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 TO REQUEST HB 2475 INTERVENOR FUNDING PRE-CERTIFICATION OF COMMUNITY ENERGY PROJECT

Community Energy Project hereby submits its Notice Request for HB 2475 Intervenor Funding Pre-Certification.

Community Energy Project (CEP) is a 501(c)(3) community-based organization that represents Oregon's frontline communities, who are vulnerable to the uncertainty posed by climate change. Our mission is to partner with low-income communities on the frontlines of climate change to create more resilient, efficient, and healthy homes. We transform homes, share skills and community wisdom, and advocate for energy justice.

Since 1979, CEP has been dedicated to creating a sustainable, equitable, and green future for our clients. Forty-seven years later, CEP has worked to ease the energy burden on frontline communities and has become a part of a larger movement toward electrification to decrease carbon emissions and improve air quality. CEP does this by providing direct in-home safety repairs, weatherization, and energy efficiency upgrades for vulnerable and underserved populations. We primarily serve the Metro region, but our program offerings and advocacy efforts have spread throughout the state. Our clients include seniors, people with disabilities, women, people experiencing low income, people of color, and other historically marginalized groups. CEP annually serves over 2,000 residents.

Our services include direct in-home safety repairs, weatherization, and energy efficiency upgrades for vulnerable and underserved populations. We prioritize the service of BIPOC individuals, seniors, and low-income individuals. During our most recent fiscal year, 35% of our clients were renters, 52% were homeowners, 24% of our clients were people of color, 78% of our clients were at or below 50% Median Family Income and 74% identify as women or nonbinary. Also, 39% were seniors and 29% had someone in their household with a disability.

We recognize that the communities we serve understand their own needs better than anyone

else can. This is why we conduct surveys and focus groups, and engage in direct conversations with clients in their homes to gather feedback and incorporate their perspectives into our work. Our clients' input plays an integral role in guiding us towards building an equitable distribution of resources.

Not only do we have on-the-ground experience with direct services for low-income households, we are also part of advocacy circles in building electrification and energy justice. We advocate for low-income households who are energy burdened and we are experts in program rulemaking, program design, and policy development around electrification for single-family homes.

CEP's unique role as a licensed general contractor providing direct whole-home upgrades in low-income households gives us a unique voice in these advocacy arenas. Our services contribute to reducing carbon emissions and empowering individuals to take action to live more efficiently and protect the environment. We bring our services to as many communities as possible by removing barriers, working with trusted partners, adapting to the varied needs of different populations, and gathering and incorporating feedback.

Over the years CEP has expanded its scope beyond direct services to address systemic barriers at the local, state, and regional levels. Through our advocacy work, CEP:

- Champions energy-burdened households by ensuring policies protect low-income families from rising costs and increase access to affordable clean energy.
- Shapes program rulemaking and design with expertise in single-family electrification, helping craft equitable policies that translate into real-world solutions.
- Builds technical credibility in utility planning by engaging in Distribution System Planning, Integrated Resource Plans, and net metering to promote equity in grid modernization.
- Identifies and addresses barriers to participation by analyzing utility programs and policies, and pushing for designs that meet frontline community needs.
- Advances low-income electrification and renter access by breaking down barriers to weatherization and clean energy upgrades for underserved households.
- Protects vulnerable and low income households in utility rate cases through expert testimony on bill discounts, arrearage management, weatherization investments, and disconnection protections.
- Advocates for a just and equitable transition away from fossil fuels by centering frontline voices in coalitions, campaigns, and policymaking.
- Educates and engages communities through workshops, listening sessions, and outreach on electrification, weatherization, energy efficiency, and climate resilience

Description of areas to be investigated

<u>UM 2211 - Implementation of HB 2475</u>
UM 2211 is a non-contested docket that addresses the implementation of HB 2475 (Energy Affordability Act). This docket provides opportunities for CEP to bring our unique perspectives

on program design and implementation. As our clients are low income communities on the frontlines of climate change that are especially energy burdened, our involvement in this docket ensures that their needs are prioritized and advocated for. Utilities are tasked to consider feedback from stakeholders such as CEP to help create successful programs that effectively address energy burden for low-income and underserved customers.

CEP will continue to provide feedback on bill discount and arrearage program eligibility, enrollment, verification, level of relief, outreach, engagement, and timeline to ensure that these programs adequately address the energy burden faced by low-income and underserved communities. We will also continue to work with utilities on outreach regarding customer protections against disconnection during extreme weather events. We will also engage in the differential rate design work stream when Staff releases their white paper.

We also host workshops with other partners with the aim to educate utility customers on protections against disconnection and energy assistance programs, and to train other CBOs on how to distribute this information to their clients.

We are also a member of Pacific Power's Environmental Justice Advocates group as well as PGE's Equity Council.

UM 2377 and UE 463 - PGE and PAC Large Loads

CEP intervened in these contested cases which involved data centers in Oregon and their impacts on ratepayers, the environment, and the reliability of energy services. We will continue participating in the implementation phase for the large data center surcharge to fund LI weatherization, energy efficiency and DERs.

Implementation of HB 2021

CEP meets weekly with advocates to discuss utility clean energy targets, decarbonization, CBREs and provides feedback where relevant. We are also an active participant of the Community Benefit Indicators Advisory Groups (CBIAGs) to PGE and Pacific Power.

Implementation of EO implementation

CEP has reviewed and analyzed Staff's white papers and work plans on EO 25-25 and 25-29 implementation to ensure that the needs of low income customers and vulnerable communities are prioritized.Community Energy Project plans to continue to engage with various stakeholders inside and outside of workshops, to provide feedback through discussions and written comments in the distributional equity workstream.

LC 80 - PGE CEP/IRP, LC 85 - PAC CEP/IRP, LC 79 - NWN's IRP

These dockets are eligible because they are related to energy planning, which is an important aspect of CEP's mission to promote community-based solutions to energy issues.

Energy Trust of Oregon - Conservation Advisory Council

CEP also serves on ETO's Conservation Advisory Council, where we review and discuss selected energy efficiency and renewable energy issues, and follow ETO's implementation of OPUC policy.

ETO 1 - Energy Trust of Oregon Multiyear plan and UM 1893

These are relevant dockets for CEP as they require ETO to deliver on its strategic plan of serving priority populations, supporting community resiliency and coordinating offers with related utility programs. They also address energy efficiency avoided costs, which determine which measures are considered cost-effective. We will continue to attend workshops, submit feedback and monitor these dockets for opportunities to engage as they rise.

Rate Cases

CEP considers these dockets eligible because they affect residential customers and CEP's mission to ensure that low-income and underserved communities are not disproportionately affected by the actions of utility companies. CEP will monitor and review any upcoming rate case filings and determine whether intervention is needed by CEP. CEP also intends to continue to be involved in environmental justice workshops that run in tandem to these rate cases if it is unable to intervene, and in any issues that grow out of these proceedings.

Community Engagement

CEP regularly engages with community members to better advocate for their needs in front of the PUC. CEP brings a very important perspective through its direct in-home work with clients, workshops and listening sessions for community members, most of whom are PGE, PAC and/or NWN customers.

- CEP has an Advocacy Newsletter where CEP shares policy updates with partners and community members, and also shares opportunities for public comment and attendance for public meetings related to the PUC.
- CEP conducts multiple community listening sessions each year on topics ranging from wildfire education and preparedness, climate resilience, fuel switching, and our clients experiences with full energy retrofits.
    - Our findings from these sessions have been used to inform our comments at the PUC, and are also compiled into public facing reports so that they may be used by other parties to influence their decision making.
    - These reports will help amplify community priorities around climate resilience, energy affordability, wildfires and emergency preparedness, energy efficiency and other related topics. CEP has shared these Listening Session Reports to maintain transparency, reinforce community trust, and to help push for equitable policies at the PUC that prioritize the needs of environmental justice communities.

General PUC Planning

Community Energy Project spends time planning future ways to advocate within the PUC beyond specific dockets already in motion. Examples of arenas and topics include:

- CEP is a member of Avista's Equity Advisory Group where it advises utilities on meaningful engagement with advocates on utility processes.
- Interconnection and small-scale/ community owned solar - interconnection creates large, expensive bottlenecks in the development of community-owned solar, as shown in the Oregon Community Solar Program.
- CEP is engaged in the upcoming legislative session and will support its implementation, including tracking relevant bills, participating in stakeholder discussions, and supporting rulemaking and other implementation efforts.

CEP also intends to be involved in other dockets that impact the following areas:

- Decarbonization/electrification
- Grid equity
- Net Metering
- Grid Enhancement Technologies

Budget Showing Estimated Fees and Costs

Attachment A and Attachment B submitted herewith set forth the estimated fees and costs. CEP understands that this is a requested budget and if any changes are necessary to accommodate other groups seeking funds, CEP will adjust its work as needed. Community Energy Project respectfully requests that this Commission grant its Notice Request for HB 2475 Intervenor Funding Pre-Certification.

Dated this November 16, 2026.

Respectfully submitted,

Charity Fain

/s/ _____

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Attachment A			
Community Energy Project Proposed Budget			
Employee	**Billable Rate**	**Hours**	**Cost**
Executive Director	$275	10	$2,750
Advocacy Director	$200	80	$16,000
Climate Justice Associate	$140	90	$12,600
Policy and Advocacy Manager	$170	98	$16,650
Subtotal			$48,000
Outreach (Community Listening Sessions 2 at $1500 per)			$3,000
Total			**$51,000**

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	Attachment B					
	Community Energy Project Proposed Budget by Utility					
	By Utility					
	PGE		**PacifiCorp**		**NWN**	
Employee	**Hours**	**Cost**	**Hours**	**Cost**	**Hours**	**Cost**
Executive Director	3	$825	3	$825	4	$1,100
Advocacy Director	27	$5,400	27	$5,400	26	$5,200
Climate Justice Associate	30	$4,200	30	$4,200	30	$4,200
Policy and Advocacy Manager	33	$5,610	33	$5,610	32	$5,430
Community Listening Sessions		$1,000		$1,000		$1,000
Subtotal		**$17,035**		**$17,035**		**$16,930**
Total						**$51,000**

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