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 VERDE

Verde hereby submits its Notice of Request for HB 2475 Intervenor Pre-Certification Funding

Background:

OAR 860-001-0840 notes that nonprofits must meet the following criteria in order to get intervenor pre-certification funding:

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.

Verde is a 501(c)(3) community-based organization that represents environmental justice communities, in particular in the Cully neighborhood, mostly in Pacific Power territory and a small corner in Portland General Electric territory, and more broadly across the state through collaborative coalition work. Verde is one of the longest-running people of color-led environmental organizations in Oregon. Verde serves communities by building environmental wealth through social enterprise, outreach, and advocacy. We reinterpret sustainability as an

anti-poverty strategy. Verde partners with communities most impacted by environmental injustices to develop solutions that create economic and collective well-being. Since 2005, Verde has brought environmental infrastructure to low-income neighborhoods, engaged residents to design and implement these projects, and ensured that environmental investments contribute to community well-being.

Verde was founded in 2005 for two reasons. First, traditional sustainability, environmental, and energy advocates, despite a foundational commitment to equity, typically did not engage low-income people and people of color and the spaces they worked in were not representative of the people who were impacted by those decisions. Similarly, peer community organizations (groups that represent and organize low-income people and people of color) did not engage with sustainability, environmental, and energy policy as a result. Verde has worked for almost two decades to connect environmental justice communities and organizations to policy-making spaces like the Public Utility Commission (PUC) and to ensure that those spaces are equitable and accessible. Verde was one of the primary advocates for HB 2475 and the preceding bills that helped to establish this intervenor/justice funding program. To that end, Verde has engaged in (PUC processes for over six years, working to advocate for environmental justice communities in many dockets without the support of intervenor funding. It has been a long road to get here and we are proud to have helped support the creation of this program.

Organizational History: Verde truly represents the communities we serve. Verde is led by an Latino Executive Director, 60% of Verde staff identify as BIPOC and many are bilingual, and Verde has one of the most diverse boards of any Portland-based environmental organization. Verde programs strengthen communities through three program areas:

- Advocacy - We mobilize community members and coalition partners to advocate for equitable policies that address air quality, energy, transportation, and water justice.
- Community Engagement - We engage community members around the issues impacting them, provide environmental education, and connect them with agencies to produce solutions to environmental problems.
- Clean Energy Solutions and Green Infrastructure - We help homeowners access low and no cost heat pumps, weatherize homes, and develop community solar projects to help homeowners save on utility bills. We work on green infrastructure projects to reduce urban heat island effects.

Over 20 years, Verde has accomplished many important projects that strengthen communities and address environmental injustice. Signature accomplishments include:

- *Cully Park*: Transformed a 25-acre landfill into a park in the under-served Cully neighborhood. Raised $14 million over six years to build the park, engaged thousands of Portlanders in the design and build, and achieved 70% minority and woman-owned business participation.
- *Portland Clean Energy Fund*: Co-lead a campaign to establish $40-60 million to be

invested in climate projects in low-income and people-of-color communities in Portland, built by minority, women-owned businesses, and social enterprises partnered with nonprofits.

- *Legislative Accomplishments*: Accomplished substantial state-level policy work through Energy Affordability, Healthy Homes, 100% Clean Energy for All, FAIR, OEAP Expansion, and Emergency Heat Relief.

Public Utility Commission Experience: Since 2016, Verde has brought our blend of Project work, organizing, and policy and regulatory expertise to the PUC, including – but not exclusively through the aforementioned work. As such, we fulfill all of the requirements of OAR 860-001-0840 by representing the interests of these low-income and historically overlooked customers within matters surrounding "utility rates or terms and conditions of service affecting those customers."

Intervenor Funding Request:

Verde requests a total of $51,000 in funding, drawn from Pacific Power ($17,000), Portland General Electric ($17,000), and Northwest Natural ($17,000) funds. The funds will support staff time for the Energy Justice Association position to focus on Verde's energy regulatory and policy work and Executive Director, administrative support, the ability to retain technical assistance as needed, and community education.

Verde's Energy Justice Associate recently accepted a new position and left the organization. Verde intends to fill the position in the new year. In the interim, Verde's Executive Director will continue to work closely with a Legal Fellow from Crag Law Center. The Legal Fellow has worked closely with Verde over the last year on the issues Verde engaged on with the Public Utility Commission in our previous intervenor funding- such as helping author comments, and doing research, analysis, and writing on disconnection protections. Verde's Community Engagement & Leadership Coordinator has supported previous intervenor funded projects by engaging the Spanish-speaking community through the Lideres Verdes program and will continue to do so. This structure will allow us to continue to bring community engagement into the outlined rate cases well the position remains vacant. More detail is provided in Appendix A ("Verde Proposed Budget").

Projected Dockets:

Rate Cases:

Relevance/Eligibility: Verde intervened in five rate cases in the last two years, such as NW Natural, Pacific Power, and Portland General Electric. By continuing to actively engage in future rate cases, Verde hopes that communities are represented in the decision-making process that directly impacts them.

How Verde Intends to Engage: Verde will engage in rate cases that will impact our communities,

including low-income and BIPOC communities, and intends to try and secure reasonable and affordable rates for community members.Verde engage in rate cases by advocating for the needs of low-income and BIPOC communities. This will include, but is not limited to, analyzing proposals, presenting testimony, collaborating with partner organizations, and engaging community members to ensure their voices are represented.

UM 2211 - Implementation of HB 2475: *Relevance/Eligibility:* UM 2211 is a non-contested and ongoing docket (since 2021) that addresses the implementation of HB 2475, for which Verde was a primary advocate. This includes: PGE Advice Income Qualified Bill Discount (ADV 1365), NWN's Advice Residential Low-Income Bill Discount Program (ADV 1390), and PacifiCorp Low-Income Bill Discount Program (ADV 1412).

This docket impacts energy-burdened environmental justice communities, including Cully, which is a significantly energy-burdened community (see above Living Cully Energy Plan) in both Pacific Power, Portland General Electric, and Northwest Natural service territories. These dockets involve the development and implementation of programs that affect the rights and needs of low-income and underserved communities in the energy sector. Verde can provide its expertise in both community perspectives and utility regulation to support advocacy to ensure that programs are maximally effective for the people they serve and have a minimal impact on non-participating ratepayers.

How Verde Intends to Engage: Verde provided feedback on program eligibility, enrollment, verification, level of relief, outreach, engagement, and timeline to ensure that these programs adequately addressed the energy burden faced by low-income and underserved communities.

Utility IRP & related Dockets

Relevance/Eligibility: Verde has previously in the past been part of these type of conversations because it is related to energy planning, which is an important aspect of Verde's mission to promote community-based solutions to energy issues.

How Verde Intends to Engage: Verde plans to be engaged through the duration of any relevant and upcoming utility IRP & work alongside the Energy Advocates to advocate for the most cost-effective and clean/renewable procurement amongst the major IOUs. Verde also plans to participate in this docket as a member of the Energy Advocates coalition, and advocating for communities to be meaningfully involved in utility Clean Energy Plans, including supporting a group of community members in engaging in the process, along with Community Energy Advocates, along with Rogue Climate, Coalition of Communities of Color, Oregon Just Transition Alliance, and Multnomah County.

Implementation of FAIR Energy Act, (UM 2405, AR 676, AR 677, AR 678)

Relevance/Eligibility: These dockets collectively implement the FAIR Energy Act (HB 3179), a

core piece of the 2025 Energy Affordability Package designed to protect households from sharp, repeated utility bill increases and move rate changes out of the coldest winter months. UM 2405 is the investigation docket focused on key provisions of HB 3179, including a prohibition on residential rate increases between November 1 and March 31, new General Rate Case impact analysis requirements, annual visual representations of cost drivers, and forward-looking reporting on expected rate increases over the next 18 months. The FAIR Energy Act explicitly re-orients ratemaking toward affordability and transparency for residential customers, aligning directly with Verde's mission to reduce energy burden and ensure that rate design and regulatory processes center communities historically excluded from decision-making.

How Verde Intends to Engage: Verde intends to continue lift up community voices by coordinating with partners such as CUB, NWEC, Oregon Just Transition Alliance, Unite Oregon, and others to support community members in providing testimony, sharing lived experience with bill spikes and arrearages, and shaping affordability metrics and protections in these proceedings. Through this engagement, Verde will work to ensure that implementation of the FAIR Energy Act meaningfully advances energy affordability and stability for environmental justice communities across Oregon.

Verde also intends to be involved in other dockets that impact the following items:

- Decarbonization/electrification
- Energy affordability and low-income rate-payers including rate revisions
- Grid equity and grid modernization
- Community solar, community energy, distributed energy resources, and distribution system planning
- Equity metrics and diversity, equity, and inclusion broadly within PUC processes and work
- Transportation electrification
- Disconnections
- Resilience

Budget Showing Estimated Fees and Costs:

Appendix A below shows the funds and associated budget Verde is asking for from each utility from funds starting in 2027.

Dated this 16 day of November 2026.

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APPENDIX A
VERDE PROJECTED BUDGET

Verde Internal Expenses	**Rate**	**Hours**	**Cost**
Staff			
[*role to be filled]* Energy Justice Coordinator	$100	216	$21,600
Izzy Meda, Executive Director	$175	40	$7,000
Stacie Walen, Finance Director	$150	6	$900
Staffing Subtotal			$29,500
Contracting			
TBD, Technical Assistance Provider	$150		$4,500
Contracting Subtotal			$4,500
Community Resources			
Lideres Verdes (Verde Community Group) (Focus Group/Training)			$3,500
Community Workshops (PUC, bill discount program education)			$8,000
Community PUC Education/Testimony Training Stipends and Accessibility Resources			$5,500
Community Resources Subtotal			$17,000
Total			**$51,000**