BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2389

In the Matter of PUBLIC UTILITY COMMISSION OF OREGON, Pre-Certification Funding Application and Budget	COALITION OF COMMUNITIES OF COLOR'S NOTICE TO REQUEST HB 2475 PRE-CERTIFICATION JUSTICE FUNDING FOR 2027

Coalition of Communities of Color (CCC) hereby submits the following request for HB 2475 pre-certified intervenor funding for 2027.

Coalition of Communities of Color (CCC) is 501c(3) organization and an alliance of 20 culturally-specific community based organizations that work directly with Black, Indigenous, and people of color (BIPOC) community members on issues such as housing, education, environmental justice, and economic justice. CCC members are largely located in the Portland metro region, with representation from the following communities of color: African, African American, Asian, Latine, Middle Eastern and North African, Native American, Pacific Islander, and Slavic. CCC is requesting precertification funding for staff time to engage in advocacy across several issue areas and dockets in 2027, and a qualified organization under ORS 757.072 subsections 1 and 2, and an Eligible Recipient as defined in Article 1(e) of the Environmental Justice Communities Funding Agreement.

Over the past 6 years, CCC has been highly involved in PUC advocacy and has gained expertise in utility regulatory policy, planning, and energy justice. We have worked closely with other energy justice advocates to elevate environmental justice issues across policy areas such as utility rate cases (UG 490 and UE 433) and HB 2475 implementation (UM 2211), drafting comments and developing ideas that protect low-income and vulnerable community

members from utility disconnections and help to alleviate energy cost burden. We are also receiving Case Funding to participate in LC 88 - PGE's 2027 CEP/IRP to focus on assessing opportunities for Community Based Renewable Energy projects (CBREs).

CCC is requesting HB 2475 pre-certification funding for 2027 to continue to support this work and participation. CCC anticipates being involved in the following issues/dockets:

1. **Implementation of HB 2475 and other dockets impacting energy affordability and low-income customers (UM 2211)**

CCC has been involved in the implementation of HB 2475 since its passage in 2021. In 2027, we plan to continue to work with partners, utility staff, and PUC staff on discount program design, evaluation, and outreach, and on utility disconnection protections for low-income and vulnerable customers. We will continue to work closely with energy justice partners to provide feedback to utilities and PUC on issues such as arrearage and disconnection patterns and protections, increasing access to energy efficiency and weatherization programs, and utility outreach and community engagement practices. We will continue to join weekly meetings with energy justice advocates to discuss this docket, as well as utility-led meetings such as Pacific Power's regular meetings with Environmental Justice Advocates, PGE's Equitable Policy Council, and NWN's Semi-Annual Energy Affordability Updates, and other meetings about bill discount programs, Energy Burden Assessments, arrearage management programs, and other protections.

Given steadily rising utility rates, energy affordability is a key priority for our member organizations and the communities they work closely with, so we plan to keep these groups in the loop on our work and share engagement opportunities with them. These matters are eligible proceedings because they focus on the implementation of programs and policies that impact low-income customers.

2. **HB 2021 Implementation and Pacific Power's 2027 CEP/IRP (LC 85)**

CCC is part of a group of energy advocates who have been very actively involved in HB 2021 implementation. We will continue to meet weekly with these energy advocates. As mentioned above, we are already receiving Case Funding for our involvement in LC 88 (PGE's

IRP/CEP). We also plan to track LC 85 Pacific Power's IRP/CEP as well in 2027. We expect to monitor and review the public filings in this docket as well as utility materials, focusing on issues in the Plans that maximize benefits and minimize burdens to low-income and environmental justice communities to ensure the standards under HB 2021 are reached in an equitable manner. These issues include opportunities for small-scale and community-based renewable energy projects and the metrics used to evaluate these opportunities, such as Community Benefit Indicators (CBIs). We will join PUC-hosted and utility-hosted meetings and roundtables and other meetings hosted by other partners, and contribute to joint written comments. This matter is an eligible proceeding because it focuses on the implementation of clean energy legislation that can deliver benefits to environmental justice communities.

3. **Community resilience, expanding access to clean energy, community engagement, and other issues impacting low-income and environmental justice communities**

Community resilience is a core priority for CCC, so we will be monitoring opportunities to engage or stay apprised of dockets that may lead to increased resilience or more clean energy projects. For example, we plan to review utility compliance filings in AR 681 (Microgrid Frameworks and Implementation of HB 2065 and 2066), for example, to evaluate community benefits and accessibility to environmental justice communities. We will also review NW Natural's 2027 IRP filings and join or review materials from related workshops to analyze for impacts to low-income customers and environmental justice communities, and will work with advocates to develop comments and feedback.

CCC has engaged local community leaders in energy justice policy advocacy and will continue to do so, in coordination with other partners. We will continue to work with other organizational and community partners to make PUC processes more accessible to the general public, more inclusive to a wider range of communities, and more equitable for those who are most impacted by the decisions made. We will continue to build on our relationships with PUC staff, utility staff, and other stakeholders to shape effective engagement strategies. This is an eligible matter because establishing meaningful engagement forums for communities to offer input is essential to ensuring that energy decisions deliver tangible benefits to the communities who need them most.

4. **Rate cases**

CCC has intervened in several general rate cases over the past 6 years. CCC will monitor any upcoming rate case filings and determine whether CCC should intervene. CCC also joins environmental workshops hosted in conjunction with rate cases, and will continue to do this even if we are unable to intervene formally in the case.

Budget

We request a total of **$26,950** to be directed towards CCC staff time and administrative costs. The proposed budget breakdown is included in Attachment A, and the budget by utility is included in Attachment B.

Dated this 17th day of November 2026.

Respectfully submitted,



Nikita Daryanani
Coalition of Communities of Color
221 NW 2nd Ave., Suite 303, Portland, OR 97209
nikita@coalitioncommunitiescolor.org

ATTACHMENT A
Coalition of Communities of Color (CCC) Proposed Budget
2027

CCC Internal Expenses	**Rate**	**Hours**	**Cost**
Staff			
Nikita Daryanani, Climate and Energy Policy Manager	$175	140	$24,500
Admin costs (10%)			$2,450
Total:			**$26,950**

ATTACHMENT B
Coalition of Communities of Color (CCC) Proposed Budget By Utility

	PacifiCorp	**PGE**	**NW Natural**	**Total**
CCC Staff Time	$8,983.33	$8,983.33	$8,983.34	**$26,950**