

Exh. CMM-2T
Docket UE-230172
Witness: Christina M. Medina

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFICORP dba
PACIFIC POWER & LIGHT COMPANY

Respondent.

Docket UE-230172
(Consolidated)

In the Matter of

ALLIANCE OF WESTERN ENERGY
CONSUMERS'

Petition for Order Approving Deferral of
Increased Fly Ash Revenues

Docket UE-210852
(Consolidated)

PACIFICORP

REBUTTAL TESTIMONY OF CHRISTINA M. MEDINA

October 2023

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ATTACHED EXHIBITS

Exhibit No. CMM-3—2023 Clean Energy Implementation Plan Public Participation Plan
Exhibit No. CMM-4—The Energy Project’s Response to PacifiCorp Data Request No. 004

1 **I. PURPOSE AND SUMMARY OF TESTIMONY**

2 **Q. Are you the same Christina M. Medina who previously submitted direct**
3 **testimony in this proceeding on behalf of PacifiCorp dba Pacific Power & Light**
4 **Company (PacifiCorp or the Company)?**

5 A. Yes.

6 **Q. What is the purpose of your rebuttal testimony?**

7 A. My rebuttal testimony responds to general equity concerns raised in response testimony
8 by Molly A. Brewer (witness Brewer) on behalf of the Washington Utilities and
9 Transportation Commission Staff (Staff). The rebuttal testimony of Matthew D. McVee
10 (witness McVee) provides further rebuttal to the equity concerns raised by witness
11 Brewer.¹ My rebuttal testimony also responds to proposals regarding the
12 implementation of community-based social marketing for low-income assistance
13 programs, and the development of a language access plan raised in the response
14 testimony by Shaylee N. Stokes (witness Stokes) on behalf of The Energy Project
15 (TEP). As discussed below, I recommend the Commission reject TEP proposals.²

16 **II. PACIFICORP'S EQUITY RELATED ACTIVITIES**

17 **Q. Does witness Brewer acknowledge the Company's equity-related actions that were**
18 **not proposed in the Multi-Year Rate Plan (MYRP)?**

19 A. No. It appears that witness Brewer has a narrower view of the Company's equity-
20 related requirements. PacifiCorp considers equitable actions or modifications to its

¹ McVee, Exh. MDM-2T at 26-47.

² Unless personal pronouns are specified by a witness in their testimony, in my rebuttal testimony I use "they/them" when using a pronoun to refer to a witness.

1 operations that were not explicitly proposed within this case to be relevant.³ This
2 includes the substantial equity work outlined in the Company’s Clean Energy
3 Implementation Plan (CEIP). The Company adopts a broader interpretation of the
4 Commission’s guidance and does not believe it is necessary to wait for approval in a
5 subsequent rate case to implement equitable modifications to its operations. Equity
6 serves as a guiding principle for actions that the Company takes within its Washington
7 service area, which generally aligns with the Commission’s equity discussion in the
8 *Cascade* order.⁴

9 **Q. Can you provide an example from your direct testimony?**

10 A. Yes. For instance, my direct testimony discussed the Company’s extreme weather
11 disconnection moratorium that PacifiCorp implemented.⁵ The Company does not
12 believe that it should have refrained from independently implementing this program
13 and instead included it as a proposal in its multi-year rate plan to comply with the
14 equity requirement. The Company strongly believes that it is more reasonable to
15 implement equitable modifications to its operations as soon as practicable, without
16 waiting for them to be proposed and approved in a subsequent rate plan proposal. This
17 is especially true given the time between multi-year rate filings. Such an unnecessary
18 delay can result in unequitable outcomes for our customers, and would appear contrary
19 to prior Commission guidance.

³ Brewer, Exh. MAB-1T at 22:14 (“Because these actions were outside of this case, they didn’t factor into Staff’s position.”).

⁴ *WUTC v. Cascade Nat. Gas Corp.*, Docket No. UG-210755, Order 09 at ¶58 (Aug. 23, 2022) (“Recognizing that no action is equity-neutral, regulated companies should inquire whether *each* proposed modification to their rates, practices, or operations corrects or perpetuates inequities.”) (emphasis added).

⁵ Medina, Exh. CMM-1T at 9:22-10:2.

1 **Q. Do you have other examples of equitable actions and modifications to**
2 **PacifiCorp’s operations in addition to those described in your direct testimony?**

3 A. Yes. The Company is continually promoting equity within its Washington service
4 area. The following is a non-exhaustive list of additional equitable actions that the
5 Company has pursued:

6 • **Establish an Electric Vehicle (EV) grant program:** On May 20, 2022,
7 PacifiCorp filed its 2022 Washington State Transportation Electrification Plan
8 (Plan) with the Commission in Docket No. UE-220359 and supplemented its
9 original filing with an addendum on September 28, 2022. This is PacifiCorp’s
10 first filed Plan since legislation was enacted in 2019. The Commission
11 acknowledged the Plan on October 27, 2022, which enabled PacifiCorp to begin
12 developing the proposed programs, that included a communities grant program,
13 outreach and education program, and managed charging pilot program. These
14 programs broaden the previous EV programs by allowing for multiple project
15 types to participate, with benefits and preference targeted towards Named
16 Communities. The overall goal is to provide exploratory programs that will help
17 to plan, promote, or deploy electric transportation technology and projects across
18 the service area, including within Named Communities. These programs have
19 been shared with stakeholders for feedback and review.

20 • **Program Changes Tied to Utility Actions within the CEIP:** PacifiCorp made
21 several changes to residential and non-residential customer energy efficiency
22 programs to increase the focus on delivery of benefits to Named Communities.
23 These utility actions were based on input received from the Equity Advisory

1 Group (EAG) and relevant Customer Benefit Indicators (CBIs). Changes
2 included, but were not limited to: expanding the tariff applicability for the
3 installation of energy efficiency improvements; increasing the funds that are
4 available for repairs from 15 percent to 30 percent of the annual reimbursement
5 on energy efficient measures; and updating income guidelines to be consistent
6 with RCW 19.405.020(25). Before these changes, certain income-qualified homes
7 could not receive energy efficiency improvements due to the extent of critical
8 maintenance needed before the energy efficiency improvements could be made.
9 The utility actions (including updates as needed) will be included in the 2024-
10 2025 Biennial Conservation Plan filing due November 1, 2023. Similarly, as a
11 result of the Company's CEIP, the Company has launched Demand Response
12 programs. PacifiCorp has leveraged the EAG as a channel to build awareness of
13 the Company's newly developed Demand Response programs, as they have been
14 rolled out in 2022 and 2023. Program staff presented at approximately five EAG
15 meetings in 2022 and three in 2023 to-date to discuss plans for program design of
16 Demand Response programs. Additionally, PacifiCorp hosted a technical
17 workshop on Demand Response in January 2023, to which EAG members and
18 Staff were invited. Specifically, the Company sought feedback on community
19 groups to target with messaging, in-person events to attend, suggestions for ways
20 to reach small businesses, and ultimately how to partner with the EAG to get the
21 message out.

- 22 • **Select Outreach and Engagement Activities:** PacifiCorp has taken steps to
23 foster greater engagement and continue the efforts to improve the community

1 outreach mechanism. For instance, PacifiCorp created a Community Calendar to
2 further participation in the local community events happening in Washington and
3 is shared quarterly with the Washington EAG. The Company has also added a
4 new bilingual outreach coordinator for small businesses in highly impacted
5 communities to the program delivery team. The outreach coordinator is a trusted
6 community partner who offers meaningful insight and a relevant voice to
7 programs and their benefits through participation. Additionally, the need to
8 increase focus on supporting agricultural workers in the region prompted
9 PacifiCorp to develop and deliver 14 presentations at fruit packing houses to
10 approximately 780 agricultural workers. The presentation content was
11 educational, focusing on programs and actions intended to ease the energy burden
12 and support greater participation and benefits for the attendees and their families.
13 PacifiCorp distributed 850 pieces of informational collateral on energy efficiency,
14 bill assistance, and weatherization information.

- 15 • **Finalized an Energy Burden Assessment:** PacifiCorp hired Empower
16 Dataworks to prepare a 2022 Energy Burden Assessment (EBA) for the
17 Company’s residential customers in Washington. In the EBA, Empower
18 Dataworks highlighted that the “[Low Income Bill Assistance] program design is
19 very good at targeting benefits to higher burden customers” and overall, “program
20 administration/overhead is very efficient relative to other programs in the state.”
21 High-level takeaways also noted “good coordination between PacifiCorp and the
22 local agencies on culturally appropriate marketing and program design.”⁶ Finally,

⁶ Stokes, Exh. SNS-4 at 17.

1 the study identified a series of recommendations for continued improvement.
2 PacifiCorp partners with three agencies to administer and deliver the program:
3 Blue Mountain Action Council (BMAC) serves Columbia, Garfield, and Walla
4 Walla counties, Opportunities Industrialization Center of Washington (OIC)
5 serves Upper Yakima County, and Yakima Valley Farm Workers Clinic dba
6 Northwest Community Action Center (NCAC) serves Lower Yakima County.

7 **Q. How do you respond to witness Brewer’s testimony pertaining to equity and**
8 **capital planning?**

9 A. Witness McVee provides a response to witness Brewer’s testimony on capital planning
10 in his rebuttal testimony.⁷ However, it is my understanding much of the Company’s
11 *planning* does not occur within a general rate case. While Staff has commended the
12 Company for implementing an equity questionnaire in its Request for Proposals
13 processes,⁸ it is crucial to understand that both the Integrated Resource Plans and Clean
14 Energy Implementation Plans undergo extensive public input and comment. PacifiCorp
15 aims to actively involve and consider the public in shaping its plans for a renewable
16 energy future in Washington. In particular, the company’s Public Participation Plan
17 (PPP) for its CEIP ensures robust and inclusive participation. In particular, the PPP is
18 built upon the following four pillars: (1) Engaging members of the public with
19 appropriate outreach, methods, timing, and language considerations; (2) Addressing
20 barriers to participation; (3) Making data accessible and available to members of the
21 public and CEIP stakeholders; and (4) Incorporating learnings from existing advisory
22 groups. I have attached the PPP as Exhibit CMM-3 to my rebuttal testimony.

⁷ McVee, Exh. MDM-2T at 40-47.

⁸ Brewer, Exh. MAB-1T at 22:4-6.

1 **Q. Is there a pending policy docket related to the equity requirement?**

2 A. Yes. The Commission initiated an equity-focused proceeding in docket A-230217.
3 The Commission recently clarified that it would solicit stakeholder input concerning
4 the four tenets of equity justice in turn, first exploring Procedural Justice, followed by
5 Distributional Justice, Recognition Justice, and then Restorative Justice, and noting
6 the Commission expectation is that will take about two years to complete. The
7 Company looks forward to collaboratively working with the Commission, Staff, and
8 other stakeholders in this proceeding to gain a better collective understanding on this
9 important topic.

10 **III. COMMUNITY-BASED SOCIAL MARKETING**

11 **Q. Please describe witness Stokes' proposal related to community-based social**
12 **marketing.**

13 A. Witness Stokes recommends that the Commission order PacifiCorp to establish a
14 community-based outreach program with a budget of at least \$100 thousand for the first
15 three years.⁹ This program would involve collaboration between PacifiCorp and
16 Community Action Agencies to identify Community Based Organizations (CBOs) that
17 would receive compensation for marketing low-income programs. If approved, witness
18 Stokes suggests that PacifiCorp and the Low-Income Advisory Committee (LIAC)
19 work together to determine the specific implementation details of the program.

20 **Q. Do you agree with witness Stokes proposal?**

21 A. Not at this time.

⁹ Stokes, Exh. SNS-1T at 24-27.

1 **Q. Can you please explain PacifiCorp’s current marketing activities for low-income**
2 **assistance programs in Washington?**

3 A. Yes. With input received from partner Community Action Agencies, the Low-Income
4 Bill Assistance program (LIBA) marketing and outreach campaigns run in the Spring
5 and Fall through various physical and digital media. These include:

- 6 • Website;
- 7 • Social media (Facebook and Twitter);
- 8 • Digital media ads including cinema video advertisements;
- 9 • Bill messages;
- 10 • English/Spanish radio ads in the Yakima service area;
- 11 • English movie theatre advertisements in Walla Walla;
- 12 • English and Spanish newspaper advertisements;
- 13 • Community organizations English/Spanish handouts;
- 14 • Church pamphlets;
- 15 • Gas toppers placed at gas stations in Yakima;
- 16 • Community Outreach local spokesperson – leveraged Wattsmart outreach in 2022
17 to deliver program information to employees of fruit storage and packing
18 facilities; and
- 19 • Leveraging Wattsmart Residential pilot program with local spokesperson for
20 various radio, print and tv interviews and attend local events.

21 **Q. What is the annual budget for these marketing activities in Washington?**

22 A. The annual budget is \$60 thousand.

1 **Q. Is witness Stokes proposal excessive given PacifiCorp’s current marketing**
2 **budget?**

3 A. Yes. Given that the current budget for marketing activities is only \$60 thousand,
4 witness Stokes budget proposal is excessive as it would require this Commission to
5 order PacifiCorp to provide at-least \$100 thousand of customer funds to be
6 transferred directly to CBOs, without any detail concerning accountability or
7 cost-effectiveness.

8 **Q. Does witness Stokes provide any reasoning why at least \$100 thousand is an**
9 **appropriate level of funding for this program?**

10 A. No. Witness Stokes only states that such funding would be necessary “[t]o ensure
11 sufficient funding for sustained engagement by CBOs.”¹⁰ However, witness Stokes
12 does not provide any further detail explaining why this specific level of funding is
13 necessary.

14 **Q. Does witness Stokes provide any support that transferring ratepayer funds to**
15 **CBOs is cost-effective?**

16 A. No. While witness Stokes mentions that program details would be determined in LIAC
17 meetings, the current record lacks evidence to support the Commission’s order of at
18 least \$100 thousand of ratepayer funds to CBOs as a cost-effective measure. For
19 instance, there is no proposal outlining how much of the proposed \$100 thousand
20 amount would be allocated for covering administrative expenses versus actual
21 advertising of low-income programs.

¹⁰ Stokes, Exh. SNS-1T at 27:18-19.

1 **Q. Does witness Stokes provide any detail on the oversight of customer funds given**
2 **to CBOs?**

3 A. No.

4 **Q. Do you agree with witness Stokes' premise that CBOs could provide value in**
5 **improving the effectiveness of low-income program marketing?**

6 A. Yes. PacifiCorp acknowledges the value of CBOs and their importance in the
7 communities they serve. PacifiCorp would be open to receiving feedback and input
8 from CBOs on how to potentially improve its advertising efforts and invites CBOs to
9 reach out to the Company or attend its LIAC meetings. Although PacifiCorp would
10 be open to receiving feedback and input from CBOs on how to potentially improve its
11 marketing activities, it is not convinced at this time that directly providing CBOs with
12 customer funds is in the public interest. PacifiCorp would be willing to discuss this
13 proposal, including all the details of such a proposal, within the context of LIAC
14 meetings.

15 **Q. Has PacifiCorp made any efforts to connect with CBOs in its service area?**

16 A. Yes. PacifiCorp has made efforts to connect with CBOs in its service area. The
17 Company maintains contracts with various community action agencies / community-
18 based organizations to help shape and deliver the Company's low-income programs.
19 This includes Northwest Community Action Center located in Toppenish,
20 Washington that serves the lower Yakima County, OIC of Yakima that serves the
21 upper Yakima Valley, Blue Mountain Action Council located in Walla Walla,
22 Washington that serves Walla Walla, Garfield, and Columbia counties and Yakama
23 Nation Housing Authority within the Yakama Nation Reservation. Additionally,

1 PacifiCorp has made efforts to connect with community-based organizations by way
2 of its outreach in local community events as well as through presentations in
3 collaboration with local non-profit organizations. Company representatives have
4 connected with community-based organizations such as Yakima Valley Farm
5 Workers Clinic through its health and resource fairs, the Asian Pacific Islander
6 Coalition, the Central Washington Hispanic Chamber of Commerce, and the
7 Salvation Army to name a few.

8 **Q. Should the Commission defer to the LIAC on how customer funds should be spent**
9 **for marketing low-income assistance programs?**

10 A. Yes. Witness Stokes acknowledges that the details of this program, if ordered by the
11 Commission, should be determined within LIAC meetings.¹¹ However, it is concerning
12 that witness Stokes proposes the Commission order the implementation of this program
13 without any input from the LIAC. It is essential to consider procedural justice, as
14 emphasized by the Commission in its *Cascade Order*.¹² The Commission should not
15 bypass the LIAC and dictate the method on how these programs should be advertised,
16 because the LIAC acts in a representative capacity for the Company's low-income
17 customers, and their input holds significant value. They are in the best position to
18 determine if such a program aligns with their needs and if it is the most effective use of
19 limited customer funds.

20 **Q. Do you have an alternative recommendation?**

21 A. Yes. PacifiCorp is willing to work collaboratively with TEP and will include this
22 proposal as an agenda item to be discussed in a forthcoming LIAC meeting.

¹¹ Stokes, Exh. SNS-1T at 27:22-23.

¹² *WUTC v. Cascade Nat. Gas Corp.*, Docket No. UG-210755, Order 09 at ¶56 (Aug. 23, 2022).

1 IV. LANGUAGE ACCESS PLAN

2 **Q. Please describe witness Stokes' proposal related to the development of a language**
3 **access plan.**

4 A. Witness Stokes proposes that the Commission should order the Company to develop a
5 language access plan.¹³ While the Company already offers various services and
6 outreach programs to assist customers who speak languages other than English, witness
7 Stokes believes that a formal language access plan is necessary, and should be
8 developed in consultation with the LIAC and EAG. The proposed timeline for this plan
9 includes: developing the plan within six months of the final order in this proceeding,
10 soliciting input from the LIAC and EAG within seven months, making a subsequent
11 filing with the Commission containing the final plan within 12 months (pursuant to
12 WAC 480-07-885), and maintaining and revising the plan as needed with approval and
13 feedback from the LIAC and EAG.

14 **Q. Do you agree with witness Stokes' proposal?**

15 A. No.

16 **Q. Does PacifiCorp's CEIP acknowledge the need to increase its Spanish outreach to**
17 **customers?**

18 A. Yes. Page 96 of the 2021 CEIP provides:

19 PacifiCorp also recognizes the need to continue to increase Spanish
20 outreach to customers. While this work has already begun, PacifiCorp
21 will continue to increase the number of ads and direct outreach (mail,
22 email, and collateral) in Spanish. PacifiCorp will also create additional
23 program webpages and materials in Spanish on its website, including
24 education materials on a new webpage dedicated to educational
25 content. Educational sources will include content, videos and resources
26 for customer and community use. Spanish ads will drive directly to
27 these Spanish webpages. Digital and printed materials in Spanish will

¹³ Stokes, Exh. SNS-1T at 21-24.

1 be available to customers and community organizations to provide
2 information about program offerings. PacifiCorp also will continue to
3 identify and expand outreach to non-profits that provide services to
4 named communities.¹⁴

5 **Q. Can you explain what actions and services the Company provides for its**
6 **customer who speak a primary language other than English?**

7 A. PacifiCorp understands the importance of equal access to information, and that varied
8 communication approaches, paired with a myriad of delivery modalities, are the tools
9 that foster connections with the customers and communities the Company is honored
10 to serve. To that end, PacifiCorp has developed various pathways, public engagement
11 spaces, and methods on how feedback is utilized and captured through various public
12 channels. These include:

- 13 • The development of a Multicultural Marketing Campaign in Yakima and Walla
14 Walla;
- 15 • Creating messaging in culturally relevant language and means of
16 communications;
- 17 • Partnering with local, trusted community members to spread program and
18 incentive messages within the community and facilitate conversations;
- 19 • Using data to understand and leverage the known communication methods of our
20 customers;
- 21 • Exemplifying the usability, and value of programs and benefits by sharing real-
22 life examples and case studies of participation in local communities;
- 23 • Our Customer Care call center offers the following to improve and support

¹⁴ *In the Matter of PacifiCorp, dba Pacific Power & Light Co. Clean Energy Implementation Plan*, Docket No. UE-210829, Revised 2021 Clean Energy Implementation Plan at 92 (Mar. 13, 2023).

1 expanded customer accessibility:

- 2 ▪ Language translation services are available 24/7;
- 3 ▪ Hearing impaired customers may engage with PacifiCorp through
- 4 Telecommunications Relay call services;
- 5 ▪ Collection notices in Washington are offered in English, Spanish,
- 6 Russian Cambodian, Laotian and Vietnamese; and
- 7 ▪ Direct agent support line for Spanish speaking customers is available
- 8 24/7.¹⁵

9 **Q. Are you familiar with the concept of a “language access plan”?**

10 A. No, witness Stokes’ testimony is the first time I have come across this concept. The
11 Company issued a data request to determine if TEP could provide an example of a
12 language access plan from another utility. In response, TEP explained that it was not
13 aware of any language access plan by any other regulated utility in Washington and
14 was not able to provide a copy of any language access plan for reference.¹⁶ Given the
15 that the Company does not possess an example of a language access plan, it may be
16 difficult for the Company to develop one if ordered by the Commission.

17 **Q. Do you agree with witness Stokes’ proposal for a language access plan?**

18 A. Not at this time. Similar to my testimony regarding the CBO proposal, there is no
19 record in this proceeding indicating whether the LIAC or EAG would support the
20 specific method of a language access plan. Witness Stokes suggests that the
21 Commission order the development of the plan without seeking input from the LIAC or
22 EAG to determine if they agree with the concept of a language access plan, or if they

¹⁵ PacifiCorp also has a version of its website in Spanish: <https://www.pacificpower.net/es>.

¹⁶ Medina, Exh. CMM-4.

1 believe the development of such a plan is a worthwhile use of limited resources. As
2 mentioned earlier, it is crucial to consider procedural justice, as emphasized by the
3 Commission in its *Cascade Order*. The Commission should not bypass the LIAC or
4 EAG and directly dictate the method on how the Company engages with customers
5 who do not have English as their primary language. The LIAC and EAG act in a
6 representative capacity for the Company's low-income customers and Named
7 Communities, and their input is highly valuable. They are best positioned to provide
8 insights on how to effectively address language barriers and ensure equitable access to
9 services. However, the Company is willing to work collaboratively with TEP and have
10 a discussion of their proposal at forthcoming LIAC and EAG meetings.

11 **Q. If the Commission orders the development of a language access plan, does witness**
12 **Stokes provide any reason as to why the Company must develop a language access**
13 **plan within six months after the final order in this proceeding?**

14 A. No, witness Stokes does not provide a specific reason for the six-month timeline. It
15 appears to be an arbitrary deadline. As mentioned earlier, PacifiCorp would prefer to
16 discuss any relevant proposals within the context of advisory group meetings.
17 Furthermore, the Company believes it is important to take the necessary time to
18 inclusively and thoughtfully develop any proposal in collaboration with interested
19 stakeholders. This approach ensures that any proposal effectively assists customers who
20 do not have English as their primary language, rather than rushing to meet an arbitrary
21 deadline.

1 **Q. Does witness Stokes provide any reason as to why the Commission should order a**
2 **subsequent filing within twelve months?**

3 A. No, witness Stokes does not provide a specific reason for the Commission to order a
4 subsequent filing within twelve months. The deadline of twelve months appears to be
5 arbitrary. However, it is possible that the rationale behind this timeline is to allow
6 sufficient time for stakeholder input following the development of the language access
7 plan. Furthermore, witness Stokes does not explain why the Commission should order
8 the Company to make a subsequent filing, which would initiate an entirely new docket,
9 rather than a compliance filing in this proceeding pursuant to WAC 480-07-880.

10 **V. CONCLUSION**

11 **Q. Please summarize your recommendations to the Commission.**

12 A. I recommend the Commission reject TEP's community-based social marketing and
13 language access plan recommendations, and find that the Company has appropriately
14 considered equity as part of its MYRP.

15 **Q. Does this conclude your rebuttal testimony?**

16 A. Yes.

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EXHIBIT OF CHRISTINA M. MEDINA

2023 Clean Energy Implementation Plan Public Participation Plan

October 2023

2023 CLEAN ENERGY IMPLEMENTATION PLAN

PUBLIC PARTICIPATION PLAN

Introduction

Washington passed the Clean Energy Transformation Act (CETA) in 2019, that combines directives for utilities to pursue a clean energy future with assurances that benefits from a transformation to clean power are equitably distributed among all Washingtonians.¹ CETA requires investor-owned utilities to submit a Clean Energy Implementation Plan (CEIP) every four years to the Washington Utilities and Transportation Commission (WUTC or Commission) that describes the utility’s plan to meet CETA’s ambitious clean energy targets.² Among other things, the Commission must determine whether utility CEIPs comply with CETA.³

The WUTC has engaged in several rulemaking proceedings to implement CETA.⁴ Relevant here, the Commission directs utilities to involve advisory groups and relevant stakeholders in “meaningful and inclusive public participation” when developing future CEIPs, and while implementing previously acknowledged CEIPs.⁵ To document these engagement channels, utilities must file biennial public participation plans (PPP) by May 1st of each odd-numbered year that detail each utility’s “schedule, methods, and goals for public participation and education both during the development of its CEIP and throughout the implementation of the plan.”⁶ In its rulemaking adoption order, the Commission noted that PPPs are “inherently flexible” and will “document work conducted during the period before the submission of the plan and outline forward-thinking efforts for public involvement through the period.”⁷ The Commission also noted that utility PPPs may “begin to include elements for integrated resource planning, particularly as they relate to equity needs.”⁸

Consistent with WAC 480-100-655(2), PacifiCorp filed its initial PPP with the Commission in May of 2021,⁹ and filed a revised PPP in July of 2021.¹⁰ Because this was PacifiCorp’s first PPP, the plan focused on activities to facilitate public participation for the upcoming 2021 CEIP. On December 30, 2021, PacifiCorp filed its inaugural CEIP with Commission, and subsequently filed a revised CEIP on March 13, 2023.¹¹ Commission Staff requested that the Commission initiate an adjudication on PacifiCorp’s CEIP shortly thereafter, and the docket remains open.

Because PacifiCorp’s 2021 CEIP has not been acknowledged by the Commission, PacifiCorp’s 2023 PPP focuses on the Company’s efforts to increase engagement and broaden educational

¹ 2019 WA Laws Ch. 288.

² RCW 19.405.060.

³ RCW 19.405.090(9).

⁴ *See, e.g., In re CETA Rulemaking*, Dockets UE-191023 and UE-190698, General Order R-601 (Dec. 28, 2020).

⁵ WAC 480-100-655(2).

⁶ *Id.* at -655(2)(a)-(g).

⁷ General Order R-601, ¶ 153.

⁸ *Id.*

⁹ *In re PacifiCorp’s 2022 PPP*, Initial PPP, Docket UE-210305 (May 3, 2021).

¹⁰ *In re PacifiCorp’s 2022 PPP*, Revised PPP, Docket UE-210305 (Jul. 30, 2021).

¹¹ *In re PacifiCorp’s CEIP*, Docket UE-210829.

opportunities arising from the 2021 CEIP. Generally this includes: incorporating relevant discussions from the Company's 2023 Integrated Resource Plan Two-Year Progress Report – Appendix O that updated the Company's CEIP;¹² identifying strategies to reduce barriers to public participation, including language, cultural, economic, or other factors;¹³ plans to provide information/data in broadly understood terms through meaningful participant education;¹⁴ relevant proposed schedules of public meetings or engagement, including advisory group meetings;¹⁵ and discussion of our CEIP website and other relevant communication materials.¹⁶ Future PPPs to engage relevant stakeholders will commence after the Commission has approved PacifiCorp's 2021 CEIP.¹⁷

PacifiCorp respectfully submits this 2023 PPP for the Commission's consideration. This PPP is an extension of the first and provides information on the various pathways that the Company has developed, or is in the process of developing, for its public engagement spaces, and utilizes feedback captured through its various public channels. Public participation methods and outreach for the 2021 CEIP will build upon the following pillars that support robust and inclusive participation: (1) Engaging members of the public with appropriate outreach, methods, timing, and language considerations; (2) Addressing barriers to participation; (3) Making data accessible and available to members of the public and CEIP stakeholders; and (4) Incorporating learnings from existing advisory groups.

In addition to these pillars, PacifiCorp understands that advancing energy equity in Washington requires going beyond traditional conceptual frameworks to actions that create opportunities for improving communities that have been historically underserved. To that end, PacifiCorp has embraced the need for continual learning and growth to better implement these concepts, and this approach is reflected throughout the 2023 PPP.

Public Participation and Outreach

PacifiCorp is continuing to build a CEIP public participation process that is open, transparent, and accessible. To meet these goals, we have implemented processes that provide opportunities for public participation that embrace inclusive design and aim for communication with stakeholders to be proactive and easy to understand. This section details the Company's specific actions, outreach, timing, and continued and expanded methods to promote equity and engagement within the Company's Washington service area.

Utility Actions

The Company has taken the following actions since filing its previous PPP to promote equity and engagement. Select efforts and initiatives include:

¹² WAC 480-100-625(4)(c).

¹³ WAC 480-100-655(2)(b).

¹⁴ WAC 480-100-655(2)(c).

¹⁵ WAC 480-100-655(2)(d).

¹⁶ WAC 480-100-655(2)(g).

¹⁷ See, e.g., WAC 480-100-655(2)(a), (e), and (f) (elements more focused on upcoming CEIPs, that would appear to require an approved CEIP).

Formed Equity Advisory Group (EAG): The EAG was assembled in 2021 to help inform and advise the Company on the issues most important to the communities that PacifiCorp serves in Washington. The EAG is comprised of ten representatives from organizations that serve highly impacted communities and vulnerable populations within the Company’s Washington service area, including Yakima and Walla Walla. These members have expertise on equity-related topics, such as the health of vulnerable populations and programs for low-income customers. The EAG meets regularly and provides significant input on the Company’s Customer Benefit Indicators (CBIs) and related metrics, new and existing programs, communication strategies, and other equity-related matters to help to inform how the Company plans and operates within its Washington service area.

Developed CBIs: Consistent with CETA, the Company is committed to a distribution of benefits where benefits from the transition to clean energy are broadly shared and equitably distributed among all customers, with a specific focus on named communities. PacifiCorp has partnered with stakeholders and advisory groups, including its EAG, to identify the highest priority benefits to customers and identify potential barriers and burdens that may prevent some customers from receiving those benefits. These efforts have resulted in nine CBIs to evaluate the equitable distribution of benefits. These CBIs allow the Company to assess and monitor the impacts of each proposed program, action, and investment, and were included in the Company’s most recent CEIP.¹⁸ The Company has received positive feedback on its proposed CBIs, as well as helpful suggestions for additional changes, and we look forward to working with stakeholders as the docket is resolved.

Program Changes Tied to Utility Actions within the CEIP: PacifiCorp made several changes to, residential and non-residential customer energy efficiency programs to increase the focus on delivery of benefits to named communities. These utility actions were based on input received from the EAG and relevant CBIs. The same utility actions were included in the 2022-2023 Biennial Conservation Plan, and updates for 2023 were included in the 2023 Annual Conservation Plan.¹⁹ These actions included modifying the low-income weatherization program that the Company filed on December 21, 2021. Changes included, but were not limited to: expanding the tariff applicability for the installation of energy efficiency improvements; increasing the funds that are available for repairs from 15 percent to 30 percent of the annual reimbursement on energy efficient measures; and updating income guidelines to be consistent with RCW 19.405.020(25). Before these changes, certain income-qualified homes could not receive energy efficiency improvements due to the extent of critical maintenance needed before the energy efficiency improvements could be made. The utility actions (including updates as needed) will be included in the 2024-2025 Biennial Conservation Plan filing due November 1, 2023.

Launching Demand Response programs is another specific action from the CEIP. PacifiCorp has leveraged the EAG as a channel to build awareness of the Company’s newly developed Demand Response programs, as they have been rolled out in 2022 and 2023. Program staff presented at approximately five EAG meetings in 2022 and three in 2023 to-date to discuss plans for program design of Demand Response programs. Additionally,

¹⁸ *In re PacifiCorp’s 2021 CEIP*, Docket UE-210829, at 27–60 (Dec. 30, 2021).

¹⁹ *See, e.g., In re PacifiCorp’s 2023 Annual Conservation Plan*, Docket UE-210830 (Nov. 15, 2022).

PacifiCorp hosted a technical workshop on Demand Response in January 2023, to which EAG members and WUTC staff were invited. Specifically, the Company sought feedback on community groups to target with messaging, in-person events to attend, suggestions for ways to reach small businesses, and ultimately how to partner with the EAG to get the message out.

On-Bill Financing: The Company's residential customers now have the option of obtaining a loan through Craft3 for Home Energy Savings program-eligible projects. The purpose of this program is to address the upfront capital cost that may exist for some customers to participate in certain residential energy efficiency programs. Craft3, who administers the on-bill financing program, extended eligibility in 2022 to additional housing types, including manufactured homes on leased land, and homes in Tribal communities where traditional lender liens are less common. Additionally, Craft3 increased the maximum loan amount to accommodate the inclusion of financing for critical repairs such as asbestos remediation, roof repair, mold removal, electrical panel upgrades, etc. Essential maintenance may only be financed in conjunction with and preparation of a rebate-eligible project.

Establish an Electric Vehicle (EV) grant program: On May 20, 2022, PacifiCorp filed its 2022 Washington State Transportation Electrification Plan with the Commission in Docket UE-220359,²⁰ and supplemented its original filing with an addendum on September 28, 2022. This is PacifiCorp's first filed TEP since enabling legislation was enacted in 2019. The Commission acknowledged the plan on October 27, 2022, enabling PacifiCorp to begin development of the proposed programs in the TEP inclusive of a communities grant program, outreach and education program, and managed charging pilot program. These programs broaden the previous EV programs by allowing for multiple project types to participate, with benefits and preference targeted towards named communities. The overall goal is to provide exploratory programs that will help to plan, promote, or deploy electric transportation technology and projects across the service area, including within Named Communities. These programs have been shared with stakeholders for feedback and review. Looking ahead, PacifiCorp is working with its EAG, the Commission, and other stakeholders to review the draft community grants, outreach, and education programs prior to anticipated filing in Q2 of 2023. PacifiCorp anticipates launch of program and pilots in Q3/Q4 of 2023.

Modified the Low-Income Bill Assistance Program and Expanded Marketing Materials: PacifiCorp's low-income bill assistance (LIBA) program was established in 2003. LIBA provides a tiered discount for monthly customer bills based on income levels. Previously, the LIBA was designed to provide credits to income-eligible households on monthly usage over 600 kWh and included an annual enrollment cap. Consistent with the requirements in RCW 19.505.120 and after consultation with the Low-Income Advisory Group, the Company submitted an Advice filing on July 2, 2021, that proposed modifications to its program. In particular, the Company proposed to (1) increase the maximum income threshold for the program consistent with RCW 19.405.020(25); (2) modify the discount from a per kWh above 600 kWh, to a percentage discount of the net bill, with the

²⁰ See, e.g., Materials available online at [UTC Case Docket Document Sets | UTC \(wa.gov\)](#)

discount level based on household size and income; and (3) eliminate the annual enrollment cap. These changes were allowed to go into effect on August 1, 2021. As a result of these modifications, the number of customers receiving bill discounts increased by 39 percent with a 17 percent increase of total assistance granted at the end of September 30, 2022, compared to end of September 30, 2021. Additionally, as PacifiCorp continues to improve on outreach and marketing tactics, a couple of new items were launched to improve customer accessibility. For instance, the LIBA webpage was revamped to include a direct vanity URL (PacificPower.net/LIBA) for customers to access. This new vanity URL is used for all LIBA outreach material. Additionally, during the Fall LIBA 2022 campaign, the Company implemented an Out-of-Home advertising pilot in the Yakima area to provide gas toppers on the LIBA program.

Finalized an Energy Burden Assessment: PacifiCorp hired Empower Dataworks to prepare a 2022 Energy Burden Assessment (EBA) for the Company’s residential customers in Washington. In the EBA, Empower Dataworks highlighted that the “LIBA program design is very good at targeting benefits to higher burden customers” and overall, “program administration/overhead is very efficient relative to other programs in the state.”²¹ High-level takeaways also noted “good coordination between PacifiCorp and the local agencies on culturally appropriate marketing and program design.” Finally, the study identified a series of recommendations for continued improvement. PacifiCorp partners with three agencies to administer and deliver the program: Blue Mountain Action Council (BMAC) serves Columbia, Garfield, and Walla Walla counties, Opportunities Industrialization Center of Washington (OIC) serves Upper Yakima County, and Yakima Valley Farm Workers Clinic dba Northwest Community Action Center (NCAC) serves Lower Yakima County.

Residential Energy Usage Survey: PacifiCorp has compiled a voluntary residential customer survey to distribute to its residential customers within its Washington service area. This survey aims to track the progress of its first CEIP to help ensure that the benefits of the transition to clean energy are broadly shared and equitably distributed amongst all customers, with a specific focus on named communities.

Select Outreach and Engagement Activities: PacifiCorp has taken steps to foster greater engagement and continue the efforts to improve the community outreach mechanism. For instance, PacifiCorp created a Community Calendar to further participation in the local community events happening in Washington and is shared quarterly with the Washington EAG. The Company has also added a new bilingual outreach coordinator for small businesses in highly impacted communities to the program delivery team. The outreach coordinator is a trusted community partner who offers meaningful insight and a relevant voice to programs and their benefits through participation.

Additionally, the need to increase focus on supporting agricultural workers in the region prompted Pacific Power to develop and deliver 14 presentations at fruit packing houses to approximately 780 agricultural workers. The presentation content was educational, focusing on programs and actions intended to ease the energy burden and support greater participation and benefits for the attendees and their families. PacifiCorp distributed 850

²¹ See, e.g., [Pacifcorp | DSM AG meeting](#).

pieces of informational collateral on energy efficiency, bill assistance, and weatherization information.

Marketing Programs to Increase Participation: PacifiCorp plans to improve and expand its outreach and marketing to better reach all customers, including customers in named communities. The Company has existing marketing plans for its various programs that are targeted to English-speaking and Spanish-speaking customers in Washington. PacifiCorp is considering additional innovative ways to better communicate with customers regarding energy efficiency and energy assistance programs. Further, the Company created an Energy Resource Center on its website (PacificPower.net/Resources) where customers can go online to learn more about energy-savings rebates and watch videos pertaining to energy efficiency, renewable energy, electric vehicles, energy assistance, and time of use rates. The idea behind the Energy Resource Center came from the Washington EAG that recommended the Company provide a better user-friendly experience where customers can find all the information they need.

PacifiCorp is also exploring new advertising channels to better reach Spanish-speaking customers more directly in their communities. For example, PacifiCorp is launching a pilot program to increase awareness and participation in its Wattsmart energy efficiency programs. For this initiative, the Company is working closely with a multi-cultural marketing agency to develop an earned media plan that will connect, resonate, and strengthen media and customer relationships to reach the Latine community using culturally relevant messaging and content. Additionally, PacifiCorp is continuing to nurture relationships with local chambers of commerce to better reach communities. Energy efficiency program administrators are also working with their local contacts to connect with Washington customers in named communities.

Outreach

An overview of PacifiCorp’s Public Participation outreach methods is provided in Table 1 below, including opportunities for getting the word out about PacifiCorp’s CEIP activities, as well as sharing information and seeking stakeholder input.

Table 1 – Outreach Methods and Opportunities for Feedback

GETTING THE WORD OUT	
Tool	Description
PacifiCorp’s CEIP website: https://www.pacifi-corp.com/energy/washington-clean-energy-transformation-act-equity.html	PacifiCorp’s CETA project website provides information on the CEIP in both English and Spanish. Also included are upcoming public participation opportunities, meeting information, surveys results, and Washington EAG meeting materials, and other work papers the Company has put together to share for public reference
Energy Resource Center (PacificPower.net/Resource-Center)	PacifiCorp provides digital and printable educational materials to customers in English and Spanish.

Washington EAG pre-meeting materials	Meeting materials are shared with advisory group members prior to each meeting. EAG pre-meeting materials include the presentation slide deck and an expanded agenda that describes the meeting objectives, discussion topics and questions.
Washington EAG meeting public notes	Following each EAG meeting, a summary of the session’s activities and dialogue is prepared and posted on the CEIP website. Items requiring subject matter expert follow-up are also noted within the public notes.
Partner channels	PacifiCorp partners with its EAG and local community groups and organizations to share information on CEIP-related items, community events and various programs.
PacifiCorp website	PacifiCorp has referenced the CEIP project on its primary website and provided a link to https://www.pacificorp.com/energy/washington-clean-energy-transformation-act-equity.html

SHARING INFORMATION AND SEEKING INPUT

Tool	Description
Community surveys	As was the case with the Company’s December 30, 2021, filing, the CBI metrics require PacifiCorp to use survey responses to calculate metrics for vulnerable populations in the Washington service area. The Washington Residential Survey launched in April 2023, which was announced on social media platforms and via email to encourage customers to respond and reassure them the survey was company-sponsored. The survey responses are collected both online and via phone. The survey was promoted and conducted in both English and Spanish.
Project email (ceip@pacificorp.com) and web comment form	Input from stakeholders and the general public is being collected by e-mail and from a comment form on the CEIP website.
Public meetings	PacifiCorp will be organizing combined advisory group meetings comprised of the EAG, Integrated Resource Planning stakeholders, the Demand Side Management (DSM) Advisory Group, and the Low-Income Advisory Group. These larger cohort style meetings will be open to the public and will offer space to solicit additional feedback from its customer base in preparation for its biennial CEIP filing and following the results from the Washington Residential Survey.
Advisory group meetings	PacifiCorp will present information to advisory group members to discuss, react, and comment on. Existing groups include the EAG, IRP stakeholders, the Demand Side Management (DSM) Advisory Group, and the Low-Income Advisory Group. Participants in any of these engagement spaces are able to provide input and/or engage in dialogue with each project team and each other on the designated topics presented at each session.

Timing

PacifiCorp’s existing Washington advisory groups have met regularly and will continue to hold meetings to, in part, support elements of CEIP development/implementation and seek more equitable processes and outcomes. The Equity Advisory Group meets approximately 10 times per year; the IRP Public-input process also generally holds meetings monthly during development of an IRP ranging from 1-2 days depending on the breadth of content available; the DSM Advisory Group holds meetings at least four times per year; and the Low-Income Advisory Committee will hold quarterly meetings. A tentative timeline of anticipated advisory group meetings and public participation meetings throughout 2023 is shown in Table 2 below. These meeting topics are open to refinement based on the needs and priorities of the advisory groups and the Company.

Table 2: 2023 Advisory Group and Public Participation Meeting Schedule

Completed and Anticipated Meetings	Indicative Timing
January WA EAG meeting	January 12, 2023
February WA EAG meeting	February 9, 2023
March WA EAG meeting	March 9, 2023
First DSM Advisory Group meeting	March 2023
April WA EAG meeting	April 13, 2023
First LIBA Advisory Group meeting	April 2023
Local in-person visits with the WA EAG	May 2-4, 2023
Second DSM Advisory Group meeting	June 2023
Second LIBA Advisory Group meeting	June 2023
June WA EAG Meeting	June 8, 2023
Third DSM Advisory Group meeting	July 2023
July WA EAG Meeting	July 13, 2023
Fourth DSM Advisory Group meeting	August 2023
Fifth DSM Advisory Group meeting	September 2023
Third LIBA Advisory Group meeting	September 2023
September WA EAG Meeting	September 14, 2023
October WA EAG Meeting	October 12, 2023
Sixth DSM Advisory Group meeting	December 2023
Fourth LIBA Advisory Group meeting	December 2023

December WA EAG Meeting

December 7, 2023

Methods for Continued and Expanded Outreach

To continue consistent outreach, PacifiCorp uses engagement methods included in its CEIP, including PacifiCorp's CEIP and IRP dedicated website; email updates; fact sheet and flyers found within the Company's *Energy Resource Center*; bill inserts and bill messages; social media, paid and press media; text message notices; partner channels; community surveys; ; EAG Meetings; existing advisory groups and EAG pre-meeting materials; and meeting public notes.

These engagement methods attempt to further facilitate durable community relationships. Examples of continued outreach include:

- PacifiCorp's Washington EAG began meeting in 2021 and has continued to hold meetings to, in part, support CEIP development and implementation. These meetings have continued into 2023, and offer in-person and virtual meeting opportunities throughout the year;
- PacifiCorp continues to utilize its Washington Clean Energy Transformation Act & Equitable Distribution of Benefits webpage and the [Integrated Resource Plan](#) webpage to provide information to the public regarding how to participate in meetings, CEIP actions and the development of the IRP;
- PacifiCorp's outreach for both the DSM Advisory Group and the Low-Income Advisory Group continues to occur by email to participants on the distribution list; and
- The company has set up a dedicated email address, CEIP@pacificorp.com, that is posted on the webpage to facilitate timely responses to any comments and questions. Additionally, PacifiCorp encouraged members of the public who wanted to participate in the development of the CEIP to join the company's email list, which was used to communicate upcoming meetings, meeting materials, and other opportunities for education and feedback.

In addition to continued outreach, the Company has expanded its Public Participation outreach methods to draw in more diverse customer interests. For example, PacifiCorp developed a Residential Survey that targets our broader Washington customer base to gather input on specific elements within the CEIP.

Addressing Barriers to Participation

This section discusses the Company's attempts to address barriers to participation in CEIP-related initiatives, including specific actions to develop both external and internal stakeholder participation.

The Company continues to address barriers to participation and support inclusion and accessibility in the Company's CEIP activities and IRP planning processes. For example, PacifiCorp:

- Now offers hybrid meeting formats for its EAG meetings, where members can attend meetings online or in person. Initially, the COVID-19 pandemic prevented in-person gatherings, making virtual arrangements necessary. Over time, the need for virtual meeting formats

lessened, allowing the group to explore other ways to connect. Various stakeholders expressed an interest in in-person meeting options as well. PacifiCorp held its first hybrid meeting for the Washington EAG in March 2023. Many of the participants attended in person. The Company intends to continue to offer a mix of online and in-person meeting options in the future.

- Continues to seek input from the EAG and the public to foster inclusion and equity and to learn how the Company can better communicate to meet the cultural needs of its communities.
- Continues to aim that information is available in broadly understood terms for all in the community and ensures that customers have access to information through various accessible formats.
- Updates the EAG and stakeholders on the CEIP development process in engagement spaces.
- Delivers presentation content to EAG members for review before meetings, which offers time for content consideration and preparation before sessions.
- All meeting content, including meeting notes, are translated into Spanish, and posted online to improve and support greater accessibility.
- Actively seeks to increase the number of EAG participants.

PacifiCorp is also working to address language barriers. Accessibility is key to ensuring an inclusive public participation process. PacifiCorp is working with a transcription and translation service group to provide Spanish versions of the company's WA EAG meeting content. PacifiCorp understands that its Washington service area is heavily comprised of Spanish speakers. Providing information in one's native language ensures each person has the ability to engage with shared content and information. Additionally, PacifiCorp will continue to work with its EAG to assess how to make the public participation materials more accessible and may include translation support in additional languages if needed.

Finally, PacifiCorp is also making efforts to promote equity through internal stakeholder development. To achieve results in this arena, PacifiCorp is developing and equipping internal stakeholders with adaptive leadership skills and education to build intercultural competency and access to a devoted core team supporting an equity lens on stakeholder engagement. This has included using outside subject matter expertise and facilitation. The Company uses a third-party stakeholder facilitator and content support developer, who acts as an accountability partner for internal stakeholder development.

BData Availability and Accessibility

PacifiCorp's CEIP includes the Company's CBIs, which are attributes or outcomes related to PacifiCorp's clean electricity resources and investments, and measure potential benefit and/or impact to communities of the resources proposed in the CEIP. PacifiCorp will continue to use CBIs, along with other factors, to help shape the CEIP - related programs, actions, and investments. These CBIs and their associated metrics were based on input obtained from customers, including both public surveys and discussions with stakeholders. Please see Chapter 2 of the Company's CEIP for additional information regarding the process for developing CBIs.

PacifiCorp is also currently considering additional input on the Company's CBIs in response to public comment and stakeholder feedback received in Docket UE-210829. Of note, the Washington Department of Health (DOH) also recently updated the agency's highly impacted communities (HIC) analysis in January 2022.²² Based on this DOH update, the Company concluded there is one additional HIC located within PacifiCorp's Washington service territory compared to what was considered in the Company's 2021 CEIP. Furthermore, one HIC that was originally included in the analysis is no longer considered to be an HIC due to the DOH update. The Company is in the process of accounting for the updated HICs within the baseline and will account for them when developing metrics for the July 1, 2023, compliance report.

The process of updating the metrics for the July 1, 2023, filing will be based largely on the results of a public survey. As was the case with the Company's first CEIP, the CBI metrics will require PacifiCorp to use survey responses to identify energy burden for vulnerable populations in the Washington service area. This survey was launched in April 2023, and includes both an email and telephone effort to accumulate necessary data.

Additionally, for cross-channel engagement to be meaningful, the process must support full and authentic participation. Collaboration on the timing, format and frequency of meetings will provide the greatest opportunity for individuals to attend; and participant compensation and/or stipends are necessary to accomplish these goals, especially when participation requires stakeholders to forgo providing critical services to others. At present, PacifiCorp provides its Washington EAG members with the option to receive compensation for their participation: For every company-convened meeting, members can opt in to receive \$400. PacifiCorp has also implemented a travel reimbursement policy that supports travel to onsite meeting offerings. Finally, the need to continue to create inclusive environments by establishing psychological safety for all participants of our public engagement spaces is fundamental to the work we are doing to build equity in all areas. PacifiCorp continues to look for opportunities to enhance accessibility (including language, cultural, economic, and other factors), by exploring new tools and accommodations in our public engagement processes.

PacifiCorp Advisory Groups

PacifiCorp has historically considered input throughout the planning process from the Company's existing Washington advisory groups: the DSM Advisory Group, Low-Income Advisory Group, and the IRP Public Input Process. PacifiCorp has also established its Washington EAG. These groups and processes will continue to inform how the Company approaches, among other things, long and intermediate-term planning, programs, and outreach strategies. Specific learnings from each of the Company's advisory groups, and how they are incorporated in the Company's processes, are discussed below.

²² See generally, Washington Department of Health, Information by Location (IBL) (available here: <https://doh.wa.gov/data-and-statistical-reports/washington-tracking-network-wtn/information-location>).

Low-Income Advisory Group

PacifiCorp's Low-Income Advisory Group meets regularly to discuss issues related to energy burden, as well as to advise the company on program design to increase limited-income customers' ability to pay their monthly bills through energy assistance, efficiency measures, and bill discounts. The group currently has three core existing programs in its purview:

- **Bill Discount Program:** Included 6,930 participating households in 2022 with a total assistance amount of approximately \$4 million;
- **Fuel Fund:** Provides assistance through customer and employee donations, and assisted 150 households in 2022; and
- **Low-Income Weatherization:** Has provided weatherization funding to over 8,000 homes since the program began. This program assists customers with household income that does not exceed the higher of eighty percent of area median income (AMI) or 200 percent of the Federal Poverty Level (FPL).

Under Section 12 of CETA, this group discussed the methods by which utilities must make funding available on July 31, 2021, for low-income households with income that do not exceed the higher of 80 percent of area median income or 200 percent of federal poverty level. This CETA-directed change modified the eligibility threshold of the current low-income bill assistance program effective August 1, 2021.

Members of the Low-Income Advisory Group includes Commission Staff, The Energy Project, Public Counsel, NW Energy Coalition, PacifiCorp and the three local Community Action Agencies that administer Low Income Bill Assistance Program (Schedule 17) (Blue Mountain Action Council in Walla Walla, Northwest Community Action Center in Toppenish, and Opportunities Industrialization Center in Yakima).

The Low-Income Advisory Group met in May and June of 2021 to discuss potential modification to the Company's Schedule 17 - LIBA tariff. Input from the Low-Income Advisory Group helped inform the CBIs developed as part of the 2022 CEIP, as well as the specific actions considered. PacifiCorp obtained Low-Income Advisory Group input through the Clean Energy Benefit Survey and has also presented the draft CBIs to the group on July 20, 2021.

The Low-Income Advisory Group met in February 2022 and the company provided an update on the Clean Energy Implementation Plan and plans for Energy Burden Assessment. In June 2022, Empower Dataworks shared results of the Energy Burden Assessment and its recommendations to create new marketing strategies in collaboration with agencies and other community organizations to increase low-income program participation. Low Income Advisory Group met in April 2023 and members agreed to increase the LIBA outreach budget to support additional outreach channels targeting high-burden and neighborhoods and support expanding LIBA local partnership for program delivery.

Demand-Side Management Advisory Group

PacifiCorp uses its DSM Advisory Group to meet the requirements of WAC 480-109-110. The DSM Advisory Group was initially created in 2000,²³ and the Company's IRP public input process under WAC 480-100-238. PacifiCorp also has a separate Washington Low-Income Advisory Group that includes members representing customers with limited income. Any issues related to conservation programs for customers with limited income will be considered and reviewed by the Low-Income Advisory Group as well as by the DSM Advisory Group.

DSM Advisory Group topics are focused on energy efficiency (also known as conservation) and include but are not limited to the Energy Independence Act (EIA or I-937) biennial target setting process, including program design and plans, adaptive management, budgets, and communication strategies to achieve the Commission-approved biennial target, cost recovery through the system benefit charge, cost effectiveness. Regulatory filings related to conservation must be provided to the DSM Advisory Group at least 30 days ahead of filing. Members are asked to provide written comments on conservation filings within 1-2 weeks so their review can be incorporated into the final filed documents. The DSM Advisory Group reviews demand-side options that inform the company's preferred portfolio. As such, the advisory group provided PacifiCorp's specific actions developed as part of the 2022 CEIP.

The DSM Advisory Group meets at least four times per year. Some meetings in odd-numbered years are required (by Commission order) to occur at certain times: no later than July 1 to align with the EIA process. Prior to COVID-19, meetings were in-person at the Commission office building and were also online. Meeting dates are scheduled two to three weeks ahead on the current company platform (Teams) with proposed agenda topics. The meeting invitation also contains a request for additional agenda items. Presentation materials are provided 1-2 days in advance of the meeting. Supplemental files may also be provided. The meeting is typically conducted by one or more members of PacifiCorp's conservation delivery team. Company speakers rotate depending on the subject matter. Subject matter experts outside the company may be asked to speak. Presentations are informal with questions encouraged and discussed in the presentation. Specific group follow-ups are captured and included in the next meeting agenda.

Members include Commission staff, The Energy Project, Public Counsel, NW Energy Coalition, and PacifiCorp. Representatives from Northwest Power and Conservation Council, Northwest Energy Efficiency Council, Washington Department of Commerce, PacifiCorp customers, Puget Sound Energy, Avista and the Northwest Energy Efficiency Alliance have attended selected meetings in the past. PacifiCorp members have attended Puget Sound Energy and Avista advisory group meetings in the past.

On June 23, 2021, PacifiCorp presented details regarding CETA, the EAG and HICs within the Washington Service Territory to the DSM Advisory Group. Further, on July 21, 2021, PacifiCorp provided details regarding vulnerable populations, draft CBIs, and requested the DSM Advisory Group to complete the Clean Energy Benefit Survey. In 2022 and 2023, PacifiCorp presented updates to the DSM Advisory Group on the Equity Advisory Group, the CEIP, PacifiCorp's utility actions from the CEIP and progress on CBI metrics.

²³ *In re PacifiCorp's 1999 Rate Case*, Dkt. UE-991832, Third Supplemental Order (Aug. 9, 2000).

IRP Public-Input Process

Stakeholders have been involved in the development of PacifiCorp’s IRP process generally, and the 2023 IRP specifically, from the very beginning. For the 2023 IRP, the public-input meetings held beginning in January 2022 were the cornerstone of the direct public- input process, and there have been 11 public-input meetings held as part of the 2023 IRP development cycle. Due to restrictions and concerns surrounding COVID-19, all meetings have been held via phone conference, with no in-person participation. The IRP public-input process also included state-specific stakeholder dialogue sessions held in the summer of 2022. The goal of these sessions was to capture key IRP issues of most concern to each state, as well as to discuss how to tackle these issues from a system planning perspective. PacifiCorp seeks to ensure stakeholders understand IRP planning principles, and these meetings continued to enhance interaction with stakeholders in the planning cycle and provided a forum to directly address stakeholder concerns regarding equitable representation of state interests.

For the 2023 IRP, PacifiCorp offered a Stakeholder Feedback Form that provided stakeholders a direct opportunity to provide comments, questions, and suggestions in addition to the opportunities for discussion at public-input meetings. PacifiCorp recognizes the importance of stakeholder feedback to the IRP public-input process. A blank form, as well as those submitted by stakeholders and PacifiCorp’s response, can be located on the PacifiCorp website.

As of April 2023, PacifiCorp has received 40 Stakeholder Feedback Forms with hundreds of questions, comments, and recommendations. The Stakeholder Feedback Forms have allowed the company to review and summarize issues by topic as well as identify specific recommendations that were provided. Information collected is used to inform the 2023 IRP development process, including feedback related to process improvements and input assumptions, as well as responding directly to stakeholder questions.

Washington EAG

In compliance with WAC 480-100-655(1)(b), PacifiCorp formed an EAG comprised of community members and leaders from across its service area in Washington. PacifiCorp continues to apply an inclusive approach in its group model, consulting with both experts, community partners and inviting stakeholder feedback to ensure the EAG represents the same customers and vulnerable communities that PacifiCorp serves in the state. Current members of the Washington Equity Advisory Group include:

Table 6: PacifiCorp 2023 Equity Advisory Group Members

Name	Organization
Paul Tabayoyon	Asian Pacific Islander Coalition
Sylvia Schaeffer	Blue Mountain Action Council of Walla Walla
Todd Hilmes	Northwest Community Action Center
Isidra Sanchez	Opportunities Industrialization Center
Silvia Leija Rosas	Yakima Community Aid
Norman Thiel	SonBridge

Erendira Cruz	Sustainable Living Center
Giovanni Severino	Latino Community Fund
Jonathan Smith	Yakima County Development Association
Jessica Van Doren / Lilian Bravo	Yakima Health District

EAG activities are co-created to establish shared understanding of equity values, perspectives, and community needs and viewpoints. PacifiCorp’s WA EAG group structure and process will remain flexible to allow for the EAG to provide input that will inform the timeline of activities and focus areas. The Company will continue to hold space for additional voices, perspectives, and experiences by continuing to recruit new members that represent areas and perspectives that have not yet had the opportunity to contribute to the shared space.

PacifiCorp will continue to gather input from customers and stakeholders on the challenges they face and the benefits they envision from a clean electricity transformation. We will continue to work with the EAG to test concepts, co-create program designs, and allow for their input on other aspects of PacifiCorp’s service and operations in Washington.

Below is the 2023 Washington Equity Advisory Group meeting schedule and proposed topics. Meeting topics are open to refinement based on the needs and priorities of the EAG and the Company and are subject to change as needed. The vision for EAG meetings is that they will be iterative, and the progress and inputs from each meeting will inform subsequent meetings and future collaboration.

Table 7: PacifiCorp 2023 WA EAG Meeting Schedule

Date, Time, and Meeting Format	Proposed Agenda Topics
January 12th 1pm-4pm (PST) Online	Washington Rate Case; Craft3 WA Home Energy Loan Program Community Connections
February 9th 1pm-4pm (PST) Online	Wattsmart Small Business Lighting (Utility Actions Update) Demand Response Core Concepts WA Residential Survey: Closing the Feedback Loop
March 9th 1pm-4pm (PST) Hybrid: Perry Technical Institute (Yakima)	Transportation Electrification Washington Plan Filing, Feedback, and CBI Update Demand Response Washington Filing and CBI Update Community Spotlight
April 13th 1pm-4pm (PST) Online	Communications Team Vision & Updates; Comms CBI Update Energy Efficiency Updates Community Connections
May 2nd-4th	Local, in-person visits with the WA Equity Advisory Group
June 8th 1pm-4pm (PST) Online	CEIP Annual Progress Report Check In; Energy Efficiency Updates Community Connections

July 13th 1pm-4pm (PST) Hybrid: Sustainable Living Center (Walla Walla)	Filed CEIP Annual Progress Report & Feedback; WA Non-Energy Impacts Updates Community Connections
August	No Meeting
September 14th 1pm-4pm (PST) Online	Energy Efficiency Updates (Preview Biennial Conservation Plan and program changes) Community Connections
October 12th 1pm-4pm (PST) Hybrid	Energy Efficiency Updates Community Connections
November	No Meeting
December 7th 1pm-4pm (PST) Online	End of the Year Survey and Reflection; 2024 Planning

Conclusion

PacifiCorp continues to advance energy equity and increase the Company’s understanding of the central tents of energy justice for the Company’s Washington customers. The equity metrics discussed in this 2023 PPP offer tests and measures by which approaches to decision-making, benefits, impact identification, and barriers to participation and inclusion may surface, be addressed, and improved upon. Accordingly, PacifiCorp is committed to continued improvement and adaptation of its stakeholder engagement, services, product, and program offerings to foster more significant energy equity, and welcomes additional engagement on this journey.

Exh. CMM-4
Docket UE-230172
Witness: Christina M. Medina

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFICORP dba
PACIFIC POWER & LIGHT COMPANY

Respondent.

Docket UE-230172
(Consolidated)

In the Matter of

ALLIANCE OF WESTERN ENERGY
CONSUMERS'

Petition for Order Approving Deferral of
Increased Fly Ash Revenues

Docket UE-210852
(Consolidated)

PACIFICORP

EXHIBIT OF CHRISTINA M. MEDINA

The Energy Project's Response to PacifiCorp Data Request No. 004

October 2023

BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

Washington Utilities & Transportation Commission v. PacifiCorp
Docket No. UE-230172

PacifiCorp Data Request No. 004 to TEP
SUBJECT: Equity / Language Access Plan

In reference to Stokes, Exh. SNS-1T at 23-24, Witness Stokes describes the components of a language access plan and recommends that the Commission should direct PacifiCorp to prepare a language access plan.

- a. Please provide examples (if any) of language access plans that have been prepared by WUTC-regulated utilities.
- b. If no examples are provided in response to (a), please provide examples of language access plans prepared by utilities in other jurisdictions.

October 4, 2023 Response:

- a. The Energy Project (TEP) is not aware of any language access plans prepared by WUTC-regulated utilities.
- b. TEP has not performed a comprehensive search, yet is aware of the following regulatory orders requiring language access plans from utilities in other jurisdictions. TEP does not have a copy of these utilities' language access plans.
 - PA Public Utilities Commission et al. vs. Pennsylvania-American Water Company, Dkt. R-2020-3019369, Opinion and Order (Feb. 25, 2021).
 - MA Department of Public Utilities, Petitions of Berkshire Gas Company, Eversource Gas Company of Massachusetts, NSTAR Gas Company, and NSTAR Electric Company, Fitchburg Gas and Electric Light Company, Liberty Utilities (New England Natural Gas Company) Corp., Boston Gas Company, Massachusetts Electric Company and Nantucket Electric Company, and Cape Light Compact JPE for Approval of Three-Year Energy Efficiency Plan for 2022 through 2024, Dkts. D.P.U 21-120 through 21-129, Order Approving Three-Year Energy Efficiency Plans, at 43-44 (Jan. 31, 2022) (The utilities “propose to implement a language access plan by 2023 to increase participation of limited English-proficiency customers in all sectors, with a \$9.14 million budget (Statewide Plan, Exh. 1, at 22, 68).”).