

HB 2475 Intervenor Funding Facilitating Increased Access



Nolan Moser
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Implementing HB 2475

- New Staff
- Focus on equity in analysis
- Facilitating participation of new stakeholders
- Implementation of HB 2475 funding opportunity
- Income driven ratemaking



- Representing low-income residential customers
- Representing environmental justice community customers

Justice Funding



HB 2475 Justice Funding

- \$500,000 available annually
- Based on agreements between recipient groups and utilities
- Agreements negotiated and memorialized in final rules



HB 2475 Funding – AR 652

- Rulemaking to develop Permanent Rules
- Coordinated negotiation
 - All utilities
 - Rogue Climate, Verde, CEP
- Larger group of many intervenors provided feedback
- PUC facilitation, CUB support
- Agreement adopted February 8, 2023 – See Order No. 23-033
- Rules adopted April 20, 2023 – See OAR 860-001-0800



Eligibility

Groups Representing

- Interests of low income communities
- Interests of environmental justice customers, including communities of color, communities experiencing lower income, tribal communities, rural communities, coastal communities, communities with limited infrastructure and other communities traditionally underrepresented in public processes and adversely harmed by environmental and health hazards, including but not limited to seniors, youth and persons with disabilities

Dockets/Matters

- Non-complaint contested cases, rulemakings, and non-contested dockets that affect the applicable utility and its low-income residential customers and environmental justice communities are eligible for funding
- Named, non-docketed Commission led processes addressing issues that affect the applicable utility and its low-income residential customers and



Pre-certified Funds

- Grant-like opportunity for groups representing PacifiCorp, PGE, and NWN customers
- For activity in multiple dockets
- Limited to 5 grants annually
- 1-time yearly application in docket no. UM 2276



Case Funding

- Case by Case request – available to groups representing ALL regulated electric and natural gas utility customers
- Must ask for funds for each docket a group want funding for (i.e., not a broad grant to participate across multiple dockets)
- Available for any type of docket – contested, non-contested public meeting, rulemaking etc.



Justice Funding Resources

- Website: <https://www.oregon.gov/puc/filing-center/Pages/Intervenor-Funding.aspx>
 - Key orders
 - Templates
 - Other resources



- Year 1 – topic area driven, discussion of process, with Commissioners
- Year 2 – process specific trainings
- Year 3 – docket specific trainings (all rate cases)

Annual Training Series



Docket-Specific Trainings

- Contested case process
- Guidance on participation with/without Attorney
- Intervenor Funding
- Docket-specific schedule review



Open-door approach to all stakeholders

- Party discussions about process, docket status, participation options
- Support for referencing existing example filings, etc.
- Goal – increase stakeholder familiarity and comfort with process, to allow for independent engagement
- Encouragement and facilitation of coalition approach to cases
- Some process accommodations, where legally/practically permissible



Interim Bill Discount Programs

We have “interim” bill discount programs in place for all 6 IOUs

Of those in effect they all have:

1. Low barriers to enrollment: self-attestation of income; auto-enrollment/categorical eligibility with LIHEAP/OEAP; multiple language, venue and format applications)
2. Targeted assistance: Tiered percentage of bill discount structures providing higher levels of relief for lower income households
3. Reporting mechanisms: to track participation rates and metrics on a quarterly basis

Some include arrearage management and forgiveness options; we are exploring the feasibility of including this feature more broadly through the UM 2211 process

All programs have seen higher participation rates and faster ramp ups than any other energy assistance program available to IOU customers in Oregon



Staff-Led Process

- Staff recently administered and synthesized an equity landscape questionnaire across advocates to inform our HB 2475 implementation strategy and identify areas to improve energy equity within Commission authority
- Staff are in the process of completing a data landscape analysis to ensure we are optimizing data collection to reduce administrative burden and enhance our capacity to thoughtfully evaluate differential rates and programs



Needs

- Continued Education on what policies/objectives individual dockets can impact
- Legal support and engagement
- Feedback on future trainings, accessibility issues
- Process feedback – from everyone



Understanding the limits of Accessibility

- Due Process protections, APA, contested cases: there are inherent limits on accommodations for unrepresented stakeholders
 - Priority therefore is building the “muscles” of our new participants – so that they can identify issues and participate fully in any process, no matter how formal Feedback on future trainings, accessibility issues



THANK YOU!



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