

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

In the Matter of

UM 2273

**PUBLIC UTILITY COMMISSION OF
OREGON,**

Investigation Into House Bill 2021
Implementation Issues.

ROGUE CLIMATE’S REQUEST FOR
ENVIRONMENTAL JUSTICE CASE
FUND GRANT (HB 2475 GRANT),
PROPOSED BUDGET AND REQUEST
FOR UP-FRONT PAYMENT

Pursuant to Commission Orders No. 23-033, and 22-043, the Environmental Justice Communities Funding Agreement, and OAR 860-001-0800, et. seq., Rogue Climate (also referred to as RC) requests a total grant of \$44,525 from PacificCorp’s Environmental Justice Case Fund and also asks that PacificCorp be directed to provide 50% of the award to Rogue Climate an up-front payment pursuant to OAR 860-001-0890 and Section 7.2 of the Agreement and states the following in support.¹

Rogue Climate has filed a Petition for Intervenor status. Rogue Climate has been deemed to be eligible for Environmental Justice Funding in Orders 22-043, 23-033 and 23-180. This proceeding was deemed to be an eligible proceeding in Order 23-180 and Rogue Climate has been pre-approved for a case fund in this docket in the amount of \$14,990.19 in Order 23-180. In that Order, Rogue Climate was invited to seek additional case funds for work in this docket and is doing so here. The additional amount sought is \$29,534.81. Rogue Climate is seeking to

¹ As of the date of filing the Intervenor Funding Summary stated that over \$95,000 was the available balance of PacificCorp’s Case fund.

fund all of its work in this docket pursuant to a case fund grant and will use the Pre-Certified Grant funds awarded in Order 23-180 for other work in the dockets identified in that grant and for other dockets which present issues such as decarbonization/electrification, wildfire planning, grid equity and equity metrics, disconnections, and resilience.

Rogue Climate incorporates by this reference the points and authorities it submitted in its request for a pre-certified grant in UM 2276 and otherwise restates the specific discussion about Rogue Climate's intended participation in this proceeding:

UM 2273 - HB 2021 Implementation (UM 2225):

Rogue Climate plans to participate in this docket by advocating for the implementation of HB 2021, which promotes equitable access to clean energy for all Oregonians. This docket is eligible because it is not a complaint proceeding and it is a contested case proceeding establishing public policies affecting the quality and price of utility services and utility resource planning. It is related to the legal, policy, and implementation questions related to CEPs which are HB 2021's mechanism for implementation of the emissions reduction targets. The mechanism requires the electric utilities to decarbonize their retail electricity sales with consideration for direct benefits to local communities. This docket will affect the planning and service provision of both PGE and PacifiCorp.

RC intends to participate in all aspects of the proceeding as an intervener, represented by counsel. RC and will review and analyzing testimony, comments and supporting documentation. It will engage the services of counsel and devote staff time to conferring with and directing counsel. Counsel and/or staff will file briefs, pleadings, comments, testimony and supporting information and otherwise participate in the proceedings by researching and investigating the issues. RC will also continue its work with the cohort to foster public engagement in this proceeding. RC will continue its work engaging in Customer Benefits and Impacts Advisory Group workgroups and with members of those groups to promote success of CEPs.

This work aligns with RC's mission to promote community-based solutions to energy issues, including reducing greenhouse gas emissions and ensuring equitable access to clean energy on a state-wide basis.

Statement of Work to be Performed

Rogue Climate has been tracking its participation in this proceeding by hours and activity

and submits the following in support of the proposed budget attached hereto as Attachment A. Rogue Climate has and intends to participate in every procedural aspect of these proceedings. Rogue Climate will participate in party conferences, and workshops and settlement negotiations/conferences. Rogue Climate intends to review and analyze the testimony, comments and supporting documentation filed in these proceedings. Rogue Climate intends to seek discovery/information requests - formal or informal - and will reciprocate by responding to reasonable, relevant requests asked of Rogue Climate. Rogue Climate intends to file briefs, testimony and supporting information in these proceedings and participate in any hearings, if appropriate.

Description of Areas to be Investigated

Rogue Climate's investigation will include the areas identified by the Commission in Order 23-194 and the following areas, among others:

Potential public interest factors that could give the Utilities guidance for acknowledgment of their Clean Energy Plans and the policy and legal basis for the Commission to cabin some of its discretion by adopting such factors.

Analysis of how to achieve the policies identified in the policy statement of HB 2021, including what should be required to minimize burdens on environmental justice communities and whether the establishment/practice of the advisory groups are sufficient to satisfy some of those policies.

The efficacy of acknowledgment orders and compliance filings in the RPS program and whether such measures would be sufficient to ensure continual progress and satisfaction of annual goals.

Rogue Climate will also investigate all other issues raised by other parties during the proceedings.

The Budget Showing Estimated Fees and Costs

Attachment A submitted herewith sets for the estimated fees and costs.

For the foregoing reasons Rogue Climate respectfully requests the Commission approve its budget and issue an order awarding it an Environmental Case Fund grant from PacificCorp's case fund and direct PacificCorp to provide an up front payment in the amount of 50% of the award.

This 20th day of June, 2023.

/s/ Tonia L. Moro
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ATTACHMENT A
 ROGUE CLIMATE PROPOSED BUDGET

UM 2273

RC Internal Expenses	Rate	Hours	Cost
<i>Staff</i>			
<i>RC Internal Resources</i>			
Advocacy Director, Alessandra de la Torre	150	100	15,000
Communications Coordinator	105	15	1575
Community Organizer	105	20	2100
Executive Director	185	10	1850
			Sub Total \$20,525
<i>RC External Resources</i>			
<i>Representation/Consultants/Experts</i>			
Counsel, Tonia L. Moro	300	80	24,000
			Total UM 2273 \$44,525