



Oregon

Tina Kotek, Governor



550 Capitol St. NE
Salem, OR 97301
Phone: 503-378-4040
Toll Free: 1-800-221-8035
FAX: 503-373-7806
www.oregon.gov/energy

Oregon State Energy Strategy Feedback

The following is a compilation of written feedback received during engagement to inform the complementary analyses for the Oregon Energy Strategy. It reflects all comments received between November 6 and December 2 through email and the Oregon Energy Strategy comment portal. The Oregon Department of Energy solicited feedback throughout this time period to inform the selection of customer groups for the proposed Energy Wallet analysis, regional groupings for the Air Quality modeling, and the prioritization of indicators to analyze in the geospatial mapping. November 27 was the original deadline for feedback on the complementary analyses, but this deadline was extended to 12:00pm, December 2 based on stakeholder request.

House Bill 3630 directs the Oregon Department of Energy to develop an Oregon Energy Strategy that identifies pathways to achieving the state's energy policy objectives, develops policy recommendations to help achieve these objectives, and that is informed by robust stakeholder engagement. The Energy Strategy is meant to serve as a resource over time through continued analysis and engagement to help Oregon achieve emissions reductions in line with state energy and climate policy goals.

The process to develop the Oregon Energy Strategy is divided into three phases: Phase 1 focuses on the modeling and technical analysis to explore different pathways to meeting the state's energy policy objectives. Phase 2 applies learnings from this analysis to inform policy discussion and develop policy recommendations. Phase 3 involves the development of the final report, which must include: a summary of pathways to achieve Oregon's energy policy objectives, policy recommendations, and a description of the engagement process and how stakeholder perspectives informed the Energy Strategy.

The Oregon Department of Energy continues to invite written feedback on the Energy Strategy comment portal throughout the development of the Energy Strategy. The comment portal can be found here: <https://odoe.powerappsportals.us/en-US/energy-strategy/>

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Oregon Energy Strategy

Energy Wallet, Air Quality, and Geospatial Mapping Complementary Analyses Public Comment

Carol Shenk

The State should place EV chargers (both types) at all highway rest stops! For safety and access to facilities. Another opportunity is to offer grants to cultural and heritage organizations to install EV chargers in their parking lots. EV drivers often have to seek out chargers in unfamiliar towns, and charging in a museum parking lot would encourage people to visit the museum--charging gives about the right amount of time for a museum visit. This would get the museums on the map for EV drivers as a regular destination.

Oregon Energy Strategy

Energy Wallet, Air Quality, and Geospatial Mapping Complementary Analyses Public Comment

Patrick Mills, Confederated Tribes of the Umatilla Indian Reservation

1) Energy Wallet: This reviewer is confident that ODOE has appropriately selected a range of customer groups that do well at representing the majority of Oregon energy customers. However, the “Rural Home” customer group is broad unto itself and could have been further delineated to better indicate energy burden in remote communities, the residents of which must travel great distances for fuel, groceries, and school, for example. Residents of many remote communities likely do not have access to natural gas and are far more dependent on conventional liquid fuels. As for prioritizing the nine customer groups, it is recommended that the full analysis be completed first and data made available to the Advisory Group for consideration. It would be particularly helpful if statistical results such as those from Analysis of Variance (ANOVA) were provided for our consideration as well.

2) Air Quality Modeling: This reviewer finds ODOE’s approach acceptable. No other comments.

3) Geospatial Mapping: This reviewer finds ODOE’s approach acceptable. No other comments.



December 2, 2024

Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301

421 SW Oak St., Suite 300
Portland, OR 97204

1.866.368.7878
energytrust.org

Submitted via the Oregon Energy Strategy Public Comment Portal

Re: Oregon Energy Strategy – Energy Trust of Oregon Comments on Complementary Analyses

Energy Trust of Oregon appreciates the opportunity to submit comments on the draft technical approaches for three environmental justice and equity related analyses to the Oregon Energy Strategy.

Below we share our thoughts on two of the three approaches, the Energy Wallet and Geospatial Mapping.

Comments on Energy Wallet

Feedback requested: Which five of the nine customer groups should be prioritized for the Energy Wallet analysis?

As described, we understand that the customer groups are intended to be representative of and provide insights into the changing energy costs for different households across electricity, natural gas, gasoline, and other fuels. Just as the pathways modeling approach is designed to provide directional results, the energy wallet is not meant to comprehensively capture the impacts of different energy pathways on every Oregonian.

Given the goal and the request to prioritize five of the nine, we suggest focusing on Homeowner, Rural Home, High Priority Area Home, Average Renter, and Low-income Renter Multifamily. These five customer groups broadly represent a significant portion of households, while the remaining ones can likely be considered in relation to one or two of the prioritized five. For example, if manufactured homes are assumed to be 70% more energy intensive per square foot, a comparison of average homeowner size to manufactured home size could inform relative impacts to these households.

Although the customer type approach to comparing household impacts of modeled scenarios to the reference will be informative and helpful, we caution overreliance on the output as truly representative of impacts for all Oregonians. The main value of the results may be in helping to identify additional research and analyses needed to inform policy discussions.

In designing energy efficiency measures, Energy Trust and similar entities consider several factors that impact energy usage and therefore energy costs across households. These factors include climate zone, current heating/cooling equipment efficiency and fuel type, household size and type (single family, multifamily, manufactured home), number of occupants, building age and weatherization, and occupant energy usage behaviors. It would not be possible to consider all these factors in designing representative household types but as the results are evaluated through the Energy Wallet, keeping these usage factors in mind will help identify additional research or analysis needed to support policy discussions.

ODOE's proposed design for workgroup input to take place through the spring 2025 has great potential to provide an interactive and engaging process for additional stakeholder input, where the results of the Energy Wallet can be considered for questions to be assessed.

Comments on Geospatial Mapping

Feedback requested: Which indicators are the highest priority to map and analyze their relationship?

The CETI team compiled numerous publicly available datasets and summarized data by census tract in response to feedback from the environmental justice and equity working group. It's our understanding that the final dataset will be used to develop geospatial mapping that complements the other analyses and pathways modeling output with community information related to environmental and human health, resilience, and economic and community well-being.

ODOE requested feedback on which indicators should be prioritized for creation of a limited number of bivariate maps. The initial maps are directionally helpful for policy discussions. Before creating an additional 5-10 maps, we suggest, if possible, waiting until the initial energy pathways modeling results and Energy Wallet and air quality analyses are complete before selecting additional indicators to map. The working groups' review of the pathways modeling results, particularly the variation in energy burden impacts for customer types resulting from the Energy Wallet analyses, will spark additional questions that inform which geospatial mapping could add value as a complementary tool to support policy discussions.

In addition, there is a wealth of valuable information in the final dataset. We strongly support evolving this work, as time and resources allow, into a widely accessible interactive mapping tool for stakeholders to explore their interests further.

Energy Trust appreciates the opportunity to provide these comments and for the continued great work of ODOE's Energy Strategy Team in their design and implementation of modeling analysis to inform Oregon's Energy Strategy.

Sincerely,

Elaine Prause
Senior Manager Regulatory Policy and Funder Relations
elaine.prause@energytrust.org

Hello Edith and ODOE team,

Thank you for developing this ODOE Energy Wallet and moving it forward. I made a few comments during the meeting today, but I'll be more specific here.

Groups to include in the Energy Wallet analysis

Five is a small number of groups to model in the ODOE Energy Wallet, so you have some difficult choices to make about which to focus on! In my view, the selection of groups to study needs to meet at least two goals, below. I've offered some methods of achieving each goal.

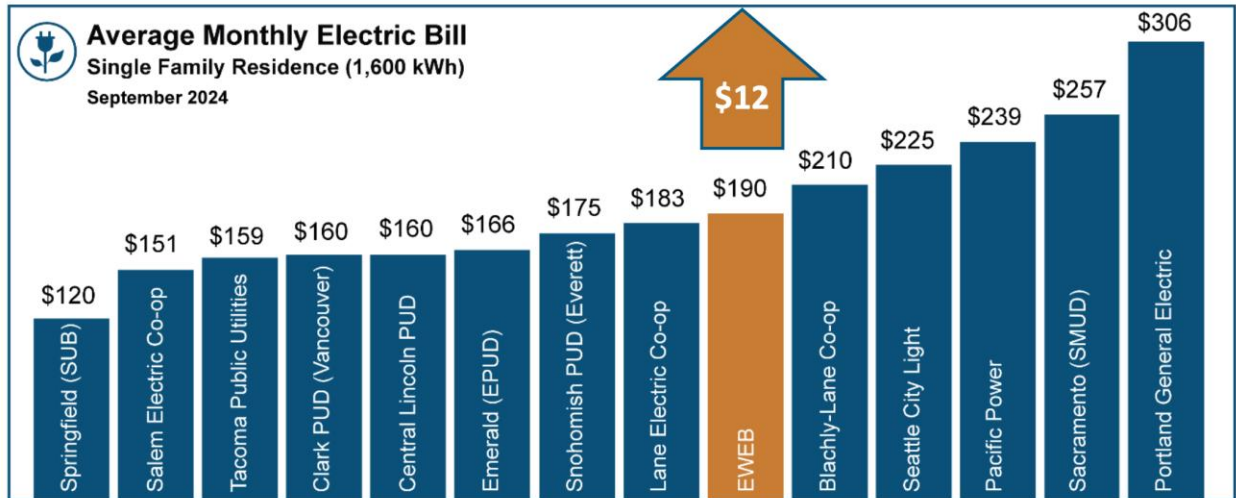
1. Goal: To better understand how the energy transition will affect different types of households, and to indicate which households may need extra help. For instance, should Oregon implement programs to move people out of inefficient manufactured homes so their energy costs decline?
 - *Method: Include households that represent the greatest number of Oregonians.* Policymakers should know which policies to pursue to make to maximize their return on investment and affect the most Oregonians. They'll need data on the energy wallets of as many Oregonians as possible.
 - *Method: Include marginalized or low-income households.* Policymakers should also know how policies affect the most vulnerable Oregonians. This could mean modeling the energy wallet of households who live in manufactured homes or are extremely low income.
2. Goal: To help policymakers know which housing types to pursue so that Oregon can minimize hardships caused by the energy transition. For instance, should Oregon encourage or discourage multifamily or detached housing with the goal of helping households reduce energy costs during the energy transition? In other words, which housing types best support the transition to a low-carbon, affordable energy future?
 - *Method: Include a group for new multifamily housing.* Policymakers should know whether those units are more efficient than other types of housing, and how that affects the energy wallets of those households.

Consumer-owned vs investor-owned utilities

Policymakers may find it very revealing to see how the energy wallet of consumer-owned utility customers differs from that of investor-owned utility customers. COU customers have significantly lower electric bills than IOU customers, and their electricity also has a fraction of the carbon

content. If policymakers are intent on reducing emissions while simultaneously keeping energy costs low for customers, they may want to replicate the COU model.

For instance, lumping together the energy wallets of customers of Portland General Electric and EWEB masks huge differences in how much those customers actually spend on energy. Below, you can see a chart that EWEB created based on data we collected, and it shows the yawning gap in rates between COU and IOU customers. (The arrow indicating “\$12” shows that EWEB’s rates will rise next year. Rates at other utilities will, too.)



Policymakers should know the differences between the energy wallets of those two customer categories so they have full knowledge of how to craft policies that will best enable Oregon to pursue a zero-carbon future that is also affordable.

As you already know, a few factors help COUs keep costs down and policymakers may find it useful to think about how to expand or support the COU model as they strive to keep costs down.

- *The low-cost hydropower from the Bonneville Power Administration (BPA) and the federal hydropower system on the Columbia and Snake Rivers.* This system is invaluable for customers at COUs by keeping rates low and keeping carbon content minimal. Policymakers may be keen to know how they can protect this affordable, low-carbon system.
- *The lack of profit margin.* COUs are not beholden to shareholders or out-of-state investors who are seeking to make a profit from Oregonians’ utility bills. This local, customer ownership keeps rates low and keeps money inside Oregon.

I have a couple ideas about how model the differences in the energy wallets of IOU and COU customers, but this is not my area of expertise, so you probably have much better ideas.

- Include COU customers and IOU customers as distinct groups among the five.

- Assume that all the customer groups are IOU customers, then reduce their wallets by a percentage to model the lower costs they would face as COU customers.
- Model each group as both a COU or IOU customer. (This would lead to 10 groups, which is almost assuredly too unwieldy.)

Thank you for reading this comment! Let me know if you'd like to discuss anything in greater detail.

Oregon Energy Strategy

Energy Wallet, Air Quality, and Geospatial Mapping Complementary Analyses Public Comment

James Belcher

For the Oregon Energy Strategy Energy Wallet, Air Quality, and Geospatial Mapping Complementary Analyses, here are my recommendations:

— Homeowner, High Priority Area Homes, Weatherization, Average Renter, and Low-income Renter Multifamily

— No recommendation on air quality zones

— All of the socioeconomic / demographic info will be useful for targeting; no suggested changes or additions.



11/21/2024

Lauren Rosenstein
Community Equity and Inclusion Analyst
550 Capitol St. NE
Salem, OR 97301

RE: Oregon Energy Strategy Public Comments

Ms. Rosenstein,

Below are my comments on the Oregon Energy Strategy Energy Wallet, Air Quality and Geospatial Mapping Complementary 11/06/2024 Analyses draft provided to me via email on 11/06/2024:

- Page 4, Table 2- I recommend clarifying whether the Rural Home, Coastal Home, High Priority Area Homes and Weatherization customer groups are owner-occupied.
- Page 4, Table 2- I recommend clarifying whether duplexes and triplexes are considered Multifamily.
- Page 6, Feedback requested question- I recommend the five groups prioritized for the energy Wallet analysis are Homeowner, High Priority Area, Weatherization, Manufactured Homes, and Average Renter.
- Page 8, Feedback requested question- I do not recommend any changes to the regions in Figure 5.
- Page 11, Feedback requested question- I would recommend adding Percent of Individuals Receiving Medicaid benefits and Percent of Individuals Receiving Social Security Disability Income.

Thank you for the opportunity to participate in the Oregon Energy Strategy's Environmental Justice & Equity Working Group and ensuring that diverse stakeholders were engaged in this important feedback process.

Please reach out if you have any questions on my comments.

Respectfully submitted,

A handwritten signature in black ink that reads "Christina Zamora".

Christina Zamora
Executive Director, KLCAS
christinaz@klcas.org



2316 S 6th Street, Suite B, Klamath Falls, OR 97601 541.882.3500 866.665.6438 541.882.3674 fax

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Oregon Energy Strategy

Energy Wallet, Air Quality, and Geospatial Mapping Complementary Analyses Public Comment

Sarah Wochele, CUB

I am writing to ask for more time to provide comments on the equity analyses for the energy strategy, and to ask a question about the geospatial mapping piece. A lot of us are off next week making it hard to continue our collaboration, and get leadership sign offs, on comments that we plan to submit jointly.

Even being able to submit Monday 12/2 would be helpful - but even more additional time would be useful to us. A lot of us have been navigating a very intensive PUC process related to disconnections and arrearages, and our capacity has been low as we give our energy to that urgent process. **Please let me know if there is flexibility in when we submit the comments and what additional time you might be able to offer us!**

Geospatial Mapping: For feedback on the geospatial mapping indicator prioritization, do we need to list all of the indicators in Appendix A in order of priority, or just select a few? If so, how many? More clarity here would be helpful, thank you!

Monday December 2, 2024

Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301

RE: Oregon Energy Strategy Energy Wallet and Geospatial Mapping Complementary Analyses

Thank you for the opportunity to provide comments and for the extension to allow us more time to gather comments surrounding the holiday last week. The following comments are in response to ODOE's [draft technical approach](#) for *two of the three* environmental justice (EJ) and equity related analyses that will feed into the Oregon Energy Strategy: an Energy Wallet and Geospatial Mapping.

Modeling Questions

We do still have a few questions related to the technical approach. The Energy Wallet gets data from the Energy Modeling results, including consumption amounts and prices for all the energy carriers used by each sector and customer group. Are the proposed customer groups represented in the Energy Model's demand-side module? If not, how are the model's sectoral sub-groups (e.g., residential heating, commercial lighting, personal transport) transposed to the proposed Customer groups?

Our understanding is that the Energy Model's demand-side module consists of two-regions. Are the Customer groups the same or different for the two Oregon regions?

Energy Wallet Customer Groups

Oregon is an incredibly diverse state, whether that is diversity in demographics, housing, climate, location, or more. This diversity has huge ramifications for their idiosyncratic relationship to energy and energy use. To be limited to just five will be a disservice to certain customer groups that end up not represented well. In addition, the aggregation of these idiosyncrasies will result in aggregated results that are too general to be insightful. That said, with a strict limit to five customer groups, we feel the best approach is to strike a fine balance between diversity and specificity of customer groups. We recommend the following customer groups below, which also acts as an illustrative example of how we feel it best to strike a balance between diversity and specificity.

Rural Manufactured/Mobile Homes: The inclusion of manufactured and mobile homes as a customer group is vital because they are the most household energy-burdened customer group, if not Median Energy Burdened. This group will likely be most sensitive and vulnerable to any changes in electricity pricing, and costs that come from the energy transition. Although a lot of these customers are not hooked up to gas at all, if so they are more likely to be stranded on the

gas system as well. While urban manufactured/mobile homes do exist within the state, specifically observing their more rural counterparts such as in eastern, southern, and central Oregon is key because they are generally more energy-burdened. These rural households also tend to benefit less than urban households from energy assistance programs— due in part to substantial differences in proximity to Community Action Agencies and other assistance providers, but also partly because of cultural differences surrounding assistance and general trust with government etc.

Willamette Valley Urban Single-Family Homeowners: This customer group will capture the typical single-family home in cities such as Portland, Salem, and Eugene. Justification for only single families in the valley is that it is a populous customer group, and the mild climate pervades the whole valley, which allows for standardization. Including single families from elsewhere in the state will result in generalizations that are likely to be harmful instead of insightful; there are too many differences in climate, income, culture, and more.

Low-Income Renter Multifamily: This customer group will provide insight into renters living in multifamilies—another populous customer group. The main differentiation from the other customer groups is that multifamilies generally use much less energy annually primarily because of heating/cooling a smaller space and typically contain fewer occupants. This customer group can be used to generally see how timing of investing in electrification will result in differing costs between owners and renters, but also as a usable proxy for low income customers because they are more likely to live in apartments. Renters, generally regardless of income, also have much less flexibility regarding energy efficiency of their dwellings for countless structural reasons, making this a useful group to understand regarding the energy transition.

Rural and Harsh Climates: The primary purpose of this customer group is to capture all customers that live in very remote locations with harsh climates. This will include isolated places in subalpine, alpine, and high desert climates, such as customers within the foothills of the Cascade Mountains, central Oregon, and southeastern Oregon. While only a small portion of the overall Oregon population, they have relatively high energy burden, and most likely have high Median Energy Burden also. Atypical heating fuels such as wood and kerosene are not uncommon for this customer group, differentiating them from all the other customer groups where the vast majority of customers use either natural gas or electricity. While this group may seem more general, encompassing all sorts of locations, climates, and housing types, their common thread is very high heating/cooling costs, and so their energy burden can be observed. These common threads also likely weave into similar transportation costs for households living in these areas.

Tribal: We suggest Tribal communities here, meaning Tribal Communities living on reservations, while acknowledging we have limited understanding of reservations in Oregon specifically. We believe that a customer group specific to households on reservations is important. Tribal communities living on reservations across the state of Oregon likely have similarities related to energy and transportation for many structural policy reasons, despite living in different areas of the state. While more than 1 in 4 Native folks in the US live in poverty, the

poverty rate for Native folks living on reservations is even higher.¹ In Oregon, we know that in Pacific Power’s territory, households in Census Tribal areas were flagged as a “Key Customer Segment” in the Company’s 2024 Energy Burden Assessment.² The assessment notes that this segment does not encompass all tribal households or all Native-American households, but this group has an incredibly high level of poverty (72%) and energy burden (50%). Further, these households use 14,300 kWh/year on average (34% more than the average for Pacific Power), with annual electricity bills slightly over \$2,100/year.³ From this assessment, we also know this customer segment has large potential for energy efficiency.

This set of five customer groups will better provide insight into the modeling effects on energy burden, energy spending, and electrification investment purely due to optimizing the constraint of five customer groups on diversity in many aspects to account for as many people within the state of Oregon as possible. If more than five can be considered, it is highly encouraged and will benefit from a revision of the recommendations above. We suggest using the greater flexibility to explore options such as including a group consisting of LIHEAP recipients, BIPOC communities, and more. However, no matter the number of customer groups, the overarching goal of how to construct the groups remains the same: diversify it enough so that as many Oregonians are represented as possible, and with a keen eye on energy burden and the cost impacts of various scenarios.

Geospatial Mapping

Geospatial mapping that uses census data to incorporate socioeconomic analysis at the census tract level must be used to provide equity insights. Prioritize race, ethnicity, language, income, poverty, education levels, etc. to ensure an equity lens on disadvantaged and BIPOC communities when evaluating different scenarios.

Thank you for your continued engagement and your acknowledgement of our specific expertise on these issues.

Sincerely,

/s/ Ryan Tran
Economist
Oregon Citizens’ Utility Board

/s/ Greer Klepacki
Policy & Advocacy Manager
Community Energy Project

/s/ Alma Pinto
Energy Justice Policy Associate
NW Energy Coalition

¹ American Bar Association, *Federal Policies Trap Tribes in Poverty*: https://www.americanbar.org/groups/crsj/publications/human_rights_magazine_home/wealth-disparities-in-civil-rights/federal-policies-trap-tribes-in-poverty/, Jan 2023

² Docket No. UM 2211: PacifiCorp's Oregon Energy Burden Assessment, Oct 1 2024: <https://edocs.puc.state.or.us/efdocs/HAH/um2211hah331734033.pdf>, pdf p 29.

³ *Id.*



Submitted electronically.

November 25, 2024

Ms. Edith Bayer
Energy Policy Team Lead
Oregon Department of Energy
550 Capitol Street NE, 1st Floor
Salem, Oregon 97301

Dear Ms. Bayer:

Thank you for accepting the Oregon Municipal Electric Utilities Association’s comments on the *Draft Energy Wallet, Air Quality, and Geospatial Mapping Complementary Analyses*, as well as feedback on ODOE’s plans for Phase 2 of the Energy Strategy.

Energy Wallet. As noted at the November 20th Advisory Group meeting, we are disappointed to see that none of the proposed customer groups is clearly distinguishable as a consumer-owned utility (COU) customer. Over 30% of Oregonians receive their power from a COU. The lowest income areas in the state are often served by COUs. We encourage ODOE to address this significant oversight by including a distinct COU customer group. (OMEU also offered this feedback at one of the meetings of the *Environmental Justice & Equity Working Group*.)

As we understand it, the energy wallet is supposed to examine energy spending and energy burden for different customer types. We appreciate that your proposal does not look at rate design. If you did, it would clearly show that a typical COU customer pays far less than a typical customer of an investor-owned utility (IOU). Because of our unique, not-for-profit business model, we operate solely for the good of our customers without shareholder profits built into our rates. Additionally, the governance of COUs is vastly different. Municipals, for example, are overseen by elected city officials or utility boards. Local control is another factor that helps keep costs low. These are huge differences that policymakers need to understand. Starting with the “present-day energy bill” of a COU customer group in the analysis will help to illuminate these differences.

If the energy wallet is designed to look at the cost of delivering energy to customers, there is huge disparity between IOUs and COUs there too. In reviewing the draft, it appears that you are using “electricity” as a fuel source and using Federal data—nothing Oregon-specific—about how the electricity is produced. That approach masks cost differences in electricity production methods for the Northwest as compared to the nation as a whole, and the differences between COUs and IOUs.

1201 COURT ST. NE, SUITE 102 • SALEM, OREGON 97301 • (971) 600-6976 • E-MAIL: jenniferjoly@omeu.org

COUs have access to the Federal Columbia River Power System (FCRPS). In fact, most COUs in Oregon get 100% of their power from the FCRPS, which is 95% carbon free today. While there are costs to maintaining the dams and ensuring proper mitigation for fish, the “fuel”—water—is free, which keeps our operating costs low and protects against fluctuations in fuel prices. Over the years, the dams have consistently provided some of the nation’s most affordable electricity. On the other hand, Oregon’s IOUs are much further behind in their GHG emissions profile, relying on natural gas and coal imports. Because of this emission profile and the legislative directives in HB 2021, IOUs are spending much more on the construction of renewable energy and storage, which impacts the affordability of electricity. It is critical that ODOE include a COU customer group in the energy wallet to make this clear to policymakers.

These huge cost disparities need to be reflected in the energy wallet. The Energy Strategy should have a better breakdown of the IOU and COU coverage areas in the state. For COU customers, hydropower, including the Lower Snake River Dams, are key to both affordability and air quality. Policymakers must understand that curbing hydro output—whether through breaching the Lower Snake River Dams or high spill operations—will have a corresponding reduction in air quality and affordability as other energy sources are brought in to cover the shortfalls. Of course, while not a direct focus of the energy wallet, reliability of the system would also be at risk.

Phase 2. While we have no concerns with ODOE rethinking the Working Groups and working to ensure a balanced set of voices for the policy portion of the strategy, we prefer the “opt in” feature that ODOE used with the Working Groups in Phase 1. By allowing participants who may not have been selected by ODOE for membership in a Working Group, ODOE can avoid any perception that the “deck was stacked” for these critical policy discussions. We are confident that ODOE and the facilitators can manage participation in a fair and equitable manner without cutting off participation in the design of the Working Groups.

We would be happy to discuss these suggestions. I can be reached at (971) 600-6976, jenniferjoly@omeu.org.

Sincerely,

/s/ Jennifer Joly

Jennifer Joly, Director
Oregon Municipal Electric Utilities Association

November 27, 2024

Ms. Edith Bayer
Energy Policy Team Lead
Oregon Department of Energy
550 Capitol Street NE, 1st Floor
Salem, Oregon 97301

Dear Ms. Bayer:

Thank you for allowing the Public Power Council (PPC) to provide comments to the Oregon Department of Energy as you collect input on the draft Energy Wallet, Geospatial Mapping, and Air Quality analysis.

PPC represents the interests of the non-profit, community-owned electric utilities in the state of Oregon, as well as those in Washington, Idaho, western Montana and parts of Wyoming and Nevada. These utilities rely in whole or in part on the largely emission-free electricity marketed by the Bonneville Power Administration (BPA) and transmitted through the agency's network of more than 15,000 circuit miles of high voltage transmission lines.

The typical consumer owned utility (COU) customer across the Northwest – including in Oregon – is vastly different than the typical customer of an investor-owned utility (IOU) in the region, largely rooted in how IOUs got started in more urban areas compared to the more rural profile of the COUs as they formed. While population growth and urbanization have blended some of these defining characteristics in some areas, there are still distinct differences between the two. Generally, the COU areas are more economically depressed and have experienced fewer job growth opportunities when our state economy has boomed. As well, the rural areas have experienced more impacts from renewable and non-renewable energy resource development in their areas over time, as compared to highly urbanized areas of the state. Some of this development has brought differing levels of local particulate and other carbon emissions to these areas, historically, including to areas where electricity fuels passed through (e.g., coal trains running through rural Oregon to stockpile the former Boardman coal plant).

Over time, the COUs and IOUs have taken vastly different resource routes to supply their Oregon customers. COUs have largely been served by emission-free hydro and nuclear resources marketed by BPA, or have supplemented with their own resources that often include additional non-carbon sources (e.g., Eugene Water and Electric Board-owned hydro). Conversely, the IOUs such as Pacific Power (PacifiCorp) and Portland General Electric have had or still have coal and natural gas in their portfolios, and to a lesser degree, other non-carbon sources in their energy mixes, including hydro and wind.

This is all set as background to make a point that when the state of Oregon is charting a course for the state's energy future – and outlining scenarios and choices – we must take a scalpel approach to defining the territories of the IOUs and the COUs and the consumers within those boundaries, because the energy realities in these areas are vastly different enough that they must be carefully defined among their unique characteristics. This isn't to say that such delineation is bad or good – it just means that different choices and issues may be relevant in different areas.

In fact, there may well be more defined opportunities and challenges for both the COU and IOU territories by making the distinction. For example, factors such as EV deployment and adoption may be a lower barrier in IOU territories when also factoring in for aspects such as existing infrastructure, tax incentives for for-profit entities, etc. Similarly, there may be factors for the COU areas that are important to consider as different than those for IOUs, such total carbon emissions per residential customer, etc.

Therefore, what we would hope to explore going forward with respect to any modeling exercise(s) under the draft approach to the Energy Wallet, Geospatial Mapping, and Air Quality analysis is that we make a clear distinction between the types of electricity services (e.g., generation sources, air quality impacts, costs, availability, etc.) that are being provided to Oregon's citizens in the COU-served and IOU-served areas so that we can better pinpoint the respective barriers and challenges, impacts of various choices and the "right" corresponding solutions.

Thank you for considering our input.

Sincerely,



Scott Simms
CEO & Executive Director, Public Power Council