oregon toward an economy that is rooted in our shared values, the principles of a Just Transition. Today, we bring together and represent advocacy groups, community based organizations, and community members committed to base-building in frontline communities and work on the intersections of climate justice, energy affordability and energy justice, and environmental justice policy.

OJTA represents and partners with alliance members in PGE territory in the Portland Metro region, Pacificorp and Avista territory in Southern Oregon and North Portland, Northwest Natural territory in Western Oregon, and Cascade Natural Gas in Central/East Oregon. Throughout all the geographic regions, OJTA's priorities in both legislative policy, community engagement and rulemaking remain how energy rates and programs, utility development, and the transition to clean energy pursuant to HB 2021 impacts or benefits lower income communities and environmental justice communities. **Thus, we represent the interests of such communities on a wide geographic scale, and our members are customers of one or more of the utilities that are parties to the applicable agreement and contribute a significant portion of the overall support and funding. It is also within our mission (primary) interest to continue doing so.**

Oregon Just Transition Alliance was an approved Environmental Justice Intervenor in 2023 and 2024, and most recently for 2026. We are currently listed as a party in the executed Justice Funding Agreement in docket UM 2389, adopted by the Commission at its public meeting on October 14, 2025, effective January 1, 2026. We now seek to apply for precertification funding that will apply to our work in 2027.

Historically, OJTA helped pass HB 2021 back in 2021, in addition to a broader Resilient, Efficient Buildings policy package in 2023- which made it easier and more affordable for all Oregonians to improve their current homes and buildings and run on clean electricity. Of particular importance is the Healthy Heating & Cooling for All (SB 868) which sets a target to install 500,000 new heat pumps that will both heat and cool homes efficiently and affordable- and provides financial assistance to purchase and install heat pumps prioritizing low-income households and those at highest risk from extreme weather. Most recently in the 2025 long session, we supported the passage of HB 3792 (OEAP expansion), and co-lead the efforts to pass HB 3179 (the Fair Energy Act) and have been in implementation of HB 3179 for over the last year.

Since the passage of HB 2021, HB 2842, and HB 2475, OJTA has been participating in the HB 2021 Energy Advocates coalition to advocate for equitable implementation and engagement of HB 2021 from utilities. Recognizing a need to have further direct community engagement and education, OJTA co-launched a community leadership program in October 2022, in collaboration with Coalition of Communities of Color, Verde, Northwest Energy Council, and Multnomah County Office of Sustainability. This cohort has continued since then, and continues to meet weekly community meetings that teach community members about our energy system and how to navigate PUC proceedings.

As such, OJTA has demonstrated the ability to **substantively contribute to the record on behalf of customer interests.** The interests reflected at the local, state, agency, and federal levels **have been with and on behalf of frontline communities or environmental justice communities,** prioritizing the needs of people of color, low-income families, people with disabilities, and people in rural areas, those most impacted by the climate crisis.

B. The types of matters in which OJTA intends to participate in 2027:

We are currently active in/have plans to be active in:

- UM 2211 - Implementation of HB 2475: This ongoing docket impacts energy-burdened households across Oregon, as utilities are tasked to consider feedback from stakeholders, such as OJTA, to create programs to address the energy burden for low-income and underserved customers. OJTA also plans to continue brainstorming additional ways to protect vulnerable customers from disconnections- in addition to working on other policy solutions to protect privacy for utility data.

- HB 3179 (Fair Energy Act) Implementation: There are four dockets associated with just the implementation of HB 3179, and OJTA is a current stakeholder/intervenor in all of them.
    1) UM 2405- general investigation docket
    2) AR 676- Multiyear plan, including implementation of Sb 688 (performance-based ratemaking)
    3) AR 677- general rate provisions and scheduling
    4) AR 678- winter rate moratorium, reporting requirements

    We plan to continue our participation in the implementation of HB 3179.

- General rates cases: While not a formal intervenor in the newly filed PGE and PacifiCorp general rate cases, utilities have already started filing for rate increases before the effective dates of the multi-year rate plans as required by HB 3179. OJTA has and will continue to participate in the environmental justice workshops and submit comments in response to some issues regarding low-income customer impacts and HB 3179 implementation within GRCs.

- Equitable policy (council(s)): We also participate in the bi-monthly Equitable Policy Council(s) of both PGE and PacifiCorp as well as increasing our proactive coordination and collaboration with both utilities and PUC staff to further our work.

- General PUC Planning- OJTA will spend time planning future ways to advocate within the PUC beyond specific dockets already in motion. Examples of arenas and topics include: coordinating with our members so that more experienced advocates can help advocates that are newer to the PUC process as they begin to engage through the pass-through funding, and undergoing community trainings such as our ongoing “Energy Justice Leadership Institute” and participating in utility equity workgroups, and procedural justice.

Additionally, as part of our requested budget below, OJTA plans to continue to support our Alliance members, and pass through resources to member organization Rogue Climate to support engaging community members on issues such as energy affordability, access to clean energy, and community climate resilience, amongst others, in partnership with OJTA staff. This is being done with the intention of increasing PUC engagement on the community and environmental justice level.

a. Rogue Climate subgrant

Rogue Climate organizes for climate justice with Southern Oregon and South Coast communities most impacted by climate change and wildfires– including low-income, youth, seniors and communities of color. With offices in the Rogue Valley and Coos Bay, Rogue Climate leads local and state-level campaigns to address the drivers and impacts of climate change, while deepening community resilience and local power.

Rogue Climate has advocated for energy justice at the PUC as an intervenor on rate cases and in bill implementation, and in 2026 we were grateful to have the support of Environmental Justice Communities Funding to elevate the perspectives of Southern Oregon and South Coast communities on energy justice issues that matter to our base. We anticipate continuing to engage in the Energy Advocates and Wildfire Advocates meeting spaces. Additionally, we will continue to sign-on and/or collaborate on relevant written comments with organizational partners like OJTA, CUB, Verde and Green Energy Institute.

In 2027, Rogue Climate will continue to grow the skills of our staff and base to engage in relevant PUC dockets. We will engage in organizational and collaborative comments on dockets that impact our base in Southern Oregon and the South Coast, which covers Avista, Pacificorps, and Northwest Natural service territories. We will educate community members about the role of the PUC in achieving a just energy transition, and support members of our base to engage with dockets that impact their lives and futures.

Upcoming dockets relevant to our organization's work include a forthcoming docket relating to the Coos Bay Pipeline purchase by NW Natural and AR 681 (Microgrids). Other dockets we could expect engaging with in some capacity include wildfire liability implementation, fuel switching, and implementation of policies we help to pass in the 2027 session (for example, plug-in solar, virtual power plants, data center regulation, etc).

C. **<u>Participating Public Utility Accounts</u>**

As stated above, OJTA is requesting a total of $60,413 in pre-certification funds from PGE, NWN and Pacific Corp from both 2026 and 2025 funds.

- Pre-Certifications Funds
    - PGE - $20,784
    - PAC - $20,784

- NWN - $18,846

  For a total of $60,413

See Attachment A for a more detailed budget.

The aforementioned proceedings and work above are eligible for precertification from each utility available this year, funding because such planned work applies to *all* utilities. OJTA has, and plans to continue to advocate for low-income ratepayers statewide, within the FAIR dockets, and for stronger consumer and disconnection protections across all utilities and counties, in addition to representing members of our statewide Alliance.

D. Budget Showing Estimated Fees and Costs

Attachment A shows the funds OJTA is asking for from each utility from funds for 2027 Oregon Just Transition Alliance respectfully requests that this Commission grant its Notice Request for HB 2475 Intervenor Funding Pre-Certification.

Dated this November 13, 2026.

Respectfully submitted,

/s/ Jamie Pang
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Attachment A

OJTA's PUC Intervenor Funding by Utility				
	Northwest Natural	PacifiCorp	PGE	Total
OJTA Staff Time				
Deputy Director of Policy and Programs	$11,227	$11,227	$13,061	$35,515
Advocacy Director			$2,406	$2,406
Subgrants to Member Organization				
Rogue Climate	$6,000	$6,000		$12,000
Community Meetings Budget	$1,667	$1,667	$1,667	$5,001
Overhead - Fiscal Sponsorship Fee	$1,889	$1,889	$1,713	$5,491
Grand Total	**$20,783**	**$20,783**	**$18,847**	**$60,413**