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 ACTION PARTNERSHIP OF OREGON

Community Action Partnership of Oregon hereby submits its Notice of Request for HB 2475 Intervenor Funding Pre-Certification for 2027 in the amount of $51,000. We submit this application pursuant to Section 5.2 of the *Environmental Justice Communities Funding Agreement effective January 1, 2026*, in time for the due date of November 17, 2026, specified by the written notice from ALJ Mapes on October 12, 2026.

(A) Applicant Eligibility:

Community Action Partnership of Oregon (CAPO) is the 501 (c)(3) state association of 18 Community Action Agencies (CAAs) that carry out the federal Community Action Program ("CAP"). The 1964 Economic Opportunity Act established CAAs to fight poverty by empowering lower income households. CAAs are a unified and strong network of local and regional service providers with decades of foundational expertise and community presence providing integrated services to households in need. Oregon CAAs serve over 260,000 individuals every year with food, energy, housing, crisis prevention, asset building, education, case management, and youth support programs. Our agencies specialize in serving some of our community's most vulnerable with a wrap-around service model—including families in active financial crises, homebound seniors, rural and farmworker communities, households with language barriers, and households who lack tools and technology needed to self-serve or need extra support to overcome barriers and navigate programs.

Community Action Agencies are the designated implementors of the federal Weatherization Assistance Program (WAP) and Low-Income Home Energy Assistance Program (LIHEAP), and ratepayer-funded Energy Conservation Helping Oregonians (ECHO) and Oregon Energy Assistance Program (OEAP) funding through the state grantee, Oregon Housing and Community

Services (OHCS). CAAs implement and leverage many sources of federal, state and Investor Owned Utilities (IOU) and Consumer Owned Utilities (COU) ratepayer funding, including funds through subgrantee contracts with OHCS, to provide wrap-around services to alleviate causes and conditions of poverty by addressing energy burden, utility affordability and crisis events. CAA network members also provide income verification for utility low-income programs. CAA programs largely serve Oregonians with incomes at or below 60 percent of State Median Income and/or 200% of the Federal Poverty level. CAA clients include seniors (60 years and older), people with disabilities, families with children eighteen (18) years of age and under, veterans, people of color, and other historically marginalized groups, all with disproportionally high energy usage and energy burdens. CAAs also regularly encounter Asset-Limited, Income Constrained, Employed (ALICE) households that may be over-income for core programs, but whom CAAs aim to serve as they can including through referrals to appropriate resources.

Annually, CAAs serve tens of thousands of low-income households through utility assistance and whole-home weatherization programs, including customers of all six investor-owned utilities. This experience positions the community action network, through CAPO, to advocate on behalf of low-income utility customers, including those who live outside major metro areas. Not only is our shared primary purpose to serve and represent low-income customer needs and interests, but we are positioned to develop policy positions and contribute to the record. CAPO identifies utility policy issues and advocacy positions in partnership with Oregon Energy Coordinators and Affiliates (OECA), a network that brings together staff from CAA low-income energy conservation and utility assistance programs across the state. OECA has a long history of bringing together low-income energy service providers, utilities and other affiliates, and continues to be an important venue for coordination, education, mentorship, training, feedback gathering for and to CAPO and OHCS. In-person and virtual network gatherings offer the opportunity to interrogate policy proposals, hear feedback and low-income client stories and experiences from across the entire network and develop advocacy positions.

CAPO's utility policy program works closely with CAA program staff to uplift stories, experiences, insights and recommendations, and is also housed under Oregon Training Institute (OTI), the only IREC accredited weatherization workforce training program in the state. CAPO is positioned to bring technical and workforce program development expertise to policy implementation spaces as well, with expert trainers and a workforce development program in-house

Rural Customer Representation: CAPO is well-positioned to represent the needs and interests of low-income residential customers not only from the most populated communities in the state, but particularly from rural areas, across all six investor-owned utility service territories. Rural residential customers face higher barriers to accessing support and participating in state-level advocacy efforts, and the organizations that offer support to these customers see parallel challenges in rural areas. CAPO is also positioned to represent the

challenges and opportunities in serving low-income residential customers in urban-adjacent and border regions, where competition for trained program staff can be uniquely challenging.

Past Participation: Over more than thirteen years, CAPO and network CAA programs have been involved in OPUC dockets and contributed to the record around utility affordability, energy burden, leveraging federal, state and ratepayer resources to address energy insecurity, relations tools to address low-income energy burden, income-qualified energy conservation, effects of COVID-19 pandemic on utility customers, permanent and temporary customer disconnection protections and a PGE general rate case. CAPO and CAA network members are now actively involved in a number of dockets, and we intend to expand our involvement in 2027 in eligible proceedings where consequential issues to low-income Oregonians arise.

Finally, Commission Order No.25-409 also determines that CAPO is an eligible recipient of Justice Funding grants from all six investor-owned utility funds.

(B) Projected Dockets and Types of Matters:

CAPO intends to engage in dockets that touch **issues of energy affordability, energy insecurity income qualified energy conservation, economic impact of rate changes, targeted programs for "income eligible" or low-income ratepayers, including programs related to clean energy transition, and associated reporting dockets** related to each of the investor-owned utilities that participate in pre-certification funding grants**.** We intend to participate in a variety of ways including research and analysis, workshops, public comment opportunities, presenting oral testimony, low-income advisory groups, Commission meetings, information sharing with our network, and collaboration with other EJ and low-income serving organizations. We will also monitor utility and ETO reporting. We will collaborate with EJ and other advocacy organizations whenever our interests align and will strive to find that alignment. CAPO will both represent low-income customer interests and advocacy positions uplifted and shaped by the CAA network and will support CAA network participation in eligible dockets to build network expertise and awareness of policy implementation.

The following is representative of dockets CAPO intends to investigate to determine where we should allocate staff and network resources and capacity:

- UM 2211 - Implementation of HB 2475

UM 2211 is a non-contested docket that addresses the implementation of HB 2475. All workstreams are consequential for low-income customers and the CAA organizations that support and advocate for their needs and interests and would be considered eligible proceedings. CAPO intends to participate in advocate meetings, OPUC-led workshops and

Commission meetings, will consider oral and written comment, and will monitor OPUC-required utility reporting, energy burden assessments and arrearage relief program implementation.

- UM 2417: Distributive Equity Workgroup, EO 25-25 and 25-29 Implementation

One workgroup under UM 2417 is ongoing and specific to equitable distribution of benefits in implementation of Executive Orders, and to date has specifically focused on energy conservation as a benefit-distribution tool. Outcomes of this ongoing workgroup effort will affect low-income customers of participating utilities and would be considered eligible proceedings. We intend to monitor filings, participate in workshops and public comment opportunity and Commission meetings.

- Surcharge for Large Load Customers/Schedule 111 Implementation

This named, not yet docketed process to further refine administration and implementation of a surcharge for non-cost-effective energy conservation and distributed energy resources will have direct impact on resources available to customers, including low-income households and therefore would be considered an eligible proceeding. We intend to monitor filings, participate in workshops and public comment opportunity and Commission meetings.

- ETO 1, UM 1158 – Energy Trust Multiyear Plan Implementation and Performance Metrics

The Energy Trust's planning process is an explicitly eligible proceeding and annual performance metric development is critical to understand broad and specific impact of implementation strategies for low-income households. We intend to participate in workshops, public comment opportunities, low-income program implementation meetings, Commission meetings, and will monitor regular ETO reporting, particularly as these relate to low-income offers and programs.

- AR 676 – FAIR Act Implementation

This is an eligible proceeding because it shapes transformative new rules that affect energy affordability and utility performance-based ratemaking. Implementation can also have impacts on the timing, distribution and interactivity of affordability and energy conservation programs and utility efforts to increase the quality of customer service to low-income households. The reporting requirements and multiyear framework can offer great benefits to and in serving low-income households. We will consider participating in remaining workshops, oral and written comment opportunities, advocate meetings and Commission meetings.

- General Rate Cases (GRC)

While not a formal intervenor in UE 473, we will monitor PGE's recently filed GRC and consider written comments by Q1 2027. There may be additional GRCs filed before utilities begin implementing multiyear planning. GRCs are eligible dockets because they directly impact and can increase the number of vulnerable low-income rate-payers and could impact income qualified programs that are leveraged to support low-income households. CAPO will monitor filings, consider participating in and organize participation in EJ workshops and public hearings, and determine whether to intervene.

- Investor Owned Utility IRP & CEP dockets

These dockets are explicitly eligible because resource planning and clean energy planning can and do have direct impact on low-income household utility rates and facilitate opportunities for low-income households and low-income service providers to participate in and benefit from clean energy transition. Cost effective energy conservation, community based renewable energy and required analyses and actions associated with these plans are all consequential to low-income Oregonians. We will consider participating in workshops, oral and written comments, advocate meetings, Commission meetings and monitor reporting.

- UM 1930 - Community Solar Program Implementation

This is an eligible docket because it sets the rules and guides the implementation of a renewable energy program that creates a unique opportunity for low-income households. It complements energy conservation and affordability efforts and creates opportunities where housing stock would not appropriately support roof top solar. We will monitor implementation of administrative cost savings strategies, consider participating in workshops, oral and written comments, advocate meetings, Commission meetings, and monitor reporting.

- General OPUC Planning:
    - Continued participation in EJ Advocate meetings and Utility Equity Advisory and Income-Qualified Program Implementation Groups. CAPO and OECA membership participate these groups for all Investor-Owned Utilities and work closely with utility and state agency partners to ensure that low-income customer interests and CAA program needs are represented.
    - Increase regular participation in Equitable Policy Council convenings.

CAPO will also consider investigating other dockets that relate to:

- Income-qualified energy conservation to address energy insecurity and high energy use
- Decarbonization/electrification, including implementation of heat-pump pilots and TVE
- Implementation of HB 3792
- Affordability and equity for low-income ratepayers in rate revisions
- Wildfire and community and household resiliency
- Community renewable and resiliency resources
- Utility services territory sale proposals still seeking resolution

Low-Income Customer and Service Provider Engagement:

CAPO's Community Action Agency (CAA) network, which is made up of non-profits, county government divisions and local housing authorities that run a common set of programs, are critical partners in both developing advocacy positions and ensuring representation of the interests and experiences of low-income Oregonians. CAPO's participation in eligible dockets will be done in partnership with and will be deeply informed by our network and the interests

of their low-income program participants/utility customers. The Community Action network is very well represented in the existing OECA program, which offers in-person and virtual space to engage low-income energy service providers across the state. Funding requested to support network engagement will cover a portion of the cost of regular in-person OECA convenings and staff participation in virtual engagement to develop advocacy positions, and to uplift and encourage local engagement of low-income clients in ongoing efforts to gather critical qualitative and quantitative data. In-person gatherings occur three times per year, typically in Central Oregon, the Oregon Coast, and in the lower Willamette Valley, and virtual engagement will take place on a regular basis with targeted OECA subgroups based on topical relevance. This structure allows us to ensure we represent low-income customer interests and perspectives from all geographies of the state across relevant dockets at the OPUC.

Our strategy for engagement aims to strengthen our network coordination and build deeper network capacity and knowledge toward low-income energy advocacy. It aims to reinforce Community Action Agencies' community connections as critical, local low-income utility assistance and whole-home energy conservation providers in their communities, and will support education, organization, preparation for and facilitation of network engagement in proceedings. Our strategy is also centered on the expertise of our network, both in their trauma-informed and comprehensive work with low-income households, and in administering highly technical, complex and integrated programs that achieve impactful results for vulnerable households. Through this collaborative effort, we can ensure advocacy positions and messages are reflective of both metro and non-metro low-income customer interests that reflect the specific expertise of our network of low-income energy service providers.

(C) The Participating Public Utility account or accounts from which the applicant seeks funds:

CAPO is eligible and seeks pre-certification funds from Portland General Electric, Pacific Power and Northwest Natural Gas, as outlined in attachment A. CAPO is uniquely positioned, in partnership with 18 Community Action network organizations that participate in OECA, to represent low-income customer needs and interests throughout the full scope of each utility territory. CAPO and CAA network organizations consistently aim to strengthen relationships with these utilities, particularly because of the CAA network's role in local administration and implementation of low-income utility assistance and whole-home weatherization programs. As we expand our participation at the OPUC, we are looking for ways to best represent low-income customer interests in the variety of venues where their needs are being considered. CAPO is seeking funding through the OPUC from each of these utility fund sources as they will support our efforts to work constructively with IOUs, Commission and advocate partners and represent low-income customer interests in this important regulatory space.

(D) A budget showing estimated Eligible Expenses

Attachments A & B outline estimated fees and costs to participate in this work at the OPUC. Our budget includes funding for low-income customers and service-provider engagement in partnership with our network of Community Action Agencies/Programs, which will require and financially support agency efforts to gather information from low-income customers and share it in policy implementation and advocacy position development conversations. CAPO understands that this is a requested budget, and CAPO will adjust its work as needed to accommodate other organizational funding requests. CAPO has outlined in the budget attachment how it would use $51,000 in pre-certification funding and is also positioned to increase its funding request to support deeper engagement with our CAA network through OECA to represent the interests of low-income customers, if the Commission determines it is appropriate.

CAPO respectfully requests that this Commission grant its Notice Request for HB 2475 Intervenor Funding Pre-Certification.

Dated this November 17, 2026.

Respectfully submitted,

/s/_____

Janet Allanach
Executive Director
Community Action Partnership of Oregon

Attachment A: Estimated Eligible Expenses
Hours are rounded estimates.

Project Budget:

	Hours	Total Cost
Staff:		
Lauren Kolojejchick-Kotch, Utility Policy Manager	518	$28,878
Drew Sizemore, OTI Director	78	$5,570
Low-Income Customer and Service Provider Engagement		
Support for in-person and virtual convenings of OECA network for education and coordination.		$7,500
Travel, lodging, meals to support network education and coordination		$2400
Subtotal		$44,348
15% De Minimus		$6,652
Total		$51,000

Attachment B: Estimated Budget by Utility Fund:

Hours are rounded estimates.

	PGE	Pacific Power	NWN
Staff:			
Lauren Kolojejchick-Kotch, Utility Policy Manager	$9,626 (172 hrs)	$9,626 (172 hrs)	$9,626 (172 hrs)
Drew Sizemore, OTI Director	$1,857 (26 hrs)	$1,857 (26 hrs)	$1,857 (26 hrs)
LI Customer and Service Provider Engagement			
Support for in-person and virtual convenings of OECA network for education and coordination.	$2,500	$2,500	$2,500
Travel, lodging, meals to support network education and coordination	$800	$800	$800
Subtotal	$14,783	$14,783	$14,783
15% De Minimus	$2,217	$2,217	$2,217
Total	**$17,000**	**$17,000**	**$17,000**

CAPO_PreCertificationFunding2027

Final Audit Report 2026-11-17

Created:	2026-11-17
By:	Lauren Kolojejchick-Kotch (Lauren@caporegon.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAAgQBwAlXEdYuoB30_gfP9u5hH2jHpoVgM

"CAPO_PreCertificationFunding2027" History

Document created by Lauren Kolojejchick-Kotch (Lauren@caporegon.org)
2026-11-17 - 10:40:47 PM GMT

Document emailed to Janet Allanach (janeta@caporegon.org) for signature
2026-11-17 - 10:41:12 PM GMT

Email viewed by Janet Allanach (janeta@caporegon.org)
2026-11-17 - 10:41:27 PM GMT

Document e-signed by Janet Allanach (janeta@caporegon.org)
Signature Date: 2026-11-17 - 10:41:44 PM GMT - Time Source: server - Signature Appearance Selected: IMAGE

Agreement completed.
2026-11-17 - 10:41:44 PM GMT

Adobe Acrobat Sign