



OREGON

Community Benefits and
Impacts Advisory Group

2024 Biennial Report

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Acronyms

CBI	Community Benefits Indicator
CBIAG	Community Benefits and Impacts Advisory Group
CBRE	Community-Based Renewable Energy
CEP	Clean Energy Plan
DSP	Distribution System Planning
EBA	Energy Burden Assessment
ETO	Energy Trust of Oregon
EV	Electric Vehicle
IRP	Integrated Resource Plan
LID	Low-income discount
LIHEAP	Low-income home energy assistance program
OAME	Oregon Association of Minority Entrepreneurs
OEAP	Oregon energy assistance program
PSPS	Public Safety Power Shutoff



Pacific Power, serving customers in Oregon, Washington and California as a part of PacifiCorp, is proud to submit this 2024 Community Benefits Biennial Report for consideration by the Public Utility Commission of Oregon (OPUC or Commission).¹

I. Introduction

In 2021, Governor Kate Brown signed House Bill 2021 (HB 2021) into law. HB 2021 defined ambitious greenhouse gas reduction goals for electric providers, while also directing utilities to consider how to maximize additional benefits to communities. Under the law, retail electricity providers must reduce greenhouse gas emissions associated with electricity sold to Oregon consumers by 100% by 2040.

HB 2021 lays the groundwork for the transition to a clean, reliable and sustainable energy future, but also seeks to protect and support communities who are the most vulnerable and highly impacted by the energy transition. In support of these efforts, Pacific Power seeks to engage directly with communities, not only to educate and foster open dialogue, but to create equity in outcomes.

This report serves as a summary of engagement activities carried out among the company, the Community Benefits and Impacts Advisory Group (Section II) and the Clean Energy Plan Engagement Series for Oregon Tribal Nations Group (Section III). The report also summarizes community benefits and impacts of clean energy planning and the related community benefit indicators (Section IV) and concludes by touching on future engagement planning (Section V).

¹ Pursuant to ORS 469A.425

This resource and the efforts it outlines are powered by Pacific Power’s desire to consistently and substantively engage the communities Pacific Power is proud to serve; identify ways to meaningfully improve customers’ experience with their electric service provider; and implement processes and practices that advance Oregon’s clean energy transition while ensuring the safe, reliable and affordable delivery of power.

The Biennial Report was developed in consultation with the CBIAG and Oregon Tribal Nations engagement members. Pacific Power’s inaugural Biennial Report reflects the first two years of an iterative process that is ongoing; it is a status snapshot of a long-term effort that will continue to change, especially as valued feedback continues to be received. The company will continue to request and receive constructive input and prepare information for external audiences to establish shared understanding and advance common objectives.

A. Regulatory Landscape

HB 2021 represents significant acceleration in the state’s climate policy and will drive long-term outcomes across regulated electric providers. While HB 2021 became effective on September 25, 2021, the OPUC, along with other state agencies, is still in the process of implementation. To that end, there are several key ongoing OPUC dockets that are of note regarding the implementation of HB 2021:

- [Docket no. UM 2225](#) – Clean Energy Plan Investigation²
- [Docket no. AR 655](#) – Clean Energy Plan Procedural Rulemaking³
- [Docket no. AR 651](#) – Direct Access Rulemaking⁴
- [Docket no. UM 2273](#) – Investigation into HB 2021 Implementation Issues

Pacific Power is an active participant in each of these dockets alongside various other parties and organizations that have a vested interest in the success of HB 2021. Each of these dockets progresses at a varying rate as they involve extensive rounds of workshops and comment periods. Please refer to Figure 1 for a visual depiction of the various HB 2021 implementation

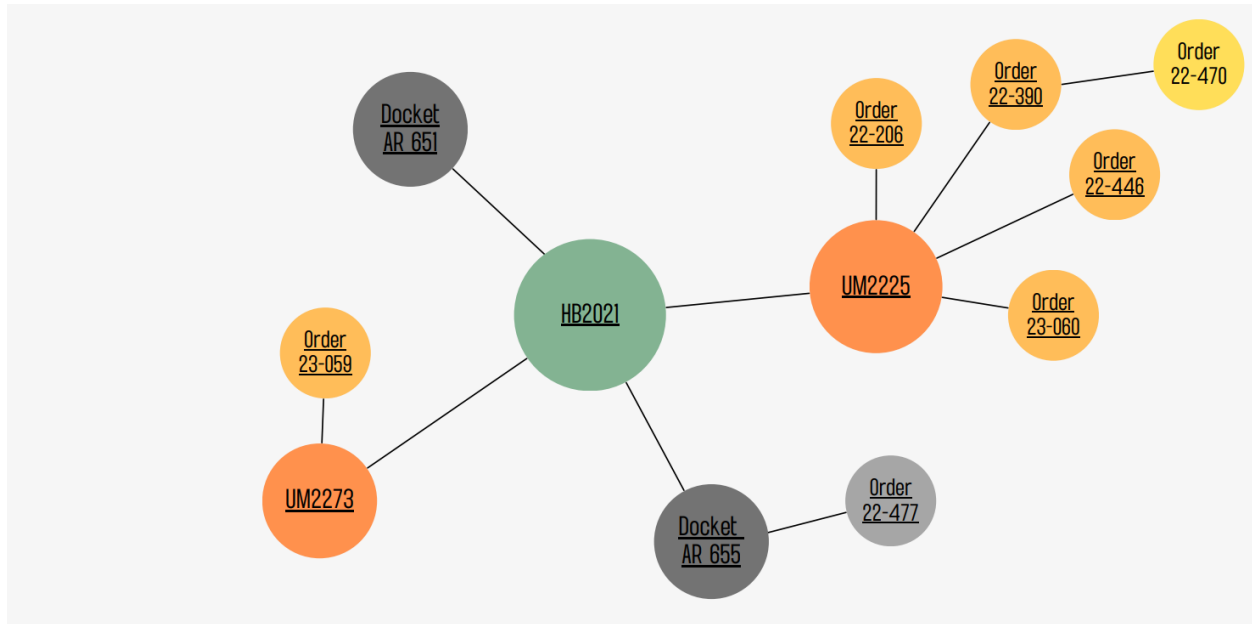
² Follow along at <https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=23160>.

³ Follow along at <https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=23559>.

⁴ Follow along at <https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=23063>.

dockets and important OPUC orders that have resulted. The company has and continues to actively incorporate guidance and rules from these dockets and resulting orders into its various business decisions and plans regarding the overall implementation of HB 2021.

Figure 1 – Infographic depicting the nexus of OPUC dockets regarding HB 2021 implementation and resulting orders



Specific to Pacific Power, there is also the ongoing docket LC 82 – Pacific Power’s 2023 Integrated Resource Plan (IRP) and Clean Energy Plan (CEP).⁵ On May 31, 2023, Pacific Power filed its inaugural 2023 CEP in docket LC 82, as required by law and in accordance with initial guidance in UM 2225. This inaugural CEP represented Pacific Power’s first attempt at defining a long-term strategy to meet the ambitious greenhouse gas reductions, while creating an initial framework to define key community benefits and impacts. As a result of a recent OPUC decision in LC 82 that the company has not made “continual progress” towards HB 2021 long-term decarbonization targets, OPUC staff opened docket UM 2345 to determine whether the OPUC can set the terms of resource procurement and direct utilities to procure resources regardless of the potential impacts to customers and the company’s financial health.

⁵ Review docket LC 82 online at <https://apps.puc.state.or.us/edockets/docket.asp?DocketID=23647>.

While not directly relevant to HB 2021 implementation, the OPUC recently opened docket UM 2348 – Integrated Resource Plan/Requests for Proposals Modernization. This docket is intended as an exploration into new rules that govern how electric utilities conduct their long-term resource planning and resource acquisition processes. The docket will allow OPUC staff to workshop proposals with utilities and other interested parties with the expectation of a final OPUC staff report summarizing the findings and a final proposal in Spring 2025. This docket may have impacts to the company’s clean energy planning process and change how future CEPs are conducted and filed.

These actions are running concurrent to increasing costs to serve customers and associated concerns over affordability. Pacific Power’s recent request to increase base rates highlighted concerns over ongoing system investments in transmission infrastructure and wind resources, along with the costs to mitigate and insure against wildfire risk.⁶ Questions regarding these costs - and the cost of the resource transition - were rightfully expressed by CBIAG members and Tribal Nations members in response to this report.

While HB 2021 sets broad direction for electric providers and is largely focused on the path towards a zero-carbon-emitting future – the intent of this report is to spotlight the company’s engagement with the community and its advisory members, to bring a community informed-approach to its equity practices and clean energy planning.

B. Pacific Power’s Clean Energy Plan

In 2021, Oregon adopted an energy policy seeking to reduce emissions from electric generation facilities used to serve customers in the state. HB 2021 requires retail electricity providers to reduce greenhouse gas emissions associated with electricity sold to Oregon consumers by 100% by 2040, with interim emissions reduction milestones of 90% by 2035 and 80% by 2030.⁷ An

⁶ PacifiCorp’s Request for a General Rate Revision, docket UE 433, can be reviewed online at <https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=24006>.

⁷ ORS § 469A.410.

electric company must develop a clean energy plan for meeting the relevant targets concurrent with the development of its integrated resource plan.⁸

Pacific Power submitted its first CEP on May 31, 2023, to the OPUC, subsequently followed by a CEP Supplemental update on April 1, 2024. Each CEP is inherently based upon the company's latest IRP. A utility's CEP must:

- Include annual goals and actions that make progress towards the clean energy targets
- Include an examination of resiliency opportunities based on industry resiliency standards established by the Commission
- Examine the costs and opportunities of offsetting energy generated from fossil fuels with community-based renewable energy
- Demonstrate continual progress towards meeting the clean energy targets
- Result in an affordable, reliable and clean electric system⁹

Each CEP, similar to an IRP, goes through an acknowledgement process with the OPUC. A Commission acknowledgement, or non-acknowledgement, on elements of its long-term planning and action plans help provide direction for the company. However, IRPs and CEPs are not rate-making exercises. While long-term planning includes analysis of cost tradeoffs and can define the least-cost, least-risk path towards meeting demand and policy objectives, these plans are based off estimates of future conditions and cannot, and should not, capture all real-world cost drivers and impacts. While the company recognizes the very real concerns customers have regarding potential rate impacts of these plans, these planning spaces allow limited ability to reflect upon real-world cost impacts directly to customers.

Plans are inherently designed to change – a 20-year forecast is based on then-current assumptions of the world that are subject to constant change. Pacific Power operates on a two-year planning cycle in which during every odd-numbered year, a full update is conducted to its IRP, while in every even-numbered year, a less comprehensive update to the IRP is completed

⁸ *Id.*

⁹ *Id.*

and filed. Based on HB 2021 statute, Pacific Power expects to file a CEP every two years in the same year as its fully updated IRP. These updates are essential for the company to adapt and evolve its plans given the latest information, such as updates to market conditions, a changing regulatory landscape and updated demand projections.

While IRPs and CEPs help support resource acquisition strategies, it is only in rate-making proceedings that prudence of costs are determined and actual rate impacts to customers can be assessed. Rate case proceedings, like a general rate case, are an involved regulatory process where the Commission must approve any general rate changes proposed by the company to recover its costs. The goal of any rate case proceeding is to update customer rates with the current cost of service, which includes updates to operating costs, review of new investments that have been placed into service, and the cost of capital to support ongoing utility investments.

Pacific Power is currently preparing for its 2025 planning cycle, which will include filing its 2025 Clean Energy Plan. Pacific Power's 2025 CEP will re-cast projected emissions reductions through 2045, describe the company's progress and plans for supporting community-based renewable energy, and include updates to its community benefits indicators framework and metrics. In support of Pacific Power's long-term planning efforts, engagement with the community is vital to ensuring that customers and community members are kept apprised of the company's plans as they evolve and grow and have a chance to provide feedback and input that helps shape the company's understanding of community needs.

Pacific Power engages with a range of interested parties across its various regulatory processes and six-state service area. Specific to its IRP process, Pacific Power has a rigorous public input process.¹⁰ The company holds a regular public input meeting series that begins as far as two years before an IRP is filed. Public input meetings are open to the public, though they are generally technical in nature.

¹⁰ PacifiCorp's IRP public input process can be followed online at <https://www.pacificorp.com/energy/integrated-resource-plan/public-input-process.html>.

Ahead of Pacific Power’s first CEP filing, the company decided to augment its typical IRP public engagement process with its “Clean Energy Plan Engagement Series.” These meetings are hosted less frequently but are meant to provide CEP-focused overviews while also touching on cross-functional initiatives and programs across the company, such as, for example, Distribution System Planning or Transport Electrification. The CEP engagement series is also typically more technical in nature and helps to create ongoing communication and a feedback loop with intervenor parties that participate in the planning dockets.¹¹

C. Community Engagement

In 2022, Pacific Power filed its Oregon’s Clean Energy Plan Engagement Strategy, which proposed a hybrid stakeholder engagement model that leveraged learnings from the IRP public input process and that incorporated survey information from the company’s Distribution System Planning outreach and engagement efforts. A summary of the survey results was provided to the Community Benefits and Impacts Advisory Group in February 2023.¹²

According to the survey results, the top challenges facing communities within the company’s service area are affordable housing and the high cost of living. Residential customers’ primary challenges are the high cost of living, climate change and healthcare, although noticeable differences were identified in the challenges facing communities across the state. The most important benefits related to a cleaner energy future that participants identified included reducing the impact of climate change, preparing for natural disasters, decreasing reliance on fossil fuels, lowering customer energy bills and reducing the environmental impact of the electric system. Costs and potential bill increases are the primary concerns regarding the transition to cleaner energy. The dependability of renewable sources and the potential impact of materials required for clean energy technology also concern more than half of the surveyed participants.

The 2022 Survey also provided communication recommendations that served as the foundation for clean energy planning community engagement; recommendations included:

¹¹ Interested parties and members of the public can keep up-to-date with the company’s CEP-specific engagement process online at <https://www.pacificpower.net/community/oregon-clean-energy-plan.html>.

¹² Available online at https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/dsp/2022-05_Pacific_Power_DSP_Stakeholder_8_Survey_Results.pdf.

- Educating customers about the plans to move toward a cleaner and more equitable energy grid while explaining the associated rationale, planning process and steps clearly and concisely
- Focusing on key desired benefits, such as reducing the impact of climate change, preparing for natural disasters, reducing the decreased reliance on fossil fuels, spending less on energy lowering customer bills and reducing the environmental impact of the electric system
- Working towards solutions that address primary concerns, such as transition costs and the potential impacts on electric bills
- Focusing on equitably transitioning to the energy grid of the future and explaining what the transition means for all involved
- Employing a mix of communication strategies
- Partnering with more local organizations and communities to provide clear and useful information

The Biennial Report is an initial summary of the company's engagement, and a guide for the future. Early learning has highlighted the dynamic nature of advisory group spaces, where each continues to shift with its participants over time. Offering information in an accessible way requires testing new approaches, co-designing, building psychological safety within each space and emphasizing the importance of listening to and understanding one's audience. Approaches may adapt over time as advisory group members share feedback and content is presented. As parties collectively participate in shared dialogue and interests continue to grow, attention to subjects and the menu of content offered will continue to shift to reflect the priorities expressed by engagement members and participants.

Pacific Power's Community Benefits and Impacts Advisory Group and Tribal Nations

Engagement members advise the company on the elements related to developing its CEP and other related plans and programs. Matters of importance as expressed across engagement spaces by members include:

- Costs and potential bill increases are the primary concerns, alongside the transition to cleaner energy, and advisory groups are committed to addressing these challenges. Many

participants are also concerned about the dependability of renewable resources and the potential impact of materials required for clean energy technology.

- Advisory group members have expressed a need to see input in the advisory space translated into action or meaningful community benefits.
- Partnerships are key to advancing actions for greater community benefits, and include the sharing of general program information and program opportunities for greater accessibility.
- More information and learning tools are needed to support a shared and foundational understanding of utility systems and the regulatory environment.
- A more transparent and user-friendly way forward is needed for members to understand the intersections of regulatory processes.
- Access to funds to add capacity for participation in programs and offerings resulting from clean energy planning is a continued need.

II. Community Benefits and Impacts Advisory Group

Pacific Power launched its inaugural CBIAG in November 2022. The CBIAG consists of a group of 11 individuals and/or organizations that represent the lived experiences, interests and perspectives of the communities and customers within Pacific Power's Oregon service area.

Consistent with the definition of Environmental Justice communities under Oregon House Bill 2021, communities identified for inclusion or representation in the CBIAG include communities of color, communities experiencing lower incomes, 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 seniors, youth and persons with disabilities.

Current CBIAG Members include representatives from:

- ACCESS
- AllCare Health
- Coalición Fortaleza
- Community Energy Project
- Ecumenical Ministries of Oregon

- Josephine County Food Bank
- Klamath & Lake County Community Action Services
- Multnomah County Office of Sustainability
- Rural Development Initiative
- United Community Action Network
- Verde

Figure 2 – Map of CBIAG Advisory Members



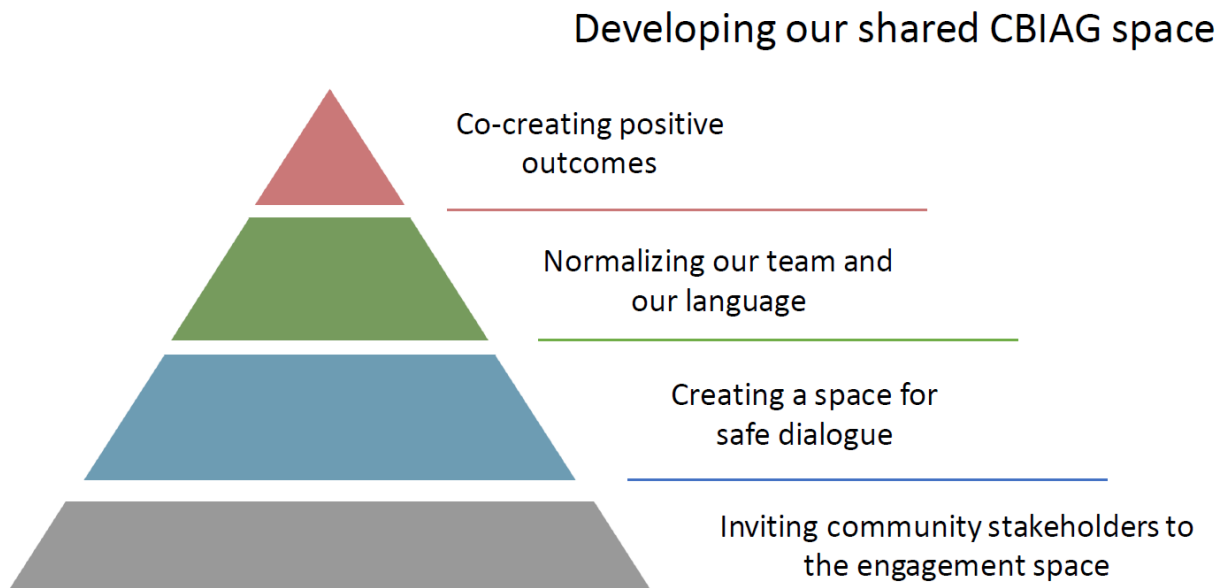
Pacific Power plans to continue seeking direct stakeholder feedback as the company continues to build an inclusive and accessible process for consultation. This includes increasing participation from communities and environmental justice organizations who have not traditionally participated in utility planning processes; obtaining a better understanding of community needs and perspectives; identifying barriers to participation and receiving input on how to address these barriers; and acting as a conduit for the exchange of information and ideas.

A. Feedback

Advisory group members are integral to identifying diverse community benefits and impacts. Their feedback during advisory group meetings is not only heard but valued and integrated into

Pacific Power’s planning and programs. Their role in assisting the realization of potential actions is significant. Equally important is keeping the advisory groups informed about the company’s plans, progress and opportunities to participate, as it validates their input and encourages continued involvement. This iterative process for the shared CBIAG space is reflected below in Figure 3.

Figure 3 – The process for creating a shared CBIAG space



Feedback provided to Pacific Power through its engagement process is reflected within a feedback tracker and in notes offered in both English and Spanish. The company has this practice in place to ensure accountability and to help track any follow-up activities or conversations that may result from input. Pacific Power’s Feedback Tracker is available online and the team is working on providing quarterly updates to ensure that meeting participants, including advisory group members, are being kept informed and involved in planning processes and related ongoing activities.¹³

¹³ View PacifiCorp’s Oregon Clean Energy Feedback tracker online at https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/cep/Oregon%20CEP%20Feedback%20Tracker%20Through%20June%202023_Uploaded_10_10_2023.xlsx

As part of the feedback process, Pacific Power also intentionally starts each advisory group session with a “close the loop” segment in which any follow-up or updates from previous meetings are summarized for the next meeting. This process is reflected in Figure 4, and seeks to reaffirm feedback previously provided while offering a second opportunity for participants to surface topics that are important to them and the communities they represent.

Figure 4 – Close-the-loop feedback process



B. Accessibility

For engagement with the CBIAG to be meaningful, the process must support full and authentic participation. As such, the company plans to continue developing methods to make the CBIAG meetings a meaningful space for engagement and to address the following potential barriers to CBIAG involvement, including by members of the public:

- Methods and channels used within meetings should foster inclusive and transparent communication. Communication methods and channels include:

- Pacific Power’s CBIAG webpage: <https://www.pacificorp.com/energy/oregon-community-benefits-and-impacts.html>
- Email distribution lists, including for broader Oregon CEP stakeholders, which any member of the public can join by emailing OregonCEP@pacificorp.com
- Preparation of pre-meeting materials that outline meeting objectives, discussion topics and relevant background information should be consistent and timely.
- Direct email communications with CBIAG members, including transmittal of pre-meeting materials before scheduled CBIAG meetings, should be timely.
- Select CBIAG materials should be translated into Spanish and posted on the website.
- Conference calls with CBIAG members should be conducted when beneficial (*e.g.*, when requested by CBIAG members, which can be done by contacting ORCBIAG@pacificorp.com in cases where a CBIAG member cannot attend a scheduled CBIAG meeting).
- Cross-channel communication between the CBIAG, the IRP Public Process and the DSP Public Process should be facilitated to remind and notify stakeholders regarding the opportunity to participate in CEP development.
- Meetings should occur regularly, currently held on the third Thursday of the month. In addition to inclusive scheduling, Pacific Power will use the publicly facing CBIAG webpage to include the following information in advance of upcoming meetings:
 - Meeting times
 - Meeting lengths
 - Meeting frequency
 - Meeting location and format (*e.g.*, in-person or virtual)
- CBIAG members should be invited to provide feedback on language considerations and translation support to determine whether such support needs to be expanded.

CBIAG meetings remain open to the public for observation, with an opportunity for public comment provided during each session. This opportunity ensures that every attendee feels included and can participate even if not formally a member of Pacific Power’s CBIAG.

When it comes to active participation in discussions and breakout rooms, the company has intentionally limited opportunities to non-CBIAG members so that members value their role more formally as part of the advisory group. CBIAG members have the option to be compensated for their time at each meeting. Payments are made to either the individual participant or their represented organization based on their preference.

CBIAG meetings are facilitated by a third-party consulting company, E Source, who ensure the meetings run smoothly and provide impartial guidance, including on sometimes sensitive topics.

C. Group Charter

Pacific Power and CBIAG members co-created the CBIAG Charter to memorialize the group's mission and participant objectives, and to establish engagement agreements. The Charter is reflected in Figure 5 below.¹⁴ The creation of the Charter occurred over several months; it was approached in segments through interactive exercises and a reflection session to validate and test how the input was noted. The Charter is not a static document, but a living one, and it will continue to be adapted and revisited.

¹⁴ Available online at https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/cbiag/CBIAG_Meeting_2024-10_October_Slides.pdf.

Figure 5 – CBIAG Charter



D. Meetings

As of October 2024, Pacific Power had convened 24 CBIAG meetings, the first of which kicked off on November 17, 2022. Meetings have occurred almost every month, offering an in-person option in some instances. The company was intentional about rotating hybrid sessions around Oregon, using these opportunities to be present in the community and to partner with advisory group member organizations. Each onsite or hybrid session allowed Pacific Power to weave in a community lens segment that offered valuable insights into the specific community's needs. As expressed by each host, these community lens segments allowed advisory group members to share a little more about their organization, mission and values. Co-sharing the presentation space, and spending time in the community, has been a valuable opportunity for both Pacific Power employees and advisory group member participants.

A snapshot of meetings and topics can be found below in Figure 6.

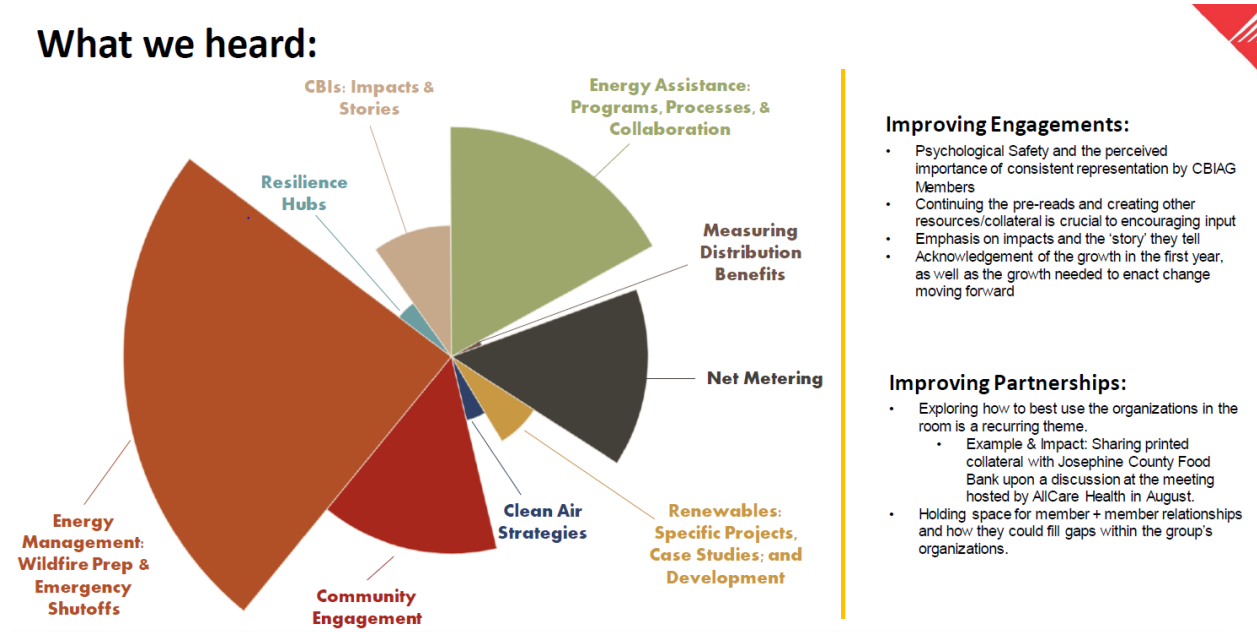
Figure 6 – Snapshot of past CBIAG meetings

27-Oct-22	20-Jul-23	21-Mar-24
Onboarding Hybrid, Medford, OR	Oregon Department of Energy	Washington Advisory Lens
17-Nov-22	Resilience Overview	Community Benefit Indicator: Health & Wellbeing
Draft Demand Response Program	Community Based Renewable Energy	Low Income Bill Discount Overview
Low Income Discount Program	Resource Procurement	Community Based Renewable Energy Pilot
15-Dec-22	17-Aug-23	18-Apr-24
Community Benefit Indicators Intro	Energy Efficiency	Community Benefit Indicator: Resilience
Electricity 101 and Clean Energy	Energy Assistance Programs	Community Based Renewable Energy Intersect
19-Jan-23	Community Based Renewable Energy	Wildfire Mitigation
Community Benefit Indicator: Resilience	Grant Pilot	20-Jun-24
Charter Discussion Start	21-Sep-23	Community Benefit Indicator: Environmental Impact
16-Feb-23	Validating the Charter	Customer Generation Programs
Community Benefit Indicator: Health & Wellbeing	Intro Small Scale Renewables	Integrated Resource Plan Update
2023 External Engagement Overview	CBI Process Updates and Group Exercise	18-Jul-24
2022 Distribution System Survey Highlights	19-Oct-23	Community Benefit Indicator: Economic Impact
16-Mar-23	Year in Review	Rural Mobile Training Unit
Community Benefit Indicator: Environmental Impact	21-Dec-23	Customer Satisfaction
Charter Validation	Validate 2024 CBIAG Planning	Biennial Report Discussion
Distribution System Planning Update	Clean Energy Benefit Survey	15-Aug-24
20-Apr-23	Small Scale Renewables	Community Benefit Indicator: Economic Impact Cont.
Community Benefit Indicator: Economic Impact	18-Jan-24	Equity in Contracting
Clean Energy Plan	Accessibility Accommodations	Energy Efficiency, Program Delivery
Distribution System Planning Update	2024 CBIAG Roadmap	Transportation Electrification Updates
18-May-23	Rate Case Updates	Community Benefit Indicator: Energy Equity
Biennial Report Overview and Discussion	Small Scale Renewable Workshop Update	Energy Burden Assessment
Clean Energy Benefits Survey Workshop	15-Feb-24	19-Sep-24
15-Jun-23	Community Lens	Biennial Report Outline & Discussion
Clean Energy Plan Update	Biennial Report	
Energy Trust of Oregon Presentation	Integrated Resource Plan	
Transportation Electrification	Regulation Updates	
Community Based Renewable Energy		
Clean Energy Benefits Survey Follow-Up		

In addition to these meetings, Pacific Power conducts annual planning sessions with the CBIAG to offer time and space for reflection on what has been discussed and learned over the year, and to identify areas where the group might want Pacific Power to integrate additional topics of interest. The planning agenda typically reflects topics that include a combination of required items to discuss, programs and matters selected by advisory group members. Below, Figure 7 is

an example of how Pacific Power has reflected members' topics of interest in presentation materials.

Figure 7 – Example of reflections from CBIAG on past engagement and improvements



Pacific Power views stakeholder engagement as multifaceted and cross-functional. It encourages an informed and adaptive approach for greater community impact.

III. Oregon Tribal Nations Engagement

Pacific Power's more recently developed Clean Energy Plan Engagement Series for Oregon Tribal Nations (Tribal Nations Engagement) supports and fosters collaboration, consultation and shared understanding of federal, state and local programs, policies and grants with Tribal communities in Oregon.

Pacific Power developed the Tribal Nations Engagement series by conducting direct outreach to Oregon Tribal Nations representatives with whom the company had an existing relationship and through new Tribal Nations relationship building. In 2023, Pacific Power hired a Tribal Liaison who works to expand the company's relationships with Tribes and foster internal understanding

of Tribal governance, and who has helped amplify participation in Tribal Nations Engagement forums.

Pacific Power is adapting its approach to further connect with Oregon Tribal Nations and Indigenous organizations, such as community-based organizations, nonprofits and Tribal enterprises. The company is seeking feedback through additional methods including assessments, onsite visits, expanding support teams and program insight and adaptation opportunities. This ensures Pacific Power meets its commitment to improving engagement and building stronger relationships with Tribal communities. As the company plans for a clean energy future, it is necessary to directly engage Tribal communities located within and/or connected to its electric service, providing Tribal communities with ample opportunities for input and dialogue.

Pacific Power also understands that robust consultation with sovereign Tribal governments and communities is critical to understanding each Tribe's concerns and perspectives. The company continues to gain understanding in the following areas:

- Each Tribe's desired level of participation in the utility planning processes
- Barriers to participation in the energy planning process
- Preferences for engagement (e.g., as part of advisory groups or alternative approaches)
- Preferences for multi-modal communication
- Preferences regarding Tribal consultation processes
- Tribes' economic development initiatives and strategic planning priorities

Pacific Power continues to convene its Oregon Tribal Nations Engagement meetings, focusing on equity and a clean energy future in Oregon per Oregon House Bill 2021. Through this external engagement and informational series, the company plans to continue seeking feedback to build an inclusive and accessible process for consultation and collaboration. Engagement will continue to include:

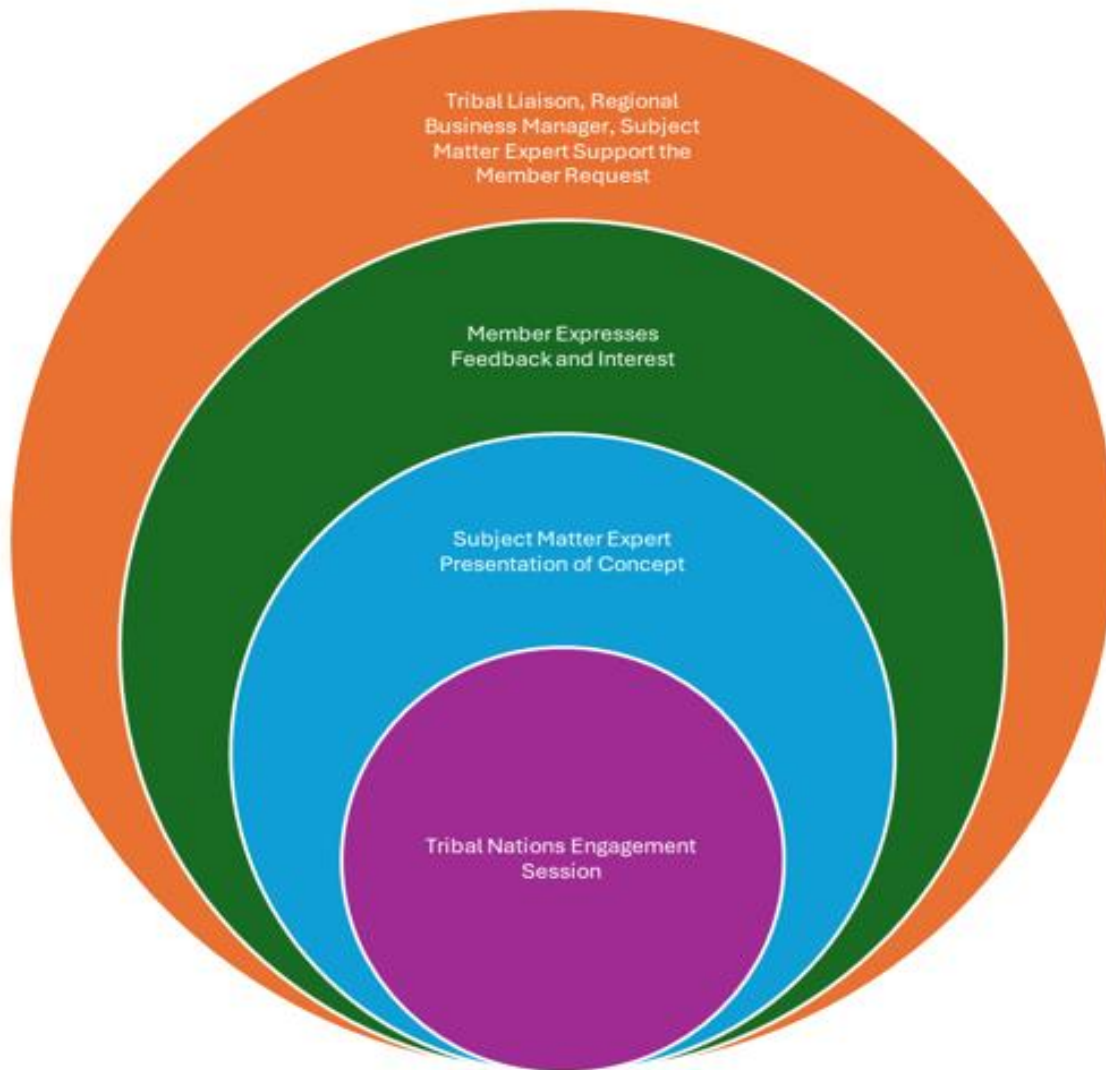
- Increasing participation of communities who have not traditionally participated in utility planning processes
- Providing spaces for expanded dialogue and understanding of Tribal Nations' community structures and sovereignty

- Providing a better understanding of Tribal community needs and perspectives
- Identifying barriers to participation and input on how to address these barriers
- Acting as a conduit to exchange information and ideas between the company and interested parties
- Focusing on available programs and outreach to amplify larger community impacts

The Tribal Nations Engagement series was started in March 2023 after six months of direct outreach. Meetings occur nearly every month to support accessibility. After one year of delivering Tribal Nations Engagement meetings, Pacific Power determined that compensation was an helpful part of facilitating involvement from individuals and organizations who represent and serve Oregon Tribal Nations directly. For members who work for a Tribal organization, many of which operate on limited budgets, authorizing employee time for service on advisory bodies without compensation can deprive these organizations of limited human resources and draws resources from services provided to their communities. Pacific Power recognizes that providing a compensation option better supports and validates individual time and contributions for membership in a dedicated advisory group. For Tribal engagement to be meaningful, it is crucial that the collaboration process supports full and authentic participation. Pacific Power is committed to developing processes that address potential barriers to engagement, ensuring that all voices are heard and valued. The process of Tribal Nations engagement is depicted in Figure 8.

Members of the Tribal Nations Engagement play a vital role of informing Tribal-specific sections of this initial Biennial Report. This report is enriched by community-informed contributions. Collaborating closely with members of the Tribal Nations Engagement will facilitate consistent involvement from individuals and organizations who represent and serve Oregon Tribal Nations directly.

Figure 8 – Tribal Nations Engagement



A. Inclusivity & Representation

Pacific Power has developed a Tribal Nations Hub on its website that will continue to evolve as additional input from Tribal Nations representatives is received. The hub for Tribal Nation engagement includes:

- Engagement series links
- Grant and program links
- Engagement and presentation content
- Feedback tracking tools

- Calendar of key dates
- Key program and support tools
- Contact information for Pacific Power staff

Outreach has been representative of all of Oregon's federally recognized Tribes. Current members and representatives of the Tribal Nations Engagement Series consist of a combination of Tribal Nations members and Tribal Nations supporting organizations within Pacific Power's service area who have expressed interest in participating. The company expects advisory group membership to continue to evolve over time. The company crucially understands that no member or participant speaks on behalf of or represents an entire Tribe, nor does any single Tribe represent all the Tribes. The individuals who serve on the Tribal Nations Engagement group represent a collective of personal and professional expertise and knowledge of Oregon's Tribes and Indigenous communities.

Pacific Power also acknowledges that an intentional process for follow-up and concept exploration is necessary. Seeking more detailed feedback on programs and services offered to Tribal Nations requires a strategic response structure that aligns with and respects Tribal Nations' sovereignty.

B. Tribal Liaison & Engagement Efforts

In 2023, Pacific Power onboarded its first Tribal Liaison Representative, who offers another layer of leadership and guidance to support continued relationship growth and trust-building between the company and Tribal Nations. Pacific Power also engages Tribal Nations with the assistance of Regional Business Managers who play a crucial role in nurturing relationships with Tribal Nations located in their geographic service areas. Their local presence underscores the company's dedication to the community and Tribal Nations engagement.

As of October 2024, Pacific Power's Tribal Nations Engagement group has convened 12 times, with the first meeting taking place May 17, 2023. Over time, the group has elected to adapt its meeting frequency. Initially, meetings were scheduled for three hours every other month, but participants expressed a desire for shorter, more frequent meetings. In April 2024, Pacific Power

started monthly two-hour sessions. This has resulted in fewer agenda items and longer discussions on respective topics as shown below in Figure 9.

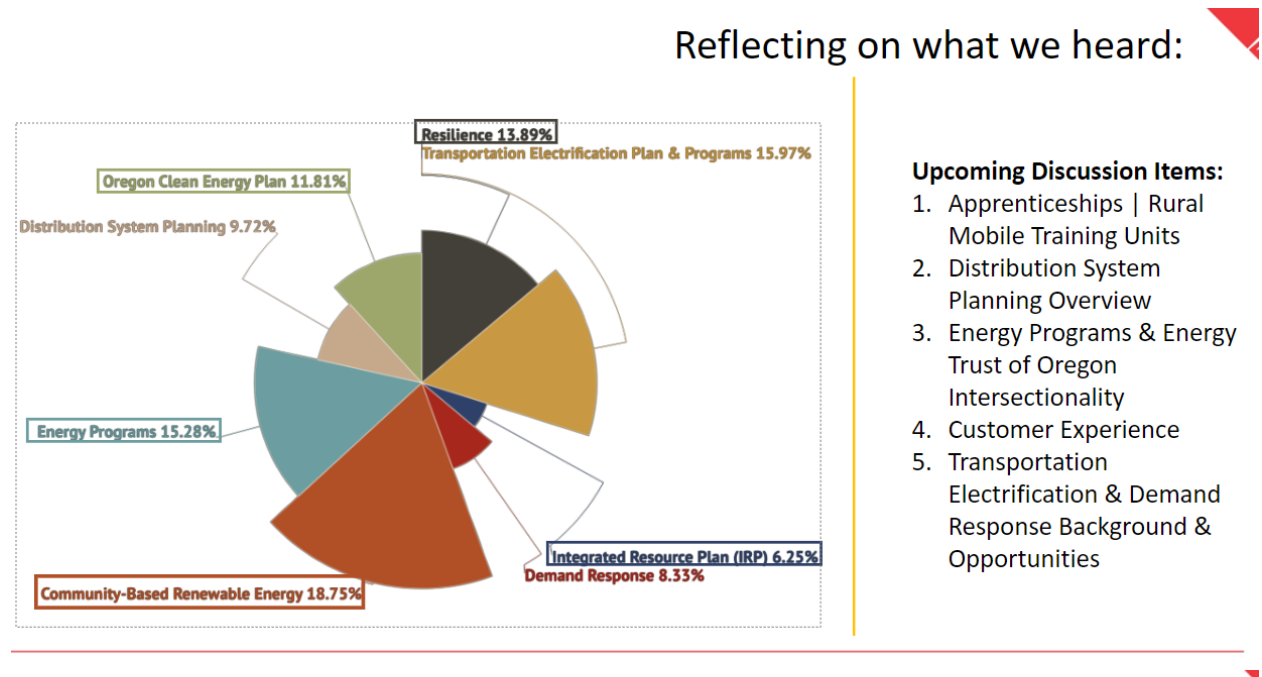
Figure 9 – Recent meeting agendas for Tribal Nations Engagement

17-Mar-23	23-Feb-24
Engagement format exploration	Structuring Engagement exercise
Clean Energy Plan Review	Biennial Report Overview
Transportation Electrification	Community Benefit Indicators
19-May-23	Community Based Renewables Energy
Solutions and Support	26-Apr-24
Energy Efficiency Roadshow	Regulation Updates; General rate case filing
Community Benefit Indicators	Community Benefit Indicators
21-Jul-23	31-May-24
Solutions and Support Close the Loop	Wildfire Mitigation
Clean Energy Plan Update	Community Benefit Indicators
Energy Trust of Oregon	Integrated Resource Planning
Engagement Exploration	Clean Energy Plan Updates
Community Based Renewable Energy	28-Jun-24
Distribution System Planning Update	Community Benefit Indicators
22-Sep-23	Integrated Resource Planning
Oregon Department of Energy	26-Jul-24
Engagement	Biennial Report
Community Based Renewable Energy	Customer Generation Projects
Small Scale Renewables Primer	30-Aug-24
15-Dec-23	Biennial Report
New Tribal Liaison Rep Intro	Rural Mobile Training Unit
Energy Efficiency Workshops	Clean Energy Plan Updates
Transportation Electrification Need Assessment	27-Sep-24
Planning Next Steps	In person Hybrid at Warm Springs
	Community Lens
	Energy Trust of Oregon Projects Review
	Community Based Renewable Energy Updates
	Distribution System Planning
	Demand Response Portfolio Updates
	Transportation Electrification

Agenda items presented to the advisory groups are co-developed. Topics include a combination of required items to discuss, as well as programs and matters elected by the advisory group

members. Figure 10 depicts an example of how topics of interest, as expressed by members, have been reflected.

Figure 10 – Example slides of reflection on topics of interest expressed by Tribal Nations Engagement members



Topic Opportunities for Consideration



Tribal Engagement Advisory Group 2024 Timeline & Themes

Pacific Power onboarded a Tribal Liaison Representative in November 2023, who began attending Tribal Engagement meetings in December 2023.

- Early in 2024, the group decided to meet every month, rather than bi-monthly, to help provide adequate time to discuss prominent issues and concerns.
- The Tribal Engagement meetings led to development of a “Transportation Electrification Roadshow,” led by customer solutions experts and the Tribal Liaison, who developed a presentation and Needs Assessment questionnaire specifically for Tribes. That was followed by outreach to Tribal utilities and economic development offices to schedule in-person visits with Tribes in Pacific Power’s Oregon service area to discuss electrification goals and needs including electric vehicles, charging stations and funding opportunities. The first visit was held April 1, 2024 at the Cow Creek Tribe of Umpqua Tribe of Indians in Roseburg, Oregon. There were subsequent meetings with the Confederated Tribes of Warm Springs and the Klamath Tribes.
- The Tribal Engagement team also offered an in-person meeting in September, hosted by the Confederated Tribes of Warm Springs and featuring special agenda items designed to support relationship-building and cultural awareness.
- Pacific Power communications and government affairs staff made an intentional outreach effort to Tribal public relations organizations, social media and newspaper offices regarding the Wildfire Mitigation Community Forums, which were held in spring 2024 throughout Pacific Power’s Oregon service area.
- April 2024 meeting themes included agenda topics about the proposed customer rate increase and its effect on Tribal households and Indigenous communities.
- The July 2024 meeting focused primarily on the Biennial Report and the timeline for gathering input. The Tribal Engagement team is actively seeking guidance from members and Tribal representatives on how they would like their feedback to be incorporated. It was emphasized that any feedback attributed to an individual member of a Tribe or Indigenous organization must clearly identify the participant or organization, as responses will vary among individuals. Collective responses should be avoided, as each Tribe and NGO has distinct priorities and challenges. All advisory members acknowledge that responses will differ among participants due to the unique challenges faced by each member or Tribe. The key objective is to elevate feedback, especially high-priority comments, rather than merely attributing it. It is crucial to create an environment that encourages follow-up discussions and sharing information about ongoing projects. Fostering this sense of safety will

strengthen the relationship between the utility and the Tribes. This group should not be utilized as justification for decisions beyond their control.

IV. Community Benefits and Impacts

Community Benefit Indicators are designed to demonstrate the impact of Pacific Power’s proposed programs, actions and investments. Pacific Power defines CBIs as the measured outcome of utility actions that could either incentivize influence or provide a benefit. Each CBI identifies a desired positive result, while metrics allow Pacific Power to monitor progress toward achieving these outcomes. For example, the “benefit” of a CBI can be viewed through this framework:

- Community: What is the relevant customer segment?
- Challenge: How are these customers affected?
- Action: What Pacific Power program, resource or recommendation can address the challenge?
- Benefit: What are the improved outcomes for customers?

Pacific Power considers its current CBIs and metrics that are reflected in the CEP and CEP Supplement as interim, meaning they will adapt over time. Stakeholder engagement and input offer a lens to help continue developing and refining these measurements.

The company’s Oregon-specific community benefits and impacts are reported in the following sections, beginning with a general discussion of Pacific Power’s existing CBIs. In each section, the company describes the required benefit or impact, outlines the public process related to each topic, discusses whether the topic is covered by an existing Pacific Power CBI (or whether the topic may or should be addressed in a future CBI) and identifies next steps, actions and impacts as necessary. Some CBIs are more developed, while others are less developed, and Pacific Power anticipates revisiting each in future planning cycles.

A. Pacific Power’s Interim CBIs

Consistent with OPUC’s guidance on implementation of HB 2021 CBI,¹⁵ Pacific Power’s inaugural CEP included eight outcomes and indicators across various CBI categories, including resiliency, community health and well-being, environment, energy equity and economic metrics. These CBIs and indicators are represented in Table 1 below:

Table 1 – Pacific Power’s current CBIs

Primary CBI Category	Proposed CBI	Metric
1. Resiliency	<p>A. Improve resilience of vulnerable Communities during Energy Outages</p> <p>B. Reduce frequency and duration of energy outages</p>	<ul style="list-style-type: none"> • Stability, ability for a community to withstand events such as wildfire or extreme weather • SAIDI, SAIFI, CAIDI¹⁶ • Measurements to track duration and frequency of outage events
2. Community Health & Well-Being	<p>A. Decrease Residential Disconnections</p> <p>B. Decrease the number of Small Commercial Disconnections</p>	<ul style="list-style-type: none"> • Number of residential disconnections by census tract
3. Environment	<p>A. Increase Energy from non-emitting resources and Reduce CO₂e</p>	<ul style="list-style-type: none"> • Oregon Green House Gas emissions tracking from Oregon allocated resources • Oregon allocated renewables

¹⁵ E.g., Order No. 22-390, Appendix A.

¹⁶ System Average Interruption Duration Index; System Average Interruption Frequency Index; Customer Average Interruption Duration Index – system reliability indexes used by electric utilities.

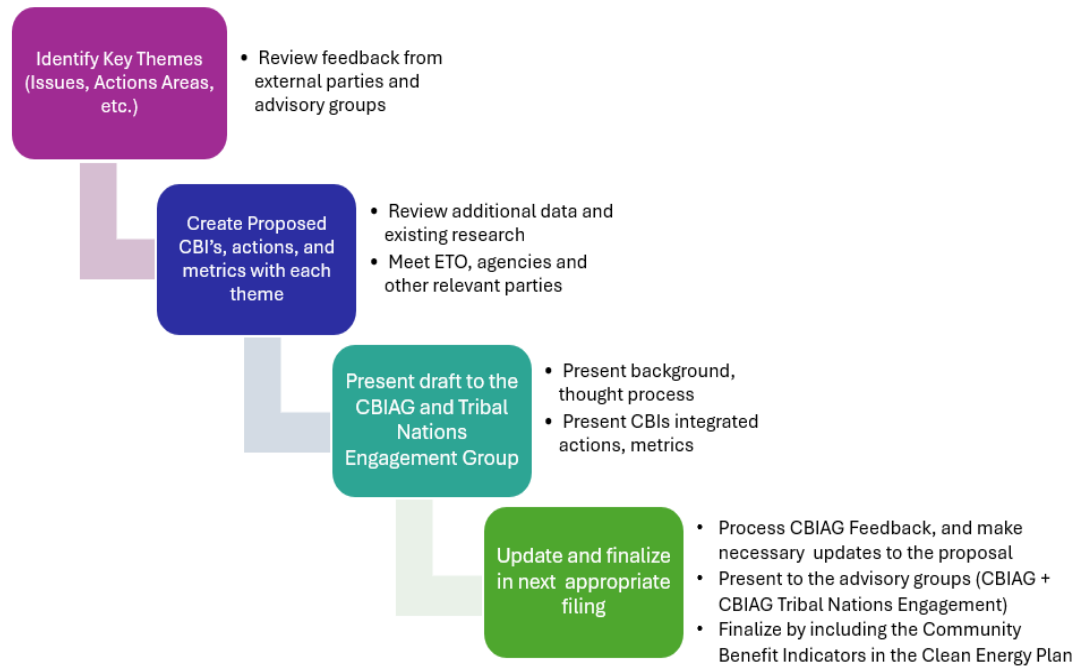
4. Energy Equity	<p>A. Decrease proportion of households experiencing high energy burden</p> <p>B. Increase efficiency of housing and small businesses in disadvantaged areas</p>	<ul style="list-style-type: none"> • Average energy burden by census track, for low-income customers, bill assistance participants, Tribal members and for all customers • Work with Energy Trust of Oregon to ensure equitable distribution of benefits to Pacific Power customers
5. Economic	<p>A. Increase community focused efforts and investments</p> <p>B. Reduce barriers for disadvantaged communities for company led program participation</p>	<ul style="list-style-type: none"> • Program delivery access and grant opportunities • Public charging stations • Pre-apprenticeship/ educational program participation • Energy supply resource development, workforce and spend

The process for development of these CBIs is reflected in Figure 11 below. Pacific Power will work with partners, such as Energy Trust of Oregon, to identify related actions and metrics for any revisions to existing CBIs, or the development of new CBIs.¹⁷ Where relevant, Pacific Power discusses how these existing CBIs map onto HB 2021’s required community benefits and impacts that are included in this report.

¹⁷ PacifiCorp received feedback from an advisory member to include other partners beyond Energy Trust of Oregon, like other weatherization assistance program providers in assisting with the distribution of benefits of energy efficiency, or CAPO network. PacifiCorp is reviewing and revising its CBI framework as part of its 2025 Clean Energy Plan filing and will take this feedback into consideration as PacifiCorp expands its CBI strategy.

Figure 11 – CBI development workflow

CBI Development Workflow



B. HB 2021 Section 6

Section 6 of HB 2021 requires the company to, in its biennial report, include a description of the following:

- A. Energy burden and disconnections for residential customers and disconnections for small commercial customers;
- B. Opportunities to increase contracting with businesses owned by women, veterans or those who are Black, Indigenous or People of Color;
- C. Actions within environmental justice communities within the electric company’s service area intended to improve resilience during adverse conditions or facilitate investments in the distribution system, including investments in facilities that generate non-emitting electricity;
- D. Distributions of infrastructure or grid investments and upgrades in environmental justice communities in the electric company’s service area, including infrastructure or grid investments that facilitate the electric company’s compliance with the clean energy targets set forth in section 3 of HB 2021;

- E. Social, economic or environmental justice co-benefits that result from the electric company’s investments, contracts or internal practices;
- F. Customer experience, including a review of annual customer satisfaction surveys;
- G. Actions to encourage customer engagement; and
- H. Other items as determined by the electric company and the electric company’s Community Benefits and Impacts Advisory Group.¹⁸

Some of these descriptions more clearly tie into the CBIs and metrics already identified by the company, and some have broader implications. These community impacts are across various types of business decisions and cover a wide range of actions. Pacific Power is still in its early phases of identifying all the ways in which it drives or affects certain outcomes in its communities through its business decisions and where the most impactful and equitable benefits can be derived. In the following subsections, the meaning of each sub-bullet is described in the context of Pacific Power’s customers, how the company has and will continue to engage with its advisory groups on these topics, and where actions have been identified that will drive positive impacts.

C. Energy Burden and Disconnections

HB 2021, Section 6 2(a)(A): “Energy burden and disconnections for residential customers and disconnections for small commercial customers.”¹⁹

Energy Burden

“High energy burden” is defined as customers who spend 6% or more of their income on home energy costs. This coincides with the definition of energy burden given by the American Council for an Energy Efficient Economy.²⁰ Based on this definition, energy burden may be higher for vulnerable populations because they have less income; energy bills are higher; they have access

¹⁸ ORS 469A.425.

¹⁹ ORS 469A.425(2)(a)(A).

²⁰ <https://www.aceee.org/energy-burden>

to less energy-efficient housing; or more energy is needed to keep housing hotter or cooler (energy escaping, use of space heaters, etc.).

The CBIAG discussed this issue in August 2023 and March 2024. In 2023, Pacific Power discussed energy assistance programs offered by the company. Related initiatives include:

- Energy Burden Assessment (EBA) completed, and that the company contracted with Empower Dataworks for the assessment
- General data collection and analysis

In March 2024, the company discussed key measures related to average energy burden by census tract; average energy burden by low-income customers, bill assistance participants and Tribal members; and the low-income bill discount survey.

Pacific Power filed the EBA with the OPUC on October 1, 2024.²¹ The next steps for the EBA are to: collaborate with stakeholders to evaluate the filed EBA findings, during the fourth quarter of 2024; develop and implement a plan to incorporate select EBA findings into low-income programs including company outreach, low-income discount (LID) adjustments, LID post-enrollment verification and weatherization partnerships (actions and next steps will be reviewed with interested parties in the first quarter of 2025); evaluate average energy burden within each census tract; and continue to participate in Oregon’s UM 2211 Docket, HB 2475 Implementation of Differential Rates and Programs in Oregon.²²

Concurrently, Tribal Nations Engagement members in May 2024 discussed: low-income discount programs and the eligibility requirements; overviews & income guidelines of the low-income home energy assistance program (LIHEAP); the Oregon energy assistance program (OEAP); COVID-19 Energy Assistance programs; and the Fuel Funds Program.

Overall, these groups gave the following feedback:

²¹ Filing available online at: <https://apps.puc.state.or.us/edockets/edocs.asp?FileType=HAH&FileName=um2211hah331734033.pdf&DocketID=23122&numSequence=141>.

²² Follow the OPUC docket online at <https://apps.puc.state.or.us/edockets/docket.asp?DocketID=22475>.

- Continue development of the low-income discount survey
- Increase program awareness by distributing flyers in senior and disability service centers, providing additional bill inserts and creating incentives and materials for referrals from friends
- Offer resources to participants with children to reduce energy use
- Update marketing materials to include customers in community that participate in the program
- Initiate stakeholder engagements for development of EBA metrics
- Coordinate EBA metrics with other utilities across the state of Oregon
- Provide results of EBA to Commission staff no later than October 2024

The following changes were made because of this feedback:

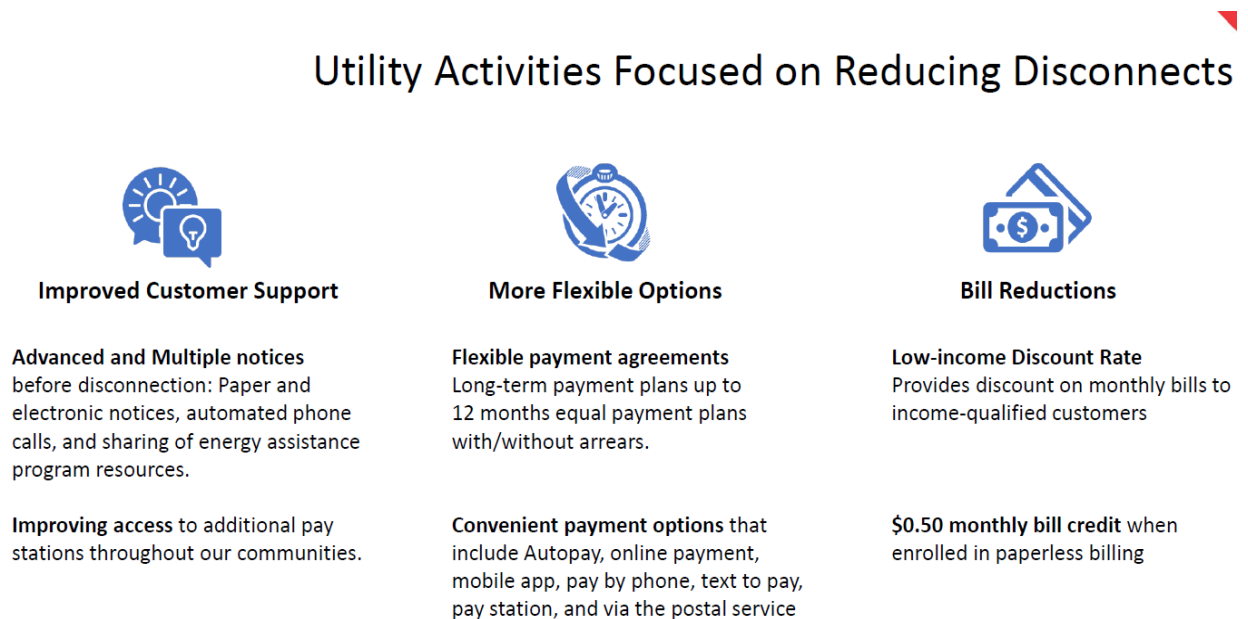
- Low-income discount survey and program distribution methods adapted from input
- Expanded outreach to additional postcards, emails and social media
- Modified residential survey approach to include both email and phone to capture customers that do not have an email on file with Pacific Power

Residential and Small Customer Disconnections

Disconnect data for residential customers was presented to the CBIAG in March 2024. Topics addressed during the meeting included the fact that commercial data has not been reviewed with advisory groups; a general discussion on Pacific Power's disconnect reduction policy and mechanisms; and dialog regarding consumer protections and improved customer support.

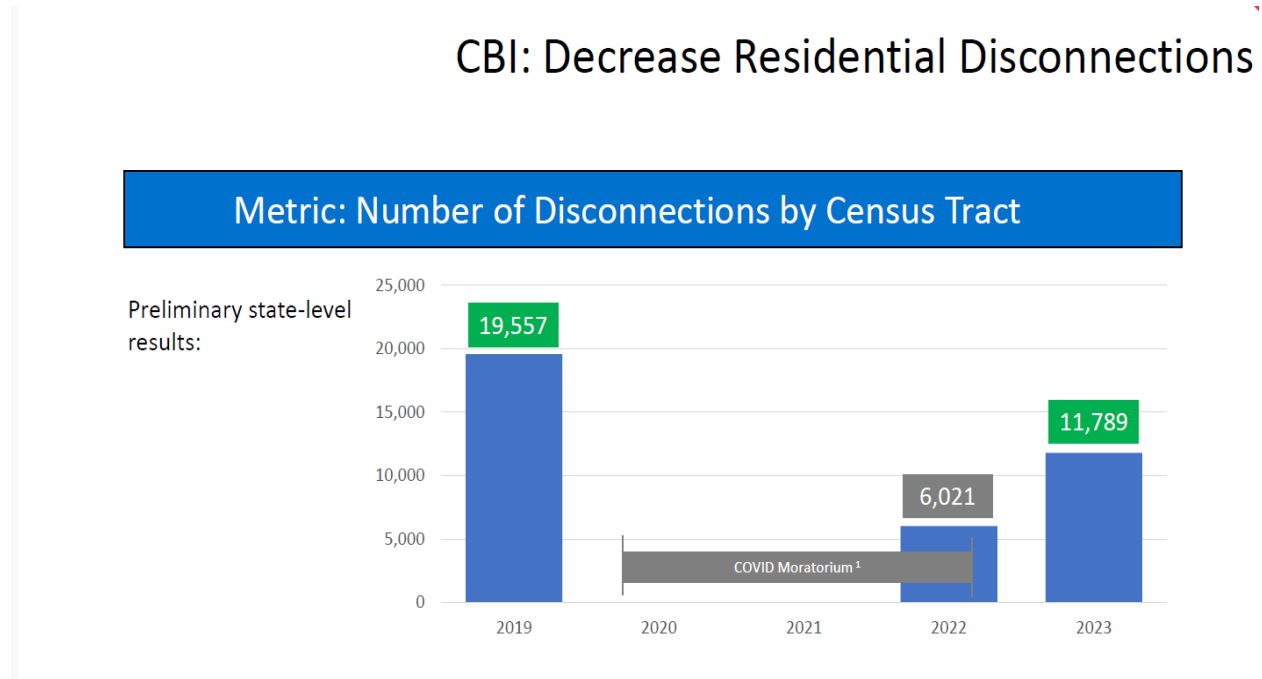
As reflected in Figure 12 below, Pacific Power's activities focused on reducing disconnections include: (1) improved customer support (in the form of more advanced and multiple notices and improve access to pay options); (2) more flexible options (including flexible payment agreements and convenient payment options); and (3) bill reductions (including low-income discount rates and bill credits).

Figure 12 – Activities focused on reducing disconnects



Feedback received was positive regarding the company’s efforts to provide outreach, work conducted with customers to connect them with resources including the company’s low-income discount program (LID) and providing contact with local energy assistance agencies. Pacific Power’s progress to date on decrease residential disconnections can be found in Figure 13 below.

Figure 13 – CBI: Decrease residential disconnections²³



As part of these ongoing efforts, Pacific Power’s EBA, conducted by Empower Dataworks, will help identify the energy burden in Oregon, study arrearages for the company and provide recommendations on how to address energy burden and reduce disconnections. The CBIAG provided positive feedback about this effort, and its results will drive further discussion. The company will revisit the CBIAG and Tribal Nations engagement members with the results of the of the 2024 Energy Burden Assessment in early 2025.

Pacific Power is also actively participating in Oregon Docket UM 2211 to review utility disconnects. This docket has a dedicated data metric reporting workstream to identify how the utilities can provide data to parties that is meaningful, consistent and helps identify areas of success and improvement. This has included looking at arrearages, disconnection numbers, reconnection numbers, company collection practices and Oregon Administrative Rules. Commission staff provided an assessment of disconnections and arrearages on September 16,

²³ Available here:
https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/cbiag/CBIAG_Meeting_2024-03_March_Slides.pdf

2024, and parties met to discuss the assessment on September 17, 2024. Parties are providing comments and supplementing data for further discussion. Commission Staff proposed a draft near-term residential and arrearage and disconnection action plan, filed in docket UM 2211 on October 24, 2024.²⁴

Pacific Power will continue to work with parties in Docket UM 2211 to address concerns with disconnections for residential customers that includes an assessment of outreach, administrative rules, programs and efforts to help reduce energy burden, and arrearage management plans.

Finally, Pacific Power has worked with small commercial customers on a case-by-case basis to make extended payment arrangements and has a dedicated group of customer service representatives that can work with commercial customers on issues such as collections while addressing high bill concerns and reducing energy usage.

D. Contracting Opportunities

HB 2021, Section 6 2(a)(B): “Opportunities to increase contracting with businesses owned by women, veterans or Black, Indigenous, or People of Color.”²⁵

The CBIAG discussed this issue in August 2024, and shared the following recommended practices:²⁶

- Participate in trade shows and other opportunities to interact and engage with diverse businesses such as Oregon Association of Minority Entrepreneurs (OAME) and the Oregon Governor’s Marketplace
- Encourage and partner with prime contractors to engage and subcontract with diverse suppliers
- Develop or resurrect outreach materials on Pacific Power’s commitment to engage with local small businesses

²⁴ Available online at <https://edocs.puc.state.or.us/efdocs/HAH/um2211hah332395120.pdf>.

²⁵ ORS 469A.425(2)(a)(B).

²⁶ Additional feedback was received from an advisory group member, at a later date, that recommended adding consideration to leverage trust and relationships with local organizations who have access to business owned by women, veterans or BIPOC community members.

- Work with business units to identify mentoring opportunities for local, small and/or diverse suppliers
- Participate in community-based organization outreach events
- With business unit input and agreement, invite at least one diverse supplier to formal competitive bids²⁷

The Tribal Nations Engagement series has not yet received this presentation; however, the group has consistently offered feedback on the Energy Trust of Oregon Program Delivery Contractors and potential impact to costs due to limited accessibility.

E. Environmental Justice Community Resiliency Measures

HB 2021, Section 6 2(a)(C): “Actions within environmental justice communities within the electric company’s service area intended to improve resilience during adverse conditions or facilitate investments in the distribution system, including investments in non-emitting electricity generating facilities.”²⁸

Pacific Power has attempted to address these actions on multiple fronts. Most notably, stakeholder engagement has been an integral part of the development of the Community-Based Renewable Energy (CBRE) Resilience Hub Pilot (CBRE-RH Pilot or Pilot). Formal engagement events tied to the Pilot’s development are provided in Appendix: CBRE Feedback in summary form.

The Clean Energy Plan (CEP) Engagement Group and other stakeholder meetings related to the Community-Based Renewable Energy (CBRE) initiatives have occurred throughout 2023 and 2024, with various discussions and feedback sessions to refine the proposed CBRE-RH Pilot. The initial introduction of CBRE to stakeholders occurred in February and March 2023, with the concept presented at meetings with the CEP Engagement Group, the CBIAG and Oregon Tribal Nations. Pacific Power emphasized that supporting CBRE projects would be vital in partnering with communities for a clean energy future. In subsequent meetings, the company provided more

²⁷ August 2024 OR CBIAG_DRAFT.pptx

²⁸ ORS 469A.425(2)(a)(C).

details, including developing a CBRE plan, an inventory to inform a CBRE Potential Study and a proposal for smaller-scale projects, such as resilience hubs at neighborhood-level community centers.

Throughout 2023, several rounds of feedback were gathered from stakeholders, focusing on developing and socializing a survey to assess community interest in CBRE projects. In these meetings, Pacific Power introduced the concept of a CBRE Pilot and sought input on engaging communities effectively. Specific suggestions for outreach included partnerships with local groups, schools and universities, as well as the use of media to promote the initiative. Stakeholders also provided input on how best to use public funding, engage with communities who could realistically develop projects, and explore additional funding opportunities. In August 2023, the company reported back to stakeholders, highlighting actions already being taken and outlining further steps, such as outreach to funding applicants and collaboration with organizations capable of project proposal development.

As the CBRE-RH Pilot evolved, Pacific Power presented more detailed plans, including three proposed components for resilience hubs. In October 2023, stakeholder feedback indicated a desire for increased funding for the pilot projects. By February 2024, Pacific Power held additional discussions with Tribal representatives and Commission staff, refining the focus of the CBRE-RH Pilot on resilience hubs at critical community facilities. Staff suggested broadening the eligibility criteria to include hydropower projects and questioned whether the proposed incentives would be sufficient to attract participation. The company continued to solicit input on various aspects of the pilot, including metrics for tracking progress and methods for reaching out to communities.

In spring 2024, Pacific Power met with the CBIAG, Energy/Environmental Justice Advocate Groups and other stakeholders to refine the pilot's details further. Feedback collected focused on the timing of incentives, metrics to measure community resilience and strategies for engaging diverse communities. Two stakeholders suggested contacting long-term recovery groups to identify resilience hubs and using multiple languages and outreach channels to ensure broad community engagement. As of May 2024, Pacific Power was still awaiting additional written feedback from the Advocate Groups. Most recently, in June 2024, Pacific Power continued to

integrate input from the CBI Resilience metric into the development of the CBRE-RH Pilot, providing further opportunities for stakeholders to offer feedback.

Stakeholder input provided to the company regarding CBREs and the CBRE-RH Pilot, and the actions taken as a result of that input are summarized in Table 2 below.

Table 2 – Summarized input regarding the CBRE Pilot

Input Provided	Action Taken
Prioritize support of small resilience hubs at neighborhood-level community centers was suggested	The CBRE-RH Pilot has targeted support for resiliency projects at critical community facilities.
Connect to the “planners” of the community	Outreach has been planned at the local and county levels.
Partner with local groups and Energy Trust of Oregon	Pacific Power has worked closely with ETO as it has developed the CBRE-RH Pilot. Regional Business Managers will reach out to community groups upon Commission approval of the Pilot.
“Pitch” projects in local communities	The company will use resilience metrics to inform the early outreach to vulnerable communities and will include the suggestion to consider the enhancement of resilience at Disaster Recovery Centers identified in a tracker made available by the Federal Emergency Management Agency. In addition, the Pilot will leverage local engagement during Distribution System Planning activities to outline CBRE-RH opportunities.

Explore opportunities to leverage public funding to advance CBRE projects	The CBRE-RH Pilot may also communities to leverage public funding by providing matching grants to communities seeking state and federal funding. The Pilot will also focus its continued partnership on projects that have already been funded by other grant opportunities within Component 2.
Engage with Tribes on applications for BIL formula grants	Pacific Power recently created a Tribal Liaison position. That role will include, upon approval of the Pilot, outreach to Oregon Tribes about the grant match opportunity.
Utilize media outlets to raise awareness and stimulate interest	The Pacific Power communications team will use a variety of platforms to share the opportunities offered within the CBRE-RH Pilot.
Partner with schools and universities	The company is already in communication with several academic institutions about their development of CBRE projects.
Leverage energy fairs, cultural events and festivals	Pacific Power Regional Business Managers will be equipped with information about the CBRE-RH Pilot as they engage with communities at public events across Oregon.
Generate online engagement platforms and gamification	A webpage will be developed for the CBRE-RH Pilot.
Motivate engagement through a “sense of value”	The company will continue to engage communities and stakeholders, expanding upon the potential benefits that result from the CBRE-RH Pilot.
“Strengthen” the Pilot by increasing the amount of funding used to support projects	The requested funding amount for the CBRE-RH Pilot was increased from \$2.75m to \$4m over the course of its development.
A variety of potential metrics that might be used to track the way that CBRE projects help to advance the Community	The company will continue to work with the CBIAG, leveraging the suggestions already provided, to determine the most effective and efficient methods of tracking progress.

Benefit Indicator specific to resilience	
A variety of methods of community engagement as it relates to sharing the opportunities for CBRE project advancement found in the CBRE-RH Pilot	Pacific Power will assess the most effective and efficient methods of outreach. The intent will be not just to “advertise” the opportunities found within the CBRE-RH Pilot, but to share with communities the other pathways and forms of support that are available.

Pacific Power anticipates that CBRE projects will provide direct and measurable resilience enhancement to those Oregonians whom each project serves. With the CBRE-RH Pilot, the company supports the development of projects in different phases of design and construction. Tracking the advancement of CBRE projects, and in particular the impact that Pacific Power’s targeted support has on them, will likely require amended and/or additional metrics.

Regarding next steps, with the anticipated rollout of a more comprehensive battery storage demand response program in Oregon in the beginning of 2025, the CBRE-RH Pilot may come to represent an introduction to a program available to a wider “audience” of resilience projects and a path for early adopters to develop case studies for other communities. These learnings will be shared with stakeholders over time.

Additionally, internal workgroups will continue to collaborate on the development and intended application of resilience metrics, which are currently in development. The CBRE-RH Pilot will likely serve as one of the initial opportunities that these metrics, which encompass both vulnerability and reliability statistics, may be leveraged on a programmatic basis.

Finally, the company continues to work closely with Energy Trust of Oregon, which is also in the development of methods and pathways to support CBRE projects.

F. Environmental Justice Community Grid Investments and Upgrades

HB 2021, Section 6 2(a)(D): “Distribution of infrastructure or grid investments and upgrades in environmental justice communities in the electric company’s service area, including infrastructure or grid investments that facilitate the electric company’s compliance with the clean energy targets set forth in ORS 469A.410.”²⁹

In the 2023 CEP, the company proposed defining three key components of resilience: community resilience, utility resilience and community-utility resilience, which integrates both. The distribution system planning team has developed initial definitions for each of these components.

Community resilience is defined as the ability of a community to withstand or recover from long-duration service disruptions. To accurately define this, the company first identified the factors that make a community resilient or more vulnerable. Three primary categories of vulnerability to prolonged power outages were identified: health, preparedness and evacuation.

Utility resilience is defined as the total duration the average customer has experienced outages over a five-year period.

To calculate community resilience, data was collected from various external and internal sources, including the U.S. Census Bureau, Center for Disease Control and Prevention, weather data and utility information. The company then calculated the percentiles of resilience scores for both utility and community components, multiplying these percentiles to identify the most at-risk areas. Identifying communities that exhibit the highest vulnerability to long-duration power disruptions and the relatively worst reliability, is a benefit as future activities are considered.

The company also reviewed EJ40 communities, as defined by the U.S. Department of Energy, to identify grant opportunities that could reduce financial barriers to implementing solutions that

²⁹ ORS 469A.425(2)(a)(D).

decrease outage vulnerability. Disadvantaged communities are defined as census tracts that exceed one or more of the following category thresholds:

- Climate Change
- Energy
- Health
- Housing
- Legacy Pollution
- Transportation
- Water and Wastewater
- Workforce Development

After calculating the community-utility resilience for each census block group and EJ40 communities within Pacific Power’s service area, a GIS layer was created to visualize the entire service area. The company then used the Federal Emergency Management Agency and Red Cross National Shelter System databases, which list facilities that can serve as shelters during disasters and indicate whether a facility has on-site backup generators. These locations were mapped within the community-utility resilience and EJ40 layers to identify opportunities to enhance grid or community resilience. Additionally, the company has established relationships with community and public safety partners to identify potential sites for Community Resource Centers during Public Safety Power Shutoff (PSPS) events.

Regarding next steps, Pacific Power plans to provide technical assistance and feasibility studies to interested communities and facility owners through the upcoming CBRE pilot. Furthermore, this analysis will be integrated into the Distribution Planning Study Process, and the company will invite stakeholders with resilience interests to participate in community workshops.

G. Social, Economic or Environmental Justice Co-Benefits

HB 2021, Section 6 2(a)(E): “Social, economic or environmental justice co-benefits that result from the electric company’s investments, contracts or internal practices.”³⁰

³⁰ ORS 469A.425(2)(a)(E).

The term “co-benefits” is one that is still evolving in the context of equitable and community-driven utility actions. The benefits associated with the company’s investments, contracts or internal practices can be organized in the categories of resilience, health and community well-being, environmental impacts, energy equity and economic impact. Each subject is discussed below.

Resilience

Company investment into resilience efforts results in benefits for customers by helping them withstand and rapidly restore power delivery following non-routine disruptions of severe impact or duration. Pacific Power has established two resilience-focused Interim CBIs: (1) Improve Resilience of Vulnerable Communities During Energy Outages; and (2) Reduce Frequency and Duration of Energy Outages. These CBIs are considered by the company as being related to its CBRE efforts.

Pacific Power also believes that CBRE projects would provide direct and measurable resilience benefits to those Oregonians served by each project.³¹ The company has undertaken a significant public outreach effort to ensure that the benefits offered by the CBRE-RH Pilot Project meet the needs of stakeholders and the communities they represent. Table 2 provides more detail on the company’s actions related to the CBRE-RH Pilot Project development.

Health and Community Well-being

Investments that help customers access energy and meet basic human needs generate benefits to health and community well-being. For its inaugural CEP, Pacific Power established the Interim CBI of Decrease the Number of Residential Disconnections, tracked by the number of residential customer disconnections by census tract. This may benefit customers primarily through the reduction in stress due to threat of disconnection.

³¹ ORS 469A.400(2).

Environmental Impacts

Environmental impacts are currently being considered by the company as an outcome of its optimal portfolio development and can help inform portfolio rankings based on how well a portfolio of resources contributes to environmental impacts. Pacific Power has established the Interim CBI of Increase Energy from Non-emitting Resources and Reduce Carbon-Dioxide-equivalent (CO_{2e}) Emissions to Meet HB 2021 Targets.

While there is naturally a focus on global greenhouse gases, including carbon-dioxide, because of the HB 2021 directives, it is also vital to consider the impact of electricity generation on local pollutants. Local pollutants are those that are typically in higher concentrations closest to the sources of pollution and can disproportionately harm communities that are closer to sources of pollution. Recognizing a need to represent impacts on local communities, the company is considering additional portfolio metrics that will help track the impact of a portfolio on local pollution emissions, such as sulfur oxide (SO_x) and nitrogen oxides (NO_x). While this is being proposed within the lens of a modeled portfolio metric, the company will also explore how to track this data in actuals and trace it to its owned generation within its Oregon communities. Pacific Power will bring this topic to its equity advisory groups ahead of its 2025 CEP.

Energy Equity

Pacific Power has established two energy equity focused Interim CBIs: (1) the Interim CBI of Decrease Proportion of Households Experiencing High Energy Burden; and (2) Increase Efficiency of Housing and Small Businesses in Disadvantaged Areas.

Pacific Power contracted with Empower Dataworks to conduct its Energy Burden Assessment (EBA) in March 2024. Empower Dataworks is a regional consulting firm specializing in energy equity analytics and has conducted similar assessments for numerous utilities throughout the Pacific Northwest. EBA results were presented to Commission staff and docket UM 2211 stakeholders on August 28, 2024. Pacific Power filed on October 1, 2024, the complete EBA report, along with findings and recommendations as prepared by Empower Dataworks, with the OPUC as required in Phase 2 of docket UM 2211.

Pacific Power remains committed to ongoing engagement in docket UM 2211 on reducing energy burden for its customers. The company's position is that changes to its offerings targeted to low-income customers and reducing energy burden are best addressed in Docket No. UM 2211 (Implementation of House Bill 2475), a proceeding specifically created to examine differential rate programs more holistically, where all stakeholders can be involved and shared learnings can be leveraged from the experiences of the different utilities in Oregon.

Economic Impacts

Pacific Power has established two energy economic impact focused Interim CBIs: (1) the Interim CBI of Increase Community-Focused Efforts and Investments; and (2) Reduce Barriers for Disadvantaged Communities for Company Program Participation. Two areas of specific economic impact are highlighted below.

First, over the past five years, Pacific Power has supported public EV charging stations through various programmatic activities, including:

- **Electric Mobility Grants:** These grants provide funding for projects that benefit underserved residential customers, often involving the installation of electric vehicle charging equipment in areas of need.
- **Utility-Owned Public Charging:** Pacific Power owns and operates charging stations at five locations throughout Oregon.
- **Rebates:** Pacific Power offers rebates of up to \$4,500 per port for both commercial and multifamily customers, typically in locations with public access.
- **Technical Assistance:** Pacific Power provides free technical assistance to commercial customers, including coordinating and scheduling site visits to analyze charging technology options, costs, rates and best practices for siting, configuring, installing and managing equipment.

Second, regarding increasing expenditures on diverse businesses, Pacific Power is partnering with prime contractors to encourage the use of diverse subcontractors. The company also participates in trade show events and conferences such as sponsoring and exhibiting at the OAME Trade Show and the Governor's Marketplace. These efforts can result in positive

community benefits through the creation of more jobs, more options for charging vehicles and greater savings related to company program participation.

H. Customer Satisfaction

HB 2021, Section 6 2(a)(F): “Customer experience, including a review of annual customer satisfaction surveys.”³²

The customer experience is the practice of measuring and managing the way customers do business with an organization. Pacific Power’s CX practices are used to help the company continually improve the way it serves its customers. Customer experience practices allow the company to understand how it is serving customers and identify ways to better serve them such as:

- Using surveys to better understand customers and their changing needs to inform strategic approach for continual improvement
- Gaining a better understanding of Low-Income Discount enrollees to further validate equity and reach of the program
- Evaluating the impact of the programs on participants

Surveys are used to better understand customers and their changing needs. Customer sentiment helps to identify what is working well, what needs to improve and how service expectations evolve. Insights from this research gauge customer satisfaction, favorability and concerns. Research findings are used to reveal customers’ perception, experience and expectations. The research informs business plans, communication outreach, technology improvements and employee training, and drives other initiatives for improvement.

In 2023, Pacific Power conducted a Clean Energy Benefits Survey in Oregon. The CBIAG played an advisory role in developing the questionnaire. This online and telephone survey of Pacific Power residential customers included broad, quantitative customer experiences, including customer satisfaction. The research provided a window into attitudes, priorities, hopes, concerns,

³² ORS 469A.425(2)(a)(F).

awareness and understanding of clean energy benefits. Responses indicated the most important benefits to a cleaner energy future are spending less on energy bills, preparation for natural disasters and improving air quality, though perceived importance varies widely by region across the state. The costs and potential bill increases are the primary concern with the transition to cleaner energy, with dependability of renewable sources and the potential environmental impact also highly concerning.

The CBIAG discussed key metrics and results related to this issue in December 2023, March 2024 and July 2024. Specifically:

- December 2023 – A review of the Clean Energy Benefit Survey was conducted.
- March 2024 – A presentation was provided by Escalent to review the Community Action Agency survey results. The discussion included customer perception, satisfaction, enrollment, program awareness, marketing and accessibility.
- July 2024 – Discussed key measures related to:
 - Outage Communications
 - Customer Touchpoints
 - Customer Experience

The group provided feedback whether it is possible for Pacific Power to increase the percentage of Spanish-language survey respondents, and the company will incorporate this feedback in future CEPs.

I. Customer Engagement Actions

HB 2021, Section 6 2(a)(G): “Actions to encourage customer engagement.”³³

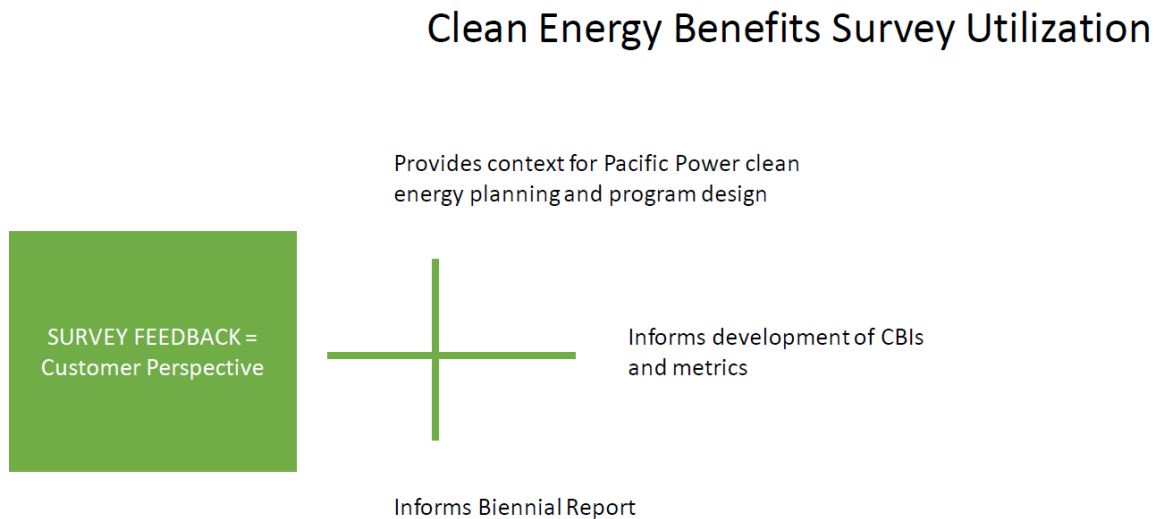
In general, Pacific Power sees actions to encourage customer engagement as multifaceted and cross-functional. It encourages informed and adaptive considerations for greater customer engagement in part of all program design for more effective usability. This report focuses on opportunities for improvement and development approaches – co-designed with advisory groups

³³ ORS 469A.425(2)(a)(G).

over the preceding two years. The company places a high value on actions and discussions that engage advisory groups for input and consultation. The adaptive approach to advisory groups and engagement is an example of improvement using a codeveloped adaptation approach and model. Pacific Power provides more background on its Clean Energy Benefits Survey below.³⁴

In May 2023, Pacific Power initiated a discussion with its CBIAG to co-design a Clean Energy Benefits Survey. The survey intended to seek context for Pacific Power’s clean energy planning and program design through survey feedback or customer perspective, as depicted in Figure 14. The survey questionnaire was developed with the advisory group over the course of several meeting sessions.

Figure 14 – Clean energy benefits survey utilization

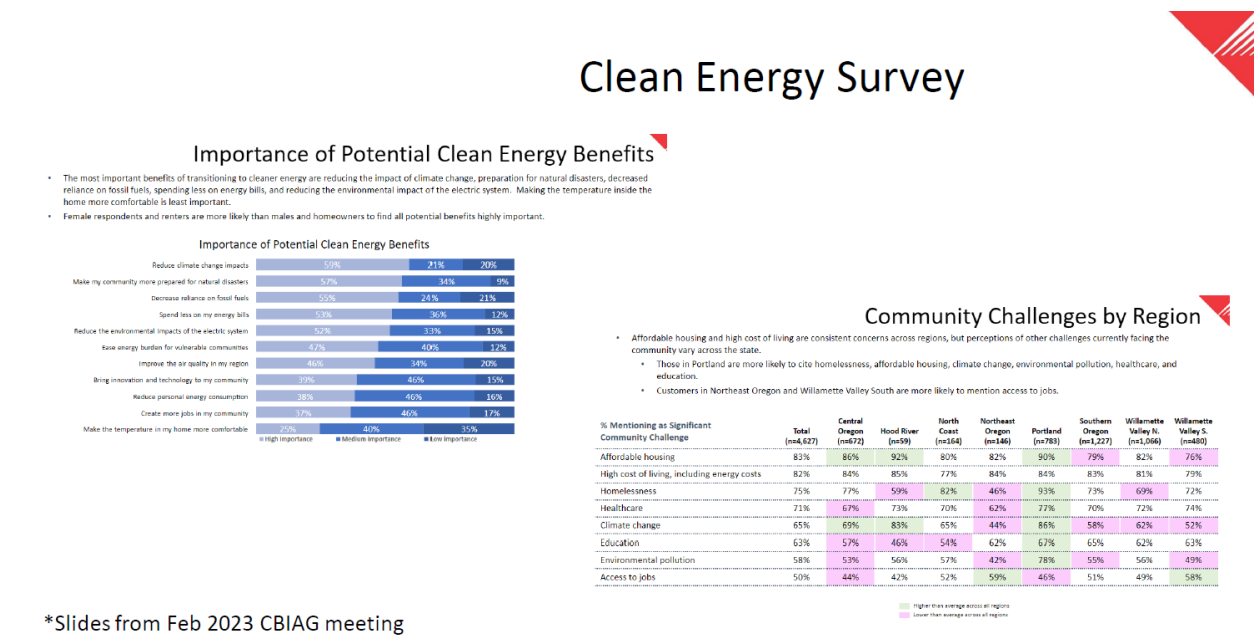


The purpose of the survey was to benchmark perspectives across Pacific Power’s Oregon service area about the transition away from fossil fuels, and the Clean Energy Plan. The survey also asked detailed questions about how respondents used energy in their daily lives, and what their greatest needs were from a clean energy transition. The survey was implemented first in 2022. Pacific Power shared detailed results with the CBIAG and other stakeholders. In 2023, Pacific

³⁴ The first iteration of the survey was referred to initially as the Distributed System Planning (DSP) survey, and was developed and implemented primarily as part of the DSP initiative.

Power updated the survey to collect more targeted information about areas of potential utility action, and to address comments from the CBIAG and stakeholders on the prior year's implementation, as well as on the updated draft questions.

Figure 15 – Clean Energy Benefits survey (slide from February 2023 CBIAG Meeting)



In 2023, a revised survey was issued to all residential customers in Oregon. The survey was delivered in both English and Spanish, with option for response via phone or online. Over two weeks in August and September, the survey received 4,329 responses.

The survey revealed some important findings about responders' beliefs, including some striking differences between customers' priorities and values by region. Across the whole customer population, key findings included:

- Beliefs that the most important potential benefits from a cleaner energy future are spending less on energy bills, preparation for natural disasters and improving air quality.
- The costs and potential bill increases are the primary concern with the transition to cleaner energy, with dependability of renewable sources and the potential environmental impact also highly concerning.
- Three in ten (29%) customers rate a community-based renewable energy project as "high importance."

- Nearly half (46%) of customers rate a Community Resilience Hub as “high importance”
- Food replacement and heating/cooling their home are the top concerns about an extended power outage; concern about food replacement is more prevalent among customers under the age of 35 and those who make less than \$40k per year.
- Solar panels are the electrical equipment with the highest ownership and interest. Interest in electric cars or trucks is moderate, but over half cite cost as a barrier, and 41% cite concerns regarding battery range.

These findings validated Pacific Power’s focus on the low-income program and the CBRE-RH Pilot. In addition, the findings served (and continue to serve) as a touchstone for Pacific Power staff as they develop marketing and outreach activities for existing programs and consider additional activities.

The company continues to refine external engagement approaches to broaden accessibility:

- Seek direct feedback from interested parties to build inclusive and accessible processes for input and collaboration
- Seek increased participation from communities that traditionally have not yet participated in utility planning processes
- Work with advisory groups to exchange information and ideas between the company and communities and assist with community outreach
- Expand translations in languages other than Spanish to promote engagement and interaction
- Ensure psychological safety and consistent representation by CBIAG members
- Continue offering pre-reads and create other resources/collateral
- Continue to educate CBIAG members on utility operations, requirements and rate-making components and process
- Tell the “story” regarding impacts

Feedback from advisory groups continues to foster the development and adaptation of accessibility approaches. This includes formatting, availability of information, language access

considerations and more. The following changes were made as a result of advisory group feedback:

- Expansion of communication channels for Spanish-language outreach
- Completion of a “who’s in the room” walk-through at the start of each meeting
- Sharing of information in advance of meetings while closing the loop in every meeting to help set the table and orient the participants in the space

Figure 16 – Example slide of variety and volume and resources

Variety and volume and resources

Over the past year, we’ve been focused on creating a library of resources that are available to the CBIAG members and the public:

- [Community Benefit and Impacts Advisor Group landing page](#)
- [Pacific Power Oregon Clean Energy Plan landing page](#)
- [Energy Resource Center – Select Oregon](#)

Figure 17 – Example slide of variety and volume and resources

Tribal TE Engagement Needs Assessments

Goal: Seeking to understand Tribes’ interest, and ability to integrate charging stations and electric vehicles into Tribal operations and enterprises.

Next Steps:

- Oregon New TE Plan 2026-2028
 - Draft Due May 1
- February Discussion on TE Plan Concepts

How is the Tribe currently planning to implement a new charger-ready infrastructure, or provide electric vehicle chargers?

What potential challenges do you face in installing chargers at select locations?

What legal barriers and codes need to be considered to ensure successful implementation of electric vehicle infrastructure?

J. Other

HB 2021, Section 6 2(a)(H): “Other items as determined by the electric company and the electric company’s Community Benefits and Impacts Advisory Group.”³⁵

CBIs – Energy Equity, Economic, Community Health & Well-Being, Environment

The May 2024 Tribal Engagement meeting focused on feedback and brainstorming about CBIs that specifically relate to Tribes and Indigenous communities, and the challenges in meeting Tribal member needs.

The following challenges to meeting Tribal member needs were provided by members of the Tribal Engagement space present at the May 2024 meeting:

Breakout Group A

Impacted Tribal Members & Groups	Challenges noted by breakout groups to Meeting Tribal Member Needs
All Tribal Members	High bills; high energy burdens; can encounter some difficulty working with the utility

³⁵ ORS 469A.425(2)(a)(H).

Tribal Businesses	Limited capital; limited resources; does not always have the capacity to navigate resources
Businesses Located in Remote Areas	Remote locations have more outages; may have more extended outages; getting communications into remote areas during extended outages
Tribal Services Groups	Capacity in the organization; can encounter some difficulties working with the utility

Breakout Group B

Impacted Tribal Members & Groups	Challenges noted by breakout groups to Meeting Tribal Member Needs
All Tribal Members	Energy programs may reduce power but does not reduce costs
Tribal elders and other vulnerable populations	Finding contractors to come to reservations is hard, meaning it is not going to work. Could be beneficial to be larger scale/reservation wide; many Elders lived on a fixed income that can make rate increases or other financial changes difficult to manage
Agriculture	Reservations (or other disadvantaged communities) do not have the opportunities because of locations (i.e., jobs) Programs must be utility led On reservation programs are not equitable to members living off reservations

The goals from the activity feedback include:

- Increasing collaboration with Tribal groups to expand resources and access
- Bringing more utility led programs to Tribal members (on and off reservations)
- Brainstorming methodology to reduce energy costs alongside reducing power
- Recognizing specific Tribal needs to better communication
- Focusing on high-risk groups (i.e., Tribal elder, low-income families, business owners, agricultural workers)

Pacific Power is developing metrics with input from OPUC staff, Tribal communities, other interested parties through OPUC workshops and the CBIAG. A key aspect of the CBI framework is that it is intended to be adapted overtime, it is a living document with room for improvement.

The other agenda topic was wildfire mitigation efforts and community meetings in Oregon.

Wildfire mitigation generator incentive feedback, included:

- Engagement member raised the concern that individuals may not have the capacity to bare the upfront costs associated with receiving a rebate, so is there an ability to get qualified and have the utility pay for the material to receive the rebate?
- Pacific Power is looking to shift the program in that direction. However, at this time the customers will have to sustain the upfront costs.
- Engagement member reiterated the importance of making programs as accessible as possible to capture the diversity of economic and health circumstances since most do not have the capacity to manage these programs outside of their normal course of work.

The June 2024 meeting topic focused primarily on renewable energy and environmental justice issues. There was feedback about agriculture, protecting Tribal lands and transparency, as well as concern expressed regarding the costs of renewable energy generation compared to fossil fuel-based energy generation. Costs associated with renewables were a concern for the group. The group would like greater transparency around cost impacts.

Members addressed the intentionality and scope and making sure this engagement space is not limited to topics. Some tribes seek to establish strategic energy managers that can start handling the information from a more high-level perspective.

V. Future Engagement

Pacific Power is grateful for the opportunity to develop and distribute this first biennial report, which serves as an update on key topics even as the company continues the critical work that this document overviews. While not fully inclusive of all feedback the company has received, this

effort serves as a valuable foundation for future reporting and documentation, one developed in consultation with CBIAG and Tribal Engagement members.

Pacific Power intends to continue co-designing and developing its engagement spaces with consultation from advisory group members. At the end of 2024, Pacific Power conducted its annual planning process with advisory group members in preparation for the forthcoming consecutive sessions. Planning sessions include a recap of the content and discussions between the company and advisory group members. A review of the road map for 2025 will be subsequently presented to internal and external stakeholders in January 2025.

Pacific Power plans to include additional emphasis on providing more background information on utility operations and rate-making. Pacific Power provided brief primers on the rate-making process and its rate filings in 2024. Additional information is important to provide context to evaluate the benefits and impacts of initiatives, and to address the valid concerns raised and summarized in Section VI.

Pacific Power would like to thank all the contributors who made this report possible. The advisory group members and Tribal Nations Engagement members provided invaluable perspectives, time and expertise that aided in the implementation of the company’s public engagement strategy through input, insight and feedback. The company also sincerely appreciates its subject matter experts who shared their time and furthered a commitment to shared understanding and interactive concept discussions. The company looks forward to learning and growing with its advisory groups and teams as engagement continues well into the future.

VI. Appendix

A. CBRE Feedback

- In the Clean Energy Plan CEP Engagement Group meeting on February 24, 2023, the company introduced the concept of CBRE and how it envisioned CBRE in the utility’s Oregon CEP.³⁶
- In the CBIAG meeting on March 16, 2023, the concept of CBRE was first introduced.
- In the CEP Engagement Series for Oregon Tribal Nations meeting on March 17, 2023, the concept of CBRE was first introduced. The company articulated its belief that support of CBRE projects will be one way to partner in the transition to a clean energy future.
- In the CBIAG meeting on April 20, 2023, a CBRE development plan was introduced along with an inventory being organized that would inform a CBRE Potential Study in the CEP. An opportunity for input was provided to stakeholders, with the company asking about the highest priority of opportunities for communities as well as the most important benefits to communities. Support for smaller projects was highlighted, and a focus on resilience hubs at neighborhood-level community centers was suggested.
- In the CEP Engagement Group meeting on April 28, 2023, a definition of CBREs was introduced to stakeholders. A CBRE Development Plan was discussed, and CBRE projects were compared and contrasted with Small-Scale Renewable Energy projects.
- In the CBIAG meeting on June 15, 2023, additional details were shared with stakeholders about what would be included in the CBRE section of the CEP. Input on how to develop and socialize a survey to assess communities’ interest in CBRE projects was requested. Examples of suggestions included connecting to the “planners” of the community, partnering with local groups as well as ETO and “pitching” projects in local communities. A stakeholder also prioritized the exploration of opportunities to leverage public funding to advance CBRE projects.
- In the CEP Engagement Group meeting on June 23, 2023, a review of the CEP submission was provided to stakeholders. An overview was given of the straw proposal of a CBRE

³⁶ PacifiCorp’s CEP Engagement Series is open to all members of the public and all interested parties are encouraged to attend this engagement series to receive high-level updates or information regarding ongoing clean energy planning. This series does not include specific membership nor are meetings held as frequently as advisory group meetings but can help supplement understanding for interested members of advisory group meetings, though is not necessarily required. All past and future meeting information is available online at: <https://www.pacificorp.com/energy/oregon-clean-energy-plan.html>.

Pilot, and input on how to develop and socialize a survey to assess communities' interest in CBRE projects was requested. A link to a survey form was provided within a presentation slide, as well as a QR code allowing stakeholders to access the survey. Questions in the survey included ways that Pacific Power might assess community interest and increase input from *all* communities.

- In the CBIAG meeting on July 20, 2023, additional feedback was requested on ways to increase engagement and community input. A link to a survey form was provided within a presentation slide, as well as a QR code allowing stakeholders to access the survey. Questions in the survey included ways that Pacific Power might assess community interest and increase input from *all* communities.
- In the Clean Energy Planning Engagement Series for Oregon Tribal Nations meeting on July 21, 2023, a review of the CEP submission was provided to stakeholders. An overview was given of the straw proposal of a CBRE Pilot, and an input request was made. A link to a survey form was provided within a presentation slide, as well as a QR code allowing stakeholders to access the survey. Questions in the survey included ways that Pacific Power might assess community interest and increase input from *all* communities. A specific request was made in the meeting for Pacific Power to engage with Tribes on applications for Bipartisan Infrastructure Law (BIL) grants.
- In the CBIAG meeting on August 17, 2023, the company reported back to stakeholders about feedback received and signaled continued development of the CBRE-RH Pilot. Pacific Power shared that a variety of actions were suggested, many of which were reported to be current actions already being taken. Interviews, feedback tracking, transparent communication and online opportunities fell into that category. Other suggestions were shared to be in development. Those included outreach to applicants of other funding opportunities, the generation of post-engagement summaries and a focus on organizations that "could realistically put together a project/proposal." Other suggested actions included the use of media as an outreach tool, partnerships with schools and universities, and attendance at energy fairs and cultural events.
- In the CEP Engagement Group meeting on August 25, 2023, stakeholder feedback was provided back to the attendees. Pacific Power shared that a variety of actions were

suggested, many of which were reported to be current actions already being taken. Interviews, feedback tracking, transparent communication and online opportunities fell into that category. Other suggestions were shared to be in development. Those included outreach to applicants of other funding opportunities, the generation of post-engagement summaries and a focus on organizations that “could realistically put together a project/proposal.” Other suggested actions included the use of media as an outreach tool, partnerships with schools and universities, and attendance at energy fairs and cultural events. An overview of the three proposed CBRE-RH Pilot components was introduced and recent changes in the CBRE landscape were noted (e.g. recent increases in project funding opportunities, supportive legislation, etc.). Initial responses to the proposal were solicited, and a specific question about guardrails was directed to stakeholders. No feedback was provided.

- In the Clean Energy Planning Engagement Series for Oregon Tribal Nations meeting on September 22, 2023, stakeholder feedback was provided back to the attendees. An overview of the three proposed CBRE-RH Pilot components was introduced, initial responses to the proposal were solicited and a specific question about guardrails was directed to stakeholders. No feedback was provided. Pacific Power shared feedback that was collected from the previously distributed input form: a variety of actions were suggested, many of which were reported to be current actions already being taken. Interviews, feedback tracking, transparent communication and online opportunities fell into that category. Other suggestions were shared to be in development. Those included outreach to applicants of other funding opportunities, the generation of post-engagement summaries and a focus on organizations that “could realistically put together a project/proposal.” Other suggested actions included the use of media as an outreach tool,

partnerships with schools and universities, and attendance at energy fairs and cultural events.

- In the CEP Engagement Group meeting on October 27, 2023, the company contrasted CBRE projects with Small-Scale Renewable Energy projects and provided an overview of the three components in a developing CBRE-RH Pilot. Called out were intended Pilot outcomes as well as the anticipated funding ask. Feedback received included the suggestion to “strengthen” the Pilot by increasing the amount of funding used to support projects.
- In the Clean Energy Planning Engagement Series for Oregon Tribal Nations meeting on February 23, 2024, stakeholders heard additional details about the three offerings of the CBRE-RH Pilot. Feedback was requested about the best ways to reach out to Tribal parties interested in developing CBRE projects. It was shared that some Tribes have an official process for consultation, but it was recommended that the company reach out to communities on-site or at a conference.
- On March 21, 2024, the company met with OPUC Staff to present on the proposed CBRE-RH Pilot. Included in the discussion was the rationale for a focus on resilience hubs at critical community facilities, the methods of proposed support for CBRE projects, as well as anticipated incentive amounts associated with each support method. Staff suggested that the company consider broadening the eligible project criteria to hydropower projects in addition to locally focused community resilience projects. Staff also wondered if the incentive values proposed were large enough to entice project participation.
- In the CBIAG meeting on March 21, 2024, proposed Pilot details were shared, including eligibility criteria and Pilot components. A direct link was highlighted between the CBRE-RH Pilot and the Interim Resilience Community Benefit Indicator (CBI) developed by the stakeholder group. Four feedback questions were posed to stakeholders in the form of a questionnaire. Those questions included metrics to be tracked (linked to the interim Resilience CBI), methods to best share this opportunity with critical community facility sites, and feedback on incentive payments. No feedback was returned to the company.
- In the CBIAG meeting on April 18, 2024, the link between community resilience and the specific offerings in the proposed Pilot were underscored. Additional feedback was solicited from the group regarding details such as the timing of the provision of incentives and the potential metrics used to track Pilot progress. Two stakeholders submitted

responses. Feedback provided was that Pacific Power might contact long-term recovery groups to help identify resilience hubs being developed, to use social media and press releases to spread word of the opportunities in the Pilot, to use multiple languages when disseminating information and to utilize multiple avenues of engagement.

- Two meetings were held with Energy/Environmental Justice Advocate Groups: one on April 25, 2024, and another on May 16, 2024. Pacific Power provided shared details of the proposed CBRE-RH pilot in the initial meeting and requested input in the same form as provided to the CBIAG. A follow up meeting was requested for May 16 and Pacific Power provided answers to a set of questions provided by the Advocate group. The Advocates captured notes from the May 16 discussion and Pacific Power personnel edited and appended the notes with further details following the discussion. As of the date of this filing, the Advocates have not provided further input via the question form or in other written correspondence.
- In the CEP Engagement Group meeting on June 21, 2024, Pacific Power presented on the intersectionality of both the CBI Resilience metric and the Resilience metrics, other parts of the meeting agenda, with the CBRE-RH Pilot. This included the Pilot's focus on community resilience hubs to specifically address the intentions targeted in the CBI, and a reference to the Oregon Department of Energy Study on Small-Scale Renewable and Community-Based Renewable Energy Projects cited earlier in this filing. The company also presented on the intended use of resilience metrics within the Pilot. An Input Form was provided as a way for stakeholders to provide feedback on particular aspects of CBRE-RH Pilot development. Two Input Forms were submitted to the company. Feedback provided included possible metrics used to track CBRE advancement and ways that the company might reach out to communities.

B. Draft Biennial Report Feedback from Advisory Members

This section provides an overview of the key issues identified within the report by the advisory group members during the draft and review process. Significant efforts have been made to ensure the report's reflects proactive steps undertaken to resolve them, offering clarity on the improvements already implemented.

Two rounds of the draft Biennial Report were shared with advisory members. Feedback from both rounds of comments is reflected here. Any feedback and suggested revisions that could be incorporated into the body of the report have been. Note, not all feedback was or could appropriately be, addressed in the context of this Biennial Report, but is recorded for transparency and accountability. It is also recognized that most feedback was given by individuals, representing their own perspectives, and is not indicative of an entire group, organization or Tribe's perspectives.

Feedback from CBIAG (individual) members:

First draft:

- More background on LC 82
- Lacks data and analytics
- Goal of the report is unclear
- Be mindful of the language and story being told
- Hard to tell who target audience is
- Lack of content around wildfires as it relates to rate pressures
- Report currently feels like a procedural document reporting to OPUC about company procedures
- 1-2 page summary alongside full report would be helpful
- Add intentionality to the document:
 - Incorporate the shared values and how we arrived here, detail the “newness” of the space and emphasize that nothing like this has been done before.
 - People in the space want a more collaborative way of governance with the utility.
 - Put the vision first in the document.
 - Make the document a bit more technical.

- Add a glossary in the beginning for audience who may be unfamiliar – determine the audience.
 - Define words like environmental justice, equitable transition, etc.
- The group does not want an endorsement document.
- Add a quick summary of what the company has learned throughout co-creating the space.
 - Detail what worked, some challenges

Second draft:

- The latest draft creates more clarity around the purpose of the document – audience understands where to find the more technical details (IRP and CEP filings).
- The report is strong since incorporating the changes from the first round of feedback.
- Does a good job answering how the utility is approaching legislative issues procedurally.
- The company has done the survey work around community priorities, consider leading with those. For example, energy cost is a top priority the report (whether this one or another) should specifically detail how much energy costs have gone up, cost attribution, and what strategies /programs are in place to address energy burden. Basically, look at the top priorities and speak to them very specifically. Please consider sending out the final version in a format that allows searching and highlighting for better ease of access. The report is very thorough, intentional, and overall, well done. Readability is high even with more complex information.

Feedback from Tribal Nations (individual) members:

First draft:

- Report is fairly complex and there are multiple filings at the PUC that seem to tie into this requirement – how do they all flow together?
- The timeframe to provide comments on the draft report was too short for a turnaround in November.
- The report seems like a formality and loses value because there is no clear tie to how it helps the Tribes.
- Work is required for participants to present to councils.

- The discussion and report is productive on most levels, with an understanding that this report is developed because of OPUC requirements.
- There is a need for action – the report raises the question of where it is going to lead.
- Previous comments were resurfaced around capacity and bandwidth limitations for Tribes and the needs for technical support for securing funding.
- There are concerns about rising energy costs and the implementation of renewable energy and other projects that are/will be passed onto ratepayers. Concerns were raised around the impact to Tribal members and how it will be solved.
- Costs of renewable energy projects are not reflected in this report. The effects on customers, especially on those who are disadvantaged, are not being reflected. There should be a cost analysis.
- Current reporting is not accurately capturing what is causing bills to rise.
- Grants for charging stations are not helping Tribes, they do not increase value to membership and they do not decrease bills.
- There are concerns about re-enrollment period for LIBA.
- It would be helpful to create a journey map of the Biennial Report process to understand topics, timing, impacts and recommendations better

Second draft:

- Miscellaneous edits and requests for language changes by individual (addressed in the body of the document unless otherwise noted).
- An individual comment that action should be the focus, rather than more studies and engagements.
- Some key aspects that were not included or given enough voice in the report is the following:
 - Tribes/tribal members economic position not allowing them to cost share.
 - Reporting of actual increases to power bills related to the move to renewable energy.
 - Bringing together all funding sources to allow programs and assistance without cost match from Tribal Communities.

- Cost based/recovery of cost information (renewable credits, tax incentives, Trust assistance, ...) that could be used in building community-based energy projects that would offset energy consumption amount on Tribal communities' utility bills.
 - Listing of State Mandates that prohibit the sharing of costs of renewable energy and effects on customers' bills.
- Expressed concern about there not being an additional comment period before the final submission to OPUC, especially with the Tribes' names being listed on the document. If Tribes are associated with the document, they should have a final say – this final version feels rushed and inappropriate without a (third) comment period.

VII. Glossary

Clean Energy Plan

The Clean Energy Plan, or CEP, is specific to Oregon customers and communities and focuses on community-based actions to meet clean energy milestones. It is based on Pacific Power’s 20-year, long-term planning document, known as the [Integrated Resource Plan or IRP](#).

Community Benefit Indicator

The desired measurable outcome from which a utility action could influence to be more equitable

Community Resilience

The ability of a community to prepare for anticipated natural hazards, adapt to changing conditions and withstand and recover rapidly from disruptions

Disadvantaged Communities

Disadvantaged communities are defined as census tracts that exceed one or more of the following category thresholds:

- Climate Change
- Energy
- Health
- Housing
- Legacy Pollution
- Transportation
- Water and Wastewater
- Workforce Development

Energy Burden

Customers spending 6% or more of their income on home energy costs

Energy Equity

The fair and just distribution of benefits in the energy system to all levels of society, regardless of ability, race or socioeconomic status

Environmental Impacts

Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's activities, products or services

Environmental Justice

The just treatment and meaningful involvement of all people, regardless of income, race, color, national origin, Tribal affiliation or disability, in agency decision-making and other Federal activities that affect human health and the environment

Equity

The quality of being fair and just, especially in a way that takes account of and seeks to address existing and historical inequalities

Renewable Energy

Electricity supplied from renewable energy sources, such as wind and solar power, geothermal, hydropower and various forms of biomass – these energy sources are considered renewable sources because they are continuously replenished on the Earth.

Vulnerable Populations

Tracts or counties with a portion of the population with three or more vulnerability indicators higher than the national average