

2024 Draft Budget Public Comments and Staff Responses

Overview of Public Comment Process and Purpose

Each year Energy Trust invites formal public feedback on its draft budget and action plan to prepare a final proposed budget. Written comments and informal feedback are shared with Executive Team members and budget managers across the organization. Public feedback can result in revisions to budget and action plan details or can influence how staff implement budgeted activities the following year. Comments also provide an opportunity for staff to better understand the priorities of organizations and individuals and how the budget and action plan supports those priorities.

All written comments with responses are then included with the final proposed budget and action plan materials to be referenced by the board of directors during its consideration and vote to adopt the budget.

How Comments Were Collected

The formal public comment period was October 4 to October 18, 2023, with opportunities for informal feedback made available prior to these two weeks. Staff promoted the public comment period through Energy Trust's website, social media channels, blog, email and presentations and outreach. Communications directed people to www.energytrust.org/budget and encouraged written comments.

In addition, throughout the year staff asked stakeholders for information and input to inform our annual business planning, budgeting and action planning process. More on this can be found in the *Summary of Market Intelligence* memo in the final proposed budget and action plan materials.

Staff received 64 written comments from organizations, the Oregon Public Utility Commission, three partner utilities and individuals. Copies of written comments follow.

Written Comments and Staff Responses

Staff appreciates all written comments and informal feedback stakeholders and members of the public provided on the Draft 2024 Budget and 2024-2025 Action Plan. We observe the majority of comments are supportive of our budget and plans. Additionally, informal comments made during Conservation Advisory Council, Diversity Advisory Council and the Renewable Energy Advisory Council meetings were overall supportive of the 2024 budget and plans. Based on comments, changes were made to the final proposed budget to provide additional information on expenditures, reduce some expenditures and delay rate impacts of the budget on utility customers until April 1, 2024. We recognize the time commitment involved with attending budget meetings and reviewing our budget materials, and we thank interested parties for submitting their written comments.

Excerpted Comments by Oregon Public Utility Commission (OPUC)	Staff Responses
<p>Based on stakeholder feedback during budget discussions, Staff would like Energy Trust to consider changes that reflect a delay to the effective date of new utility tariffs for 2024 from January 1 to April 1, 2024. Utility bills in January and February are often the most expensive of the year due to heating needs. Staff supports CUB’s recommendation and is pleased that Energy Trust plans to be flexible in its operations in order to accommodate this idea without impacting incentives or services.</p>	<p>We agree that delaying rate impacts until after the heating season will alleviate impact on ratepayers, and we will work with Portland General Electric, Pacific Power and the Oregon Public Utility Commission to delay the effective date of new utility tariffs for 2024 from January 1 to April 1, 2024.</p>
<p>While Staff notes that the Energy Trust budgeting process is already complex and time-consuming, Staff would like Energy Trust to meet with utilities to explore whether or how Energy Trust may be able to include an alternate scenario in future budgets. Staff understands this may not be feasible or practicable given current systems and processes.</p>	<p>We will meet with utilities to determine if providing alternative scenarios may be possible in future years. It is possible that this concept can be incorporated into the multiyear planning process that Energy Trust will be developing next year.</p>
<p>Staff also encourages Energy Trust and utilities to consider how to adopt a multi-year budgeting process that can remain flexible to changing resource needs.</p>	<p>Thank you for this guidance. In 2024, we plan to develop a new multiyear budgeting process that can be implemented in 2025. The multiyear process will enable Energy Trust to align planning with longer-term utility carbon reduction goals and to be responsive to changing resource needs and market dynamics.</p>
<p>Further, Staff recommends Energy Trust use 2024 to characterize the various ways in which external funding will interact with ratepayer funds.</p>	<p>We expect information on the structure, uses and potential interactions with Federal and other new funding sources will develop throughout 2024 and beyond and will become clearer in ensuing years. As this information becomes clearer, we will integrate this information into future budgets, financial projections, and program design. We will plan future budgets with the best available information where these funds can reduce Energy Trust incentives and other costs, how they will increase the volume of projects and/or make additional measures cost-effective.</p>
<p>Where external funding may overlap with existing Energy Trust programs and measures, Staff agrees with the utilities and requests Energy Trust work with Stakeholders to review and evaluate whether Energy Trust provides enabling funding, complementary funding, or reduces spend on certain measures when external funds are used to acquire energy efficiency. Energy Trust’s ongoing task is to understand how external funds change the cost-effective, achievable potential and adjust strategy to ensure the organization continues to acquire</p>	<p>We will be happy to discuss how the funds interact with other funders and stakeholders. We are working with Oregon Department of Energy, Portland Clean Energy Community Benefits Fund (PCEF) and other funders to coordinate funding and determine how to leverage ratepayer funding with other sources to serve more customers, stretch ratepayer dollars further and achieve more energy savings.</p>

<p>all cost-effective energy efficiency, even if the volume and cost is more than current forecasts.</p>	
<p>Energy Trust should monitor if external programs cause unexpected market changes such as requiring less ratepayer co-investment to achieve savings.</p>	<p>We agree that it will be important to consider when external funding should be used to reduce incentives or to accelerate or maintain program volume. Monitoring market dynamics will be critical, and monthly forecasting and trade ally market intelligence will help us determine the best use case for rate-payer dollars going forward. Our decisions on these issues will be discussed with stakeholders.</p>
<p>Staff appreciates Energy Trust’s scenario analysis to forecast the cost-effectiveness of 2024 programs with and without avoided cost increases, complementary funding, or development of HB 2475-type programs. Figure 3 shows that without some of those updates, the residential and existing building programs are borderline cost-effective. However, Energy Trust’s analysis also gave Staff confidence that updating avoided costs, leveraging complementary funding, and developing HB 2475 programs will improve the cost-effectiveness values.</p>	<p>We appreciate your confidence that our 2024 programs will be cost-effective by the time Energy Trust is required to report cost-effectiveness in our 2024 Annual Report.</p>
<p>Staff highlights that Energy Trust’s budget as proposed is cost-effective at the portfolio level from both the utility and participant perspective. Staff views this portfolio approach to be valuable because it enables a higher volume of savings to be achieved while making sure Energy Trust’s cumulative investments continue to have downward pressure on rates. The counterfactual circumstance, where less efficiency is pursued so that each individual measure or program is cost-effective, puts each utility in a more challenging compliance position for their respective decarbonization requirements.</p>	<p>We agree that evaluating cost-effectiveness at the portfolio level enables additional flexibility to serve customers while maintaining cost-effective programs.</p>
<p>Staff finds the new investments in staffing necessary to achieve savings targets and to test the ability to reach new customers. In 2024, Staff will update the Commission on Energy Trust performance in Docket No. UM 1158. At that time, Staff will likely support a waiver of the performance measure that limits to 10 percent year-over-year actual increases in staffing costs. With expenditures increasing 35.5 percent, Staff finds Energy Trust’s proposed staffing increase of 28.5 percent to be reasonable. As Energy Trust begins to consider multiyear planning and budgeting, Staff encourages Energy Trust to continue reporting on staffing needs and performance.</p>	<p>We appreciate your acknowledgement that 2024 staffing investments are appropriate and critical to increasing savings and maximizing the value of future complementary funding. We agree and will continue to be transparent regarding staffing needs and performance by providing information in quarterly and annual reports to the OPUC as well as on an ongoing basis with OPUC staff through meetings and planning for future budgets.</p>
<p>In 2024, Staff will likely support a waiver of the administrative cost performance measure. With Energy Trust’s overall expenditure increase of 35.5 percent, Staff expects administrative costs to increase more than 10 percent. Absent a waiver, Energy Trust’s performance</p>	<p>We appreciate your support for administrative cost increases in the 2024 draft budget, and we plan to work with stakeholders and the OPUC to rationalize year-over-year growth of administrative cost in future budgets.</p>

<p>metric for administrative cost as a percentage of revenue is eight percent. Staff supports the 30 percent administrative cost increase proposed by Energy Trust for 2024 but will work with stakeholders and Energy Trust early in next year's budget process to limit year-over-year administrative costs growth.</p>	
<p>In this year's budget, Energy Trust proposes to change how administrative cost performance is evaluated. The historical comparison to revenues can mask that Energy Trust varies how much is requested of utilities based upon the size of each utility's reserve account. Instead, Energy Trust proposes evaluating administrative cost performance against expenditures. Energy Trust notes that administrative expense as a percent of total cost is a common way in which non-profits are evaluated and allows Energy Trust to be benchmarked against peers. Staff supports this change and will address the topic in Docket No. UM 1158 in 2024.</p>	<p>We appreciate the shift to evaluating and reporting administrative expenses as a percent of total expenditures, which aligns with generally accepted accounting principles and is used by many nonprofits.</p>
<p>Staff encourages Energy Trust to keep making explicit connections between increased cost and savings, especially in 2025 and 2026 once new programs and infrastructure are in place.</p>	<p>We agree that our annual budgets must tie investments to corresponding savings and results, and we will continue to do so in 2025 and 2026 budgets as well as in our forthcoming multiyear planning process.</p>
<p>While the budget is complex, there are many examples of specific programs and investments that Energy Trust makes in 2024. The \$13.3 million highlighted in the Diversity, Equity, and Inclusion Activities section is an example of these. Staff supports these investments with the expectation that they will lead to future savings beyond what was included in the forecasts for the next two years. Many of the external funding sources have long timelines, so this scale up will serve beyond 2024.</p>	<p>We value your acknowledgement that investments in programs and market infrastructure have long lead times and will result in energy savings in years beyond 2024 and 2025.</p>
<p>Staff does not support PGE's proposal to withhold reserves because the benefits of doing so are unclear and Energy Trust's budget includes important 2024 investments.</p>	<p>We appreciate the OPUC's guidance that Energy Trust should not withhold PGE reserves.</p>
<p>With regards to not deploying no-cost measures or expand residential HVAC incentives, Staff is surprised at PGE's position given how these programs form a keystone component of Energy Trust's strategy to use ratepayer resources more equitably. Further, encouraging more efficient heat pumps and no-cost measures like weatherization have important contributions to reducing peak load and are enablers of more effective flexible loads. By contrast, PacifiCorp requested additional focus on measures that save more during summer and winter peaks. Staff sees the future, external incentives that PGE cites as helpful, but insufficient alone for addressing the State's cumulative energy, equity, and decarbonization</p>	<p>We appreciate your support for developing no-cost measures and expanding residential HVAC incentives, which are essential to increasing participation of and direct benefits to underserved customers.</p>

needs. Thus, Staff supports Energy Trust building the capacity to deliver these measures starting in 2024.	
Staff is supportive of Energy Trust’s 2024 draft budget which invests in building capacity and infrastructure to deliver an acceleration in energy efficiency.	We appreciate your support for our budget investments to maximize the impact of significant, new complementary funding expected to enter the market in 2025 and beyond. Investments in 2024 will allow us to meet existing IRP savings targets, build the infrastructure to deliver accelerated savings and braid complimentary funding.
Recommendation 1: Document and report regularly on development activities related to large sources of non-ratepayer funding and characterize how existing programs and ratepayer funds interact.	We will incorporate information on our development activities for large sources of funding into our regular reporting to the OPUC.
Recommendation 2: In response to utility feedback, develop guiding principles for considering rate pressure when coordinating management of external funding and report those prior to 2025 budget planning.	We will document our principles for leveraging and coordinating complementary funding prior to our 2025 budget planning process and include this in our materials as we develop the budget.
Recommendation 3: With external funds driving new efficiency, consider dual fuel and electrification measures that can unlock additional efficiency, and which can be considered in the next round of utility integrated resource planning.	We will closely follow how ODOE and others utilize Federal funding to fund fuel type conversion, to assess what efficiency opportunities these projects create and where Energy Trust can help maximize efficiency. Also, through our own pilot and work with NEEA, we will continue to explore electric and gas combined heating systems for homes. As we gain experience, we will discuss with utilities how we can assist in quantifying these opportunities for consideration in integrated resource plans.
Recommendation 4: Work with utilities and Staff to modernize avoided cost calculation methods to consider Oregon’s decarbonization policy goals.	We stand ready to work with OPUC and utilities to modernize avoided cost calculation methods and integrate them with decarbonization policies, through OPUC's avoided docket or other forums.
Recommendation 5: Work with utilities and Staff to develop HB 2475 programs prior to 2025 budget planning. This should include developing targeted efforts to reduce energy burden based on utility data.	We welcome the opportunity to collaborate with OPUC staff and utilities to develop HB 2475 programs in early 2024. Utility usage data will help us design targeted program offers and education to reduce energy burden for customers with low to moderate incomes.
Excerpted Comments by Portland General Electric (PGE)	Staff Responses
These comments are intended to clarify PGE’s staunch support for energy efficiency and outline the long-term partnership approach it seeks to take with the ETO to deliver energy efficiency and renewable energy to its shared customers.	We appreciate PGE's strong commitment to energy efficiency and look forward to working together in 2024 to update our planning and program assumptions to grow this resource.
PGE recognizes the need for investment in program delivery to support community based organization (CBO) capacity, trade ally expansion, and to aid in accelerating and enabling other sources of funding, but remains	We appreciate PGE's careful and diligent review of our proposed budget and your acknowledgement of the need for investments in program delivery and market infrastructure. We

<p>concerned about the size of the investment proposed for 2024/2025, given uncertainty over the potential future applicability of federal, state, or local funding to support capacity expansion efforts; and the lack of visibility into additional energy savings from the proposed investments in capacity.</p>	<p>agree there is uncertainty regarding the timing of future complementary funds, however our conversations with implementers indicate that new funding of significant magnitude will not be available in 2024. The \$13.3 million investments in market infrastructure is 4% of the 2024 draft budget and includes investments that are necessary to expand savings and to access complementary funding. As part of our development of a new multiyear planning process in 2024, we plan to work with utilities in 2024 to improve estimates of future savings as a result of these investments.</p>
<p>PGE does not see it as a prudent investment of ratepayer dollars to expand and deploy in 2024 no-cost measures beyond those with prior year measure exceptions, nor does PGE see it as prudent to double residential HVAC incentives, for end-uses that will realize sizeable taxpayer-funded rebates in 2025.</p>	<p>Developing no-cost measures and expanding incentives for residential HVAC systems are critical to increasing participation from and providing direct benefits to underserved customers, especially those with lower incomes. These offers are part of a cost-effective portfolio and part of our work to achieve the energy burden reduction equity metric in our OPUC 2023 performance measures. The no-cost measures planned for 2024 are within OPUC approved pilots for ductless heat pumps, heat pumps and heat pump water heaters. We plan to share what we learn from these pilots with other organizations working to design complementary funding programs. Increasing residential incentives is necessary to spur action after inflation has significantly increased project costs, leaving the balance of project cost unreachable for many households. It is also needed to reduce energy bills for customers with high energy burdens during a period of high inflation.</p>
<p>Given the 37% and 47% increase in expenditures relative to the 2023 budget, in 2024 and 2025 budgets respectively, PGE favors withholding \$20-25 million in program reserves “to mitigate risks, smooth out operations from year to year and reduce rate impacts.” PGE views this as prudent given the market uncertainty and opportunity to partner with ETO to implement a utility specific action plan that realizes operational efficiencies, takes a holistic and outcomes-based approach and serves to maximize the benefits for our shared customers.</p>	<p>We have made adjustments for our final proposed budget to utilize more reserves for rate relief in 2024, thereby reducing revenue required from PGE by \$6.2 million compared to our draft budget. We are planning to end 2024 at our target 2% level of reserves for PGE to mitigate risks and smooth operations from year-to-year.</p>
<p>PGE favors approval of a one-year budget, for 2024 only, and views it as prudent to withhold reserves and not deploy the no-cost measures.</p>	<p>Our draft 2024 Budget and 2024-2025 Action Plan includes a budget for 2024 only. For 2025, a projection is included, which will be updated in 2024 through the development of Energy Trust's 2025 Budget and 2025-2026 Action Plan. Energy</p>

	Trust's annual utility funding agreements are for one year only.
Also given the dramatic increase in investment in program delivery infrastructure, to enable deployment of local, state, and federal funding, PGE sees it as imperative that proportional savings attribution be included. That is, if PGE ratepayers will fund the delivery infrastructure for Oregon, then the savings realized from other sources of funding should be attributed to its customers via ETO. PGE favors making approval of the 2024/2025 budget conditional upon this requirement.	We have a long history of coordinating with other organizations with complementary funding and have tracked savings where we have a direct influence as per OPUC guidance. Where we have information on what others have influenced, we are happy to share that information with utilities. We integrate that knowledge into evolving and optimizing our role and investment. As new complementary funds further develop, we will continue to transparently share how our influence is evaluated and tracked.
[Energy Trust should] further define: Co-deployment of EE and flex load or electric rates via key design element guidance in existing docket UM 2211 (Implementation of House Bill (HB) 2475), and applicable to UM 2141 (PGE Flexible Load Plan), such that the cost to deliver demand-side resources may be mitigated and customer participation outcomes specified.	We agree to work with PGE in 2024 to define what co-deployment of energy efficiency and flex load and implementation of HB 2475 looks like between PGE and Energy Trust for potential implementation in 2025.
Request an effort to deliver an outcomes-based co-deployment framework in partnership with ETO that supports and aligns with existing dockets UM 2211 and UM 2141.	In 2024, we plan to work with PGE to define shared outcomes that are anticipated from our planned co-deployment of low- and moderate-income and flex load focused strategies.
The proposed 2024/2025 budget and associated action plans are not cost-effective at the program level. Per the ETO 202_Budget Assumptions memo "Energy Trust used current avoided costs to develop our 2024 budget, which are acknowledged to be out of date. Even with these current avoided costs, Energy Trust's budget is cost-effective at the portfolio level and for all programs except for Residential and Existing Buildings." To evaluate these programs differently represents a deviation from standard practice without formal guidance from the OPUC. PGE does not favor such a deviation, nor does it desire to see such an approach take precedent, however, PGE also recognizes the regulatory lag that exists between IRP/CEP (LC 80) and the Avoided Cost (UM 1893) dockets. PGE is committed to advancing its decarbonization goals and concedes that this criterion will not be met in this budget cycle.	In the draft 2024 budget, we calculated cost-effectiveness of programs and the portfolio using assumptions from 2019 to estimate the value of the efficiency resource to the electric utility system. The value of the electric portion of the 2024 residential program did not exceed the costs. Based on updates in avoided costs in 2024, we expect all programs will be cost-effective by the time Energy Trust is required to report cost-effectiveness of 2024 programs in our 2024 Annual Report.
[PGE] also acknowledges the need for statewide approaches to scale to meet the trades shortage.... PGE anticipates additional funding opportunities will be available over the next several years and favors a clearer articulation of ETO's role in [workforce development].	Energy Trust proposes a joint 2024 initiative with PGE and Pacific Power to co-plan joint workforce investments for 2025 to ensure the areas most affecting energy efficiency acquisition are addressed. Through this effort we can assure that all parties are confident in the level of Energy Trust investment in 2025 and beyond.
Request that Energy Trust collaborate to combine IRA funds maximizing program incentives and to increase	We agree that there is a need to ensure customers have access to available funds where

<p>braiding and bundling of like and complementary programs, respectively, across PGE and Energy Trust to better meet needs of low-income customers.</p>	<p>eligible and that it takes collaboration and thoughtful design to ensure customer funds are optimized. Energy Trust is working with ODOE and other funders to establish roles and coordinated processes that prioritize customer need and simplify their experience in accessing eligible incentives. We are committed to this collaboration and to optimizing and maximizing funding for ratepayers.</p>
<p>Strategies that PGE requests be employed in preparation for the 2025/2026 budget: Begin EE revenue collections in Spring 2024 and pro-rate for the balance of the year. This serves to delay, not mitigate, but may temporarily alleviate customer impact.</p>	<p>We agree that delaying rate impacts until after the heating season will alleviate impact on ratepayers, and we will work with PGE, Pacific Power and the OPUC to delay the effective date of new utility tariffs for 2024 from January 1 to April 1, 2024.</p>
<p>Strategies that PGE requests be employed in preparation for the 2025/2026 budget: Increase investment in lower cost market transformation via the Northwest Energy Efficiency Alliance (NEEA).</p>	<p>NEEA's primary funding is negotiated for five-year periods. It is negotiated as a whole for the region. Shares are allocated to funders, including Energy Trust, based on proportions of load and customers. NEEA does sometimes offer optional, separately funded initiatives, in which Energy Trust participates when they are consistent with our mission and the needs of Oregon investor-owned utility customers. For example, Energy Trust has participated in an initiative to coordinate Strategic Energy Management activities across the region under optional funding. There are currently funding negotiations occurring regionally for NEEA for the 2025-2029 period. Energy Trust has been supportive of funding NEEA at an aggressive level but is also reliant on regional consensus as to funding levels.</p>
<p>PGE looks forward to defining shared objectives and outcomes with ETO in the utility specific action planning process as well as sees an opportunity for a holistic approach to determining which investments serve the equity and decarbonization twin mandate and realize the greatest benefit for our shared customers.</p>	<p>We thank you for this comment and agree with the importance of realizing greatest benefit for customers.</p>
<p>Request that Energy Trust prioritize onsite and virtual home energy audits given all HOMES and HEERA heating/cooling rebates require an assessment as a means for enabling savings from identified measures and partner with PGE to co-deploy energy efficiency and flexible load programs to customers for whom the audit deems them relevant.</p>	<p>We are working to refine home energy audits to align with compliance for other complementary funds, and we support exploring how to increase the value of audits</p>
<p>Request a MOU with PCEF be formalized and socialized along with divisions of labor established between ETO and ODOE and/or DEQ.</p>	<p>As we continue to collaborate closely with the Portland Clean Energy Community Benefits Fund to optimize complementary work, we will include updates on our coordination with other funders as this work develops in 2024.</p>

Request that Solarize campaigns be funded solely out of SALMON or Smart Grid Test Bed budgets and not included in the 2024/2025 Renewables budget.	We will work with you to finalize funding for this work and address this request.
Excerpted Comments by Pacific Power	Staff Responses
Thank you and the Energy Trust of Oregon (ETO) team for the budget and action plan discussions recently.	We appreciate the time and effort of Pacific Power staff in reviewing the draft budget materials and participating in meetings and discussion. Thank you for the opportunity to work with you and better understand your comments and priorities.
We understand that certain proposed action plan activities and related costs may not result in direct acquisition but are asking for additional transparency.	Infrastructure building activities can be challenging to directly attribute an estimate for future savings impacts. We understand the need for additional transparency for these activities and will coordinate with you as we develop means to track, report and adjust investments as needed.
It would be helpful to better understand ETO's specific goals and scope in the expansion of [community engagement and workforce development] activities and how the appropriate amount of ratepayer funding in support of these activities was determined given that multiple organizations at the state and local level are engaged in similar efforts.	The New Delivery Approaches to Accelerate Energy Savings memo in the draft budget provides a summary of key investments planned for this budget totaling \$13.3 million or 4% of the draft 2024 budget. This relatively modest investment will expand multiple efforts related to growth of market capabilities to deliver future savings. In 2024, we plan to create an initiative where we coordinate these investments with all utilities to maximize our collective investments.
We do not yet fully understand what alternative [budget scenarios] exist to minimize near term rate impacts or whether a more incremental approach to funding increases is warranted....We feel it is reasonable to evaluate scenarios that adapt budgets to accommodate these other sources of funding prior to increasing ratepayer collections at such a substantial rate.	The 2024 draft budget was built from the bottom up to maximize direct acquisition of all cost-effective energy efficiency and continue to grow market capacity for future savings. Between the draft and final versions, each program and support groups are reassessing markets and adjusting program designs further. This step may lead to adjustments to the budget. We don't anticipate new significant complementary funding to enter the market until 2025 and plan to use 2024 to learn more about these opportunities as they develop. We plan to integrate new information into the development of the 2025 budget.
We noted several action plan items that would benefit from further engagement and collaboration. There are already activities underway in support of these efforts.	Thank you for noting and sharing those items where there is opportunity for further collaboration for efficient delivery of this work and connections with communities.
Clarity on the process by which a community initiates engagement with ETO or vice versa would be helpful to reduce confusion, effectively manage our respective organizations' resources and effectively communicate on programs. Additional clarity regarding how ETO collaborates with other entities such as ODOE in community energy planning would also be helpful to	Thank you for highlighting the need to level set community engagement. We would like to work with you in 2024 to further define roles and scope of engagement activities.

<p>ensure alignment in approach and engagement with communities. The roles for community engagement around energy planning, community-based renewable energy opportunities, and potential community green tariffs will require close coordination and clarification of roles to best guide and support communities in their clean energy planning efforts.</p>	
<p>We feel it is reasonable and necessary to evaluate and adapt budgets to accommodate [Pacific Power's workforce development] activities and [other] funding sources prior to increasing ratepayer collections.</p>	<p>Thank you for sharing your investments and activities in workforce development and recognizing there may be opportunities for efficiencies to maximize impacts. We look forward to establishing an initiative in 2024 for 2025 planning of this work.</p>
<p>We would like to better understand whether ETO has plans to increase adoption of measures that facilitate peak load reductions providing greater per kWh grid benefits.</p>	<p>Through working with Pacific Power to analyze impacts of past measure mixes, we've found that the top measures also contribute the most to peak savings. We anticipate the update to avoided costs through UM 1893 in 2024 may include a focus on improving how the value of capacity is calculated. Updated values will enable more accurate valuation of peak savings and potentially new program offers to increase adoption. We will work closely with Pacific Power through 2024 to assess this potential.</p>
<p>As noted above, we have significant remaining questions regarding the draft budget and developing PacifiCorp-specific budget and action plan. Given the impacts, uncertainty, and timing of budget development, additional discussion is warranted.</p>	<p>We understand that this budget looks different both in total amount and type of actions and will continue to respond to your information requests.</p>
<p>We anticipate implementation of any new collections in spring of 2024.</p>	<p>We plan to work with you to implement any revenue increase in spring of 2024.</p>
<p style="text-align: center;">Excerpted Comments by NW Natural</p>	<p style="text-align: center;">Staff Responses</p>
<p>NW Natural is supportive of Energy Trust's 2024 budget. It reflects feedback provided from the utility regarding accelerating the acquisition of energy efficiency. We anticipate increased administration budget will enable Energy Trust to grow capacity to meet increasing planning needs related to target load management and new pilot offerings.</p>	<p>We agree and thank you for your support for growth in planning and pilot work as we continue to develop opportunities for more gas savings.</p>
<p style="text-align: center;">Excerpted Comments by Portland Bureau of Planning and Sustainability (BPS)</p>	<p style="text-align: center;">Staff Responses</p>
<p>BPS supports the draft budget priorities and action plan, including the goals for additional energy efficiency investments, focus on social equity centered outcomes, and building capacity in the Trade Ally network and community-based organizations (CBOs). Especially in the years ahead with significant opportunities for transformational energy efficiency, renewable energy,</p>	<p>We appreciate City of Portland Bureau of Planning and Sustainability's review of and support for our draft 2024 budget investments.</p>

<p>and climate investments, Energy Trust’s expanded coordination and capacity-building in communities around the state will be important to meeting our state climate and energy goals. These approaches and investments in people’s homes and businesses will play a key role in reducing people’s energy burden, increasing community resilience, and lowering carbon emissions.</p>	
<p>Given the scale of need in our priority communities, it will be necessary to effectively weave together funding from Energy Trust, state, and federal programs in order to support low-income households, reach deep energy upgrades and meet decarbonization goals. This highlights the need for the additional investment in energy efficiency outlined in the 2024 Energy Trust budget, and deeper community engagement.</p>	<p>We agree that providing equitable benefits to customers requires collaboration across federal, state and local government entities and community organizations and braiding of multiple funding sources.</p>
<p>The approaches in the 2024 Energy Trust budget for expanding workforce and contractor training on clean energy implementation are also aligned with the program offerings that PCEF will be launching. Collaboration with CBOs in Portland and statewide will ensure that people are getting accurate and timely information from trusted sources about program offerings, incentives, and rebates.</p>	<p>We agree that collaboration with PCEF, as well as state and local entities, will be essential in ensuring that funds are used appropriately and benefit those most in need, including those with low incomes, those in rural areas and those in communities of color.</p>
<p>These actions need to start soon in order for that workforce, contractor and CBO infrastructure to be ready for higher volume of projects expected to effectively leverage new federal, state and local funds.</p>	<p>We agree that near-term investments are necessary to ensure that we are able to deliver programs and services at the scale needed in the coming years to support state and community energy goals.</p>
<p>We also support and appreciate the efforts in aligning Energy Trust programs with the state of Oregon decarbonization policies, including opportunities for the Oregon Public Utility Commission to provide direction about investments in helping customers identify their most efficient choices to decarbonize energy consumption. These efforts towards decarbonization of buildings and transportation are complimentary to the approaches that PCEF is deploying in our grants and programs, and serve to improve public health and safety.</p>	<p>Our draft budget ensures Energy Trust's investments are aligned with Oregon's decarbonization policies and complement the approaches of PCEF so that all programs and funds work in concert to benefit customers.</p>
<p>As our programs and policies work together, it will be important to have clear understanding of what elements can be funded by each program, what eligibility requirements apply, and how projects are tracked and measured. Energy Trust staff and PCEF staff are working together to formalize agreements of collaboration and are also engaging with state agencies and community partners to design program offerings over the coming year.</p>	<p>We appreciate PCEF's partnership in sharing information, participating in upcoming funder braiding workshops and developing a collaboration agreement to provide complementary offers that benefit ratepayers.</p>
<p style="text-align: center;">Excerpted Comments by Citizens’ Utility Board (CUB)</p>	<p style="text-align: center;">Staff Responses</p>
<p>ETO’s work is critical to affordably meeting Oregon’s decarbonization goals.</p>	<p>We appreciate the acknowledgement and understand the critical role our organization plays</p>

	in collaborating and working to support energy efficiency across the state.
We are also supportive of investments to expand the Trade Ally Network, which develops the energy efficiency workforce, which is better for customers.	We appreciate the support for our Trade Ally Network and efforts to deepen the work of existing contractors and expand the network with new contractors, especially those that are embedded in communities of color and rural communities. Not only does this ensure more contractors can deliver projects, but it helps create jobs and grow local economies.
CUB supports funding more positions and raising salaries at the ETO. ETO needs to be able to build capacity. ETO's work is critical to affordably meeting Oregon's decarbonization goals. Their capacity to do this work is critical to obtaining and retaining staff, as well as the need to fairly compensate their staff for the work.	We appreciate your support for growing and retaining staff who can to support communities across Oregon.
In particular, we are excited about ETO's no-cost, whole home retrofit service for low-to-moderate income, BIPOC, and rural customers in geographic areas that are not currently served through Community Partner Funding community-based organizations.	Developing no-cost measures and expanding incentives for residential HVAC systems are critical to increasing participation from and providing direct benefits to underserved customers, especially those with lower incomes.
In order to moderate the price increase, we recommend delaying the revenue increase for these programs until April 1st, rather than January 1st when other utility rate increases are expected to go into effect—one of the coldest months of the year.	We agree that delaying rate impacts until after the heating season will alleviate impact on ratepayers, and we will work with utilities and the OPUC to delay the effective date of new utility tariffs for 2024 from January 1 to April 1, 2024.
CUB also suggests the ETO Board consider developing multi-year budgets in the future.	Next year, we'll transition to a new multiyear planning approach that enables Energy Trust to develop strategies, make investments and realize benefits over multiple years instead of the current one-year time frame.
The CPP and HB 2021 have increased avoided cost, and we need to invest in the ETO now to help meet those goals in a least cost, least risk manner.	Our draft 2024 budget reflects a more urgent need to accelerate energy efficiency than is currently reflected in open electric IRP dockets. Base efficiency levels in current IRPs reflect avoided cost values that many agree are out of date. We plan to work closely with our utility partners to update long-term planning for efficiency in 2024.
Excerpted Comments by Coalition of Communities of Color	Staff Responses
I am emailing to express our support for the ETO's 2024-2025 budget and its approach. The proposed budget recognizes the importance of energy efficiency, which is a critical strategy that has many environmental, health, and community benefits. Focusing on those experiencing energy burden ensures nobody gets left behind as our state transitions to cleaner energy. And ETO has a uniquely important role to play in this transition.	We appreciate your review and support of our budget. We agree that the actions we take now to invest in energy efficiency are a critical part of ensuring the health, safety and vitality of Oregonians, including those with high energy burdens, today and in the future.

Excerpted Comments by NW Energy Coalition (NVEC)	Staff Responses
I've noted that the passage of HB 2021 has put a focus on decarbonization and emissions reductions for the electric utilities that you work with. This new statutory requirement to drastically reduce emissions puts an emphasis on energy efficiency like never before. The scale and vision of the current proposed budget reflects that new focus and the need for increased energy efficiency to help utilities meet their new requirements.	We appreciate the support of our budget and the acknowledgement of the scale of investment needed to achieve energy efficiency acceleration and help utilities meet state targets.
Right now, we need both our electric utilities and our gas utilities to get as much as they can as soon as they can because the electric utilities' first statutory compliance benchmark is 2030, a mere 6+ years away and the gas utilities compliance requirements under the Climate Protection Program starts next year. Additionally, the electric utilities have a statutory obligation to acquire all cost-effective energy efficiency first. Those two realities support a "no regrets" approach to acquiring energy efficiency.	We agree with the urgency for action in meeting 2030 benchmarks.
Second, concerns have been expressed about the rate impact of the proposed budget. By my calculations, the impact would have as much as a 1.5% rate impact. Some of that increase is to build ETO capacity to achieve the needed energy efficiency levels. While impact on customers should always be kept at the forefront of any planning, it is also important to remember that those customers are not well-served if the capacity to acquire the cheapest non-emitting resource is not in place. It is necessary to invest now in ETO's capacity to acquire energy efficiency in order to reduce the long-term costs of having a less efficient energy system.	We are mindful of the potential rate impact that will result from our proposed budget and are also sensitive to the fact that it will be part of larger rate increases for some of our utility partners. We prepared our 2024 budget to increase capacity for energy efficiency delivery to all customers and recognize that this will require new approaches and relationships that may take time to fully mature. We agree that the cost of doing this work now will be far lower than operating later in a less efficient energy system.
NW Energy Coalition looks forward to continuing to be engaged in those discussions and to help achieve a budget that will enable Energy Trust to help the utilities meet the requirements that they have by law.	Thank you for your support. Energy Trust greatly appreciates the collaboration and partnership with NVEC.
Excerpted Comments by Oregon Department of Energy	Staff Responses
We support the continued development of Energy Trust's budget to meet the mission of helping customers and communities.	Thank you for your review and support of the budget.
While this represents a historic federal investment in energy efficiency, it is only a fraction of what will be needed to reach Oregon's clean energy goals. Continued investment in efficiency programs like the ones outlined in Energy Trust's 2024 budget will be essential in positioning our state to meet these goals and ensuring consumers, particularly those in low-income and historically marginalized communities, experience the benefits of a clean energy transition. Our state cannot achieve the	We appreciate your acknowledgement of the scale of the challenge in front of us and Energy Trust's role in meeting it. We agree that there is a need to reduce barriers to participation so that all customers can participate directly in programs.

<p>savings necessary to equitably meet our ambitious climate goals without broad participation by these communities in energy efficiency programs. We are highly supportive of Energy Trust’s commitment to investing in programs that overcome barriers and engage these communities</p>	
<p>As part of House Bill 3049, ODOE has been tasked with developing a “one-stop-shop” to simplify how Oregon consumers find which energy efficiency investments are available to them. The success of this model relies in part on a continued investment in efficiency incentives within our state as well as close collaboration with entities like Energy Trust who administer those incentives. ODOE is supportive of the investments made in Energy Trust’s 2024 draft budget and we see Energy Trust’s work as critical to making the “one-stop-shop” successful. We also recognize the need to ensure that the multitude of programs and delivery systems are well coordinated, efficiently administered, and don’t duplicate efforts. ODOE looks forward to continuing to work closely with Energy Trust on this effort.</p>	<p>Energy Trust is committed to working with ODOE to establish roles and coordinated processes that prioritize customer need and simplify their experience in accessing funding.</p>
<p>The up-front cost of this effort requires higher incentives to cover more or even all the costs of upgrades. We must develop new delivery strategies like partnerships with community-based organizations, community outreach, and more hands-on delivery models to serve these customers who may be reluctant to participate.</p>	<p>We agree that increased incentives are necessary, as are investments in market delivery infrastructure to deliver federal funds and Energy Trust incentives to customers we have previously underserved. That’s why our budget includes additional engagement and capacity building with community-based organizations who can deliver customers to communities.</p>
<p>Energy Trust has been a leader in building capacity to keep up with opportunities. Experience and labor shortages are issues for the energy efficiency industry, especially as new funding creates more opportunities. The challenge is not lack of funds, but rather how to distribute the new funding to individuals and communities. Energy Trust’s budget recognizes these challenges and allocates appropriate funding to help overcome these challenges</p>	<p>We appreciate the support for investments in growing and expanding the workforce of skilled contractors and others needed to install energy-efficient upgrades.</p>
<p style="text-align: center;">Excerpted Comments by Small Business Utility Advocates (SBUA)</p>	<p style="text-align: center;">Staff Responses</p>
<p>We remained concerned that small business customers of utilities, except multifamily dwellings, may not reap the benefits of their rate dollars paid to fund an Energy Trust where there is an increase of \$30 million and more in 2025. We recall that in 2022 Energy Trust missed performance measure targets for 3 out of 5 utilities and we would ask if the budget for 2024 directly addresses these shortcomings from 2022. We see them as only partly addressed.</p>	<p>Economic conditions such as labor turnover and shortages, rising costs of labor, increasing equipment price and long delivery times continue to present challenges for delivery of incentives to small businesses. However, the small business focused offers launched last year have continued to mature and expand participation by small business customers. In 2024, we will increase incentives and project caps that will benefit small businesses. We will also conduct focused research to help develop packages of measures</p>

	tailored to specific market segments, including small businesses.
We remind decision makers that this budget is proposed in a context of double digit utility rate increases, huge legislation like HB 3409 (2023), the 2021 bills including decarbonization mandate, and post-COVID-19 pandemic conditions of difficult supply chains, labor market, and high inflation. Small commercial customers generally all over the state are certainly traditionally under represented in utility proceedings, which includes the ETO dockets.	We are mindful of the potential rate impact that will result from our proposed budget and are also sensitive to the fact that it will be part of larger rate increases for some of our utility partners. We prepared our 2024 budget to increase capacity for energy efficiency delivery to all customers—with initiatives targeted specifically to small businesses—and recognize that this will require new approaches and relationships that may take time to fully mature.
Small business is not represented in the Conservation Advisory Committee, a key source of input on the Draft Energy Trust 2024 budget.	We thank you for this comment. We are exploring additional membership on Conservation Advisory Council to bring additional customer and community perspectives, including small businesses.
We understand and appreciate the focus on the residential customers especially in the environmental justice communities and those residential customers with historically underrepresented demographics such as those described as Black, Indigenous, and Peoples of Color (“BIPOC”). But we do not see that an easily available information metric is used to measure impact on small commercial customers including those who might be trade allies or other contractors with Energy Trust. See this state government page for example for an easily available data supported list of COBID certified businesses that are not included in the report: (link was not included)	Thank you for noting that the availability of data sources that include information on small businesses in Oregon. We are frequent consumers of this data both in our planning and evaluation of measure and program effectiveness. In addition, 2024 new activities include new qualitative research to identify opportunities for new measures or program strategies for small businesses as well as a study that will characterize diverse small businesses. These activities will further inform metrics used to measure our impact on small businesses in the state.
The ETO proposed significant increased staffing budget is a bit concerning and the Board questions on this were appreciated. We wonder with the moneys expected from the federal legislation and also the newer structure of the Energy Trust funding how the 4FTE going to equity metrics would be fair and reasonable for small commercial customers generally.	Small businesses, and diverse small businesses in particular, are identified in our Diversity Equity and Inclusion Plan as a priority customer segment. The four FTE devoted to community outreach and engagement will be critical to expanding reach deeper into small business customer segments to generate awareness and develop relationships that lead to projects. These positions will also coordinate with workforce entities to strengthen the trade worker pipeline for delivery to small businesses.
Not much money relatively speaking to existing buildings.	Existing Buildings expenditures total roughly one-third of the organization's budget and is the largest single program expenditure category.
Glad to learn about the increased Investments in community engagement and support such as the Working Together Grant.	We are excited to increase our investments and staffing resource for community engagement and maintain support for Working Together Grants. Though many of these tactics and activities are relatively new to the organization, they are critical

	in our efforts to expand services to underserved customers.
Regarding TRC and UTC cost effectiveness exceptions measures: PUC Order No. 94-590 re Total Resource Cost (TRC) test and Utility Cost Test (UCT) to determine if energy efficiency measures and programs are cost-effective and exceptions to that would be helpful to learn how many and what kinds of exceptions existed for small commercial that were not multifamily.	Please see the <i>Measure Cost-effectiveness Exceptions Status</i> memos in the draft and final proposed budgets.
Multi-year planning: It does make sense to have multiple year planning.	Thank you for your support for multiyear planning.
Please note that any time spend commenting either orally or in writing is uncompensated for many organizations and individuals. This time SBUA Oregon staff spends on these comments is valuable time spent to support obtaining fair and reasonable rates and terms of service for small commercial customers.	We greatly appreciate the time required and given by SBUA to comment on our budget and also your perspective on behalf of a critical customer segment.

Excerpted Comments from Individuals

Individual	Comment	Staff Responses
Alan Vovolka	Please adopt a budget that dramatically increases energy efficiency. You know the reasons to do and how important it is. Please take your leadership responsibilities seriously and take a long view on behalf of ourselves and our children.	We appreciate your review and support of our budget and agree that the actions we take now to invest in energy efficiency are a critical part of ensuring the health, safety and vitality of Oregonians today and in the future.
Alice Shapiro	I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the important goals of this budget. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.	We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.
Ana Molina, Oregon Just Transition Alliance	I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the important goals of this budget. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.	We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.
Anahí Segovia Rodriguez, Verde NW	I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the important goals of this budget.	We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring

	We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.	that our utility system can meet the needs of Oregonians today and in the future.
Andrea Axel, Spark Northwest	I am writing to express Spark Northwest's strong support for the process of developing the ETO 2024-2025 budget and the direction in which it is headed. Ramping up energy efficiency programs is critical to a just and equitable clean energy transition, and the proposed budget recognizes that importance. Increased investment in energy efficiency brings multiple benefits to Oregonians – it cuts GHG emissions, energy bills, and resource utilization, while also supporting meaningful and family-sustaining jobs throughout the Energy Trust's service territory.	We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.
Ann Littlewood	Please continue to support the ETO 2024-2025 budget in the direction it's headed. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.	We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.
Ann Turner	I am writing to support the ETO 2024-2025 budget process and its focus on the importance of energy efficiency. We must decrease our current use of energy in order to reduce greenhouse gas emissions as well as creating capacity for clean energy strategies like EV's. While EV's emit no GHG's, they do require electricity for charging, increasing the load on the utility system. Increasing energy efficiency is imperative.	We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.
Art Okada	I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction it's headed. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.	We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.
Bill Harris	We can afford to burn less fossil fuel if we can expand green electricity AND if we use the electricity efficiently. One side of the equation alone is not the program we need. Please plan a budget for the ETO which has a strong energy efficiency component.	We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of utility customers.

Brett Baylor	I wanted to let you know that I enthusiastically support your proposed 2024 through 2025 budget with its potential 30% increased efficiency goals. As we transition to a more electrified economy we'll require energy conservation to counter the growing demands on our existing grid while ramping up additional grid capability over the coming years. I appreciate your foresighted budget. This is something we need more of.	We appreciate your review and support of our budget and agree that increasing investment now in energy efficiency capacity will be critical to meeting increased demand on the grid.
Brian Romer	I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction its headed. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.	We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.
Brian Stewart, Electrify Now	Please support dramatic increases in energy efficiency measures with the ETO 2024-25 budget. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.	We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.
Brian Wenzl	I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction it's headed. Energy efficiency is the cheapest, most effective carbon reductive strategy there is. Investments there are the most important, urgent investments we can make.	We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of utility customers.
Candace Avalos, Verde NW	My name is Candace Avalos, Executive Director of Verde, and I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction its headed. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.	We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.
Carol Cherin	I support the efforts of Oregon Energy Trust to promote energy efficiency in its 2024-2025 budget proposal. Energy efficiency would reduce greenhouse gas emissions which may help our warming earth.	We appreciate your review and support of our budget and agree that the actions we take now to invest in energy efficiency are a critical part of ensuring the health, safety and vitality of Oregonians today and in the future.
Cheyenne Holliday, Verde NW	I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget	We appreciate your review and support of our budget and agree

	and the direction its headed. It's so important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.	that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.
Damon Motz-Storey, Sierra Club	I wanted to send a quick note supporting the process for developing Energy Trust of Oregon's 2024-2025 budget and the direction it is pointed towards. It is vitally important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce greenhouse gas emissions and to make room for other clean energy strategies like electric vehicles which will reduce emissions but could increase load demand. The Sierra Club's 73,000+ members in Oregon are united in supporting climate action and environmental justice at all levels, including through utilities and buildings.	We appreciate the Sierra Club's review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.
Darin Henry, Oregon Educators for Climate Education	As a steering committee member for Oregon Educators for Climate Education, OECE, I support your development of the ETO 2024-25 budget without compromises by industry lobbyists. Our students, our children, deserve our best efforts to stop climate change.	We appreciate your review and support of our budget and agree that the actions we take now to invest in energy efficiency are a critical part of ensuring the health, safety and vitality of Oregonians today and in the future.
David Parker	I support the process for developing the ETO 2024-2025 budget and the direction it's headed. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.	We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.
Dianne Ensign	I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction it's headed. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.	We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.
Dylan Plummer, Sierra Club	I am writing to voice my support for the proposed ETO 2024-2025 budget.	We appreciate your review and support of our budget and agree that the actions we take now to

	We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs and building electrification which will also reduce emissions but could increase load.	invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.
Elizabeth Olsen	I live in the Portland area and support the efforts of Oregon Energy Trust to promote energy efficiency in its 2024-2025 budget proposal. Energy efficiency would reduce greenhouse gas emissions and I am very concerned about climate change.	We appreciate your review and support of our budget and agree that the actions we take now to invest in energy efficiency are a critical part of ensuring the health, safety and vitality of Oregonians today and in the future.
Emily Polanshek	Please resist pressure from those who do support the need to act decisively in order to secure a viable future for our children and theirs! I am in favor of the ETO 2024-2025 budget and the direction it is headed. We must reduce current energy usage now, both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.	We appreciate your review and support of our budget and agree that the actions we take now to invest in energy efficiency are a critical part of ensuring the health, safety and vitality of Oregonians today and in the future.
Gail Cordell	I am very supportive of increasing access to more energy efficiencies. I hope you will continue to provide opportunities to do just that. We need to act quickly to maximize the effect of lowering our energy footprint in order to slow the pace of climate change.	We appreciate your review and support of our budget and agree that the actions we take now to invest in energy efficiency are a critical part of ensuring the health, safety and vitality of Oregonians today and in the future.
Gail Sabbadini	The gravity of the change is becoming more urgent. Please dramatically increase the budget for clean energy efficiency and dirty energy conservation now, not next time.	We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring the health, safety and vitality of Oregonians today and in the future.
Greg Norman	I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction its headed. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.	We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.
Hal Nelson	I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction its headed.	We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency

	We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.	are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.
James Metoyer III, EnterCity Collaborative	I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction it's headed. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load. I am currently an instructor and advocate of energy efficient techniques and practices for underserved communities. This work not only creates healthier communities but creates jobs in the process.	We appreciate your review and support of our budget. We agree and will be increasing our investment next year in workforce development in recognition of the value that new jobs in energy efficiency and renewable energy bring to communities.
Jeanette LeTourneux	I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction its headed. We need to reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.	We appreciate your review and support of our budget and agree that the actions we take now to invest in energy efficiency are a critical part of ensuring the health, safety and vitality of Oregonians today and in the future.
Joanne Delmonico	I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction its headed. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.	We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.
Joseph Stenger, MD	I am writing in support of the process for developing the ETO 2024-2025 budget and of the direction it is headed. At this time of cascading climate catastrophes, it's crucially important to gain more energy efficiency as fast as possible. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.	We appreciate your review and support of our budget and agree that the actions we take now to invest in energy efficiency are a critical part of ensuring the health, safety and vitality of Oregonians today and in the future.
Judy Arielle Fiestal	I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction its headed. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.	We appreciate your review and support of our budget and agree that the actions we take now to invest in energy efficiency are a critical part of ensuring the health, safety and vitality of Oregonians today and in the future.

<p>Karen Harrington, Climate Reality Project</p>	<p>I support the process for developing the ETO 2024-2025 budget and the direction it's headed. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.</p>	<p>We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.</p>
<p>KB Mercer, Traveling Lantern</p>	<p>I am a strong supporter of an energy efficiency focused budget for the ETO 2024-2025 budget. We need strong energy efficiency steps in Oregon and the proposed budget recognizes that need.</p>	<p>We appreciate your review and support of our budget and agree that the actions we take now to invest in energy efficiency are a critical part of ensuring the health, safety and vitality of Oregonians today and in the future.</p>
<p>Kelly Campbell, Columbia Riverkeeper</p>	<p>I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction it is headed. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load. I want to underscore that energy efficiency is also called out in the Columbia River Inter-Tribal Fish Comission's Energy Vision for the Columbia Basin so a focus on this in ETO's budget is in good alignment with this vision.</p>	<p>Thank you for your review and support of the budget. We agree that the actions we take now to invest in energy efficiency are a critical part of ensuring the health, safety and vitality of Oregonians today and in the future.</p>
<p>Laura Rogers</p>	<p>I wanted to send a quick note supporting the process for developing the proposed ETO 2024-2025 budget and the direction its headed. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies, like EVs, which will also reduce emissions but could increase load.</p>	<p>We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.</p>
<p>Lenny Dee, Onward Oregon</p>	<p>I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction its headed. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.</p>	<p>We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.</p>
<p>Leslee Lewis</p>	<p>I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction its headed. Now really IS the moment to be doing, literally, ALL we can. We need to be doing it AS FAST AS POSSIBLE. ALL OF US. We must reduce current</p>	<p>We appreciate your review and support of our budget and agree that the actions we take now to invest in energy efficiency are a critical part of ensuring the health, safety and vitality of</p>

	energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.	Oregonians today and in the future.
Linda Craig	I understand that you are considering a budget that will significantly increase energy efficiency. Please persevere in doing this. What we are seeing of climate change terrifies me, and we need all possible incentives to reduce energy use and carbon emissions ASAP.	We appreciate your review and support of our budget and agree that the actions we take now to invest in energy efficiency are a critical part of ensuring the health, safety and vitality of Oregonians today and in the future.
Linda Perrine, 350 Eugene	I am a strong supporter of an energy efficiency focused budget for the ETO 2024-2025 budget. We need strong energy efficiency steps in Oregon and the proposed budget recognizes that need. We must reduce current energy usage now, especially methane gas, to reduce GHG emissions and to enable EVs to be added without a net load increase on our electric utilities.	We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.
Lindsay McClure	I'm sending a quick note supporting the process for developing the ETO 2024-2025 budget and the direction it's headed. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.	We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.
Lisa Cohn	I support the process for developing the ETO 2024-2025 budget and the direction it is headed. We must reduce current energy usage now both to reduce greenhouse gas emissions and to make room for other clean energy strategies, including electric vehicles and other forms of electrification, which will cut emissions but could increase load.	We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.
Marian Dixon	I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction its headed. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.	We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.
Marilyn Feldhaus	I support ETO's move towards greater energy efficiency through its 2024-2025 budget proposals. Greater efficiency would reduce greenhouse gas emissions, which is needed if we want to do something positive about climate change. Please continue with the energy efficiency strategy!	We appreciate your review and support of our budget and agree that the actions we take now to invest in energy efficiency are a critical part of ensuring the health, safety and vitality of

		Oregonians today and in the future.
Mark Darienzo	I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction its headed. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.	We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.
Martha Dibblee	I support the efforts of Oregon Energy Trust to promote energy efficiency in its 2024-2025 budget proposal. Energy efficiency would reduce greenhouse gas emissions, about which I am very concerned about because of climate change.	We appreciate your review and support of our budget and agree that the actions we take now to invest in energy efficiency are a critical part of ensuring the health, safety and vitality of Oregonians today and in the future.
Meg Bowman	I write to express my support for the process for developing the ETO 2024-2025 budget and the direction its headed. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.	We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.
Michael Heumann	I am writing in strong support of the process for developing the ETO 2024-2025 budget and I endorse the direction in which ETO is headed. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.	We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.
Dr. Pat DeLaquil, Mobilizing Climate Action Together (MCAT) Steering Committee	Unfortunately, inflation persists, and as project costs increase, ETO incentives need to increase both to maintain an appropriate share of total project costs and to account for increases in the level of cost-effective efficiency measures to higher avoided cost estimates. The 2024 Energy Trust budget will help address market barriers to accelerating savings and maximizing impact of new funding opportunities. It will also help support workforce development and the expansion of contractors and community-based organizations as trade allies. Although the 2024 proposed revenue of \$277.0 million is up 33% from the 2023 budget, these increases are needed to increase incentives to account for inflation, develop new approaches and	We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our customers and trade allies are able to thrive now and in the future.

	<p>delivery strategies, and support market infrastructure development, including expanding the Trade Ally Network, workforce development and support for Community-based organizations</p> <p>I urge you to fully support the proposed budget.</p>	
Rand Schenck	<p>Please know that I fully support the process for developing the ETO 2024-2025 budget and the direction that this budget indicates you are headed.</p> <p>It is absolutely essential that we reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies. For instance, EVs will reduce emissions but could increase load.</p>	<p>We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.</p>
Robin Bloomgarden	<p>I want to offer my support for your process developing the ETO 24-24' budget, and the direction you are headed.</p> <p>We all know how important it is to build more energy efficiency as fast as we can, and your proposed budget seems to recognize that, reducing current energy usages across the board.</p>	<p>We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.</p>
Sasha Pollack	<p>I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction its headed.</p> <p>We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.</p>	<p>We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.</p>
Susan Heath	<p>Please support the process for developing the ETO 2024-2025 budget in the direction it's headed.</p> <p>We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.</p>	<p>We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.</p>

Taran Nadler	<p>I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction it's headed.</p> <p>We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.</p>	<p>We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet the needs of Oregonians today and in the future.</p>
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Excerpted Comments from Transcribed Comments at Board Meeting

Speaker	Comment	Staff Response
Greer Ryan, Climate Solutions	<p>What was most exciting to me was how much thought was put into filling some gaps that we currently have. Thinking about who Energy Trust is best equipped to reach through incentive programs. And the truth is for lower income, or even moderate-income households, it's really hard to afford big changes, especially when you have multiple changes needed at once for older housing, even with existing incentives. So ramping up the amount of money that can be provided to these households to make something like switching to a heat pump work for them is really, really critical.</p>	<p>We appreciate your support for increasing incentives for residential customers. Large upfront costs for upgrades can make projects unreachable for many households, especially those with high energy burden.</p>
Greer Ryan, Climate Solutions	<p>I'm just excited to see the thought that was put into this. I'm excited to see the additional support that this kind of money could bring to communities in Oregon, to set you all up for success to deliver this funding and to work with different agencies and different groups to get it out the door.</p>	<p>We agree that collaboration with state and local entities will be essential in ensuring that funds benefit those most in need, including those with low incomes, those in rural areas and those in communities of color.</p>
Greer Ryan, Climate Solutions	<p>I'm glad to see that [there is] an increase in funding to soften the workforce issues to support CBOs. All of that is exactly what we need right now. Energy Trust is one of the best places to be doing this work. And we're so grateful.</p>	<p>We agree that near-term investments are necessary to ensure that we are able to deliver programs and services at the scale needed in the coming years to support state and community energy goals.</p>
Jeff Bissonnette, NW Energy Coalition (NVEC)	<p>We see a time right now, where we cannot do business as usual. And this budget underscores that the ETO recognizes that. The Energy Trust has been monumentally successful over the past 20 years in acquiring more efficiency than anybody thought possible. The Energy Trust needs to step up again and do more than anybody</p>	<p>We appreciate your review and support of our budget and agree that the actions we take now to invest more in energy efficiency are a critical part of ensuring that our utility system can meet</p>

	thought possible/thinks possible, and this budget indicates that you're heading in that direction.	the needs of Oregonians today and in the future.
Tim Miller, Oregon Business for Climate	At a program implementation level, nobody, no organization, no entity is positioned like Energy Trust to help align these initiatives for a synergistic impact. And that synergistic impact is completely aligned with Energy Trust - the objectives of capturing cost-effective energy efficiency and renewable energy generation. If we can align these things effectively, everyone benefits, including Energy Trust and its goals. But it's going to take systems and management and capacity and other infrastructure to make this successful. We have to maximize benefits delivered to underserved communities by getting that synergy to be as effective as possible.	We appreciate your support for our budget investments to maximize the impact of significant, new complementary funding expected to enter the market in 2025 and beyond. Investments in 2024 will allow us to meet existing IRP savings targets, build the infrastructure to deliver accelerated savings and braid complimentary funding.
Tim Miller, Oregon Business for Climate	Oregon Businesses for Climate strongly supports Energy Trust making investments needed to serve in this critical role that only Energy Trust can play in, collaborating and aligning as no other entity in the state can, to make all this work happen as effectively as possible.	We appreciate Oregon Businesses for Climate's review and support of our budget.

Energy Trust is a nonprofit, nongovernmental entity with which the Commission has contracted for investment of the public purpose charge and the pursuit of cost-effective energy efficiency measures.

In December 2005, Energy Trust and the Commission executed the current grant agreement that guides Energy Trust operations. The contract details parties' obligations and describes methods for accountability and oversight, such as submitting an annual budget report to the Commission for review. Specifically, Section 3.a.ii of the grant agreement stipulates that Energy Trust will:

...[D]evelop an annual calendar budget on or before November 15 of each year and a final budget, approved by Energy Trust's board of directors, on or before December 31 of each year. The budget will include projected revenues to be received under this Agreement, other revenues to be received, and describe proposed expenditures in such a manner as may be requested by the PUC. The budget will also contain information that may permit the reader to evaluate the Energy Trust's total administrative costs and whether such costs may be considered reasonable, and provides a comparison of actual revenues and expenditures received through the first three full quarters and an estimation of projected expenditure for the remaining fourth quarter of the current year, as compared to the current year's budget.

Annually, the Commission reviews and comments on Energy Trust's budget and action plan to ensure that it presents a sound plan to achieve authorized objectives and keeps certain overhead costs below agreed upon thresholds.

Under 2021's House Bill (HB) 3141, the relevant sections of which became operative January 1, 2022, the legislature authorizes expenditures under the portion of the PPC administered by the nongovernmental entity to include the above-market costs of new renewable energy resources. The legislation also adds authorization for customer investments in distribution system-connected technologies that support reliability, resilience, and the integration of renewable energy resources with the distribution systems of electric companies. HB 3141 further amends ORS 757.054 to authorize the collection of charges from retail electric customers to fund the planning and pursuit of cost-effective energy efficiency measures and to allocate a portion of those funds to a nongovernmental entity, independent of the PPC. HB 3141 also requires Energy Trust to jointly develop utility specific budgets, action plans and agreements.¹

¹ OR Laws 2021 Ch. 547 Sec. 1, 3, 9, 25; See ORS 757.054, ORS 757.746.

Analysis

Background

Energy Trust proposes a total organizational budget of \$304.8 million in expenditures for 2024. The majority of funds (97.7 percent) is for activities overseen under the Oregon Public Utility Commission (OPUC) grant agreement and past orders to support energy efficiency and small-scale renewables.² The numbers presented in this memo refer to the OPUC portion of Energy Trust's budget, unless otherwise noted. These numbers come from Energy Trust's Draft 2024 Budget and are compared to Energy Trust's 2023 Budget.

The remaining 2.3 percent of Energy Trust's planned 2024 expenditures supports a separate range of contracts and activities. This includes contracts for the Oregon Community Solar Program, Northwest Natural in Washington, Portland General Electric's (PGE) Smart Grid Testbed, Oregon Department of Energy's Landlord Provided Cooling Spaces Grant, and other small grants. Energy Trust's development funds and funds for gas transportation customer programs active in 2024 are also included in this amount.

Energy Trust made its Draft Budget and Action Plan available to stakeholders and the public in a series of meetings and through the Energy Trust website. Energy Trust presented an overview of the 2024 Budget and Draft 2024-2025 Action Plan at a public workshop on October 11, 2023. On October 12, Energy Trust presented the highlights of the joint action plans to the Renewable, Conservation and Diversity Advisory Councils. Energy Trust posted the documents online at <http://www.energytrust.org> on October 4, 2023. A two week public comment period followed.

Under ORS 757.746(1)(e), which codifies HB 3141, Energy Trust must prepare utility-specific budgets and action plans jointly with the funding public utilities. The action plans must reflect stakeholder feedback gathered through a public process managed by the nongovernmental entity and the relevant public utility, as overseen by the Commission. Implementing the process framework developed with utilities in 2022, Energy Trust began in June with initial utility meetings to kick off the process leading to joint action plans. Energy Trust shared anticipated plans and listened to utilities' priorities and feedback. In July, Energy Trust first discussed anticipated plans for the 2024 budget to include significant increases to reflect an acceleration in energy efficiency. In early August, Energy Trust shared draft utility-specific action plans with utility funders and sought feedback. In early September, Energy Trust met with electric

² The OPUC Grant directs the administration of utility funding for energy efficiency and small-scale renewables.

and gas utilities prior to the completion of the draft organizational budget to discuss the year-end forecast and utility-specific budgets and funding models.

At a Special Public Meeting on November 2, 2023, Energy Trust will present its 2024 Budget and 2024-2025 Action Plan. Staff will also present its recommendations outlined in this memo. At that time the Commission will have the opportunity to hear from Energy Trust and stakeholders and to consider adoption of Staff’s comments and recommendations. Energy Trust will hold a final round of meetings with utilities in early November to finalize revenue requirements. The Energy Trust Board of Directors will receive a Final Proposed 2024 Budget and 2024-2025 Action Plan for approval at the December 15, 2023 Board Meeting.

Status of Prior Action Items from 2023 Budget

As part of the review of each Energy Trust annual budget, Staff makes suggested recommendations for Energy Trust to adopt over the course of the next year. The 2023 Budget contained specific action items to be conducted during 2023. Energy Trust has completed four of five recommendations, with progress ongoing for the remaining item. Staff discusses below how the progress and status of each action item:

Table 1: OPUC Recommendations for 2023

OPUC Recommendation	Status
1. Review new budget process and implement strategies to reduce labor for budget development. Report on changes in next draft budget.	Ongoing
2. Revenues to be collected from individual utilities in 2023 will be no less than what was collected in 2021.	Completed
3. In future budgets, publish draft joint utility action plans with the draft budget.	Completed
4. Work with utilities to identify and target customers that have difficulty paying their bills with tailored energy saving opportunities.	Partially Completed
5. Recalculate benefits of reduced arrearages with new utility data and apply to avoided costs.	Completed

1. Review new budget process and implement strategies to reduce labor for budget development. Report on changes in next draft budget.

Energy Trust has adequately documented changes made to the budgeting process including efficiencies from a redesign of the budget data structure. In consultation with Staff, Energy Trust removed several memos that were no longer adding value to the budget review process. This recommendation is marked as ongoing because Energy Trust continues to consider process improvements for 2024.

2. Revenues to be collected from individual utilities in 2023 will be no less than what was collected in 2021.

Energy Trust will collect more revenue from each of the five utilities in 2023 than it did in 2021. Staff discusses this in the section *Overview of 2024 Budget and Action Plans* and in Table 3.

3. In future budgets, publish draft joint utility action plans with the draft budget.

Energy Trust revised the schedule for budgeting in 2023 by publishing draft joint utility action plans in the summer. This enabled draft joint utility action plans to be published with the draft budget on October 4, 2023.

4. Work with utilities to identify and target customers that have difficulty paying their bills with tailored energy saving opportunities.

Energy Trust partially completed this recommendation. Energy Trust receives data from PacifiCorp and Avista. Energy Trust was not able to gather data from Cascade Natural Gas, Northwest Natural or PGE. Staff seeks to better understand how to facilitate the exchange of information and will follow up as part of the implementation of HB 2475 in Docket No. UM 2211. Part two of this recommendation was to develop tailored energy savings opportunities. While Energy Trust made progress in overall support for low-income customers in 2023, the organization did not yet develop tailored energy savings opportunities informed by utility data.

5. Recalculate benefits of reduced arrearages with new utility data and apply to avoided costs.

Energy Trust presented analysis to Staff and the Conservation Advisory Committee on impacts of reduced arrearages as non-energy benefits associated with avoided costs. Energy Trust recommended against including arrearage non-energy benefits due to resultant modest increases in overall avoided costs benefits, compared to much larger increases expected from other changes in 2024. Staff will continue to consider whether to include reduced arrearages when avoided costs are discussed again in 2024 in Docket No. UM 1893.

Overview of 2024 Budget and Action Plans

Energy Trust proposes \$297.7 million in expenditures in 2024 for OPUC grant activities, out of the \$304.8 million organizational budget. The OPUC grant portion is an increase of 35.5 percent from the 2023 budget. Over half of these expenditures (52 percent) is expected to be paid out as incentives. Energy Trust proposes to collect \$277.0 million in revenues, an increase of 26.8 percent from 2023. Table 2 details Energy Trust's entire organizational approved budgets for 2021 through 2023 and the draft 2024 budget.

Table 2: Budgeted Revenues and Expenses³

	2021 Amended	2022 Budget	2023 Budget	2024 Budget
Revenues	\$188,486,067	\$204,331,493	\$207,696,689	\$277,011,884
Expenditures	\$211,597,841	\$219,537,575	\$226,031,647	\$304,766,280
Incentives Portion of Expenditures	\$120,805,454	\$121,453,704	\$112,336,058	\$159,219,615

Energy Trust is approaching 2024 as a time to build infrastructure and capacity to meet the moment and accelerate energy efficiency acquisition. Since the last budget process, Oregon’s investor-owned utilities filed integrated resource plans detailing efforts to meet State decarbonization goals. Those plans made clear that energy efficiency and distributed renewables are an important part of equitably supplying Oregonians with reliable, least cost energy. Energy Trust designed this budget to invest in the market infrastructure to achieve deeper savings and to reach new customers.

Table 3: Revenue by Utility - OPUC Grant Funds

	2022 Budget	2023 Budget	2024 Budget
PGE	\$93,652,540	\$96,933,700	\$124,100,000
PacifiCorp	\$63,018,540	\$63,018,540	\$97,692,103
NW Natural	\$34,274,086	\$35,474,089	\$37,064,508
Cascade	\$3,867,475	\$3,267,473	\$3,220,276
Avista	\$4,943,292	\$2,503,292	\$5,163,292

In last year’s memo, Staff noted that Energy Trust intended to collect less revenue in 2023 than was collected in 2021 for PacifiCorp, Cascade Natural Gas, and Avista. Given the increasing need for Energy Trust to deliver energy efficiency for the State, Staff recommended Energy Trust collect no less than what was collected in 2021 for each utility and to find alternative uses for excess reserves in the interim.

In meeting Staff’s Recommendation No. 2 from the 2023 Budget, Energy Trust collected more revenue from all utilities in 2023 than in 2021. Staff notes that this resulted in all utility-specific reserve accounts remaining higher than targets. Staff continues to view these reserves as opportunities to invest in infrastructure to deliver future savings, while also providing the opportunity to mitigate near-term rate pressures. For 2024, Energy Trust proposes a budget where revenue collection represents only 90.9 percent of

³ Note: This chart does not show carryover reserves, which are used to mitigate risks, smooth out operations from year to year, and reduce rate impacts.

expenditures. In the short term, Staff views this as a positive factor due to expected near-term rate increases, some of which take effect January 1, 2024.

Joint Utility Action Plans

Based on Staff's Recommendation No. 3 on the 2023 Budget, Energy Trust revised the budgeting process and schedule to accommodate collaboration on 2024 utility-specific action plans in August and September. This collaboration allowed simultaneous publication of joint action plans and the 2024 Draft budget. Draft utility-specific action plans were filed with the draft budget materials on October 4, 2023 and reflect Energy Trust's active engagement of utility partners.

Despite this earlier coordination, utilities expressed surprise at the magnitude of budget numbers shared in September. During early summer coordination, Energy Trust provided utilities with high-level guidance on an expected expenditure increase. However, Staff heard from utilities that it was hard to provide feedback or input without having detailed utility-specific budgets to review. In September, once utilities received a draft budget for 2024, utilities escalated feedback with substantive questions and testing of budget assumptions. Staff appreciated the utilities' attention to detail and concern for ensuring ratepayer investments are worthwhile. Staff sees this as an area for improvement in the next budget cycle.

For this budget though, PGE and Pacific Power questioned how such an expenditure increase will impact ratepayer bills. Staff recognizes this concern and supports the Oregon Citizen's Utility Board (CUB) proposal to minimize the rate impact during the winter heating season by shifting the effective date of the revised Energy Trust tariff from January 1, 2024 to April 1, 2024.

With regards to 2024 savings acquisitions and costs, under Senate Bill 1547 (2016) and codified in ORS 757.054(3)(a), investor-owned utilities are required by law to acquire all cost-effective energy efficiency and demand response prior to acquiring new generating resources.⁴ Energy Trust created a cost-effective budget for 2024—even without updates to avoided costs which Staff and utilities have noted do not reflect recent emissions reduction programs. Additionally, Energy Trust and utilities must continue to acquire savings in 2025 and beyond to meet the state's GHG reduction goals. Given that energy efficiency programs take well over a year to establish and ramp up, Staff also sees the budget increase as an outgrowth of clear policy guidance and necessary investments for utilities to meet State equity and rapid decarbonization goals.

Based on stakeholder feedback during budget discussions, Staff would like Energy Trust to consider changes that reflect a delay to the effective date of new utility tariffs for

⁴ ORS 757.054(3)(a), https://oregon.public.law/statutes/ors_757.054.

2024 from January 1 to April 1, 2024. Utility bills in January and February are often the most expensive of the year due to heating needs. Staff supports CUB's recommendation and is pleased that Energy Trust plans to be flexible in its operations in order to accommodate this idea without impacting incentives or services.

While utilities expressed a shared vision of acceleration, they requested more detail to help contextualize the increase. Staff observed requests for more program level detail to understand the connection between cost increases and new savings. Utilities also inquired about the ability to see more than one budget scenario as the singular draft budget does not provide options. While Staff notes that the Energy Trust budgeting process is already complex and time-consuming, Staff would like Energy Trust to meet with utilities to explore whether or how Energy Trust may be able to include an alternate scenario in future budgets. Staff understands this may not be feasible or practicable given current systems and processes. Beyond that Staff also encourages Energy Trust and utilities to consider how to adopt a multi-year budgeting process that can remain flexible to changing resource needs.

Staff also heard competing visions of how the influx of complementary funding and programs for energy efficiency from local, state, and federal sources impacts Energy Trust's budget. To date, Staff has found Energy Trust to have been proactive about pursuing complementary funding and attempting to coordinate with other organizations. These sources include but are not limited to federal Inflation Reduction Act funding, Portland Clean Energy Community Benefits Fund, and Oregon's Climate Protection Program. PGE made comments, in its integrated resource plan and during budget conversations, that Energy Trust should wait to increase its budget until there is more clarity on these external funding mechanisms and detailed coordination between all key statewide parties.⁵

Staff sees the larger planning environment and the actions that Energy Trust is taking and draws a different conclusion than PGE. The successful rollout of complementary funding relies upon a robust and expanded energy efficiency market that does a better job alleviating energy burdens and focuses on efficiency first to meet decarbonization targets. Staff finds that Energy Trust's expanded programs and services serve to enable an expanded market infrastructure. This will not only help enable the success of Energy Trust programs in 2025 and beyond but have spillover to other organizations that are operating complementary programs. And given the known lag for efficiency programs, the investments should be made now to increase the capacity of contractors and

⁵ See Docket No. LC 80, *Portland General Electric Company's 2023 Clean Energy Plan and Integrated Resource Plan Reply to Round 1 Comments*, p. 27, (Sep. 6, 2023), <https://edocs.puc.state.or.us/efdocs/HAC/lc80hac131341.pdf>.

community-based organizations. Stakeholders have expressed support for the 2024 budget in achieving these outcomes in order to enable a more prolific future.

Further, Staff recommends Energy Trust use 2024 to characterize the various ways in which external funding will interact with ratepayer funds. Staff notes that there are funding examples that acquire efficiency that Energy Trust does not currently pursue, but may consider, complement, or enable in the future. From a utility planning perspective, new efficiency opportunities increase the conservation potential in ways not currently captured in utility planning, as a type of multiplier effect. The Inflation Reduction Act's Home Electrification and Appliance Rebates program is one example, where individuals will be incented to purchase efficient electric appliances. Energy Trust may consider supporting such programs to help ensure that more efficient electric options reduce load growth impacts. Similarly, Energy Trust's role could help quantify the value to gas utilities in understanding dual fuel contribution to Climate Protection Program compliance.

Where external funding may overlap with existing Energy Trust programs and measures, Staff agrees with the utilities and requests Energy Trust work with Stakeholders to review and evaluate whether Energy Trust provides enabling funding, complementary funding, or reduces spend on certain measures when external funds are used to acquire energy efficiency. Energy Trust's ongoing task is to understand how external funds change the cost-effective, achievable potential and adjust strategy to ensure the organization continues to acquire all cost-effective energy efficiency, even if the volume and cost is more than current forecasts. Utilities' task is to understand how energy efficiency acquired outside Energy Trust impacts the system.

Staff recommends Energy Trust plan to report regularly on external funding strategies. Energy Trust should monitor if external programs cause unexpected market changes such as requiring less ratepayer co-investment to achieve savings.

Energy Efficiency Savings

In 2024, Energy Trust predicts acquiring 48.71 aMW of electric savings and 6.75 million therms of gas savings. These savings are higher than Energy Trust's 2023 budget and second quarter 2023 forecast. These savings are also an increase from 2022.

Table 4: Energy Savings

	2022 Actual	2023 Budget	2023 Forecast	2024 Budget
Electric savings (aMW)	46.75	45.17	45.77	48.71
Gas savings (MMth)	5.94	6.05	5.35	6.75

The increase in 2024 electric savings compared to the 2023 budgeted savings is 7.8 percent higher for electric and 11.6 percent higher for gas. Staff notes that these increases are smaller in magnitude than the percentage increases for expenditures in 2024. This is due to a business model change in 2024 to (a) acquire more savings at higher cost, by increasing incentives and targeting new populations (discussed below), and (b) building the programmatic infrastructure for greater future savings.

Staff highlights two additional factors with 2024 savings: gas transport customer savings and electric lighting savings. In the Staff memo for the 2023 Energy Trust budget, Staff supported and encouraged gas utilities to leverage Energy Trust’s expertise and existing relationships with large commercial and industrial entities that are classified as gas transport customers. Avista and Northwest Natural started working with Energy Trust in 2023 to acquire energy efficiency savings for their gas transport customers. These savings are not reflected in the gas savings in Table 4 as they are not covered by the OPUC grant agreement. However, gas savings for transport customers help gas utilities comply with the Climate Protection Plan and reflect Energy Trust’s role in helping utilities meet decarbonization goals. Energy Trust’s budget includes 0.20 million therms of savings for gas transport customers in 2024, accelerating to 0.85 million therms in 2025.

In 2023, Oregon legislators passed HB 2531 which prohibits sales of fluorescent lighting products containing mercury. This law impacts Energy Trust because many lighting measures will be phased out as the prohibition takes effect in 2024. Looking ahead to 2025, Energy Trust predicts a 20 percent increase in non-lighting efficiency to compensate for forecasted savings reductions by the new lighting standards. Lighting is a prime example of how less expensive energy efficiency has been largely acquired, and Energy Trust must turn to more expensive measures. Staff highlights this to show that there is a significant increase in non-lighting efficiency that is masked by the decrease in claimable lighting savings.

Renewables Generation Acquisition

Energy Trust anticipates ongoing strong demand for small-scale solar with small amounts of other renewables. The anticipated decrease in renewable generation

supported by Energy Trust marks a continued shift away from market rate customers—due to ever decreasing distributed solar installation costs—and toward investments exclusively to support low- and moderate-income customers’ installations, which have lagged market rate customers.

Table 5: Generation Supported by Energy Trust

	2022 Budget	2023 Budget	2024 Budget
Solar (aMW)	3.98	5.36	4.09
Other Renewables (aMW)	0.11	0.07	0.07

HB 3141 also requires that Energy Trust spend 25 percent of renewables funds on activities, resources, and technologies that serve low and moderate-income customers. Energy Trust’s budget includes plans to meet this requirement and further expand access to these customers.⁶ As noted above, Energy Trust’s strategy in 2024 and beyond is the phase out of standard solar incentives for market-rate customers. Energy Trust found that market-rate incentives were no longer moving the market for customers who could afford solar, but that financing and upfront cost barriers remain for low- and moderate-income customers. Though Energy Trust will still support the entire market with upstream activities (e.g., operating a robust Trade Ally network), this continued shift will enable increased ability to invest in renewables for low- and moderate-income customers.

In 2024, Energy Trust expects 42 percent of OPUC renewables investments to serve low- and moderate-income customers by working with community-based organizations and developing low- and no-cost offers. OPUC equity metrics, which Staff discusses further in the section *Diversity, Equity, and Inclusion (DEI) Activities*, provide guidance for Energy Trust investments in solar plus storage activities in 2024. Energy Trust’s strategy is also consistent with HB 3141 by continuing development of incentives for distribution system-connected technologies, including batteries and smart inverters. These strategies help low- and moderate-income customers and environmental justice communities invest in technologies that support reliability, resilience, and the integration of renewable energy sources.

In the Renewables sector, Energy Trust is pursuing meaningful collaboration and coordination to bring additional resources to customers. As included in the memo *Budget Assumptions for Draft 2024 Budget and 2024-2025 Action Plan* Energy Trust identifies a significant strategic partnership with Oregon Department of Energy to pursue an Environmental Protection Agency “Solar for All” grant of \$139 million over

⁶ ORS 757.612(2)(f); *Energy Trust’s Draft 2024 Annual Budget and 2024-2025 Action Plans*, p.27.

five years with 78 percent of funding going to direct financial assistance for low- and moderate-income customers.⁷ Staff only highlights this singular example, though others are showcased in Energy Trust's budget.

Diversity, Equity, and Inclusion (DEI) Activities

Energy Trust established an internal initiative for diversity, equity, and inclusion which aims to increase participation among currently underrepresented participants. Energy Trust is making a deliberate effort to incorporate DEI principles across the organization and its activities. The 2024 draft budget includes an increased focus on DEI initiatives and includes insight into how Energy Trust will meet the four equity metrics under House Bill 3141 adopted in Order No. 23-082.⁸ These are listed below.

1. **Access to Support for Communities:** Increased support to nonprofit organizations with a purpose to serve environmental justice communities or to support nonprofit-led initiatives serving environmental justice communities. Increased support can be incentives, training, and funding for energy efficiency upgrades, solar, or solar-with-storage projects.
2. **Access to Information:** Increased funding to support targeted outreach to environmental justice communities, including funding for community ambassadors, education, and workshops.
3. **Energy Burden Reduction:** New and expanded low-cost and no-cost offers to reduce energy burden created and launched.
4. **Community Resilience:** Solar and solar-with-storage system projects supported for low and moderate-income residents in areas with limited infrastructure or high energy burden.

Energy Trust highlights \$13.3 million in investments for new delivery approaches in 2024 that will help to meet these equity performance metrics and accelerate overall savings. This investment is broken down into four parts highlighted below.

- **\$2.6 million to develop and expand the Trade Ally Network.** Energy Trust predicts that the pool of 1,000 active Trade allies must grow 30 to 60 percent to accelerate savings by 2030. This investment aims to increase access to contractors, but also improve the diversity of contractors. Staff notes that this investment will support the success of local, state, and federal programs and funding.

⁷ *Budget Assumptions for Draft 2024 Budget and 2024-2025 Action Plan*, p. 11, https://www.energytrust.org/wp-content/uploads/2023/10/Supporting-Memos_2024-2025.pdf.

⁸ Docket No. UM 1158, Order No. 23-082, *Energy Trust of Oregon, 2023 Performance Measure Recommendations*, (Mar. 10, 2023), <https://apps.puc.state.or.us/orders/2023ords/23-082.pdf>.

- **\$2.3 million for workforce development.** This investment aims to support the creation of workforce development training centers, clean energy education and pre-apprenticeship programs, and youth energy assessments.
- **\$5.0 million for partnerships with community-based organizations.** Staff notes the success to date that community-based organizations have shared their expertise and outreach to deliver energy savings and education to diverse communities. This year's investment marks an increase in the number and depth of partnerships.
- **\$3.4 million for community engagement and support.** This investment will bolster Energy Trust's outreach and programs teams to deepen relationships with communities including tribes, rural communities, and communities of color.

Addressing Energy Burden

As part of its DEI strategy, Energy Trust highlights a new focus on no-cost, whole home retrofit services. Staff notes that both Inflation Reduction Act and Portland Clean Energy Community Benefits Fund programs share goals of completing home retrofits for low- and moderate-income households that do not have the resources to pay for upgrades. External programs that overlap with existing Energy Trust offers illustrate an area for ongoing strategic thinking and planning.

The machinery of well-funded programs with specific goals will reach new customers and present an opportunity for Energy Trust to strategically close funding gaps where those external sources are more rigid. In such examples, Energy Trust could be a key partner in ensuring external programs are successful. Simultaneously, Energy Trust may have an opportunity to invest less money than would have been needed to implement the program alone. In the years ahead, Energy Trust will be presented with many non-traditional opportunities to collaborate, and Staff has confidence in Energy Trust finding the right balance of ratepayer investment to unlock previously inaccessible savings.

In the past, no-cost home retrofit services have been challenged by two issues. First, scrutiny on individual measures being cost-effective limits the impact for customers and for programs overall. Second, enabling repair or upgrade work precludes the ability to complete the energy efficiency work.

Consider wall insulation; it is an expensive measure that results in significant savings and customer benefits like comfort and resiliency against extreme events. Due to cost, it can often be excluded for not meeting cost-effectiveness criteria. Due to deferred maintenance, exterior siding or electrical repairs may be needed prior to insulation. When programs opt against such measures, it represents a lost opportunity. The program's investment in staffing, contractors, marketing, and outreach to identify the

customer and savings is lost. From a planning perspective, that potential remains in the stock and is the reason that Northwest Energy Efficiency Alliance’s Building Stock Assessments continue to show massive energy efficiency potential.

Staff is supportive of Energy Trust building the programming, staffing, and offers to support whole-home projects. It is unlikely that external funds and programs will support the entire project cost and it presents an opportunity for Energy Trust to acquire previously inaccessible savings. Staff views home retrofits as the greatest opportunity for delivering enduring reductions in energy burdens and could see Energy Trust’s efforts evolve into a dedicated, HB 2475 program, that complements other efforts across the state.

Delivery Costs

Overall, a comparison to the 2023 budget indicates electric savings expenditures will increase by 43.1 percent and natural gas expenditures will increase by 19.4 percent.

Table 6: Expenditures by Fuel

	2022 Actual	2023 Budget	2024 Budget
Electric costs	\$123,302,646	\$156,164,421	\$223,478,330
Gas costs	\$35,521,305	\$42,744,957	\$51,051,862

What is more indicative of costs is the average cost per therm and kWh. Levelized costs are the average dollars per unit saved amortized over the lifetime of the measures. In 2024, the estimated levelized cost for electric savings is expected to increase 32 percent compared to 2023 budget, and gas is expected to increase by 13 percent as demonstrated in Figure 1 and Figure 2 respectively.

Figure 1: Electric Levelized Costs⁹

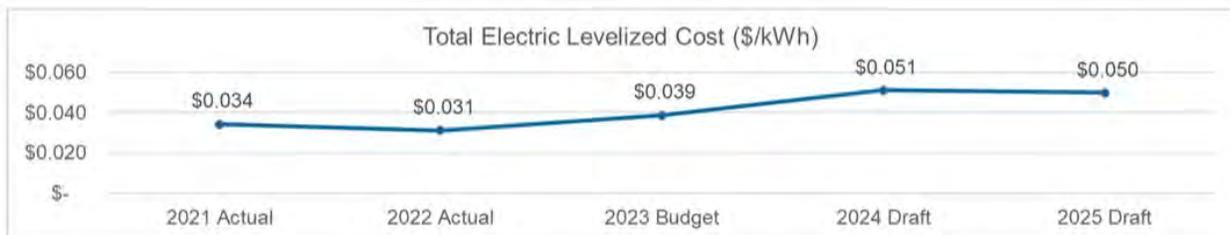


Figure 2: Gas Levelized Costs¹⁰



The increases in levelized cost are an expected result of investments Energy Trust plans for 2024 to build capacity and infrastructure for future years. Staff also highlights that Energy Trust has predicted increasing levelized costs for gas for several years. The distinct uptick in 2024 for both gas and electric levelized cost includes a reflection of increased spending to acquire harder or more expensive savings and savings for populations who may not have been reached via prior programming. As discussed above, HB 2531 is an example of how low-cost lighting efficiency will be captured by a sales prohibition and thus requires Energy Trust to turn to more expensive measures to increase savings.

Levelized costs remain an important indicator of performance, though Staff emphasizes that levelized costs do not reflect the value of efficiency for reducing coincident peak demand, greenhouse gas emissions, customer energy burdens, or avoiding localized system needs. By contrast, the process of setting avoided costs for energy efficiency in Docket No. UM 1893 attempts to account for factors including some of the benefit streams and avoided impacts cited above. Staff anticipates avoided costs to rise in the short term as utility costs rise and over the next few years as utilities plan necessary investments to meet the state's carbon reduction goals. As avoided costs rise, the value of energy efficiency increases, and investments should increase accordingly. Staff believes that Energy Trust investments combined with new external sources of programming and funding should result in higher than forecasted savings in 2025 and

⁹ Energy Trust's Draft 2024 Annual Budget and 2024-2025 Action Plan, p. 27, https://www.energytrust.org/wp-content/uploads/2023/10/Supporting-Memos_2024-2025.pdf.

¹⁰ Ibid, p. 27.

beyond. Those activities and Energy Trust’s experience in new markets should help reduce Energy Trust’s levelized cost for acquiring efficiency going forward.

Avoided Costs

Staff highlights that current avoided costs used by Energy Trust do not reflect energy efficiency’s value in the current policy environment given that electric and gas IRPs are calling for more energy efficiency than Energy Trust has identified as cost-effective in its IRP forecasts. Utility integrated resource plans revealed that the existing avoided costs calculated for use in Docket No. UM 1893 are not modernized to reflect Oregon’s decarbonization policies. Therefore, the cost-effectiveness of Energy Trust’s 2024 investments should be expected to increase once avoided costs are updated. Initial Energy Trust analysis found the values submitted by PacifiCorp in Docket No. LC 82 result in a 38 percent increase in avoided costs. Staff’s analysis of PGE’s avoided costs in Docket No. LC 80 found evidence of a minimum 60 percent increase in avoided costs.¹¹ Neither of these values should be interpreted as final but represent the expected order-of-magnitude avoided cost increase for electric utilities.

Staff appreciates Energy Trust’s scenario analysis to forecast the cost-effectiveness of 2024 programs with and without avoided cost increases, complementary funding, or development of HB 2475-type programs. Figure 3 shows that without some of those updates, the residential and existing building programs are borderline cost-effective. However, Energy Trust’s analysis also gave Staff confidence that updating avoided costs, leveraging complementary funding, and developing HB 2475 programs will improve the cost-effectiveness values.

Figure 3: Program and Portfolio View of Draft 2024 Cost-Effectiveness

2024 draft budget					2024 Program Forecast	
Program	Forecast UCT Test (ELE)	Forecast UCT Test (GAS)	Forecast TRC Test (ELE)	Forecast TRC Test (GAS)	Combined Fuel UCT	Combined Fuel TRC
Existing Buildings with MF	1.07	2.40	0.95	1.43	1.28	1.05
New Buildings	2.02	4.62			2.22	
Industry and Agriculture	1.84	2.60	2.30	3.34	1.93	2.38
Residential	0.86	2.61	0.93	2.54	1.42	1.43
Total Portfolio	1.31	2.61	1.36	2.16	1.55	1.53

¹¹ See Docket No. LC 80. *OPUC Staff Round 2 Comments and Recommendations*, p. 7, (Oct. 24, 2023), <https://edocs.puc.state.or.us/efdocs/HAC/lc80hac145648.pdf>.

Staff highlights that Energy Trust’s budget as proposed is cost-effective at the portfolio level from both the utility and participant perspective. Staff views this portfolio approach to be valuable because it enables a higher volume of savings to be achieved while making sure Energy Trust’s cumulative investments continue to have downward pressure on rates. The counterfactual circumstance, where less efficiency is pursued so that each individual measure or program is cost-effective, puts each utility in a more challenging compliance position for their respective decarbonization requirements. CUB has expressed support for a portfolio approach and Staff will continue exploring this issue with stakeholders in 2024.

Staffing Costs

Through 2022, Energy Trust experienced high turnover which resulted in 2023 budget impacts to address compensation structure and staff recruitment and retention. Although Energy Trust anticipates 2024 to accelerate in staffing investments, the organization noted 2023 successes in stabilizing staff turnover.

The proposed budget includes a 28.5 percent increase in staffing costs from 2023. Energy Trust cites three main priorities driving the increase: a) energy programs design and management to expand offerings; b) outreach and community engagement to reach new customers; and c) internal systems and support functions to support overall acceleration. OPUC Staff highlights that the proposed staffing increase in spending is lower than the overall growth rate of expenditures at 35.5 percent.

Table 7: Staffing Costs

	2022 Actual	2023 Budget	2024 Budget
Staffing Budget	\$16,926,312	\$20,058,105	\$25,778,033
Annual Change \$		\$3,131,793	\$5,719,928
Annual Change %		18.5%	28.5%

Energy Trust proposes to add 32 new full-time positions in 2024, most of which are intended to help Energy Trust acquire additional savings, particularly with historically underserved customers. New positions in community outreach and engagement indicate a shift toward high interaction and relational efforts to acquire energy efficiency. This intentional shift acknowledges that new methods are required to build networks to reach new customers and geographies.

In review of last year’s Energy Trust budget, the magnitude of staffing cost increases was a point of dialogue and negotiation between Energy Trust and utilities. The 2024 draft budget marks another significant increase and utilities again sought to understand the drivers and actions Energy Trust is taking to stabilize growth. While Staff

acknowledges the consistency in themes between the two years, Staff notes that the 2024 budget is launching from a place of stability without the staffing turmoil of 2022. Staff finds the new investments in staffing necessary to achieve savings targets and to test the ability to reach new customers.

When Energy Trust started planning for growth in 2022, the Commission approved a waiver of the staffing performance measure in Order No. 23-082.¹² This immediately removed a cap on year-over-year actual increases that was impeding Energy Trust investments in staffing. In 2024, Staff will update the Commission on Energy Trust performance in Docket No. UM 1158. At that time, Staff will likely support a waiver of the performance measure that limits to 10 percent year-over-year actual increases in staffing costs. With expenditures increasing 35.5 percent, Staff finds Energy Trust's proposed staffing increase of 28.5 percent to be reasonable. As Energy Trust begins to consider multiyear planning and budgeting, Staff encourages Energy Trust to continue reporting on staffing needs and performance.

Administrative Costs

Administrative costs fall under the following categories if such expenses are not billed to program delivery:

- Employee Salaries & Fringe Benefits
- Agency Contractor Services
- Planning and Evaluation Services
- Advertising and Marketing Services
- Other Professional Services
- Travel, Meetings, Trainings, & Conferences
- Dues, Licenses, and Fees
- Software and Hardware
- Depreciation & Amortization
- Office Rent and Equipment
- Materials Postage and Telephone
- Miscellaneous Expenses

Administrative costs are projected to increase to 8.5 percent of revenues in 2024. Energy Trust notes that current consideration of administrative costs includes program support costs, and—in the future—Energy Trust proposes to move to the Generally

¹² Docket No. UM 1158, Order No. 23-082, *Energy Trust of Oregon, 2023 Performance Measure Recommendations*, (Issued Mar. 10, 2023), <https://apps.puc.state.or.us/orders/2023ords/23-082.pdf>.

Accepted Accounting Principles (GAAP) definition of administrative costs. Staff will consider this change in Docket No. UM 1158.

Table 8 reflects how the Commission currently evaluates Energy Trust’s program delivery efficiency by comparing administrative costs to revenues. The performance measure states that administrative costs must be below eight percent of annual revenues and limited to 10 percent year-over-year actual increase. Staff notes that the Commission temporarily waived the administrative cost performance measure for 2023 due to administrative costs incurred to stabilize the workforce and provide flexibility for pursuing increased energy efficiency acquisition. In recommending a waiver, Staff wrote, “The administrative cost performance measure should not be a deterrent to Energy Trust adapting to serve customer needs at a time when the value of energy efficiency is increasing.”¹³

Table 8: Administrative Costs

	2022 Actual	2023 Budget	2024 Budget
Administrative Costs	\$14,083,859	\$17,816,885	\$22,803,607
Revenues	\$202,296,131	\$209,847,143	\$267,240,179
Percent of Revenues	7.0%	8.5%	8.5%

In 2024, Staff will likely support a waiver of the administrative cost performance measure. With Energy Trust’s overall expenditure increase of 35.5 percent, Staff expects administrative costs to increase more than 10 percent. Absent a waiver, Energy Trust’s performance metric for administrative cost as a percentage of revenue is eight percent. Staff supports the 30 percent administrative cost increase proposed by Energy Trust for 2024 but will work with stakeholders and Energy Trust early in next year’s budget process to limit year-over-year administrative costs growth.

In this year’s budget, Energy Trust proposes to change how administrative cost performance is evaluated. The historical comparison to revenues can mask that Energy Trust varies how much is requested of utilities based upon the size of each utility’s reserve account. Instead, Energy Trust proposes evaluating administrative cost performance against expenditures. Energy Trust notes that administrative expense as a percent of total cost is a common way in which non-profits are evaluated and allows Energy Trust to be benchmarked against peers. Staff supports this change and will address the topic in Docket No. UM 1158 in 2024.

¹³ Order No. 23-082, p. 10.

Formal Utility Feedback

In addition to feedback discussed in the section *Joint Utility Action Plans*, Energy Trust received formal, written feedback from PGE and PacifiCorp and shared it with Staff. Both utilities acknowledged the importance of Energy Trust in the new planning environment and noted internal utility goals to acquire energy efficiency to meet decarbonization requirements. However as discussed earlier, both shared the concern of overall budget increases, sought additional information, and proposed changes to Energy Trust's usual process.

PGE Comments

PGE provided a thorough response to Energy Trust's budget in a short amount of time.¹⁴ PGE made the following list of observations and/or requests:

- Reduce the spend on capacity building activities including community-based organization capacity and expanding trade ally network due to potential duplication of efforts with other organizations.
- Improve the visibility into savings from investments in 3rd party (e.g., trade ally, community-based organization) capacity.
- Remove all the new, no-cost measures from the budget and refrain from doubling residential HVAC incentives in 2024.
- Withhold \$20 to \$25 million from PGE's program reserves in the 2024 budget to use in 2025, so that the two entities may co-deploy flexible load and energy efficiency while leveraging external funding.
- Attribute proportional savings to Energy Trust and PGE from future programs and funds administered by other entities that Energy Trust supports with the 2024 infrastructure investments. Make budget approval conditional on this requirement.
- Collaborate for co-deployment of energy burden programs with HB 2475 in Docket No. UM 2211 and for co-deployment of flexible load measures with PGE's Flexible Load Plan, Docket No. UM 2141.
- Implement an "outcomes-based approach" for Energy Trust accountability in determining effectiveness of acceleration activities.
- Revise PGE's utility-specific action plan to include PGE's suggestions, some of which are included in this list.

¹⁴ All public comments will be included in the 2024-2025 final proposed budget, posted on Energy Trust's website on December 8, 2023. <https://www.energytrust.org/about/our-impact/budget-action-plan/>.

PacifiCorp Comments

PacifiCorp also provided a thorough response to Energy Trust's budget during the open comment period.¹⁵ PacifiCorp made the following requests:

- Clarify the connection between increased costs with specific savings and establish which investments do not lead to near-term savings.
- Propose alternative scenarios beside the single draft budget to evaluate methods for spreading out rate impact and to consider external funding.
- Detail ways PacifiCorp can best partner with Energy Trust to further shared goals in the budget, specifically community engagement, workforce development, peak reduction and supporting the grid.
- Delay the funding changes until sometime after the first quarter of 2024.

Staff Response

Staff was aware of the themes presented by both companies prior to reviewing the formal letters and appreciates the companies' diligent review of the Energy Trust draft budget. The significant budget increase deserves the scrutiny applied by both utilities and Staff recognizes the request to understand why costs increase without a commensurate savings increase. Staff finds that the answer is in the budget; upcoming energy efficiency opportunities are more expensive than the past. Considering the utilities' request, Staff encourages Energy Trust to keep making explicit connections between increased cost and savings, especially in 2025 and 2026 once new programs and infrastructure are in place.

While the budget is complex, there are many examples of specific programs and investments that Energy Trust makes in 2024. The \$13.3 million highlighted in the *Diversity, Equity, and Inclusion Activities* section is an example of these. Staff supports these investments with the expectation that they will lead to future savings beyond what was included in the forecasts for the next two years. Many of the external funding sources have long timelines, so this scale up will serve beyond 2024.

Ultimately, for 2024, Energy Trust did produce a cost-effective budget that manages to increase savings despite lighting standards removing significant savings from Energy Trust's books. As PGE highlighted in published comments, ORS 757.054 directs utilities to "plan for and pursue all available energy efficiency resources that are cost-effective, reliable, and feasible".¹⁶ Energy Trust's 2024 draft budget meets this requirement.

¹⁵ All public comments will be included in the 2024-2025 final proposed budget, posted on Energy Trust's website on December 8, 2023. <https://www.energytrust.org/about/our-impact/budget-action-plan/>.

¹⁶ ORS 757.054(3)(a)

Staff does not support PGE's proposal to withhold reserves because the benefits of doing so are unclear and Energy Trust's budget includes important 2024 investments. With regards to not deploying no-cost measures or expand residential HVAC incentives, Staff is surprised at PGE's position given how these programs form a keystone component of Energy Trust's strategy to use ratepayer resources more equitably. Further, encouraging more efficient heat pumps and no-cost measures like weatherization have important contributions to reducing peak load and are enablers of more effective flexible loads. By contrast, PacifiCorp requested additional focus on measures that save more during summer and winter peaks. Staff sees the future, external incentives that PGE cites as helpful, but insufficient alone for addressing the State's cumulative energy, equity, and decarbonization needs. Thus, Staff supports Energy Trust building the capacity to deliver these measures starting in 2024.

Staff agrees with PGE that Docket No. UM 2211, regarding the implementation of HB 2475, is the right venue for Energy Trust to address programs which reduce energy burdens. Staff includes a recommendation to Energy Trust to collaborate with utilities and Staff on the development of HB 2475 programs in. In addition, Energy Trust should participate in Docket No. UM 2211 activities and continue to collaborate with other entities like Oregon Department of Energy, Oregon Housing and Community Services and Portland Clean Energy Community Benefits Fund to avoid duplication of efforts and maximize leveraging of funding and expertise.

Staff hears the request from both PGE and PacifiCorp to incorporate more scenario analysis into the budgeting process. Staff recommends coordination between utilities and Energy Trust in the 2025 budget process to determine whether and what may be included.

Staff acknowledges that both PGE and PacifiCorp expressed interest in delaying customer revenue increases from the usual effective date of January 1. This aligns with CUB's request for an April 1 effective date to avoid further rate increases in the heating season. Staff supports an April 1 effective date due to this year's rate cases for certain utilities causing separate January 1 rate increases. However, Staff objects to later increases as compressing the change into fewer than nine months would apply additional unnecessary pressure on rates. Staff sees no reason for a potential delay in 2024 revenue changes to reoccur in 2025 and recommends utilities plan for a January 1 effective date in future years.

Staff Recommendations

- **Recommendation 1:** Document and report regularly on development activities related to large sources of non-ratepayer funding and characterize how existing programs and ratepayer funds interact.
- **Recommendation 2:** In response to utility feedback, develop guiding principles for considering rate pressure when coordinating management of external funding and report those prior to 2025 budget planning.
- **Recommendation 3:** With external funds driving new efficiency, consider dual fuel and electrification measures that can unlock additional efficiency, and which can be considered in the next round of utility integrated resource planning.
- **Recommendation 4:** Work with utilities and Staff to modernize avoided cost calculation methods to consider Oregon's decarbonization policy goals.
- **Recommendation 5:** Work with utilities and Staff to develop HB 2475 programs prior to 2025 budget planning. This should include developing targeted efforts to reduce energy burden based on utility data.

Conclusion

Acceleration is the underlying theme of Energy Trust's 2024 draft budget, punctuated by the overall increased investments in new delivery efforts. The need for acceleration is written across integrated resource plans developed to meet Oregon's new decarbonization policies for the first time. Staff is supportive of Energy Trust's 2024 draft budget which invests in building capacity and infrastructure to deliver an acceleration in energy efficiency. Staff appreciates the responsiveness of Energy Trust to utility and stakeholder feedback. The planning environment has changed and the 2024 budget was challenging to develop due to ongoing integrated resource planning discussions and a lag in updated avoided costs. Despite these challenges, Energy Trust prepared a cost-effective budget for 2024 that starts preparing the organization and the five utilities it serves to take advantage of the historic funding and incentives for efficiency and decarbonization available in the years ahead. Staff has several recommendations for Energy Trust to be intentional and proactive with new opportunities and to continue improving planning with utilities and stakeholders.

PROPOSED COMMISSION MOTION:

Adopt Staff's comments and recommendations on the Draft 2023 Budget and Draft 2023-2024 Action Plan for Energy Trust of Oregon



Portland General Electric
121 SW Salmon Street • Portland, OR 97204
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October 18, 2023

Energy Trust of Oregon
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Suite 300
Portland, OR 97204

Re: **Draft 2024/2025 Budget and Action Plans**

Executive Summary

Energy efficiency (EE) features prominently in PGE's Integrated Resource Plan (IRP) and Clean Energy Plan (CEP), filed in docket LC 80 earlier this year, as a valuable resource for achieving emissions targets. PGE acknowledges Energy Trust of Oregon's (ETO) role as statewide administrator, its two decades of experience designing, braiding, and tracking incentives as well as delivering a high savings realization rate via its implementers and trade ally network. PGE sees this role as important to ensuring streamlined delivery of local, state, federal and PGE ratepayer funded incentives and services. Given the magnitude of funding anticipated in Oregon and in our service territory, PGE also appreciates the role other agencies will play in efficiently deploying these dollars and supporting workforce development and community capacity building. We also recognize that there is a great deal of uncertainty with respect to the timing and multi-agency coordination required to deploy these dollars, especially given the intended benefits to be realized by our environmental justice communities inclusive of lower income customers.

PGE seeks a holistic, compassionate, and prudent approach to energy efficiency procurement and appreciates the efforts of ETO staff to approach the formulation of the 2024/2025 budget in the same way, despite considerable uncertainty. The budget as currently proposed provides a 13% increase in savings relative to 2023, however, forecasts flat energy savings for customers in 2024 and 2025, despite additional rate impacts. PGE offers the following observations and alternatives to the proposed 2024/2025 budget and action plans and looks forward to integrating this feedback into the upcoming funding conversation in early November.

- PGE recognizes the need for investment in program delivery to support community-based organization (CBO) capacity, trade ally expansion, and to aid in accelerating and enabling other sources of funding, but remains concerned about the size of the investment proposed for 2024/2025, given uncertainty over the potential future applicability of federal, state, or local funding to support capacity expansion efforts; and the lack of visibility into additional energy savings from the proposed investments in capacity.

- PGE does not see it as a prudent investment of ratepayer dollars to expand and deploy in 2024 no-cost measures beyond those with prior year measure exceptions, nor does PGE see it as prudent to double residential HVAC incentives, for end-uses that will realize sizeable taxpayer-funded rebates in 2025.
- Given the 37% and 47% increase in expenditures relative to the 2023 budget, in 2024 and 2025 budgets respectively, PGE favors withholding \$20-25 million in program reserves “to mitigate risks, smooth out operations from year to year and reduce rate impacts.”¹ PGE views this as prudent given the market uncertainty and opportunity to partner with ETO to implement a utility specific action plan that realizes operational efficiencies, takes a holistic and outcomes-based approach and serves to maximize the benefits for our shared customers.
- PGE favors approval of a one-year budget, for 2024 only, and views it as prudent to withhold reserves and not deploy the no-cost measures. Instead, maintaining the program reserve balance will afford ETO and PGE the flexibility to deploy ratepayer dollars that amplify taxpayer dollars in 2025 and further define:
 - Proportional savings attribution of incentives from other funding sources for which PGE ratepayers will support program delivery infrastructure. In the established ETO and PGE co-funding model both contribute to savings realized, kWh and kw, and both contribute to the cost to deliver. However, co-funding with IRA, for example, requires PGE to invest in ETO delivery to realize more kWh. PGE looks forward to participating in a multi-agency coordination meeting to arrive at an approach.
 - Co-deployment of EE and flex load or electric rates via key design element guidance in existing docket UM 2211 (Implementation of House Bill (HB) 2475), and applicable to UM 2141 (PGE Flexible Load Plan), such that the cost to deliver demand-side resources may be mitigated and customer participation outcomes specified.

Introduction

PGE’s most recent IRP Action Plan includes ETO’s forecast of all cost-effective energy efficiency, based on 2019 avoided cost inputs, 150Mwa cumulative 2024-2028. This is the quantity of energy efficiency PGE anticipated seeing in ETO’s proposed 2024/25 budget. Instead, ETO presented PGE with a proposed 2024/2025 budget predicated on ETO delivering some portion of ~50Mwa of additional energy efficiency by 2030 that was not included in the Action Plan. However, PGE acknowledges the difference in procurement timelines and looks forward to engaging ETO in conversations around multi-year planning as a result. As such, these comments are intended to clarify PGE’s staunch support for energy efficiency and outline the long-term partnership approach it seeks to take with the ETO to deliver energy efficiency and renewable energy to its shared customers.

Statutory Guidance

Historically, PGE has procured all cost-effective energy efficiency through partnership with the ETO, primarily funded through the public purpose charge. Beginning in 2023, all cost-

¹ Staff Report. ENERGY TRUST OF OREGON: Presentation of 2023 Draft Budget and 2023-24 Action Plan. Special Public Meeting (November 2, 2022)

effective energy efficiency procurement funding is recovered through customer rates. In 2023, PGE collected \$87 million from customers for energy efficiency procurement. That value is included in the general rate case (GRC) for 2024. If PGE were to approve the now updated 2024 program year in the 2024/2025 budget the energy efficiency expenditure increases to \$130 million.

Energy efficiency (EE) and demand response (DR) are two sides of the same coin and PGE grounds its demand-side investment decisions in the criteria as defined by statute. Per ORS 757.054, related to, cost-effective energy efficiency resources and demand response resources, states "The Legislative Assembly finds and declares that: (a) Energy efficiency programs promote lower energy bills... Demand response resources result in more efficient use of existing resources and reduce the need for procuring new power generating resources, which, in turn, reduces energy bills." And continues, "Each electric company serving customers in this state shall: (a) Plan for and pursue all available energy efficiency resources that are **cost-effective, reliable and feasible**; and (b) As directed by the Public Utility Commission by rule or order, plan for and pursue the acquisition of available cost-effective demand response resources."

Cost-effective

The proposed 2024/2025 budget and associated action plans are not cost-effective at the program level. Per the ETO 202_Budget Assumptions memo "Energy Trust used current avoided costs to develop our 2024 budget, which are acknowledged to be out of date. Even with these current avoided costs, Energy Trust's budget is cost-effective at the portfolio level and for all programs except for Residential and Existing Buildings." To evaluate these programs differently represents a deviation from standard practice without formal guidance from the OPUC. PGE does not favor such a deviation, nor does it desire to see such an approach take precedent, however, PGE also recognizes the regulatory lag that exists between IRP/CEP (LC 80) and the Avoided Cost (UM 1893) dockets. PGE is committed to advancing its decarbonization goals and concedes that this criterion will not be met in this budget cycle.

Reliable

As provided in the IRP/CEP filing, ETO has a high historical savings realization rate. The five-year average (2018-2022) is 96.8%. PGE is therefore confident in ETO's ability to deliver savings to our shared customers.

Feasible

Lastly is the determination of whether this action plan can be implemented practically and with ease. PGE appreciates ETO's coordination with the Oregon Department of Energy (ODOE), Portland Clean Energy Community Benefits Fund (PCEF) and Department of Environmental Quality (DEQ) regarding its Climate Protection Program as well as its Community Climate Investment entity, Seeding Justice. PGE also understands that these conversations are evolving, that these agencies, given the complexity and magnitude of the funding, are at various levels of readiness and that the timing of these local, state, and federal

incentives and grants is likely 2025. Table 1 attempts to illustrate the number of agencies and associated funding by category. PGE understands that ETO will enter into a memorandum of understanding with PCEF to establish co-funding and division of labor protocols², streamlined applications and workforce development coordination. However, given the overlapping roles of these agencies and the uncertainty around deployment PGE is cautious to commit ratepayer dollars prematurely. As a result, PGE favors approval of a one-year budget for 2024 and will reflect this in its Funding Agreement.

In 2024, while PGE appreciates the need for ETO to build the program delivery infrastructure required to braid and deliver these dollars the cost of the investment is sizeable. The proposed 2024/2025 budget includes an ETO revenue adjustment of \$25M and approximately \$20M in program reserves. As provided in the ETO 203_Investments memo, \$13M of this additional spend, in total from all utility funders, but for which PGE assumes the greater share, includes an expansion of its trade ally network, community capacity building and engagement and workforce development. The balance of the increase takes the form primarily of no-cost program delivery pilots (PDP), no-cost whole-home retrofit, a doubling of residential/multi-family HVAC incentives and an increase in staffing. PGE does not see it as prudent to double HVAC incentives nor provide no-cost whole-home retrofits in 2024 if HVAC rebates and whole-home retrofit rebates will be available in 2025.³ For awareness, for single family homes and multifamily buildings, the Inflation Reduction Act (IRA) includes three major provisions: (1) tax credits up to 30% of the cost of specified high-efficiency equipment, insulation, and other measures; (2) Home Efficiency Rebates (HOMES) of \$2,000–8,000 per home or apartment varying with energy savings and household income level; and (3) Home Electrification Rebates (HEERA) of up to \$14,000 per home or apartment depending on the measures that are implemented and household income.

Additionally, while PGE appreciates ETO's support of workforce development and pre-apprenticeship via funding for the National Association of Minority Contractors (NAMC), Earth Advantage, Oregon Solar Energy Education Fund, Constructing Hope and Oregon Tradeswomen, it also acknowledges the need for statewide approaches to scale to meet the trades shortage. The need to significantly grow the workforce across the state in a short amount of time will require an all-hands-on-deck approach that is coordinated across the state. This need to scale quickly was one of the significant drivers for the creation of the Oregon Clean Energy Workforce Coalition (OCEWC) that PGE convened in 2022, of which ETO is an important participant. PGE is encouraged that there are millions of dollars being allocated to support these workforce efforts including \$9 million to ODOE through federal and state dollars, \$36 million for the PCEF, and anticipated funding for the OCEWC. PGE anticipates additional funding opportunities will be available over the next several years and favors a clearer articulation of ETO's role in this domain.

Strategies to Manage the Rate Impact

² Up to 30-50% of PCEF project funding can be used for health, safety, accessibility, or enabling repairs (aka. deferred maintenance) and serve to complement other funding sources like ETO incentives and state or federal dollars.

³ Inflation Reduction Act, HOMES/HEERA

The proposed 2024/2025 budget provides flat savings in the associated program years despite the dramatic increase in investment. Such an increase represents a leveled cost of energy (LCOE) of \$0.049 kWh in 2024, a doubling since 2018 and a 1-1.5% rate impact annually. This rate impact is in addition to the double-digit impact of other PGE investments in distribution and electrification infrastructure required to meet decarbonization goals. As a point of fact, the proposed 2024 budget exceeds the amount of PGE's multi-year flexible load plan, transportation electrification plan and annual income qualified bill discount expenditures combined.

While PGE recognizes that ETO will need to invest in capacity expansion to ready itself to deploy future funding for energy efficiency and reach historically harder to serve communities, it is unclear whether this investment will stabilize given the proposed budget represents only some portion of ~50MWa of additional energy efficiency potential by 2030. Program delivery expenditures (inclusive of program management, staffing, implementation (PDC/PMC), agency contractor services and other outsourced services) as a percentage of total expenditures peaked in 2023 at 47%. It is also unclear how ETO plans to utilize the additional federal, state, and local resources coming online to support its capacity expansion.

It is incumbent upon us to identify and pursue strategies for mitigating the rate impact of this investment. Below are several strategies that PGE requests be employed in preparation for the 2025/2026 budget.

- Braid local, state, and federal dollars to amplify participation and customer savings.
- Begin EE revenue collections in Spring 2024 and pro-rate for the balance of the year. This serves to delay, not mitigate, but may temporarily alleviate customer impact.
- Increase investment in lower cost market transformation via the Northwest Energy Efficiency Alliance (NEEA).
- Co-deploy programs via existing dockets as the appropriate venue for development and delivery of energy efficiency and both firm (e.g., thermostats) and non-firm (e.g., electric rates) demand response, for the benefit of our shared customers.
 - UM 2211, born out of HB 2475, serves to inform the key design elements for bundling these resources for our low-income customers. UM 2211 key design elements treat holistically the level of relief, tracking and accounting, bundling, outreach, engagement, and marketing of EE and income-qualified bill discount (IQBD). This docket is the appropriate venue for defining a holistic approach to alleviating energy burden in PGE's service territory.
 - UM 2141 serves as an opportunity to approach EE and DR holistically, to realize operational efficiencies, reduce cost to deliver and maximize value for customers.

Also given the dramatic increase in investment in program delivery infrastructure, to enable deployment of local, state, and federal funding, PGE sees it as imperative that proportional savings attribution be included. That is, if PGE ratepayers will fund the delivery infrastructure for Oregon's allocation of federal and state dollars in its service territory, then the savings realized from other sources of funding should be attributed to its customers via ETO. PGE

favors making approval of the 2024/2025 budget conditional upon this requirement.⁴⁵ In general, in order to roll out integrated programs quickly and as effectively as possible, simple procedures should be developed such as evaluating overlapping ETO and state programs as an integrated package and not separately, and agreeing upfront that ETO will receive credit for “x%” of the savings, A common approach for allocating credit for savings is to base savings allocations on relative expenditures by different program implementers.⁶ ETO already tracks both utility and other incentives in the Program Participant Information (PPI) provided to utility partners so including new sources of funding is a logical next step and action that should be deemed within its scope and capability.

Outcomes-Based Approach

PGE appreciates ETO’s responsiveness to feedback and the constructive dialogue in recent work sessions. PGE also appreciates the high-level goals put forth by ETO, however, the action plans represent a list of activities by sector and do not provide specific outcomes associated with those activities. Specific outcomes ground the collaboration and provide directional guidance to our respective staff. PGE looks forward to defining shared objectives and outcomes with ETO in the utility specific action planning process as well as sees an opportunity for a holistic approach to determining which investments serve the equity and decarbonization twin mandate and realize the greatest benefit for our shared customers. Table 2 serves to illustrate an outcomes-based approach.

PGE acknowledges the need to build the capacity of community-based organizations (CBO) as a trusted delivery partner to engage our hard-to-reach customers. This investment is necessary and it is also supported by sizeable IRA and Infrastructure Investment and Jobs Act (IIJA) federal dollars and PCEF grants. PGE’s investment in ETO’s capacity building efforts is made in addition to other utility investments such as the 20-30% bill discount afforded PGE’s IQBD customers. PGE sees it as beneficial to view these investments holistically (e.g., HB 2475/ UM 2211) and evaluate their effectiveness via defined outcomes.

The ETO equity metrics⁷, established the result of HB 3141 and formalized under UM 1158, include: 1) access to support for communities, 2) access to information, 3) energy burden

⁴ Regulators Can Encourage Utilities to Help Implement New Home Energy Rebates (October 2023), ACEEE. Retrieved from: <https://www.aceee.org/blog-post/2023/10/regulators-can-encourage-utilities-help-implement-new-home-energy-rebates>

⁵ Claiming Savings from Income Qualified Weatherization Programs Where Multiple Entities Provide Funding Settlement Stipulation (2018). Retrieved from: https://www.ilsag.info/wp-content/uploads/SAG_files/Landing_Page/Executed_IHWAP_Stipulation_on_Savings_Attribution_2019-01-24.pdf

⁶ How Utility Energy Efficiency Programs Can Use New Federal Funding (July 2023). Retrieved from: <https://www.aceee.org/policy-brief/2023/07/how-utility-energy-efficiency-programs-can-use-new-federal-funding>

⁷ Equity Metrics for Energy Trust of Oregon UM 1158 Docket Announcement (February 2023). Retrieved from: <https://edocs.puc.state.or.us/efdocs/HAC/um1158hac16401.pdf>

reduction, and 4) community reliability and resilience. These performance measures are laudable, however stop short of defining specific customer outcomes. Increasing staff, program offers and grants are beneficial, and yet it is unclear the extent to which one approach results in more participation than another, and no specific targets are set for program years 2024/2025.

Utility-Specific Action Plan (USAP)

In 2024, PGE is in favor of a broader conversation regarding co-deployment. With respect to low-income program design and delivery a holistic approach also includes utility bill discounts, direct install, and prescriptive incentives⁸, and increased awareness and understanding⁹ of the relevancy of programs. PGE's planned low income needs assessment (LINA) in 2024 will inform such an approach.

Additionally, PGE sees an opportunity to co-deploy as a strategy for mitigating rate impact and maximizing customer value. ETO and PGE have met with remarkable success in co-funding residential thermostats and in co-deploying resources in the Smart Grid Test Bed. These partnerships have been pursued on an ad hoc basis and PGE instead favors the design and development of a framework for EE + DR to be completed in 2024 for implementation in 2025. The outcomes of such a partnership are the realization of both kWh and kW savings and maximizing the value for our shared customers.

The following activities represent proposed additions to the draft utility specific action plan provided by ETO.

- Request that Energy Trust collaborate to combine IRA funds maximizing program incentives and to increase braiding and bundling of like and complementary programs, respectively, across PGE and Energy Trust to better meet needs of low-income customers.
- Request that a proportional savings attribution approach be defined.
- Request that Energy Trust prioritize onsite and virtual home energy audits given all HOMES and HEERA heating/cooling rebates require an assessment as a means for enabling savings from identified measures and partner with PGE to co-deploy energy efficiency and flexible load programs to customers for whom the audit deems them relevant.

⁸Consortium for Energy Efficiency, Inc. (CEE). Program Resources: Residential Low-Income. Retrieved from: <https://cee1.org/93>

⁹ Recent market research in Massachusetts on more than 1,500 residential customers prioritized the "hardest-to-reach nonparticipants" and identified four principal barriers to their participation in available programs: (1) lack of knowledge, (2) perception of programs as not relevant, (3) mistrust of program legitimacy and providers, and (4) low prioritization of energy efficiency compared to other more basic needs. TOWARD MORE EQUITABLE ENERGY EFFICIENCY PROGRAMS FOR UNDERSERVED HOUSEHOLDS (May 2023), Schauer et al. 2022; Navigant, Illume, and Cadeo 2020, Retrieved from: <https://www.aceee.org/sites/default/files/pdfs/B2301.pdf>

- Request an effort to deliver an outcomes-based co-deployment framework in partnership with ETO that supports and aligns with existing dockets UM 2211 and UM 2141.
- Request a MOU with PCEF be formalized and socialized along with divisions of labor established between ETO and ODOE and/or DEQ.
- Request that Solarize campaigns be funded solely out of SALMON or Smart Grid Test Bed budgets and not included in the 2024/2025 Renewables budget.

Table 1: Funding Matrix

Below combines ETO's 202_Budget Assumptions memo list of funding with PGE's research and organizes categorically by incentive, grant and capacity building.

Funding Entity	Program	EE and RE Category	Allocation	Investment (\$millions)
Inflation Reduction Act (FY 2022-2026)	Environmental and Climate Justice Community Change Grants	Build Community Capacity	National	\$2000
Infrastructure Investment and Jobs Act (IIJA) (FY 2022-2026)	Advancing Equity Through Workforce Partnerships	Build Community Capacity	National	\$10
Infrastructure Investment and Jobs Act (IIJA) (FY 2022-2026)	Career Skills Training Program	Build Community Capacity	National	\$100
Infrastructure Investment and Jobs Act (IIJA) (FY 2022-2026)	Renew America's Nonprofits	Build Community Capacity	National	\$50
Inflation Reduction Act (FY 2022-2026)	Green and Resilient Retrofit Program	Build Community Capacity	National	\$250
Inflation Reduction Act (FY 2022-2026)	Greenhouse Gas Reduction Fund inclusive of EPA Solar for All	Build Community Capacity	Oregon	\$130
Inflation Reduction Act (FY 2022-2026)	HOMES	Incentives (whole-house)	Oregon	\$56
Inflation Reduction Act (FY 2022-2026)	HEERA	Incentives (electrification technology)	Oregon	\$56
HB 3409/ ODOE	Commercial building performance standards (BPS) voluntary compliance (SB 869)	Incentives (existing w/ multi-family)	Oregon	\$10
HB 3409/ ODOE	500,000 heat pumps by 2030 (SB 868)	Incentives	Oregon	n/a
HB 3630/ ODOE (through 2029)	Residential Solar and Storage Rebate Program Extension and Investment (HB 3418)	Incentives	Oregon	\$10
HB 3630/ ODOE	Residential Heat Pump Program Extension (HB 3056)(SB 1536)	Incentives	Oregon	\$25
DEQ Climate Protection Plan (CPP) (over 10 years)	Community Climate Investment (CCI)/ Seeding Justice	Build Community Capacity, Incentives	Oregon	\$100-150
PCEF Climate Investment Plan (CIP) (over 5 years)	Strategic Programs and Community Responsive Grants Climate jobs, workforce, and contractor development: \$41 million. Capacity building: \$15 million. Nonprofit organizations focused on climate justice will access	Build Community Capacity, Grants	Portland	\$400

	trainings, and staff support to more effectively meet community needs and build more climate-resilient neighborhoods.			
Energy Trust of Oregon (proposed 2024/2025 budget)	Expand Trade Ally Network via Contractor Development Pathway, Small Business Resource Network, LatinoBuilt and co-delivery with PCEF, BPA, ODOE, Community Action Partnership of Oregon and others	Other	Oregon - PGE	\$2.6 in 2024 \$2.8 in 2025
Energy Trust of Oregon (proposed 2024/2025 budget)	Invest in workforce development via training centers, clean energy education of pre-apprenticeships with Earth Advantage and Oregon Solar, and youth energy assessments	Other	Oregon - PGE	\$2.3 in 2024 \$2.2 in 2025
Energy Trust of Oregon (proposed 2024/2025 budget)	Invest in community-based organization (CBO) capacity building via Community Partner Funding, Solar Ambassadors and Working Together Grants	Build Community Capacity	Oregon - PGE	\$5.0 in 2024 \$6.0 in 2025
Energy Trust of Oregon (proposed 2024/2025 budget)	Invest in community engagement and support	Build Community Capacity	Oregon - PGE	\$3.4 in 2024 \$3.3 in 2025
Energy Trust of Oregon (proposed 2024/2025 budget)	Exceed established incentive ranges and offer no-cost measures and retrofits to income eligible residential customers	Incentives	Oregon - PGE	Information not provided

Table 2: Goals, Objectives and Outcomes

Goals	Objectives	Outcomes
<i>broad, directional, scope, long-term ideal future</i>	<i>measurable, timebound, activities in support of goals</i>	<i>benefit gained from achieving goal</i>
Maximize braiding of like program incentives and tax credits at the federal, state, and local level.	<ul style="list-style-type: none"> Amplify value of multiple value streams for shared customers with ODOE/OHCS Adhere to a funding hierarchy such that customer funds are deemed second in priority to taxpayer funds 	<ul style="list-style-type: none"> Increase number of program participants receiving both utility and other incentives
Maximize bundling of complementary programs and increase flexible load management potential as affordably as possible.	<ul style="list-style-type: none"> Align targeted promotion and marketing efforts for Summer/Fall 	<ul style="list-style-type: none"> Increase number of participants in both PGE rates (#IQBD, Community Solar, peak time rebate) and/or flex programs (#Tstat, batteries) and complementary energy efficiency and renewable energy programs (Wx, HEA, DHP, batteries)
Pursue a portfolio approach to reaching our hard-to-reach customers in accordance with HB 2475 / UM 2211 guidance.	<ul style="list-style-type: none"> Prioritize customers with the highest energy burden by streamlining eligibility and certification criteria and extending Wx services via Community 	<ul style="list-style-type: none"> # Zip code level or census-derived campaigns # Municipal climate action plan stewardship campaigns

	<p>Action Agencies (CAA) within 60 days of enrollment.</p> <ul style="list-style-type: none">• Partner with PGE flexible load management journey projects and services to build trade ally/delivery capacity	<ul style="list-style-type: none">• # Community-partner-funded (CPF) programs deployed to augment CAAs (Community Action Agencies)• # PGE flexible load journey collaborations• See also UM 1158 Equity Metrics
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October 18, 2023

Michael Colgrove
Executive Director
Energy Trust of Oregon
421 SW Oak Street
Portland, OR 97204

RE: PacifiCorp's Comments on Energy Trust's DRAFT 2024-2025 Budget and Action Plan

Dear Mike,

Thank you and the Energy Trust of Oregon (ETO) team for the budget and action plan discussions recently. Please note that the comments below are preliminary and require further collaborative discussions over the coming months.

Important context for these comments is an acknowledgement that we agree that energy efficiency is a key element to the energy future we have envisioned in our Clean Energy Plan. Our plan includes increased energy efficiency savings in the near term, and we appreciate the ongoing opportunity to consider elements of what ETO has proposed to help more fully align with PacifiCorp-specific needs. PacifiCorp also believes that it retains an obligation to review any significant proposed increase in customer funding to identify the correlation to anticipated benefits.

Comments below are organized into four key themes:

1. A request to tie increased costs to specific savings and better understand what budget items are not specific to near-term savings,
2. A request to provide alternative scenarios, including those that help flatten rate impacts to customers over the near-term years,
3. A request to provide additional detail on how we can best partner on elements of the budget that are focused on community engagement, workforce development, peak reduction and supporting the grid, and
4. An expectation that, like some past cycles, we anticipate requesting funding changes to begin sometime after Q1 2024.

Below is an overview of the prevalent themes observed within the action plans as we work to engage and finalize a PacifiCorp-specific budget and action plan.

Cost increases and related savings acquisition

The proposed \$33 million budget increase in 2024 (with additional forecast increases in 2025 and 2026) and the resulting customer rate impact is substantial and reflects an approximately 76 percent increase in expected collections from current levels, to achieve a 9 percent increase in projected energy savings by 2026. As noted above, we acknowledge our current 2023 IRP (Integrated Resource Plan) calls for increased energy efficiency acquisition in the near-term years. However, it remains unclear to us how

the additional costs translate to savings and when those savings are anticipated. We understand that certain proposed action plan activities and related costs may not result in direct acquisition but are asking for additional transparency. A better understanding of this dynamic will help us analyze which actions are associated with increased efficiency savings acquisition and to what extent those investments are driving future levels of acquisition.

During a review of the draft budget and action plan, ETO staff highlighted actions related to continued expansion of community engagement and new workforce development efforts. While these activities are important to support as part of the clean energy transformation, they are often challenging to directly attribute to increased energy efficiency acquisition. Additionally, these activities are often supported by multiple organizations with similar goals. It would be helpful to better understand ETO's specific goals and scope in the expansion of these activities and how the appropriate amount of ratepayer funding in support of these activities was determined given that multiple organizations at the state and local level are engaged in similar efforts.

Developing alternative scenarios

The proposed \$33 million budget increase in 2024 collections for energy efficiency encompasses the largest proportion of forecasted increases in ratepayer funding during 2024-2026. We do not yet fully understand what alternatives exist to minimize near term rate impacts or whether a more incremental approach to funding increases is warranted. This is particularly relevant given funding approved in the prior year often becomes the baseline for funding determinations in future years.

In addition, new funding sources are expected to become available in 2024 in support of energy efficiency including the Portland Clean Energy Fund, Federal Inflation Reduction Act funds, and other Oregon Department of Energy (ODOE) funds. We feel it is reasonable to evaluate scenarios that adapt budgets to accommodate these other sources of funding prior to increasing ratepayer collections at such a substantial rate.

Community engagement, workforce development, peak reduction and supporting the grid

We noted several action plan items that would benefit from further engagement and collaboration. One such item pertains to community engagement and community energy planning. There are already activities underway in support of these efforts. Clarity on the process by which a community initiates engagement with ETO or vice versa would be helpful to reduce confusion, effectively manage our respective organizations' resources and effectively communicate on programs. Additional clarity regarding how ETO collaborates with other entities such as ODOE in community energy planning would also be helpful to ensure alignment in approach and engagement with communities. The roles for community engagement around energy planning, community-based renewable energy opportunities, and potential community green tariffs will require close coordination and clarification of roles to best guide and support communities in their clean energy planning efforts.

Regarding workforce development, as stated earlier, additional funding sources are expected to become available in 2024 including the Portland Clean Energy Fund, Federal Inflation Reduction Act funds, and other Oregon Department of Energy (ODOE) funds. Additionally, PacifiCorp has been contacted by training centers, community colleges, school districts, and Tribes to partner and fund energy-related workforce development. We feel it is reasonable and necessary to evaluate and adapt budgets to accommodate these other activities and funding sources prior to increasing ratepayer collections.

Energy efficiency measures are selected in the 2023 IRP based on the cost of a measure and the timing of savings emphasizing an increasing need for energy efficiency savings that save more during summer and winter peak periods. We noted that in the draft action plan there were no activities designed to increase the acquisition of energy efficiency savings during these peak periods. Moving forward, we would like to better understand whether ETO has plans to increase adoption of measures that facilitate peak load reductions providing greater per kWh grid benefits.

Efforts to enhance coordination with renewables funding for grid support are crucial in our pursuit of a sustainable energy future. Coordinated funding initiatives can streamline investments, ensuring that renewable energy projects align with the needs of the grid. This not only maximizes the integration of clean energy sources but also fosters grid stability and resilience. As the demand for renewables continues to rise, collaborative approaches to implementation are essential for efficiently addressing the challenges of our evolving energy landscape.

Timing expectations for funding changes

As noted above, we have significant remaining questions regarding the draft budget and developing PacifiCorp-specific budget and action plan. Given the impacts, uncertainty, and timing of budget development, additional discussion is warranted. Consistent with the 2023 budget process we anticipate implementation of any new collections in spring of 2024. This timing will avoid winter peak customer heating bills, allow for further discussion, and ensure that all parties have had sufficient time determine impacts to rates and programs along with other utility activities funded through our System Benefits Charge.

Our comments presented here and within the action plan document represent our review of initial draft documents and require further collaborative discussion. We eagerly anticipate further review and refinement and the opportunity to enhance the clarity and effectiveness of our mutual endeavors.

Sincerely,



Kari Greer

From: Ralph, Laney <Delaney.Ralph@nwnatural.com>
Sent: Friday, October 20, 2023 8:47 AM
To: Elaine Prause <Elaine.Prause@energytrust.org>
Subject: RE: [External]Comments on draft budget?

Hi Elaine,

Thanks for the extension on public comment. We'd like to share the following:

NW Natural is supportive of Energy Trust's 2024 budget. It reflects feedback provided from the utility regarding accelerating the acquisition of energy efficiency. We anticipate increased administration budget will enable Energy Trust to grow capacity to meet increasing planning needs related to target load management and new pilot offerings.

Have a great weekend,
Laney

Laney Ralph
NW Natural – Energy Efficiency Program Manager
971.979.6241 | nwnatural.com
My pronouns: She, her, hers

Join us in [Less We Can](#)



Bureau of Planning and Sustainability

Date: October 18, 2023
To: Michael Colgrove, cc: Energy Trust of Oregon staff
From: Donnie Oliveira – BPS Director
Subject: Support for Energy Trust 2024 Budget Goals

Portland Bureau of Planning and Sustainability (BPS) staff appreciate the opportunity to review the Energy Trust of Oregon (Energy Trust) 2024-2025 Budget. BPS supports the draft budget priorities and action plan, including the goals for additional energy efficiency investments, focus on social equity-centered outcomes, and building capacity in the Trade Ally network and community-based organizations (CBOs). Especially in the years ahead with significant opportunities for transformational energy efficiency, renewable energy, and climate investments, Energy Trust's expanded coordination and capacity-building in communities around the state will be important to meeting our state climate and energy goals. These approaches and investments in people's homes and businesses will play a key role in reducing people's energy burden, increasing community resilience, and lowering carbon emissions.

At BPS, we are responsible for developing and tracking Portland's climate goals, and the implementation of the Portland Clean Energy Community Benefits Fund (PCEF). Over the past four years, PCEF has allocated over \$150 million to non-profit organizations and City bureaus to implement projects that address climate change and social and racial equity. In September 2023, Portland City Council adopted the PCEF Climate Investment Plan, outlining grant opportunities and strategic programs for allocating \$750 million over the next 5 years. The majority of these funds are directed towards programs that address residential and small business energy efficiency and access to renewable energy for our priority communities, including low-income people and communities of color. The launch of PCEF strategic programs will begin in 2024, with significant ramp up of deployment in 2025.

While PCEF will be deploying significant amounts of funding, the scale of the improvements needed to adequately address building energy efficiency in low-income communities is many times that, in the billions of dollars. Given the scale of need in our priority communities, it will be necessary to effectively weave together funding from Energy Trust, state, and federal programs in order to support low-income households, reach deep energy upgrades and meet decarbonization goals. This highlights the need for the additional investment in energy efficiency outlined in the 2024 Energy Trust budget, and deeper community engagement. Energy efficiency is a low-cost resource that reduces the need for buildout of additional generation, while providing direct comfort, livability and energy burden benefits to customers. Additionally, while PCEF's funds can only be spent within Portland, significant statewide

investments will be needed in order to meet the state and utility clean energy goals over the next decade.

The approaches in the 2024 Energy Trust budget for expanding workforce and contractor training on clean energy implementation are also aligned with the program offerings that PCEF will be launching. Collaboration with CBOs in Portland and statewide will ensure that people are getting accurate and timely information from trusted sources about program offerings, incentives, and rebates. Efforts to build a larger, more diverse and more active Trade Ally network throughout the state will serve to meet mutual goals. These actions need to start soon in order for that workforce, contractor and CBO infrastructure to be ready for higher volume of projects expected to effectively leverage new federal, state and local funds.

We also support and appreciate the efforts in aligning Energy Trust programs with the state of Oregon decarbonization policies, including opportunities for the Oregon Public Utility Commission to provide direction about investments in helping customers identify their most efficient choices to decarbonize energy consumption. These efforts towards decarbonization of buildings and transportation are complimentary to the approaches that PCEF is deploying in our grants and programs, and serve to improve public health and safety.

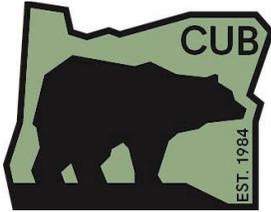
As our programs and policies work together, it will be important to have clear understanding of what elements can be funded by each program, what eligibility requirements apply, and how projects are tracked and measured. Energy Trust staff and PCEF staff are working together to formalize agreements of collaboration and are also engaging with state agencies and community partners to design program offerings over the coming year.

BPS staff look forward to working with leadership and staff at Energy Trust, along with stakeholders, to build programs that meet the needs of priority communities who have not previously had access to climate-focused programs and energy efficiency incentives. We can have greatest impact by all working together towards equitable decarbonization goals. Shared messaging, awareness and customer education will be important. We collectively have a lot of work together for the path ahead in building an equitable clean energy economy, and BPS supports the objectives and investments that Energy Trust is promoting in their 2024 budget.

Gratefully,



Donnie Oliveira
Director,
City of Portland Bureau of Planning and Sustainability



Oregon Citizens' Utility Board

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(503) 227-1984
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October 18, 2023

Energy Trust of Oregon
Board of Directors
421 SW Oak St., Suite 300
Portland, Oregon 97204
info@energytrust.org

*****By email only*****

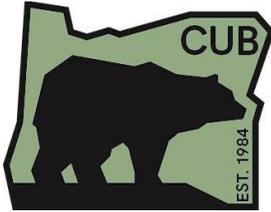
RE: CUB's Comments on the Energy Trust of Oregon's proposed "Aligning with Oregon's Decarbonization Policies" policy and draft 2024 Budget

The Oregon Citizens' Utility Board (CUB) is a statewide, membership-based organization advocating for affordable energy for residential utility customers. CUB appreciates the opportunity to provide written comments in support of the Energy Trust of Oregon's (ETO) proposed "Aligning with Oregon's Decarbonization Policies" policy and draft 2024 Budget. These comments reflect CUB's oral comments made at the ETO Board meeting on October 11, 2023.

CUB agrees with the "Aligning with Oregon's Decarbonization Policies" statement that energy efficiency is the least cost and lowest risk resource for decarbonization. In order to meet Oregon's clean energy goals *and* to be able to do this as affordable as possible for residential customers, energy efficiency investments are imperative. By being able to pursue and receive other funding, this policy helps ETO increase resources to help Oregonians save money on their utility bills, and helps give ETO the capacity to grow its important work. CUB supports the proposed policy with the recommended changes.

ETO's draft 2024 Budget is reflective of the growing need for energy assistance. Most of the budget increase is to fund additional programs, incentives, and administrative support. CUB supports funding more positions and raising salaries at the ETO. ETO needs to be able to build capacity. ETO's work is critical to affordably meeting Oregon's decarbonization goals. Their capacity to do this work is critical to obtaining and retaining staff, as well as the need to fairly compensate their staff for the work. In particular, we are excited about ETO's no-cost, whole home retrofit service for low-to-moderate income, BIPOC, and rural customers in geographic areas that are not currently served through Community Partner Funding community-based organizations. We are also supportive of investments to expand the Trade Ally Network, which develops the energy efficiency workforce, which is better for customers.

In order to moderate the price increase, we recommend delaying the revenue increase for these programs until April 1st, rather than January 1st when other utility rate increases are expected to go into effect—one of the coldest months of the year. CUB also suggests the ETO Board consider developing multi-year budgets in the future. The ETO has historically had a 2-year budget cycle. CUB believes a 3-4 year budget cycle may be better for the organization, particularly given the aggressive timelines of Oregon's clean energy goals and the costs that come with meeting those goals, in addition to other ongoing utility costs like wildfire mitigation investment.



Oregon Citizens' Utility Board

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CUB appreciates the thought and analysis that went into ETO's development of its draft budget. It is reasonable and forward-thinking. The CPP and HB 2021 have increased avoided cost, and we need to invest in the ETO now to help meet those goals in a least cost, least risk manner. Utility rates are increasing across all energy sectors. Meeting Oregon's aggressive clean energy goals is going to cost money, as are investments to mitigate wildfire risk. Energy efficiency is a way to defer the need for capital investments from utilities. Support for ETO is support for energy efficiency, which will help Oregonians better afford inevitable future rate increases. CUB supports ETO's draft 2024 Budget and the proposed Aligning with Oregon's Decarbonization Policies. Thank you again for the opportunity to provide comments.

Sincerely,

Jennifer Hill-Hart
Policy Manager
Oregon Citizens' Utility Board

To: Energy Trust of Oregon
Sent via email to info@energytrust.org

To ETO Board Members:

My name is Nikita Daryanani and I'm the Climate and Energy Policy Manager at the Coalition of Communities of Color. I apologize that this message is coming in after the comment deadline, but I hope it will still be considered.

I am emailing to express our support for the ETO's 2024-2025 budget and its approach. The proposed budget recognizes the importance of energy efficiency, which is a critical strategy that has many environmental, health, and community benefits. Focusing on those experiencing energy burden ensures nobody gets left behind as our state transitions to cleaner energy. And ETO has a uniquely important role to play in this transition.

Thank you for taking on this task. Please adopt this budget and its increased investments in energy efficiency.

Sincerely,
Nikita Daryanani

Comments on Energy Trust of Oregon
from NW Energy Coalition
on Proposed 2024-2025 Budget

submitted by Jeff Bissonnette
18 October 2023

To the members of Energy Trust of Oregon Board of Directors:

Thank you for the opportunity to add to my previous comments I've made at both the Conservation Advisory Council (CAC) and at your board meeting last week. To summarize those comments, I've noted that the passage of HB 2021 has put a focus on decarbonization and emissions reductions for the electric utilities that you work with. This new statutory requirement to drastically reduce emissions puts an emphasis on energy efficiency like never before. The scale and vision of the current proposed budget reflects that new focus and the need for increased energy efficiency to help utilities meet their new requirements.

I'd like to add two key points to the discussion as the budget development process continues.

First, energy efficiency is still the cheapest non-emitting resource that can be acquired, and energy efficiency acquired through ETO continues to be some of the lowest cost energy efficiency in the region. Right now, we need both our electric utilities and our gas utilities to get as much as they can as soon as they can because the electric utilities' first statutory compliance benchmark is 2030, a mere 6+ years away and the gas utilities compliance requirements under the Climate Protection Program starts next year. Additionally, the electric utilities have a statutory obligation to acquire all cost-effective energy efficiency first. Those two realities support a "no regrets" approach to acquiring energy efficiency. That is, we don't want to look back in five or six years and tell ourselves, "we should have acquired more energy efficiency when we had the chance." To avoid that outcome, we must plan now for the increased acquisition rate for energy efficiency. The proposed budget recognizes that need.

Second, concerns have been expressed about the rate impact of the proposed budget. By my calculations, the impact would have as much as a 1.5% rate impact. Some of that increase is to build ETO capacity to achieve the needed energy efficiency levels. While impact on customers should always be kept at the forefront of any planning, it is also important to remember that those customers are not well-served if the capacity to acquire the cheapest non-emitting resource is not in place. It is necessary to invest now in ETO's capacity to acquire energy efficiency in order to reduce the long-term costs of having a less efficient energy system.

Energy Trust stands in place of the utility as the entity that acquires that most valuable resource. If Energy Trust did not exist, the utility would be the entity trying to acquire efficiency and they would want the capacity to be able to successfully carry out either the dual statutory requirements of dramatic emissions reduction and energy efficiency acquisition first or achieve emissions reductions under the state's administrative framework. That need is no different with Energy Trust performing that role on behalf of the utility. The proposed budget recognizes the need to build the capacity required to fulfill the "no regrets" approach I noted earlier.

Thank you for this additional opportunity to comment on your proposed budget. I recognize that there are many discussions that are required between now and when you approve a final budget in December. NW Energy Coalition looks forward to continuing to be engaged in those discussions and to help achieve a budget that will enable Energy Trust to help the utilities meet the requirements that they have by law.



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

October 27, 2023

To: Executive Director Michael Colgrove and Energy Trust Board of Directors

From: Janine Benner, Director, Oregon Department of Energy

Re: Energy Trust of Oregon Draft 2024 Budget and 2024-2025 Action Plan

I appreciate the opportunity to provide comments on behalf of the Oregon Department of Energy (ODOE) on Energy Trust of Oregon's draft 2024 budget and 2024-2025 action plan. I serve on the Energy Trust Board of Directors as an ex officio member and many of our agency staff work with Energy Trust staff through the Conservation Advisory Committee, Renewables Advisory Committee, Diversity Advisory Committee, as well as through other coordination efforts.

ODOE is the state's energy agency with a mission to help Oregonians make informed decisions and maintain a resilient and affordable energy system. We advance solutions to shape an equitable clean energy transition, protect the environment and public health, and responsibly balance energy needs and impacts for current and future generations. On behalf of Oregonians across the state, we achieve our mission by providing: a central repository of energy data, information, and analysis; a venue for problem-solving Oregon's energy challenges; energy education and technical assistance; regulation and oversight; and energy programs and activities that save energy, support the state's decarbonization efforts, make communities more resilient, and position Oregon to lead by example.

We support the continued development of Energy Trust's budget to meet the mission of helping customers and communities. Energy Trust's budget will work to reduce community costs by saving energy and achieving additional benefits from renewable resources. It will also support the State of Oregon in leveraging and maximizing the benefits of federal funding.

ODOE will be deploying millions of dollars of state and federal funding through energy incentive programs as a result of recent actions by the Oregon Legislature and also the Bipartisan Infrastructure Law and Inflation Reduction Act passed by Congress. This includes the Home Efficiency Rebate programs, which will provide over \$114 million to assist Oregon households in reducing their energy consumption, and in turn their energy bills and greenhouse gas emissions, through the installation of energy efficient technologies and weatherization measures. While this represents a historic federal investment in energy efficiency, it is only a fraction of what will be needed to reach Oregon's clean energy goals. Continued investment in efficiency programs like the ones outlined in Energy Trust's 2024 budget will be essential in positioning our state to meet these goals and ensuring consumers, particularly those in low-income and historically marginalized communities, experience the benefits of a clean energy transition. Our state cannot achieve the savings necessary to equitably meet our ambitious climate goals without broad participation by these communities in energy efficiency programs. We are highly supportive of Energy Trust's commitment to investing in programs that overcome barriers and engage these communities.

As part of House Bill 3049, ODOE has been tasked with developing a “one-stop-shop” to simplify how Oregon consumers find which energy efficiency investments are available to them. The success of this model relies in part on a continued investment in efficiency incentives within our state as well as close collaboration with entities like Energy Trust who administer those incentives. ODOE is supportive of the investments made in Energy Trust’s 2024 draft budget and we see Energy Trust’s work as critical to making the “one-stop-shop” successful. We also recognize the need to ensure that the multitude of programs and delivery systems are well coordinated, efficiently administered, and don’t duplicate efforts. ODOE looks forward to continuing to work closely with Energy Trust on this effort.

The success of energy efficiency work relies heavily on our community relationships. We know that underserved, marginalized, and vulnerable communities may feel untrusting of governmental organizations, and it is our responsibility to earn their trust. Building long-term and mutually beneficial relationships takes time, effort, and funding. A commitment to develop partnerships will provide opportunities to leverage investments and bring cost-effective energy savings for people and places that have historically been left out. Serving these customers will relieve their direct energy burden and ensure equitable distribution of benefits.

The up-front cost of this effort requires higher incentives to cover more or even all the costs of upgrades. We must develop new delivery strategies like partnerships with community-based organizations, community outreach, and more hands-on delivery models to serve these customers who may be reluctant to participate. Additionally, economic conditions such as labor turnover, supply chain issues, increasing costs, and long delivery times continue to present challenges to the commercial and industrial sectors.

Energy Trust has been a leader in building capacity to keep up with opportunities. Experience and labor shortages are issues for the energy efficiency industry, especially as new funding creates more opportunities. The challenge is not lack of funds, but rather how to distribute the new funding to individuals and communities. Energy Trust’s budget recognizes these challenges and allocates appropriate funding to help overcome these challenges.

ODOE appreciates Energy Trust’s work and partnership as we work to equitably transition to a clean energy future.

Sincerely,

A handwritten signature in cursive script that reads "Janine Benner". The signature is written in black ink and is positioned above the typed name and title.

Janine Benner, Director
Oregon Department of Energy

To: Energy Trust of Oregon via info@energytrust.org
From: Small Business Utility Advocates — Oregon (“SBUA”)
Date: 10/18/23
Re: Draft 2024 Energy Trust Budget

Closer review by SBUA of the Energy Trust Budget indicates more work in 2025, especially, focusing on small business which is good/great and is appreciated. We remained concerned that small business customers of utilities, except multifamily dwellings, may not reap the benefits of their rate dollars paid to fund an Energy Trust where there is an increase of \$30 million and more in 2025. We recall that in 2022 Energy Trust missed performance measure targets for 3 out of 5 utilities and we would ask if the budget for 2024 directly addresses these shortcomings from 2022. We see them as only partly addressed.

A few reminders:

- We remind decision makers that this budget is proposed in a context of double digit utility rate increases, huge legislation like HB 3409 (2023), the 2021 bills including decarbonization mandate, and post-COVID-19 pandemic conditions of difficult supply chains, labor market, and high inflation. Small commercial customers generally all over the state are certainly traditionally under represented in utility proceedings, which includes the ETO dockets.

- “Commercial” is not broken down to any granularity in this budget.

https://www.energytrust.org/wp-content/uploads/2023/10/Financial-Reports_2024-2025.pdf

- Small commercial customers (e.g. Schedule 32 PGE, Schedule 23 PacifiCorp dba Pacific Power, and Schedule RS03 NW Natural for examples) are by far the second most numerous class of ratepayers of these utilities.
- Small business is not represented in the Conservation Advisory Committee, a key source of input on the Draft Energy Trust 2024 budget.

We understand and appreciate the focus on the residential customers especially in the environmental justice communities and those residential customers with historically underrepresented demographics such as those described as Black, Indigenous, and Peoples of Color (“BIPOC”). But we do not see that an easily available information metric is used to measure impact on small commercial customers including those who might be trade allies or other contractors with Energy Trust. See this state government page for example for an easily available data supported list of COBID certified businesses that are not included in the report:

Glad to see mention in 2024 Significant New Activities — -seems to be lighting:

- Increase outreach, delivery and marketing to accelerate lighting savings in 2024 and 2025 before compact fluorescents and linear fluorescent lights phase out. Efforts include increasing outreach staff, particularly in rural areas, streamlining project processes, and ramping up marketing campaigns focused on priority communities.

- Priority communities include small businesses, schools, rural communities, Black, Indigenous and communities of color and other underserved communities.

We are pleased to see more small business specific attention for 2025.

E.g. 2025 Expected Changes and New Initiatives

- Implement and refine new program strategies to accelerate savings across all program tracks such as no-cost offers, co-funding opportunities for small business and multifamily, and streamlining quick turn custom opportunities.

The ETO proposed significant increased staffing budget is a bit concerning and the Board questions on this were appreciated. We wonder with the moneys expected from the federal legislation and also the newer structure of the Energy Trust funding how the 4FTE going to equity metrics would be fair and reasonable for small commercial customers generally.

Not much money relatively speaking to existing buildings.

• The Existing Buildings program hosted a series of Small Business facilitated gatherings. The goal of these cohorts is to concrete culturally resonant and, as appropriate, in-language solutions with members of underserved communities.

We were unable to review the 2024 Utility specific plans.

Glad to learn about the increased Investments in community engagement and support such as the Working Together grant. Re community engagement we note Budget impact: \$3.4 million in 2024, \$3.3 million in 2025.

Regarding TRC and UTC cost effectiveness exceptions measures:

PUC Order No. 94-590 re Total Resource Cost (TRC) test and Utility Cost Test (UCT) to determine if energy efficiency measures and programs are cost-effective and exceptions to that would be helpful to learn how many and what kinds of exceptions existed for small commercial that were not multifamily.

Multi-year planning: It does make sense to have multiple year planning. Please note that any time spend commenting either orally or in writing is uncompensated for many organizations and individuals. This time SBUA Oregon staff spends on these comments is valuable time spent to support obtaining fair and reasonable rates and terms of service for small commercial customers.

Sincerely,
Guillermo Castillo,
SBUA Oregon Technical Assistant
&
Diane Henkels
SBUA Oregon Legal Counsel

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

Please adopt a budget that dramatically increases energy efficiency. You know the reasons to do and how important it is. Please take your leadership responsibilities seriously and take a long view on behalf of ourselves and our children.

Alan Vovolka
4311 SE 37th Ave Apt 4
Portland, OR 97202

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To Energy Trust of Oregon Board Members:

I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the important goals of this budget. It is so important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increases energy efficiency!

Sincerely,

Alice Shapiro
2545 SW Terwilliger Blvd, Apt 1105
Portland, OR 97201

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To ETO Board Members:

I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction it's headed. It's so important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increases energy efficiency!

Best,

Ana Molina

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To ETO Board Members:

I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction its headed. It's so important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increased energy efficiency!

Anahí Segovia Rodriguez
Energy Justice Coordinator at Verde
She/Her/Ella

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To the Energy Trust of Oregon Board Members:

I am writing to express Spark Northwest's strong support for the process of developing the ETO 2024-2025 budget and the direction in which it is headed.

Ramping up energy efficiency programs is critical to a just and equitable clean energy transition, and the proposed budget recognizes that importance. Increased investment in energy efficiency brings multiple benefits to Oregonians – it cuts GHG emissions, energy bills, and resource utilization, while also supporting meaningful and family-sustaining jobs throughout the Energy Trust's service territory.

Thank you for taking on this task and please adopt a budget that dramatically increased energy efficiency!

Yours,

Andrea Axel

Andrea Axel (she/her), Executive Director
cell (206) 234-4781 | andrea@sparknorthwest.org
Join the clean energy movement at Spark Northwest
Subscribe to our newsletter

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To Energy Trust of Oregon Board Members:

Please continue to support the ETO 2024-2025 budget in the direction it's headed. We need more energy efficiency as fast as possible and the proposed budget recognizes that. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increases energy efficiency!

Sincerely;
Ann Littlewood
2915 NE 21st Avenue
Portland, OR 97212

To: **Energy Trust of Oregon**
Sent via email to info@energytrust.org.

To Energy Trust of Oregon Board Members:

I am writing to support the ETO 2024-2025 budget process and its focus on the importance of energy efficiency. We must decrease our current use of energy in order to reduce greenhouse gas emissions as well as creating capacity for clean energy strategies like EV's. While EV's emit no GHG's, they do require electricity for charging, increasing the load on the electrical grid. Increasing energy efficiency is imperative.

Please pass a budget that significantly increases energy efficiency.

Thank you,
Ann Turner
2007 NE Mason St.
Portland, OR 97211

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To Energy Trust of Oregon Board Members:

I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction it's headed. It's so important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increases energy efficiency!

Sincerely;

Art Okada
3241 SW Spring Garden St
Portland, OR 97219

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

We can afford to burn less fossil fuel if we can expand green electricity AND if we use the electricity efficiently. One side of the equation alone is not the program we need. Please plan a budget for the ETO which has a strong energy efficiency component.

Bill Harris
NW Portland

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

Dear Board Members —

I wanted to let you know that I enthusiastically support your proposed 2024 through 2025 budget with its potential 30% increased efficiency goals. As we transition to a more electrified economy we'll require energy conservation to counter the growing demands on our existing grid while ramping up additional grid capability over the coming years.

I appreciate your foresighted budget. This is something we need more of.

Sincerely,
Brett Baylor
Portland 97202

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To Energy Trust of Oregon Board Members:

I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction its headed. It's so important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increased energy efficiency!

Sincerely
Brian Romer

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To ETO Board Members:

Please support dramatic increases in energy efficiency measures with the ETO 2024-25 budget. Its essential to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increased energy efficiency!

Brian Stewart

To: Energy Trust of Oregon
Sent via email to info@energytrust.org

To Energy Trust of Oregon Board Members:

I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction it's headed. Energy efficiency is the cheapest, most effective carbon reductive strategy there is. Investments there are the most important, urgent investments we can make.

Thank you for taking on this task and please adopt a budget that dramatically increases energy efficiency!

Sincerely;

Brian Wenzl
5115 SE 48th Ave
Portland OR 97206

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To ETO Board Members:

My name is Candace Avalos, Executive Director of Verde, and I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction its headed. It's so important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increases energy efficiency!

C

--

Candace Avalos (she/her)
Executive Director of Verde
4145 NE Cully Blvd, Portland, OR 97218
Cell: 541-728-7953

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

I support the efforts of Oregon Energy Trust to promote energy efficiency in its 2024-2025 budget proposal. Energy efficiency would reduce greenhouse gas emissions which may help our warming earth.

Carol Cherin
Milwaukie, OR

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To ETO Board Members:

I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction its headed. It's so important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increased energy efficiency!

Cheyenne Holliday (she/her)
Advocacy Manager, Verde

4145 NE Cully Blvd, Portland, OR 97218
Cell: (503) 545-7656

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

Dear Energy Trust of Oregon Board Members,

I wanted to send a quick note supporting the process for developing Energy Trust of Oregon's 2024-2025 budget and the direction it is pointed towards.

It is vitally important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce greenhouse gas emissions and to make room for other clean energy strategies like electric vehicles which will reduce emissions but could increase load demand. Energy efficiency offers us the fastest and most cost-effective route towards maximizing nearterm greenhouse gas emissions reductions, and those near-term gains make the biggest difference in mitigating the long-term and ongoing impacts of climate change.

Thank you for taking on this task and please adopt a budget that dramatically increases energy efficiency. The Sierra Club's 73,000+ members in Oregon are united in supporting climate action and environmental justice at all levels, including through utilities and buildings.

Sincerely,

Damon Motz-Storey
Oregon Chapter Director
they/them/theirs

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

Dear Energy Trust of Oregon Board Members:

As a steering committee member for Oregon Educators for Climate Education, OECE, I support your development of the ETO 2024-25 budget without compromises by industry lobbyists. Our students, our children, deserve our best efforts to stop climate change. It's so important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increases energy efficiency!

Sincerely,

Darin Henry

1916 Madison Street
Eugene, Oregon 97405

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

Dear Energy Trust of Oregon Board Members,

I support the process for developing the ETO 2024-2025 budget and the direction it's headed. It's so important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increases energy efficiency!

Sincerely,

David Parker
1953 SE 20th Ave
Portland, OR 97214
503 236-0967

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To Energy Trust of Oregon Board Members:

I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction it's headed. It's so important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increases energy efficiency!

Sincerely,
Dianne Ensign
11600 SW Lancaster Rd
Portland, OR 97219

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

Board Members:

I am writing to voice my support for the proposed ETO 2024-2025 budget. It is critical to expand programs to increase energy efficiency in Oregon as rapidly as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs and building electrification which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increases energy efficiency.

Best,

Dylan Plummer
Sierra Club

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

I live in the Portland area and support the efforts of Oregon Energy Trust to promote energy efficiency in its 2024-2025 budget

proposal. Energy efficiency would reduce greenhouse gas emissions and I am very concerned about climate change.

Elizabeth Olsen

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To Energy Trust of Oregon Board Members:

Please resist pressure from those who do support the need to act decisively in order to secure a viable future for our children and theirs!

I am in favor of the ETO 2024-2025 budget and the direction it is headed. We must acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now, both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load. Thank you for your work. Please adopt a budget that dramatically increases energy efficiency!

Sincerely,

Emily Polanshek
3841 SW Canby St., Portland 97219

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

I am very supportive of increasing access to more energy efficiencies. I hope you will continue to provide opportunities to do just that. We need to act quickly to maximize the effect of lowering our energy footprint in order to slow the pace of climate change.

Gail Cordell
Oregon City OR

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

I am a retired biologist who has been following global climate change for decades. The gravity of the change is becoming more urgent. Please dramatically increase the budget for clean energy efficiency and dirty energy conservation now, not next time. Thank you.

Gail Sabbadini
Bend, Oregon

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

Hello ETO Board Members:

I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction its headed. It's so important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increased energy efficiency!

Greg Norman

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

Dear ETO Board Members:

I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction its headed. It's so important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increases energy efficiency!

Sincerely,

Hal Nelson, Ph.D., CFA (he/him)

Associate Professor

HNelson@pdx.edu | 503.236.6720 (m)

Graduate Certificate in Energy Policy & Management: <http://bit.ly/PSU-Energy-Policy>

Master's in Public Policy <https://bit.ly/PSU-MPP>

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To ETO Board Members:

I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction it's headed. It's so important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

I am currently an instructor and advocate of energy efficient techniques and practices for underserved communities. This work not only creates healthier communities but creates jobs in the process.

Thank you for taking on this task and please adopt a budget that dramatically increases energy efficiency!

James Metoyer III

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To Energy Trust of Oregon Board Members:

I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction its headed. It's very important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We need to reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increases energy efficiency!

Sincerely;

Jeanette LeTourneux
3355 Humbug Creek Rd
Applegate, OR 97530

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To Energy Trust of Oregon Board Members:

I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction its headed. It's so important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increased energy efficiency!

Sincerely;
Joanne Delmonico
Portland, Or

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To ETO Board Members:

I am writing in support of the process for developing the ETO 2024-2025 budget and of the direction it is headed. At this time of cascading climate catastrophes, it's crucially important to gain more energy efficiency as fast as possible. The proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increases energy efficiency!

Joseph Stenger MD
97211

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To Energy Trust of Oregon Board Members:

I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction its headed. It's so important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increased energy efficiency!

Sincerely,
Judy Arielle Fiestal
3587 SE Grant Street
Portland Oregon. 97214

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To Energy Trust of Oregon Board Members:

When I first moved to Oregon I called Energy Trust to find a contractor for a home energy audit. Energy Trust was really helpful!

I support the process for developing the ETO 2024-2025 budget and the direction it's headed. It's so important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increases energy efficiency!

Sincerely;

Karen Harrington
25470 Swift Shore Dr, West Linn, OR 97068

Karen Harrington (she, her)
Volunteer
Climate Reality Project, Portland Chapter
Legislative Committee Chair
<https://www.climaterealityproject.org>
<https://climaterealitypdx.com>
1-510-833-0492
West Linn, OR, USA

"Believe in the power of your own voice. The more noise you make, the more accountability you demand from your leaders, the more our world will change for the better." Al Gore

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To ETO Board Members:

I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction its headed. It's so important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increased energy efficiency!

KB Mercer
Managing Director

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To ETO Board Members:

I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction it is headed. It's so important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

I want to underscore that energy efficiency is also called out in the Columbia River Inter-Tribal Fish Commission's Energy [Vision](#) for the Columbia Basin so a focus on this in ETO's budget is in good alignment with this vision.

Thank you for taking on this task and please adopt a budget that dramatically increased energy efficiency!

Best wishes,

Kelly Campbell

--

Kelly Campbell (she/her) | Policy Director | [Columbia Riverkeeper](#) | 1125 SE Madison Suite 103A Portland 97214 | text or call 541.953.5475

[New Newsletter: Read it now!](#)

Salmon Unite Us: Join the Fight for Recovery

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To Energy Trust of Oregon Board Members:

I wanted to send a quick note supporting the process for developing the proposed ETO 2024-2025 budget and the direction its headed. It's most important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies, like EVs, which will also reduce emissions but could increase load.

Thank you for taking on this task. Please adopt a budget that dramatically and quickly increases energy efficiency!

Sincerely,

Laura Rogers
Address 2530 SE 26th Avenue #305
Portland, OR 97202

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

Hi,

I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction its headed. It's so important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increased energy efficiency!

Lenny Dee
Onward Oregon
Your Oregon Information Source
<https://onwardoregon.org/>

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To Energy Trust of Oregon Board Members:

I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction its headed. It's so important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. Now really IS the moment to be doing, literally, ALL we can. We need to be doing it AS FAST AS POSSIBLE. ALL OF US. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increased energy efficiency!

Sincerely;

Leslee Lewis
3908 N Concord Ave
Portland 97227

Shoulders easy, lift up your back and breathe

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To the ETO Board,

I understand that you are considering a budget that will significantly increase energy efficiency. Please persevere in doing this. What we are seeing of climate change terrifies me, and we need all possible incentives to reduce energy use and carbon emissions ASAP.

Thank you.

Linda Craig
Portland, OR

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To Energy Trust of Oregon Board Members:

I am a strong supporter of an energy efficiency focused budget for the ETO 2024-2025 budget. We need strong energy efficiency steps in Oregon and the proposed budget recognizes that need. We must reduce current energy usage now, especially methane gas, to reduce GHG emissions and to enable EVs to be added without a net load increase on our electric utilities.

Thank you for taking on this task and please adopt a budget that dramatically increases energy efficiency!

Sincerely,

Linda Perrine
Lincoln City, OR 97367

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To ETO Board Members:

I'm sending a quick note supporting the process for developing the ETO 2024-2025 budget and the direction it's headed. It's so important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task, and please adopt a budget that dramatically increases energy efficiency!

Lindsay McClure

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To Energy Trust of Oregon Board Members:

I support the process for developing the ETO 2024-2025 budget and the direction it is headed. It's so important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce greenhouse gas emissions and to make room for other clean energy strategies, including electric vehicles and other forms of electrification, which will cut emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increases energy efficiency!

Best,

Lisa Cohn
3141 NW Greenbriar Terr.
Portland, Oregon
97210

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To Energy Trust of Oregon Board Members:

I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction its headed. It's so important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance.

We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increased energy efficiency!

Sincerely;

Marian Dixon
6901 SE 65th Ave, Portland, OR 97206
Marian Wolfe Dixon, MA, LMT (#3902), NCTMB Approved CE Provider (#769)
Massage for Medically Complex People
(she, her)
marianwolfedixon@gmail.com

<https://www.marianwolfedixon.com>

www.message-for-medically-complex-people.weebly.com

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To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

Dear Energy Trust;

I support ETO's move towards greater energy efficiency through its 2024-2025 budget proposals. Greater efficiency would reduce greenhouse gas emissions, which is needed if we want to do something positive about climate change. Please continue with the energy efficiency strategy!

Marilyn Feldhaus

Portland, Oregon
97222

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To Energy Trust of Oregon Board Members:

I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction its headed. It's so important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance.

We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increased energy efficiency!

Sincerely;

Mark Darienzo
6923 NE Morris St
Portland, OR 97213

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

I support the efforts of Oregon Energy Trust to promote energy efficiency in its 2024-2025 budget proposal. Energy efficiency would reduce greenhouse gas emissions, about which I am very concerned about because of climate change.

Martha Dibblee

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To Energy Trust of Oregon Board Members:

I write to express my support for the process for developing the ETO 2024-2025 budget and the direction its headed. It's vital to achieve more energy efficiency as fast as possible, and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increases energy efficiency!

Sincerely,

Meg Bowman
3232 NE 27th Ave.
Portland, OR 97212

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To Energy Trust of Oregon Board Members:

I am writing in strong support of the process for developing the ETO 2024-2025 budget and I endorse the direction in which ETO is headed. I agree with the importance to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increased energy efficiency!

Sincerely;

Michael Heumann
4343 NE 49th Ave
Portland, OR 97218

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

Energy Trust of Oregon Board of Directors

I am writing in support of the proposed 2024 ETO budget.

With the passage of HB 2021, the Clean Energy Law, and the implantation of the Climate Protection Plan, the policy and economic environment for energy efficiency has been significantly enhanced. As a result, the Oregon Public Utility Commission requested that the Energy Trust find ways to expand access to efficiency and clean energy in order to benefit from lower energy bills and to stay safe and healthy during extreme weather and power outages. Unfortunately, inflation persists, and as project costs increase, ETO incentives need to increase both to maintain an appropriate share of total project costs and to account for increases in the level of cost-effective efficiency measures to higher avoided cost estimates.

Fortunately, there are unprecedented funding opportunities expected in near future years from the Inflation Reduction Act, the Portland Clean Energy Community Benefits Fund and the Community Climate Investments program, which is part of the Climate Protection Program.

The 2024 Energy Trust budget will help address market barriers to accelerating savings and maximizing impact of new funding opportunities. It will also help support workforce development and the expansion of contractors and community-based organizations as trade allies. Although the 2024 proposed revenue of \$277.0 million is up 33% from the 2023 budget, these increases are needed to increase incentives to account for inflation, develop new approaches and delivery strategies, and support market infrastructure development, including expanding the Trade Ally Network, workforce development and support for Community-based organizations. Projected benefits for Oregonians, include \$785 million in future bill savings, opportunities for 1,600+ local businesses, and greater support for community-based organizations and investments in workforce development, as well as avoiding 3.9 million metric tons of carbon dioxide over time.

I urge you to fully support the proposed budget.

Best regards,

Dr. Pat DeLaquil
MCAT Steering Committee

To: Energy Trust of Oregon
Sent via email to info@energytrust.org

Energy Trust of Oregon Board Members:

Please know that I fully support the process for developing the ETO 2024-2025 budget and the direction that this budget indicates you are headed. We need to acquire more energy efficiency as fast as possible, and the proposed budget recognizes that importance.

It is absolutely essential that we reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies. For instance, EVs will reduce emissions but could increase load.

I am appreciative that you are taking on this task and ask that you adopt a budget that will lead to increased energy efficiency!

Sincerely;

Rand Schenck
2947 NE 31st Ave
Portland, Oregon 97212

To: Energy Trust of Oregon
Sent via email to info@energytrust.org

Energy Trust of Oregon Board,

I want to offer my support for your process developing the ETO 24-24' budget, and the direction you are headed.

We all know how important it is to build more energy efficiency as fast as we can, and your proposed budget seems to recognize that, reducing current energy usages across the board.

The big industry stakeholders will need to upgrade how they offer energy so that they can also support EV's and other uses, while not being a huge part of the problem.

Please do not allow yourselves to be railroaded by these corporations!

They are only interested in profits until the very end of our way of life.

Thank you for taking on this very important issue

Robin Bloomgarden
3690 Wood Ave
Eugene, OR 97402
541-688-182

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To ETO Board Members:

I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction its headed. It's so important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increased energy efficiency!

Sasha Pollack

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To Energy Trust of Oregon Board Members:

Please support the process for developing the ETO 2024-2025 budget in the direction it's headed. It's critical to acquire more energy efficiency as quickly as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increased energy efficiency.

Sincerely;

Susan Heath,
Albany, OR

To: Energy Trust of Oregon
Sent via email to info@energytrust.org.

To Energy Trust of Oregon Board Members:

I wanted to send a quick note supporting the process for developing the ETO 2024-2025 budget and the direction it's headed. It's so important to acquire more energy efficiency as fast as possible and the proposed budget recognizes that importance. We must reduce current energy usage now both to reduce GHG emissions and to make room for other clean energy strategies like EVs which will also reduce emissions but could increase load.

Thank you for taking on this task and please adopt a budget that dramatically increases energy efficiency!

Sincerely;

Taran Nadler
3116 SE 67th Ave
Portland, OR 97206

Greer Ryan, Climate Solutions

“Good afternoon. Thank you to the board, leadership and staff for the opportunity to comment here today. I showed up to the last meeting and shared some support for the fuel switching policy – I’m really glad to see that moving forward and grateful for all the work that ETO staff has done in thinking about how to take advantage right now of the fact that we have so much unprecedented once-in-a-generation federal funding coming through. Really doing this work not just through that kind of policy shift but also in developing this budget to think about how to best equip the Energy Trust to be able to apply for and support others in applying for the federal money as well as how to help get it out the door as equitably and efficiently as possible.

I agree largely with what Jeff [Bissonette, NW Energy Coalition] and Jennifer [Hill-Hart, CUB] have said so far – I really appreciate their comments. I will say, when I heard about this budget and got to learn a bit more about it, what was most exciting to me was how much thought was put into filling some gaps that we currently have. Thinking about who Energy Trust is best equipped to reach through incentive programs. And the truth is for lower income, or even moderate-income households, it's really hard to afford big changes, especially when you have multiple changes needed at once for older housing, even with existing incentives. So ramping up the amount of money that can be provided to these households to make something like switching to a heat pump work for them is really, really critical. And we keep hearing about the state policy level.

Something that we hear about from our community partners is the level of incentives just need to be ramped up a bit. I'm glad to see some of that as covered in the budget. I'm glad to see that [there is] an increase in funding to soften the workforce issues to support CBOs. All of that is exactly what we need right now. We have both state and federal dollars coming through, we have direction now and state statute, as Jeff laid out, for climate to be considered in energy efficiency programs. Energy Trust is one of the best places to be doing this work. And we're so grateful.

I'm just excited to see the thought that was put into this. I'm excited to see the additional support that this kind of money could bring to communities in Oregon, to set you all up for success to deliver this funding and to work with different agencies and different groups to get it out the door.

I'm going to share a personal anecdote. I just recently found out my gas furnace was red tagged. I was already excited to and planning on getting a heat pump. I told myself “I do this work, I know about the health benefits from having a heat pump”. I was excited to have cooling in the summer and to save some money on my energy bills, but that that upfront cost isn't nothing, right? Even if you're replacing your furnace with another furnace, that costs some real money. If you're going from electric resistance heating to heat pump at all, it all costs money upfront and seeing the Energy Trust incentive as a line item in my estimate for what I'm going to be getting was really, really helpful. But sticker shock overall, was still kind of a scary thing. So I think the more that incentives can be stacked, the more that Energy Trust can help to train contractors up on what are ways to install these that make the most sense for the different types of housing, different types of ductwork, all of that so folks can save money and install these really amazing energy saving appliances, just without too much overhead cost up front, I think the

better we'll all be. I'm grateful for the opportunity to comment, grateful to all of you for the work that you do, and looking forward to staying engaged and seeing what's next. Thank you."

Jeff Bissonnette, Northwest Energy Coalition

“Thank you for your time, and thank you all for your service, to the Energy Trust and to the ratepayers and bill payers and utility customers of Oregon. My name is Jeff Bissonnette, I'm here today representing Northwest Energy Coalition, and wanted to talk about two main things on your agenda. And, you know, one is the budget, but I'm going to do that second. The other one is coming up during your committee discussions, and that is your consideration of the fuel switching policy, and I wanted to speak in favor of the proposed policy. I think that it is considered, it is targeted, and it is well thought through. Both this policy and the budget are recognizing a key element that was not present at the creation of the Energy Trust and really hasn't, or is only now started to be front and center in ETO's planning and thought processes and program development. And that is responding to climate. Yes, ETO was founded and continues to focus on the value of energy efficiency and small-scale renewables. That will continue to be the focus, as it should be. However, we have a new environment, it's not all that new, but one that requires urgent action, and that is a changing climate. And for the first time in the last several years, we have binding legislation that, in the ETO's case, requires the utilities to act. And so I think I see both the fuel switching policy and the budget discussion that is still ongoing as key parts of the requirements that utilities are under to meet pretty stringent emission reduction targets. And so, to conclude on the fuel switching, I urge the board to adopt the fuel switching budget, or sorry, yes, fuel switching policy. And, and as you vote on that, to remember that it's a key element of that policy, to consider changes. That policy hasn't changed very much in the last 20 years. But there's no reason as this policy is implemented, that there can't be adjustments and, you know, and changes made sooner than the next 20 years. But I think that is a good step in the right direction, to really make sure that ETO can help customers respond to sort of the climate crisis in the way that they want to and the way that's right for them.

Focusing on the budget, I am very excited about the budget. We see a time right now, where we cannot do business as usual. And this budget underscores that the ETO recognizes that. I think that as you know, the initial conversation about the budget came to the Conservation Advisory Council there was a hint that everything was being questioned actually more than a hand it was it was clear at that point that really everything was being questioned - and I think that is very appropriate. Again, ETO still focuses on energy efficiency, first and foremost, to help the utilities meet their statutory obligation to make sure that they get all cost effective conservation first and, as it happens, energy efficiency is also key to helping the utilities make their again stringent emissions reduction requirements. None of that can happen without energy efficiency. None of that can happen without more energy efficiency and not just a little more, a lot more. The Energy Trust has been monumentally successful over the past 20 years in acquiring more efficiency than anybody thought possible. The Energy Trust needs to step up again and do more than anybody thought possible/thinks possible, and this budget indicates that you're heading in that direction. I look forward to the next three months between now and when the budget is approved. But you're heading in a great direction. Thank you for your time.

Tim Miller, Oregon Business for Climate

“I wanted to first thank you and the rest of the board for opening up this opportunity for public comment. And I'll be as brief as I can. Thanks for this early opportunity. Again, my name is Tim Miller and I'm the director of Oregon Businesses for Climate. We're a group of businesses across the state who recognize both the imperative and the opportunities of addressing climate change. I'm also the former CEO of an organization called Clean Energy Works, which some of you remember also known as Enhabit. Over the 10 years that Enhabit was active, we partnered very closely with the Energy Trust, relying on Energy Trust's critical role in setting standards and providing measurement and the trade ally network and guidance and messaging, all as we worked to help 5,000 families across Oregon improve the energy efficiency of their homes and make other improvements in their homes. That gives me a particular lens on the role that Energy Trust can play as a partner in helping align other resources; at that time it was federal funds and state funds at that time aligning with Energy Trust resources.

The other perspective I'm bringing today is in my work with Oregon Businesses for Climate, including the work on the Green Bank opportunity, the Greenhouse Gas Reduction Fund, as part of the Inflation Reduction Act. For over a year, we've been working with dozens of stakeholders on this effort, and it's now getting much clearer what this opportunity is going to look like. Leaders like Craft3 and Energy Trust have come together to help make this opportunity clearer for businesses and it's really focused on underserved communities and delivering on the Justice40 goals of the Inflation Reduction Act. And in developing this federal opportunity, it's become really clear to me and to everyone else involved that these funds, these federal opportunities, are going to be braided with many other resources.

We need to layer these funds in a smart way and that includes layering with Energy Trust programs, with the Portland Clean Energy Fund, with ODOE's own work, and ODOE's work with federal funds from the IRA, with other federal funds that may or may not flow through ODOE but may flow directly to CBOs that will be standing up other programs, and perhaps most importantly, with the Community Climate Investments (through DEQ's CPP) that you mentioned. The Community Climate Investments are a potentially very significant fund upwards of \$150 million a year managed by Seeding Justice. As noted in the Seeding Justice application, as I'm aware of directly, they are already in coordination with Energy Trust, and they're looking to Energy Trust to bring collaboration, infrastructure and capabilities to that program, both in launching the program and implementing the program in the long term.

At a program implementation level, nobody, no organization, no entity is positioned like Energy Trust to help align these initiatives for a synergistic impact. And that synergistic impact is completely aligned with Energy Trust - the objectives of capturing cost-effective energy efficiency and renewable energy generation. If we can align these things effectively, everyone benefits, including Energy Trust and its goals. But it's going to take systems and management and capacity and other infrastructure to make this successful. We have to maximize benefits delivered to underserved communities by getting that synergy to be as effective as possible. Also, that's going to be critical to help utilities reach their decarbonization goals.

Some might argue that these other funds mean Energy Trust can just kind of carry on as usual, and hope all this happens seamlessly. As my old manager at Intel told me, hope is a-- well, I can't use the word, but it's not a great strategy. We need to be intentional about aligning these resources. We know it's not true that we can just hope it works out. In that work, we'll need to be engaging new community-based organizations. We'll be ramping up new contractors, trade allies, and training and systems and tools. We'll be doing workforce development. In short, all these things that Energy Trust is good at.

As Oregon Businesses for Climate, we really appreciate Energy Trust's recognition that some of these investments at Energy Trust are going to help create opportunities for over 1,600 local businesses. These are businesses in every corner of the state, especially in Energy Trust territories, that are going to need extra support to get ramped up to do this work, along with greater support for community-based organizations and investments in workforce development. These investments that are envisioned in the Energy Trust budget to help make all this happen will also help our communities. Energy efficiency at sites that have been underserved in the past, including Oregon businesses of all sizes, but also renters and rural customers, low-income customers, customers of color, Oregonians throughout Energy Trust territory, that we can serve more and better and more deeply by braiding these resources in a smart way. That also includes providing stronger incentives to move projects, and the way to get these stronger incentives is by braiding these resources in an intelligent way. And that is going to require building out the infrastructure in the market to install these higher volumes; to execute the projects needed to absorb these federal, state and local funds, and to help meet the energy burden challenges of many Oregonians, especially our lower income and BIPOC communities and rural communities and, of course, to help Oregon reach its decarbonization goals.

Oregon Businesses for Climate strongly supports Energy Trust making investments needed to serve in this critical role that only Energy Trust can play in, collaborating and aligning as no other entity in the state can, to make all this work happen as effectively as possible. Thank you again for the time.