

[EXTERNAL: Please take care to verify address]

Name

Jake Wise

Organization

PGE

City or Region

Oregon

How do our strategic plan focus areas and desired outcomes relate to you or your organization's priorities in 2025-2030?

PGE appreciates the opportunity to provide feedback on the draft strategic plan. The proposed focus areas and outcomes very much align with PGE's decarbonization, customer engagement and community resilience goals.

What in this plan is most exciting to you or your organization or would compel you or your organization to work with us? How can we do a better job of working with you or your organization?

PGE appreciates the adoption of a new approach that defines focus areas, outcomes, metrics and strategies. PGE is excited by the stated support of electrification as a strategy to reduce the cost of decarbonization, the stated intent to secure and integrate other funding sources beyond ratepayer dollars to create greater impact for priority customers, and the inclusion of market adoption and participation targets that support motivating next level engagement.

The plan identifies how we will measure progress under each focus area. Do these seem like the right measures of progress? How much progress should we aim to achieve by 2030 in these areas?

PGE appreciates that Energy Trust plans to deepen partnerships with utilities on TLM, however, sees a more immediate opportunity for targeted and coordinated program delivery to meet shared affordability goals and would appreciate the inclusion of this work in the strategic plan. Given there are a number of ways in which to address energy burden it is desirable that energy efficiency be bundled with utility rate discounts, public sector funding and state agency assistance to maximize impact for our more vulnerable populations.

Is there anything you or your organization were hoping to see in our strategic plan that is not currently included?

PGE sees it as important to reconcile the stated ambitions with existing regulatory and statutory policies. PGE understands that "clean energy benefits", while an indirect outcome of cost-effective energy efficiency and above market cost renewables, is not an explicit Energy Trust mandate. Carbon savings and peak reductions are referenced frequently in the strategic plan; however, these are indirect outcomes of the above ratepayer investments. PGE sees it as prudent for the proposed overarching measurement framework to consider the current policy landscape so as not to presume that these indirect outcomes are to guide future investment or measure future success. PGE would appreciate the opportunity to instead participate in public conversations regarding how best to achieve these outcomes together.

September 30, 2024

Michael Colgrove
Executive Director
Energy Trust of Oregon
421 SW Oak Street, Suite 300
Portland, OR 97204

RE: Comments on Energy Trust draft 2025-2030 Strategic Plan

Dear Mike,

We appreciate the extensive work Energy Trust of Oregon (ETO) has invested in developing and presenting your draft 2025-2030 Strategic Plan. Pacific Power values the opportunity to provide feedback and offers the following comments and recommendations for your consideration:

Focus Area 1: Maximizing clean energy acquisition.

Pacific Power recognizes the importance of continuing Energy Trust's core work of energy efficiency and renewable energy acquisition. To further enhance these efforts, we encourage ETO to focus its investments in Pacific Power's constrained areas, especially where current Targeted Load Management programs are active in central and southern Oregon. More areas are being identified, and we believe that circuit-by-circuit targeting will have a significant impact. By concentrating efforts in regionally constrained areas, particularly in Central Oregon, ETO can provide critical system benefits while supporting our long-term energy goals.

Focus Area 2: Reducing the cost of decarbonization.

Cost containment is crucial as we collectively work toward Oregon's decarbonization goals. Energy Burden Assessments reveal that a significant portion of our customers are struggling to afford their utility bills, making it imperative that ETO finds cost-effective ways to deliver energy efficiency and renewable energy solutions. Any increases in Energy Trust funding requests directly affect customer bills. Therefore, Pacific Power strongly encourages ETO to prioritize cost containment within its operations.

Focus Area 3: Creating greater impact for priority customers.

Pacific Power supports ETO's focus on serving historically underserved and energy-burdened customers. However, we would like more transparency on how ETO's low-income energy efficiency programs complement the low-income weatherization services funded through the Public Purpose Charge and administered by Oregon Housing and Community Services (OHCS). With Oregon House Bill 3141 increasing the funds for these services, Pacific Power now collects and remits approximately \$8.9 million annually—nearly double the previous amount. We would appreciate seeing how ETO's efforts are incremental to OHCS's work, and how collaboration between ETO, OHCS, and local Community Action Agencies can enhance service delivery,

improve response times, and increase the depth of assistance provided to low-income customers across the state. Additionally, we urge ETO to explore new and innovative approaches to serve customers in rental properties, who make up 40-50% of our customer base, in a cost-effective manner.

Focus Area 4: Motivating the next level of customer participation.

We commend ETO for its efforts to increase customer participation in energy efficiency and renewable energy programs. To reach even more customers, especially those who may be hesitant to participate, we recommend continued collaboration with utilities to co-develop targeted load management programs. These programs should focus on maximizing customer participation in residential, commercial, and industrial sectors by providing compelling offers and addressing barriers to market penetration.

Focus Area 5: Supporting community resilience.

Energy Trust's support for community resilience is essential in helping communities adapt to and recover from extreme weather events. Pacific Power encourages ETO to focus on integrating clean energy solutions into local resilience plans, particularly in communities prone to wildfires, winter storms, and other disruptions. Importantly, we ask that ETO work directly with Pacific Power on any resilience activities that extend beyond a single site, especially those involving advanced solutions like microgrids. It is critical that any recommended measures be discussed with us first to ensure compatibility with our system and to confirm they align with legal and regulatory requirements. Strengthening partnerships with local and state governments, tribal entities, and resilience experts will further help ensure communities have the support needed to build resilience effectively and legally.

In addition, we would like to express our concerns regarding ETO's long-term budgeting approach. While we understand that ETO is considering a longer budgeting cycle, possibly extending to five years, Pacific Power believes it is essential to align this with our existing planning processes, including the Integrated Resource Plan (IRP) and Clean Energy Plan (CEP). The two-year cadence currently in place should remain balanced with any longer-term strategies, ensuring that our planning guides ETO's work in a coordinated and timely manner.

Pacific Power continues to value the contributions ETO makes on behalf of our customers. We look forward to working together in the coming years to deliver meaningful and cost-effective energy solutions while addressing the evolving needs of our communities.

Sincerely,



Clay Monroe
Managing Director, Customer Solutions

NW Natural would like to thank Energy Trust for the opportunity to provide feedback on the Draft 2025-2030 Strategic Plan. The Strategic Plan outlines the innovative strategies and evolving focus of Energy Trust. Many of NW Natural's goals for reducing emissions and keeping bills affordable are reflected within the plan, but there is some ambiguity in the language used. While the use of "clean energy" is defined within the Strategic Plan, NW Natural notes the association of the phrase may not be inclusive of gas energy efficiency. This document is intended for a broad audience and without background information it may be read as an energy generation focused plan. Many of NW Natural's comments and recommendations below are centered around ensuring energy efficiency remains in the forefront.

Comments and Recommendations:

Focus Area 1

- NW Natural recommends including the term "energy efficiency" in the title of Focus Area 1. The focus area includes energy efficiency, however, by only referencing clean energy in the title, it may read as an energy generation goal.
- The metrics proposed to measure success seem reasonable. Deferred utility investments may be difficult to quantify; NW Natural recommends working directly with each utility when setting goals for that metric and ensuring cost-effective programs. NW Natural also proposes adding peak day and peak hour energy reductions as a metric.
- NW Natural supports the emphasis for targeted load management efforts with target energy efficiency. NW Natural is currently working with Energy Trust to identify areas that may benefit from non-pipeline solutions, having processes and program structures to effectively target geographic locations will play a large role in deferring utility investments.

Focus Area 2

- NW Natural notes that electric utilities are called out in the desired outcomes for reduced cost of decarbonization, but gas utilities are not. Lowering the cost of decarbonization is a goal for all utilities and should not be limited to electrification.
- Outside funding may be used to support electrification, but Energy Trust's core rate payer dollars may not. The use of outside funding is mentioned in Focus Area 5 and should also be included when discussing electrification.
- NW Natural does not view electrification as gas energy efficiency and highlights the bill impact risk to customers that are fully electrified. Reducing bills is a strong theme throughout the Strategic Plan and should be considered in fuel switching applications. NW Natural's Energy Burden Assessment will be available next month, and highlights the bill impacts for low-income customers that switch from natural gas heating to electric heating.
- Hybrid or dual fuel systems have the potential to reduce emissions while limiting the electric peak impact in relation to full electrification. NW Natural would recommend including this as a strategy.

Focus Area 3

- NW Natural supports the focus on increasing participation among priority customers groups.

Focus Area 4

- Desired outcomes primarily read as getting customers solar and battery storage. While reducing energy use encompasses energy efficiency, we would suggest calling out specific measures such as fully weatherizing homes when new HVAC equipment is installed.
- Motivating deeper retrofits for both customers that have and have not participated may be a challenge to measure. NW Natural recommends using customer feedback as a metric to inform Energy Trust's attribution.

Focus Area 5

- The gas infrastructure plays a large role in resiliency for customers, which is not mentioned in this section. Gas fireplaces can be safely operated in power outages caused by winter storms to provide customer resiliency and hybrid/dual fuel systems can reduce electric peaks for grid resiliency. Helping communities create resilience plans is important, and NW Natural would suggest adding a strategy for connecting communities with utilities or training Energy Trust staff on utility system planning.

Name: Lisa McGarity

Organization: Avista

City or Region: Medford, OR

How do our strategic plan focus areas and desired outcomes relate to you or your organization's priorities in 2025-2030?

Energy Trust's five Focus Areas align well with Avista priorities. Avista is focused on providing safe and reliable energy to all our customers. Assisting energy burden households is important and broadening our reach to serve more of our customers with energy efficiency services can be amplified by working together.

Specifically in Focus Area 1, maximizing clean energy acquisition, Avista welcomes the emphasis on increasing investments in and support for efforts to address insufficient workforce resources.

In Focus Area 2, Avista values the continued focus on natural gas savings to reduce the cost of decarbonization for customers.

Avista also recognizes Focus Area 3's approach of utilizing community engagement principles to co-create programs as a benefit to priority customers.

In Focus area 4, Avista supports Energy Trust's ongoing commitment to NEEA and similar organizations to enable market transformation through new technology adoption.

Finally, Avista appreciates the inclusion of Focus Area 5. In particular, Avista supports proactive engagement and partnership development to ensure communities are resilient and well-prepared for natural disasters. Avista sees natural gas as a critical element of resiliency planning.

What in this plan is most exciting to you or your organization or would compel you or your organization to work with us? How can we do a better job of working with you or your organization?

In addition to the areas noted in the previous question, Avista is pleased that Energy Trust is continuing to enhance its core business of motivating the next level of customer participation as this will be necessary to ensure greater levels of energy efficiency is achieved through this strategic plan years of 2025-2030.

The plan identifies how we will measure progress under each focus area. Do these seem like the right measures of progress? How much progress should we aim to achieve by 2030 in these areas?

The metrics seem to be a useful tool to measure how Energy Trust is performing the objectives specified. A few of the metrics may be challenging to measure as they appear to be outside the direct control of Energy Trust (Focus Area #1 metrics, 2). It could be useful information, but it appears Energy Trust would be reliant upon others to assist with information.

Is there anything you or your organization were hoping to see in our strategic plan that is not currently included?

Avista appreciates the efforts of Energy Trust to help our customers reduce natural gas energy consumption through energy efficiency and thereby further decarbonization work in Oregon. This

benefits the utility system by creating resiliency, promotes least cost planning to keep overall costs lower, and creates more comfortable homes and businesses for customers.

From:

Received: Fri Sep 06 2024 15:59:07 GMT-0400 (Eastern Daylight Time)

To: Information - Energy Trust;

Subject: Energy Trust of Oregon Seeking Comment on Strategic Plan

After reviewing the Energy Trust of Oregon's draft 2025-2030 Strategic Plan, here are several feedback points that may be relevant from the perspective of rural coastal cities in Oregon:

1. **Maximizing Clean Energy Acquisition:**

- **Recommendation:** Coastal cities often face unique challenges with infrastructure, especially due to harsh weather conditions. Consider offering tailored incentives or grant opportunities specifically for coastal areas that encourage the adoption of wind, tidal, and solar energy solutions. This could help cities reduce long-term energy costs and create cleaner energy infrastructure that withstands coastal environmental pressures.
- **Feedback:** Coastal cities may require targeted support to implement large-scale renewable energy projects due to limited access to traditional grid infrastructure. Energy Trust could explore partnering with local government bodies to develop regional clean energy hubs that leverage the coastal environment.

2. **Reducing the Cost of Decarbonization:**

- **Recommendation:** Coastal cities often have limited budgets. Reducing upfront costs for decarbonization efforts, such as building retrofits, renewable energy installations, and electric vehicle infrastructure, is crucial. Offering grants, low-interest loans, or bulk procurement programs for energy-efficient technologies could be instrumental in helping rural coastal areas meet decarbonization targets.
- **Feedback:** Programs aimed at reducing costs of renewable energy adoption should prioritize small, budget-limited coastal cities where economic development often lags. Flexible financing options could help cities overcome initial cost barriers to adopting clean energy.

3. **Creating Greater Impact for Priority Customers:**

- **Recommendation:** Coastal areas often house lower-income and older populations, which tend to be underserved. Targeted outreach to these communities is essential to ensuring equitable access to energy-saving programs. Specific programs should be designed for seasonal workers and rural residents who may not have year-round access to traditional energy savings programs.
- **Feedback:** Energy Trust should focus on developing communication channels that work for rural and remote populations, including offering in-person outreach or partnership with local organizations. Tailoring solutions to the specific needs of residents in coastal cities—who may have older, less energy-efficient homes—can lead to increased engagement and more successful outcomes.

4. **Motivating the Next Level of Customer Participation:**

- **Recommendation:** Coastal cities have opportunities to engage residents and businesses in local clean energy programs, especially with tourism-driven economies. Offer coastal cities special incentives or campaigns that target small businesses in the hospitality sector (hotels, restaurants) to implement energy-efficient upgrades. Also, promote participation in electric vehicle and charging infrastructure programs, which could benefit both residents and the tourism industry.
- **Feedback:** Focus on community-wide participation models that encourage residents and small businesses to take advantage of energy programs together, creating a sense of collective impact. Additionally, supporting local governments in incorporating clean energy incentives into their tourism and economic development plans will motivate participation across sectors.

5. Supporting Community Resilience:

- **Recommendation:** Coastal cities face significant risks from climate change, including sea-level rise and increased storm frequency. Energy Trust should work closely with local governments to integrate clean energy and energy resilience into their emergency preparedness plans. Investing in microgrids and battery storage systems for critical facilities like hospitals and emergency centers could greatly enhance the resilience of these cities.
- **Feedback:** Coastal cities need targeted support for resilience-building efforts, including technical assistance for integrating clean energy solutions into emergency preparedness. Encourage collaboration with local utilities to ensure that rural coastal communities have backup power options during natural disasters, particularly through the adoption of renewable microgrid systems.

In summary, the draft strategic plan could benefit from more emphasis on the specific needs and challenges faced by rural coastal cities. By providing targeted resources, outreach, and financing options, the Energy Trust can ensure that these areas are well-equipped to adopt clean energy and build resilience for the future.

Best,

David

David A. Milliron, Credentialed City Manager (ICMA-CM)
City of North Bend, 835 California Ave, OR 97459-0014

North Bend: [*Coast, Community, Culture.*](#)

September 20, 2024

Energy Trust of Oregon
421 SW Oak St
Portland, OR 97204

Subject: Draft 2025-2030 Strategic Plan

Dear Energy Trust Board of Directors:

Thank you for the opportunity to comment on the Energy Trust of Oregon's Draft Strategic Plan. The City of Portland has many long-standing and successful partnerships with Energy Trust. The Bureau of Planning & Sustainability (BPS) broadly supports the vision and direction of this strategic plan. The City of Portland's Climate Emergency Workplan goals to reduce emissions 50% by 2030 and to achieve net-zero by 2050 rely heavily on investor-owned utility decarbonization actions and Energy Trust activities to bring affordable clean energy, and all the benefits that come with it, to everyone. Given the climatic importance of the next five years, we urge Energy Trust to more substantially integrate emission reduction outcomes – and the associated impacts to priority communities – not as a single focus area, but as a critical outcome across the entire portfolio.

BPS supported Energy Trust of Oregon's 2024-2025 budget priorities and action plan in its goals for additional energy efficiency investments, focus on social equity-centered outcomes, and capacity building in the Trade Ally network and community-based organizations. 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 energy and climate goals. BPS strongly supports the strategic plan objectives to deliver greater benefit for priority customers and for groups Energy Trust has historically underserved. Furthermore, the importance of motivating the next level of participation with strategies that appeal to people who have not yet acted resonates with our climate work and objectives at BPS.

It's timely that the American Council for an Energy-Efficient Economy (ACEEE) recently published a report [Accounting for Change: Policies and Technical Approaches for Reducing Greenhouse Gas Emissions through Energy Efficiency Programs](#), supported by Energy Trust. The report findings highlight that "a limited number of states and utilities have begun incorporating GHG reduction goals into their energy efficiency programs...to date, GHG reduction goals within energy efficiency programs have been too modest to significantly transform utility efficiency portfolios. The most prominent outcomes have been an increased preference for beneficial electrification and measures with long effective useful lives." BPS encourages Energy Trust to lead on this front, in considering and adopting emission reduction goals that move beyond energy savings, and towards targeted electrification for ETO's priority customers. Energy Trust can recenter its utility efficiency portfolio to prioritize environmental justice communities by accelerating non-emitting solutions and minimizing carbon and health impacts of outdated technologies. It is widely accepted in Oregon and acknowledged in HB3409 that "heat pumps the most energy efficient space heating option available in the market." Through these actions, ETO can make valiant progress to meet [Executive Order 20-04](#) and [Oregon's Climate Action Roadmap to 2030](#).

During this strategic plan period in the lead up to 2030, Energy Trust will play a vital role in helping Oregon and the City of Portland meet adopted climate and emission reduction goals. We applaud efforts that align with climate priorities, including:

- Ongoing engagement with the Portland Clean Energy Fund, support for the state of Oregon decarbonization programs and policies, work with the Oregon Public Utility Commission to quantify additional benefits and potential of clean energy, and deployment of federal funding that can decarbonize both energy supply and demand.
- Elevating energy justice and priority customers in the clean energy transition.
- Energy Trust's emphasis on maximizing clean energy acquisition to ensure future costs are as low as possible for customers and utilities.
- Multiyear budget and action planning to accelerate and expand energy savings that can make a larger impact over the long term and better support Oregon achieving energy decarbonization goals by 2030.
- Updates to electric avoided costs that reflect the true value that energy efficiency contributes to a reliable, decarbonized energy system.

Finally, as the City of Portland transitions to a new form of government and new elected officials in 2025, BPS and the newly formed Sustainability & Climate Commission will be re-focused on meeting our emissions reductions goals and connecting these to community resilience efforts. We are eager to engage Energy Trust's Communities and New Initiatives team and take greater advantage of Energy Trust's programmatic and custom offerings for local and state government agencies.

Thank you for the opportunity to comment on the direction of Energy Trust of Oregon over the next critical five years.

Sincerely,

Paul Hawkins | Buildings and Energy Program Manager

He/Him/His

City of Portland Bureau of Planning and Sustainability

1810 SW 5th Avenue, Suite 710 | Portland, OR 97201

p: | e:



Memo to: Energy Trust of Oregon
From: Warren Leon, Executive Director
Date: September 13, 2024

Comments on Energy Trust of Oregon Strategic Plan

This is an excellent strategic plan that recognizes important national trends, as well as Oregon-specific considerations.

It is a good that the strategic plan starts with a clear summary of three factors that will shape the future. Each of those factors is important and it is good that the plan was developed with them in mind.

- It is not clear why the topic of increased calls for equity and environmental justice is presented as an appendage to the point about extreme weather events, as opposed to being its own topic.

The five focus areas are appropriate and well-chosen. I cannot identify other, better alternative focuses. Here are some small suggestions for modifying the discussion of these:

- When it comes to renewable energy generation, “maximizing acquisition” does not always make the most sense. Quality matters as much as quantity. Sometimes a smaller system that produces generation at the times when it is most needed is better than a larger system that produces more total power, and can deliver a greater payback for the customer. The discussion on page 10 implies an awareness of that, but the point could be made more explicitly.
- On page 11, I suggest adding a clarifying word to the following sentence: “Cost-effective energy efficiency is **usually** the least cost and lowest risk tool for decarbonization...” It isn’t always true.
- On page 12, I suggest modifying the following sentence as follows: “...many have been left out of receiving **beneficial** services **when they would have benefited the most from them.**” The key factor is whether they would have benefited, not whether they would have benefited more than other people.
- In the discussion of focus area 3 on page 12, it would be good to note that Energy Trust has already started moving in this direction and that the work between 2025 and 2030 will build upon initial steps taken in recent years.
- On page 12, an additional metric could be percent of customer participation in the priority customer groups compared to percent of customer participation overall in Energy Trust’s service territory. Or share of Energy Trust spending that is devoted to the priority customer groups.
- For focus area 4 on page 13, the idea of developing new strategies to reach uninvolved customers makes good sense, but there is no discussion of how those new strategies will be developed or implemented.

Name: Brooke Landon

Organization: CLEAResult

City or Region: Portland/National

How do our strategic plan focus areas and desired outcomes relate to you or your organization's priorities in 2025-2030?

All of the strategic plan focus areas align with CLEAResult's priorities, with one exception: workforce development. With Energy Trust's broad support across Oregon, access to funding, and existing community partnerships, you are poised to take on a greater role in supporting workforce development across the entire energy industry. In fact, if any of the goals of the existing five focus areas are to be met, an investment in and focus on building the green energy economy through funding skills training and sponsoring learning and development programs across Oregon will be very necessary, and Energy Trust is in a unique position to focus on this. Related, in the "Future we are planning for," the importance of workforce development (and bringing in new people, organizations, and contractors) is clear and the plan mentions the training & support new people, organizations, contractors and customers will need, but metrics are also needed to help guide effort and resources in the most appropriate and effective manner.

What in this plan is most exciting to you or your organization or would compel you or your organization to work with us? How can we do a better job of working with you or your organization?

The focus on community resilience in Energy Trust's strategic plan. The existing role Energy Trust plays in the state means you are uniquely poised to foster this work. We are hopeful that within this focus area is an implied connection with existing agencies and groups with expertise in the area of resilience, such as FEMA, Oregon Department of Emergency Management, City bureaus of Emergency Management, and statewide Community Emergency Response Teams (CERTs). Related, I expect this is on Energy Trust's mind, but it will be very important for Energy Trust and OPUC metrics to be aligned. As highlighted in the draft plan, there will need to be coordination among a wider set of market actors, so alignment on things like metrics across agencies can help avoid additional layers of confusion and hopefully help streamline administration and things like reporting to a degree.

The plan identifies how we will measure progress under each focus area. Do these seem like the right measures of progress? How much progress should we aim to achieve by 2030 in these areas?

Insofar as the proposed measures of progress focus on the desired outcomes with customers and ratepayers, there is an opportunity to measure and track support of job creation and small businesses. With respect to earlier comments about workforce development, job creation through small businesses, non-profits, and community-based organizations will also serve to create broader momentum for Energy Trust's programs, which will in turn support Focus area 4: Motivating the next level of customer participation.

What tracking & reporting might need to be in place to support KPIs that go beyond kWh and therms such as carbon, demand reduction, equity, etc? Even in the classic EE/renewables space, the time when energy is used or saved has a huge impact on carbon savings. In emerging areas of program work, such as GEB (Grid Interactive Efficient Buildings), there are significant demand and carbon reductions.

Now that diverse supplier metrics have been in place for some years, how is Energy Trust evaluating success? How might metrics evolve?

Is there anything you or your organization were hoping to see in our strategic plan that is not currently included?

The plan is clear, concise, and comprehensive and is great! We are excited at the direction Energy Trust is going and grateful for the continued opportunity to support so much important, meaningful, impactful work.



ECUMENICAL MINISTRIES

— OF OREGON —

September 23, 2024

To: Energy Trust of Oregon

Re: Comments for Energy Trust of Oregon Strategic Plan draft 2025-2030

The [Ecumenical Ministries of Oregon](#), its Creation Justice Committee, and Oregon Interfaith Power and Light are pleased to submit comments on the Energy Trust of Oregon's Draft Strategic Plan 2025-2030. As a reminder, the Ecumenical Ministries of Oregon is a statewide association of faith partners working together to improve the lives of Oregonians through public policy advocacy, direct service programs, creation justice, and ecumenical / interreligious education and dialogue. For 50 years, EMO has advocated for the marginalized and serving those in need. Our unique approach brings together advocacy, education and direct service. To help you understand how we transform our vision into practical results, here is a [link](#) to a summary of just some of our accomplishments presented in our 2023 Annual Report.

Two of our on-going projects are particularly relevant to the important work of the Energy Trust of Oregon. The first is the [Interfaith Solar Campaign](#). Over 50 churches, synagogues, mosques, and Tribal congregations throughout our state (and beyond) have already indicated keen interest in joining the faith communities that have already added energy efficiency measures and solar arrays to their facilities.

Second, many of these faith communities are interested in learning how they can transform their facilities into Climate Resilience Hubs that can serve the local communities impacted by extreme weather events. EMO, Oregon Interfaith Power & Light and the Oregon Synod convened a nine-month multi-faith Climate Resilience Cohort last year that brought together teams of leaders (lay and clergy) from faith communities across Oregon to build capacity and learn how they can be active co-participants, along with their neighbors, in building community-wide resilience hubs and advancing climate justice. For more information, we suggest you start with the [Oregon Faith Communities & Climate Resilience Report 2023](#). EMO staff and members and EMO's Creation Justice Committee have had preliminary but encouraging conversations with Jeni Hall, EMO's Advanced Solar Program Manager, to explore opportunities for collaboration.

EMO is working with faith organizations throughout Oregon to serve as a climate resilience hubs by supporting their climate restoration goals into action, providing disaster prevention trainings to the community, and becoming a resource in the event of a climate-related disaster to their congregation members and surrounding community. We connect faith organizations with local



ECUMENICAL MINISTRIES — OF OREGON —

Emergency Management, active Community Organizations Active in Disasters (COAD), and other community-based organizations involved in disaster response. In addition, we share ways in which faith organizations can be active in climate advocacy for policy changes.

We endorse all the Focus Areas, outcomes, metrics, and strategies described in the draft Strategic Plan. However, we encourage the Energy Trust to think even more creatively about how you can best develop and use partnerships with community-based organizations and faith communities. In particular, we encourage the Energy Trust to explore partnerships with churches and other faith communities that are already demonstrating an interest in becoming trusted community resilience hubs. EMO has developed trusting relationships with many faith communities located throughout the state, including those located in historically underserved communities. We have developed expertise at EMO itself and we are in a good position to recruit, educate, support interested parties within individual churches and other faith communities.

We recommend that the potential for collaboration with Oregon's faith communities to support Focus Area 3 (Creating Greater Impact for Priority Customers), Focus Area 4 (Motivating the Next Level of Customer Participation), and Focus Area 5 (Supporting Community Resilience) be made explicit.

ETO has developed an aggressive and important strategic plan that reflects the needs, challenges, and opportunities in our state. It will require an "all hands-on-deck" approach to be successful. You are correct in noting that ETO will need to further cultivate your relationships with "utilities, state and local governments, tribal governments, community-based organizations, stakeholders and funding agencies..." We recommend you add Oregon's faith communities to this list. As you learn more about our level of commitment and capabilities, we believe that you will appreciate that we are an "untapped resource" and valuable partner that can help the Energy Trust achieve its important objectives.

Signed,

Taylor Silvey, Public Health Coordinator, Ecumenical Ministries of Oregon
Richenda Fairhurst, Creation Justice Committee Chair, Ecumenical Ministries of Oregon
Jeff Hammarlund, Creation Justice Committee Member, Ecumenical Ministries of Oregon



September 20, 2024

Michael Colgrove
Executive Director
Energy Trust of Oregon
421 SW Oak Street, Suite 300
Portland, OR 97204
Delivered via email to: info@energytrust.org

RE: Comments on Energy Trust's Draft 2025-2030 Strategic Plan

Electrify Now and Third Act Oregon appreciate the opportunity to provide feedback on the Energy Trust Draft 2025-2030 Strategic Plan. We are generally supportive of the vision and content that ETO has articulated and particularly appreciate the focus on priority customers and lowering the cost of decarbonization.

The time frame covered by this new strategy coincides with significant changes and impending changes to our energy systems, accelerating pressures from our changing climate, new state and federal policy frameworks, and new funding sources. This brings both challenges and opportunities to ETO as it strives to serve customer needs, increase system energy efficiency and help meet state climate goals making this strategic planning period particularly important as Oregon and the world transitions to a clean energy economy.

Below are comments and suggestions regarding specific deliverables we would like to see included in the final Strategic Plan. In general, our comments are directed toward making sure the plan delivers on these priorities:

- 1. Equity** - Increased resources to help low and moderate income households appreciate the benefits of energy efficiency measures and solutions which improve the health and safety of their homes.
- 2. Maximum Efficiency and Decarbonization** - Updated policies and incentives to enable the *most* energy efficient and *most* decarbonizing solutions to be prioritized to ensure the biggest return on ratepayer investments.
- 3. Education** - Better resources and information to help homeowners, building owners and professional building tradespeople make good decisions that will save energy consumers money, reduce carbon emissions and improve the safety and comfort of homes and buildings.

1 Equity

We appreciate that a focus area for the Strategic Plan is "Creating greater impact for priority customers" to better address customers that have historically been underserved by ETO and who struggle with energy burden. We recommend these additions to strategy deliverables in this area.

a. Reporting on current levels of incentive funding that specifically benefit priority customers and creating targets for future increases in this funding. Because this group of ratepayers has the most to gain from efficiency measures, and because they have been historically underserved by incentive programs, the targeted funding to them should be significantly greater than their percentage of the overall ratepayer population. Without

transparency on current funding levels and clear targets, it is impossible to determine if ETO is truly serving these communities in the way they should be served, and it is difficult to determine if ETO programs are adequately structured to reach these customers and bring attention to this critical part of the ETO mission.

b. Prioritization of measures which have health and safety benefits. Because these communities suffer more acutely from health issues related to climate change and air pollution, measures which improve home safety, protect against extreme heat, improve indoor and local outdoor air quality should be prioritized for these customers. This would mean prioritizing appliances and solutions which provide efficient heating and cooling, eliminate on-site combustion, reduce indoor air pollution and reduce local outdoor air pollution. The quantitative value of these health and safety benefits should be elevated in cost effectiveness analyses so that measures and equipment that deliver these benefits are prioritized for these customers.

c. Increased weatherization and shell improvement programs and funding. Priority customers are much more likely to live in poorly insulated or poorly air sealed homes which increases energy costs and makes occupants more susceptible to air quality issues related to wildfires and local air pollution. Building shell improvements also reduce costs related to heating and cooling equipment by reducing energy loads and enabling lower capacity and lower cost equipment to be installed. Incentive funding for priority customers should disproportionately support building shell improvements over marginal energy efficiency gains in heating equipment or cooling equipment. Reporting on current funding and specific targets for increased funding in this area should be included in the plan.

2. Maximum Efficiency and Decarbonization

While we appreciate the Strategic Plan focus on “Reducing the cost of decarbonization,” we urge the ETO to adopt a more aggressive approach in this area given the urgency of decarbonization. “Maximizing efficiency and decarbonization” would be a more appropriate focus and signal a more proactive approach to spending ratepayer dollars for maximum impact.

Considering the urgent need to reduce carbon emissions as outlined in state climate goals, the likely adoption of the Climate Protection Plan (CPP), and shifting customer preferences for clean energy solutions, it is time to evaluate if current funding mechanisms and policies are able to truly maximize the impact of efficiency spending. Specifically, this would mean evaluating current cost effectiveness tests, fuel switching policies and limitations on how specific utility contributions to ETO programs are spent to determine if these policies are capable of maximizing efficiency and carbon reduction benefits or need to be revised in order to better serve Oregon ratepayers.

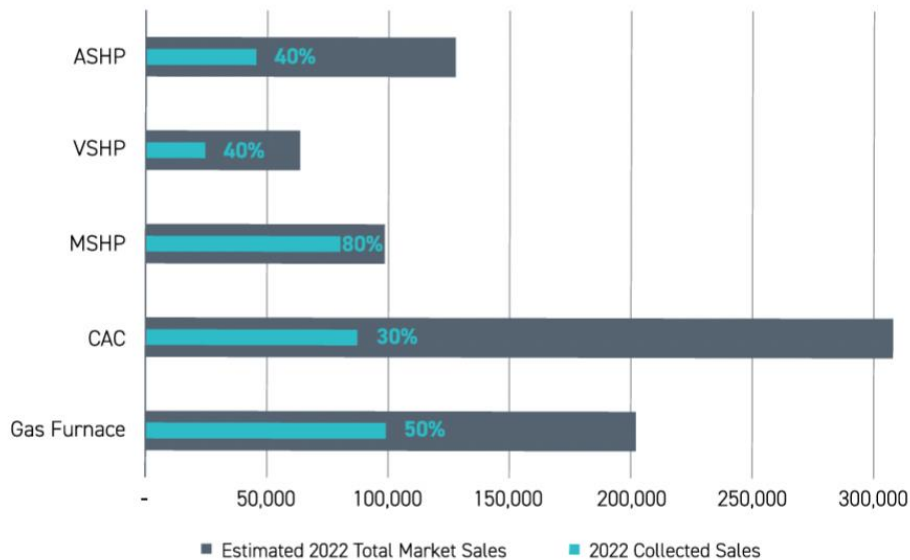
The CPP, if it is finalized as currently proposed, will require Investor Owned Natural Gas Utilities to dramatically reduce their emissions on a proscribed trajectory and pay into programs that deliver carbon reductions if they fail to reduce emissions through their operations. Reducing natural gas throughput is the most cost effective way to comply. Equipment which shifts heating load away from natural gas to electric energy will provide a substantial and quantifiable avoided cost value to the gas utilities. This could significantly impact cost effectiveness tests if these avoided costs are taken into consideration as they should be.

Homeowners are increasingly choosing heat pumps versus gas furnaces for home heating. Data from the [Air Conditioning, Heating and Refrigeration Institute \(AHRI\) Monthly Shipment Reports](#),¹ which tracks monthly HVAC residential equipment shipments nationally, shows that over the last several years, gas furnace shipments have consistently decreased while heat pump shipments have dramatically increased. 2024 year to date data shows that of combined gas furnace and heat pump shipments, 59% were heat pumps and 41% were gas furnaces. This is a complete reversal from 2018, where gas furnaces made up 54% and heat pumps accounted for 46% of residential home heating equipment shipments. Data from the [Bonneville Power Administration 2022 Northwest](#)

¹ Air Conditioning, Heating and Refrigeration Institute (AHRI) Monthly Shipment Reports, <https://www.ahrinet.org/analytics/statistics/monthly-shipments>

[HVAC Market Snapshot](#)² confirms that this trend is even more apparent in ETO territory by reporting that combined ducted (ASHP, VSHP) and ductless (MSHP) heat pumps outsold gas furnaces by 61% to 39% in the Pacific Northwest in 2022 for the first time. Fuel switching policies which prevent incentives that support fuel choice for Oregon ratepayers and prevent them from choosing heat pumps versus gas furnaces are out of line with consumer preferences.

FIGURE 1 Market Coverage of 2022 Collected Residential Sales Data



2022 Pacific Northwest Sales of Heating and Cooling Equipment

From: Bonneville Power Administration 2022 Northwest HVAC Market Snapshot

Dual fuel solutions are also increasingly popular for homeowners as customers and installers become more acquainted with the advantages of heat pumps compared to conventional air conditioning. Current policies and mechanisms are incapable of prioritizing this solution with incentives. Data from [Bonneville Power Administration 2022 Northwest HVAC Market Snapshot](#) shows that total estimated market sales for Central Air Conditioners (CAC) are greater than all forms of heat pumps combined in the Pacific Northwest. The data also shows that these CAC units deliver cooling efficiencies that are generally lower than ducted or ductless heat pumps. As summer peak electric grid loads due to the increased need for residential cooling become more severe and expensive, policies and incentives to shift away from air conditioners to more efficient heat pumps for residential cooling should be prioritized. This will require dual fuel incentive solutions.

A recent report from [Lawrence Berkeley National Laboratory and National Renewable Energy Laboratory \(NREL\)](#)³ states that “ASHPs deliver substantial energy savings and reduce average GHG emissions in all states and future grid scenarios,” The report and supplemental information provides state by state data on GHG reductions and operating costs for various levels of heat pump efficiency compared to gas furnaces and air conditioning. This report confirms that heat pumps for home heating and cooling are the most energy efficient solutions available today, produce dramatically lower carbon emissions, and consistently deliver lower energy costs than gas furnaces and conventional air conditioning in the state of Oregon. Incentives to encourage the widespread adoption of heat pumps deliver efficiency, carbon and air quality benefits that cannot be matched by gas equipment. Incentive

² Bonneville Power Administration 2022 Northwest HVAC Market Snapshot, January 2024, <https://www.bpa.gov/-/media/Aep/energy-efficiency/momentum-savings/2022-hvac-market-snapshot.pdf>

³ Heat Pumps for All? Distributions of the costs and benefits of residential air-source heat pumps in the United States, E Wilson, P Munankarmi, B Less, J Reyna, S Rothgeb, Joule, Volume 8, Issue 4, 1000-1035, April 17, 2024

programs should be structured to maximize incentives for the most efficient, most decarbonizing technologies rather than supporting efficiency measures that make only modest impacts.

Because heat pumps, heat pump water heaters, induction stoves, heat pump dryers and other efficient electric appliances eliminate on-site combustion, they offer health and safety benefits over fuel burning alternatives by reducing indoor and outdoor air pollution. These health and safety benefits should be quantified and included in cost effectiveness tests in addition to their superior energy efficiency benefits.

Due to all of the above factors – CPP requirements that create new avoided costs for natural gas reductions, the shift in consumer preferences away from gas furnaces toward heat pumps, the prevalence of dual fuel installations, the need to deliver increased cooling efficiency to minimize summer peak electrical loads and the health and safety benefits of efficient electrical appliances - the strategic plan should deliver the following:

a. Reporting on current policies which prevent incentives for dual fuel solutions, customer fuel choice for electrification and heat pumps to replace central air conditioning, and proposed adjustments to those policies to enable incentives for these maximum efficiency, maximum decarbonization solutions. If it is determined that existing policies create barriers to incentives for the most beneficial solutions, ETO should petition the Oregon Public Utilities Commission to update those policies including cost effectiveness tests and limitations to how utility funding can be spent. Proposed updated to these policies should quantify health and safety benefits as well as avoided costs for CPP compliance and efficiency benefits.

b. Reporting on current utility incentive funding directed toward appliances versus building shell improvements broken out by residential and commercial customers and utility, with targets for decreasing gas appliance incentives over time. Incentives towards gas furnaces and other gas appliances are increasingly unjustified due to the higher operational costs of those appliances compared to high efficiency electric heat pump solutions, the on-site air pollution and related health risks created by these appliances, their greater carbon emissions and their lack of cooling benefits. Incentives toward building shell improvements are a no regrets investment compared to gas appliance incentives. Reporting and spending targets are a critical first step towards shifting incentives away from gas appliances towards more beneficial solutions.

3. Education

ETO is a trusted source of information to energy consumers, homeowners, building owners and the professional building trades. ETO should strive to provide complete information regarding customer options for energy consuming devices and efficiency measures to help those customers make informed decisions. In order to do this, the strategic plan should include the following deliverables:

a. Information to customers on health implications of appliance choices and efficiency measures. The ETO website should include information regarding indoor air pollution, outdoor air pollution and any other known health related impacts associated with appliances and efficiency. For example, the [health impacts of gas cooking appliances](#)⁴ and the [health impacts related to air pollution from burning fuels – including gas, oil, biomass and wood - in buildings](#)⁵ is well studied and documented. California has recently passed legislation requiring [health warning labels on gas stoves](#)⁶ – an indication of the seriousness of this health issue. If needed, ETO should ask the Oregon Health Authority for guidance on statements regarding those health impacts to be included on ETO educational materials and websites.

⁴ A Review of the Evidence, Public Health and Gas Stoves, Multnomah County Health Department, November 2022, <https://multco-web7-psh-files-usw2.s3-us-west-2.amazonaws.com/s3fs-public/gas-stoves-health-risk-report-2022-FINAL.pdf>

⁵ What is the Health Impact of Buildings in Your State? Outdoor air pollution from buildings harms public health across the United States, RMI, <https://rmi.org/health-air-quality-impacts-of-buildings-emissions/>

⁶ Gas stoves may soon come with a tobacco-style health warning label in California, Jeff Brady, NPR OPB September 13, 2024, <https://www.npr.org/2024/09/13/nx-s1-5003074/climate-gas-stove-health-warning>

b. Information to customers on the environmental implications of appliance choices and efficiency measures.

The ETO website should provide information regarding the carbon emissions from appliance options available to energy customers in line with the organizations stated purpose to “maximize the adoption of clean energy solutions”. Most energy consumers are unaware that their furnaces and water heaters create carbon emissions but [the majority of energy consumers in Oregon care about reducing carbon pollution and transitioning to clean energy solutions](#)⁷. Since the ETO website is a resource used by energy consumers at the point of transaction towards new equipment or efficiency upgrades, this is the ideal time to supply this important information.

We are fortunate to have the dedicated and conscientious staff at Energy Trust of Oregon operating to help transition our state to clean, affordable energy and maximize the adoption of clean energy solutions, reduce energy costs and accelerate community-centered benefits. We look forward to working with ETO to realize these goals and appreciate the opportunity to comment on future plans with the aim of strengthening program impacts.

Respectfully,

Brian Stewart
Co-Founder
Electrify Now

Thor Hinkley
Coordinating Committee Member
Third Act Oregon

⁷ Yale Climate Opinion Maps 2023, J Marlon et al, Dec 13, 2023: <https://climatecommunication.yale.edu/visualizations-data/ycom-us/>

Name: Chris Smith

Organization: Energy 350

City or Region: Portland

How do our strategic plan focus areas and desired outcomes relate to you or your organization's priorities in 2025-2030?

Our company is a Program Management Contractor for the Energy Trust Production Efficiency Program. The strategic plan is well aligned with our priorities for 2025-2030. We seek to maximize the EE resource in our region, both in magnitude and reach, by driving for deeper savings and broader participation in the PE program.

What in this plan is most exciting to you or your organization or would compel you or your organization to work with us? How can we do a better job of working with you or your organization?

We appreciate everything Energy Trust has done historically and feel this plan will position us to continue this great working relationship into the future.

Is there anything you or your organization were hoping to see in our strategic plan that is not currently included?

We would be interested in seeing more focus on demand-response readiness. DR is a key component of the region's electrification goals. While we realize offering automated DR programs it outside of Energy Trust's scope, we also see many opportunities to couple DR with EE offerings. It would be interesting to explore offerings that provide enhanced incentives or requirements for DR-ready technologies or systems, or for enrolling this new equipment in the utilities DR programs.

It will be important to ensure new EE investments promote technologies that are DR-ready whenever possible. This applies well to residential measures but can also extend to large commercial and industrial systems, such as HVAC, datacenters, cold-storage, and water/wastewater control system upgrades. Adding automated DR connectivity for these systems can help provide greater cost-savings to customers and a more valuable utility resource. There may be data to show that the improved energy usage insights that DR platforms provide also enhance the EE benefits (savings and/or measure life) of these projects.

For example, when funding thermostats, heat pumps, water heaters, etc., Energy Trust may consider requiring DR participation or a tiered incentive that rewards DR participation. Many of the devices installed either are or could be "smart" or "connected" devices capable of DR. If we miss the opportunity to get them enrolled at the time of installation, this feels like a meaningful lost opportunity. Looking forward to a more renewable electric grid, we anticipate increasing need for, and value in demand flexibility. This could also help bolster the cost effectiveness by adding a meaningful value stream to both end users and society.



September 19, 2024

Board of Directors
Energy Trust of Oregon
421 SW Oak St.
Suite 300
Portland, OR 97204

Re: Draft 2025-2030 Strategic Plan Comment

Dear President Lorenzen,

Thank you for the opportunity to comment on the Energy Trust of Oregon (Energy Trust) Draft 2025-2030 Strategic Plan. Farmer's Conservation Alliance (FCA) is a non-profit organization that helps irrigation districts, ditch companies, and agricultural producers modernize their infrastructure in a manner that provides agricultural, environmental, energy, and rural community benefits. With support from Energy Trust and other key community partners, FCA has been working with communities representing 29% of the irrigated lands in Oregon. Further, we have built on the model developed here in Oregon to expand irrigation modernization efforts across six additional western states.

The five focus areas identified in the Draft 2025-2030 each relate to our work developing, funding, and implementing renewable energy and energy efficiency projects in rural communities Oregon. Co-locating these projects with agricultural water infrastructure helps to accelerate project development, reduce project costs, and provide a range of co-benefits to each community and its partners. However, these communities often face barriers to participation ranging from limited community capacity (e.g., staff, contractors, partners) to increasing resource concerns associated with climate change (e.g., drought, fire). Due to these challenges, many agricultural producers have historically focused on meeting immediate needs like addressing canal failures rather than longer-term goals like increasing renewable energy production and realizing the associated benefits.

Energy Trust's investments in irrigation modernization have helped to address these challenges in Oregon by supporting the relationships, partnership building, and community capacity critical to developing, funding, and implementing meaningful projects at scale. Over the past five years, and with support from Energy Trust and other key partners, rural communities have developed innovative renewable energy, energy efficiency, and grid resiliency projects that integrate elements such as canal solar, floating solar, battery storage, and hydropower into irrigation infrastructure. Support from Energy Trust and other key partners has created the foundation for rural communities to secure federal funding for implementation and ensure these projects realize on-the-ground benefits at scale. Together, these projects improve rural community resiliency while helping Oregon to achieve its decarbonization goals.

The five focus areas included in the Draft 2025-2030 Strategic Plan collectively align with FCA's interests in supporting thriving, resilient agricultural communities across Oregon. We support Energy Trust's continued investments in these communities and look forward to continuing to work with you under this strategic plan.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie O'Shea". The signature is fluid and cursive, with the first name "Julie" being larger and more prominent than the last name "O'Shea".

Julie O'Shea
Executive Director

Comments of Fair Oregon Utility Rates for Small Business (“FOUR”) on the Energy Trust of Oregon draft Strategic Plan 2025-2030

FOUR appreciates the opportunity to provide feedback on the Energy Trust of Oregon’s (ETO) draft Strategic Plan. We strongly urge ETO to prioritize partnerships with the small business customer class to maximize the benefit of their strategic plan. This customer class is the second largest ratepayer class of utility customers paying into the public purpose charge every month, making it a significant ratepayer with the potential to help Oregon make strides toward its decarbonization goals. The small commercial customer class is diverse and includes a growing number of minority-owned businesses. Focusing on historically underserved groups, particularly minority-owned businesses, is essential to promoting energy justice. The costs associated with achieving clean energy goals often fall on the small business class, despite their need for support to recover from disasters like freezes that disrupt business operations for days. Incorporating their needs in Energy Trust’s planning will yield significant benefits for utility customers and partners alike. Energy Trust has the opportunity to decarbonize main streets across our state through partnerships with small businesses. We are eager to see how barriers for participation are removed, enabling real and timely benefits to be delivered.

FOUR offers the following comments to the ETO draft Strategic Plan available here:

<https://www.energytrust.org/wp-content/uploads/2024/08/Energy-Trust-Draft-2025-2030-Strategic-Plan.pdf>

1) RE: Focus area 1: ETO’s failure to distinguish commercial classes is concerning.

Focus area 1 of the Strategic Plan should distinguish between “large commercial” and “small commercial” rather than lump them together in the participation metrics. (Pg. 10). FOUR suggests including small commercial customers in the metrics.

2) RE: Focus area 2: Analyzing and evaluating small business metrics is essential to taking a holistic approach to reducing the cost of decarbonization.

Focus area 2 of the Strategic Plan identified “[g]as savings and net energy impact as a result of electrification that benefits customers and the energy system,” as a metric for measuring decarbonization. (Pg. 11) This narrow approach raises concerns for small businesses, which provide diverse services— such as restaurants, dry cleaning, gyms—that all rely on different forms of energy. Therefore, the ETO’s strategy to “support electrification as requested by customers, policymakers, or funders” fails to consider that not every small business is in a position to electrify. (Pg. 11). This is troubling from the small businesses perspective because the cost of decarbonization, as outlined in this focus area, could significantly impact the operational systems of a small business. Reliance on different forms of energy may cause hesitancy in the small business customer class. For example, a restaurant owner might be reluctant to switch from natural gas to an electric option based on their internal operational limits. While ETO’s mission

is to support energy efficiency and electrification, it is critical that they investigate how they can help customers transition to new energy sources at a suitable pace. This will ensure that small businesses can deliver their goods and services with confidence behind their energy expenses. To work towards decarbonization, ETO must ensure that the transition is meaningful and beneficial for small business owners, through energy and cost savings.

3) RE: Focus area 3: ETO' should take an intersectional approach to supporting priority customers, centering small commercial customers more.

Throughout the Strategic Plan, ETO recognizes underrepresented customers, including environmental justice communities, renters, high energy burden customers, and small business, as examples of "priority customers." However, ETO's Strategic Plan does not address the intersectionality of customers. ETO's focus on equity is particularly relevant for small businesses located in environmental justice and rural communities, where rising energy costs will have profound effects on this customer type. While the metric data for specific priority customer groups going forward is helpful, it is important for ETO to recognize that a single "customer" can share all of those characteristics all at once, such as a small business owner who rents a building in an environmental justice community. ETO should consider adopting a plan to address the needs of such customers or identify them as high priority customers.

4) RE: Focus area 4: ETO should focus more on the motivations and limitations of the small commercial customer.

Focus area 4 could greatly improve small business participation for ETO's programs. The breakdown of different types of customers on why they are not participating is particularly helpful. More specifically, ETO must take into perspective why a small business who knows of ETO but has *chosen not* to participate. There are many reasons why general customers may not choose to participate with ETO but those reasons most likely greatly differ from why business customers choose to not engage. Small business owners are in a unique circumstance of running a business which includes multiple long-term planning in many aspects such as finances which relate to any potential capital equipment upgrades. If ETO hopes to improve on this focus area the small business customer is perhaps where they can draw the best results if they engage correctly. The metric of "percent of customer participation, amount of savings per customer/project rates and associated utility bill savings" could demonstrate to small business why ETO upgrades are worth the time and investments in long-term planning for a small business owner. ETO should engage with small businesses as much as possible relating to this metric.

5) Other comments:

Energy Trust Draft Strategic Plan is Inequitable

The development structure of the draft Strategic Plan is not equitable for small business customers. Despite Energy Trust's emphasis on the importance of energy efficiency, not a single member from a small business or small business based organization represents small businesses and local government offices in the Conservation Advisory Committee (CAC). This is a stark contrast to the consistent input from large corporations, low income residential customers, and Alliance of Western Energy Consumers (AWEC). Furthermore, among the groups interviewed, there is no small business that represents the uniquely small business perspective.

ETO should make sure a representative of the small commercial customer class, such as a chamber of commerce executive, is part of the interviewees. Given that the customer advocates are not small business customer advocates, FOUR wonders how much of the \$7.2 billion that has been spent by ratepayers since 2002, (Draft Strategic Plan Pg. 1) has been spent on small commercial customers. It is essential for ETO to work to identify gaps in input and outreach to all customers paying into the public purpose charge.

FOUR is concerned that ETO is not fully considering the benefits of engaging with the small commercial customer consumer as its own customer group. Moreover, it would be shortsighted to ignore small business consumers who may not qualify as "environmental justice" or "rural" communities, as effectively targeting this customer group may yield valuable savings. It is clear that the draft Strategic Plan underutilized, underserves, and overlooks small businesses.

Review of Comments From Stakeholders and Customers

FOUR offers comments after reviewing notes from stakeholder meetings and customer interview summaries available here:

https://www.energytrust.org/wp-content/uploads/2024/02/Stakeholder-and-customer-interview-summaries_January.pdf

NW Energy Coalition: High costs will be the new normal as energy costs and consumer prices continue to increase due to necessary investments to meet carbon emissions targets and market volatility. Energy efficiency is all the more essential. Oregon needs to move away from the current processes we have (e.g., avoided cost docket) to get in front of dramatic price hikes. Customer-side resources are an important part of the solution. Energy Trust staff and the board should proactively and efficiently continue to scale energy efficiency which will help offset increased system costs.

Citizens Utility Board: Weatherization and energy efficiency will be more valuable than ever as costs hit the System. The primary concern of energy efficiency and renewables has shifted to capacity. This changes the value proposition of certain measures depending on end-use timing such as between business and residential customers.

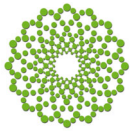
PGE/PAC: The rate of changes is far greater than expected. This relates to the clean energy transition, climate variables, environmental justice, and load growth. For example, PGE saw its 10-year load forecast double in less than six months, as the demand for AI and social media are driving expansions in data centers.

Business Oregon (BO): The energy transition is occurring rapidly and could result in major disruption and dislocation for business customers, particularly small to medium size businesses. Energy Trust has an opportunity to support and increase participation and expand offerings for this segment. Energy efficiency adoption would increase if Energy Trust could reduce the investment burden for business customers, especially small to medium sized businesses. This could be through longer amortization, higher subsidies or other creative approaches. With more support, estimated adoption could increase by as much as 50%.

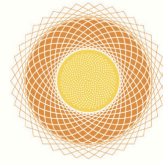
- BO agrees with national organizations and supports expanding consumer education and research on innovative approaches. Energy Trust should step in and help drive a holistic approach that ensures important measures and opportunities aren't missed. For instance, small business should also be considered for exceptions that exist for residential and multi-family programs supporting priority customer groups.
- BO agrees with the ETO Program Management contractors that "[y]ou can't go from zero to a heat pump in a home." There are many other enabling measures that may be needed to support installations of efficiency projects and optimize energy use.

Trade Allies: Upfront capital constraints are limiting for a small rural organization. Funding structured as a reimbursement is often not an option.

Community-Based Partners: Improved health, energy cost burden relief, infrastructure and resilience are all key benefits to message, whereas mitigating climate change often is not.



**GREEN ENERGY
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The Climate Reality Project®
PORTLAND CHAPTER



September 20, 2024

Michael Colgrove
Executive Director
Energy Trust of Oregon
421 SW Oak Street, Suite 300
Portland, OR 97204
Delivered via email to: info@energytrust.org

RE: Comments on Energy Trust’s Draft 2025-2030 Strategic Plan.

The Green Energy Institute at Lewis & Clark Law School (GEI), Climate Solutions, Verde, Electrify Now, Oregon Physicians for Social Responsibility, Mobilizing Climate Action Together (MCAT), 350 Deschutes, Community Energy Project, Breach Collective, The Climate Reality Project, Portland Chapter, The Environmental Center, Third Act Oregon, Seeds for the Sol, Sierra Club, and individuals appreciate the opportunity to provide feedback on the Energy Trust of Oregon’s (ETO or Energy Trust) Draft 2025-2030 Strategic Plan, published August 19, 2024.¹ We generally support the vision ETO has laid out in its Draft Strategic Plan. ETO’s Focus Areas capture the right priorities; we agree with the Energy Trust that energy efficiency and distributed

¹ Energy Trust of Oregon, *Draft Strategic Plan 2025–2030* (Aug. 19, 2024) [hereinafter ETO Draft Plan], <https://www.energytrust.org/wp-content/uploads/2024/08/Energy-Trust-Draft-2025-2030-Strategic-Plan.pdf>.

generation are essential tools to meeting Oregon’s HB 2021 goals and address other priorities like supporting environmental justice communities.

This Draft Strategic Plan finds Oregon at an inflection point as private and public actors across the state explore equitable pathways to decarbonize our state, meet climate goals, and adapt to a changing climate. ETO’s role as a trusted energy resource for households, businesses, communities, and nonprofits alike positions this plan as one strand on the pathway to achieving our state’s goals and our communities’ needs. Indeed, as an organization overseen and largely funded through Oregon’s Public Utility Commission, ETO’s services and resources are critical to Oregon achieving its climate and energy goals.²

Given the importance of ETO’s role in Oregon’s energy transition, these comments seek to encourage Energy Trust to ensure its work over the next half-decade meets both its own obligations as well as the needs of all Oregonians. ETO must work to deliver genuine financial, environmental, and health benefits to Oregonians while allowing customers to make informed energy decisions that are in their best interests.

First, we want to ensure that equity interests, including interests supporting energy justice communities and low income populations, are adequately represented. Second, we seek accountability to the state’s carbon goals while ensuring any near-term climate solutions Energy Trust supports also set Oregon up for future success. And finally, we highlight further areas where we hope Energy Trust can show transparency and leadership to best tackle the energy challenges the next six years will present.

I. SEEKING EQUITABLE SOLUTIONS

As we face climate and energy challenges, any plans and goals for the next half decade must center underserved and vulnerable populations to ensure the solutions we leverage don’t leave people or communities behind. Oregon’s energy policies center environmental justice concerns, which must be adequately reflected in Energy Trust’s focus areas. For example, HB 2021, directs implementation of the emission reduction targets to “be done in a manner that minimizes burdens for environmental justice communities.”³

Energy Trust appears to recognize its role in supporting utilities meeting HB 2021 goals and also identifies specific strategies for “priority customers.”⁴ We suggest two areas for improvement that will better satisfy HB 2021’s directive. Specifically, we emphasize the need to: (1) promote healthy homes, and (2) reduce costs to communities through the energy transition. While the

² ORS § 757.054(4); S.B. 1149, 1999 Leg., 70th Session (Or. 1999), <https://www.energytrust.org/wp-content/uploads/2016/10/sb1149.pdf> ; Recommendations for the Performance Measures for the Energy Trust of Oregon, Docket No. UM 1158 (Oregon Public Utilities Commission), <https://apps.puc.state.or.us/edockets/docket.asp?DocketID=11472>.

³ O.R.S. § 468A.405(4), .410 (2023); H.B. 2021, 2021 Leg. Sess., 81st Leg. (Or.) (codified at various sections of ORS). Under the law, “environmental justice communities” includes “communities of color, communities experiencing lower incomes, tribal communities, rural communities, coastal communities, communities with limited infrastructure and other communities traditionally underrepresented in public processes and adversely harmed by environmental and health hazards, including seniors, youth and persons with disabilities. O.R.S. § 468A.400(5). This definition is cited in Energy Trust’s Draft Strategic Plan. ETO Draft Plan, at 12.

⁴ ETO Draft Plan, at 11–12.

comments addressed in this section relate most closely to Focus Area 3 (Creating Greater Impact for Priority Customers) and Focus Area 5 (Supporting Community Resilience), the points are relevant to all sections.

A. Addressing health concerns through supporting access to energy equipment that promotes healthy communities

We appreciate that in Focus Area 3, ETO identifies the need to create greater impact for priority customers by protecting against heat impacts. Below, we outline some additional considerations we hope the final draft of the Strategic Plan incorporates to ensure healthy homes are centered in Energy Trust’s work through 2030. Additionally, we hope that Energy Trust considers augmenting its current Focus Area 5 to consider additional individual actions to support community resilience

1. Protect homes against extreme temperatures

Every household in Oregon deserves a comfortable and safe home. Since the record-breaking summer of 2021 left dozens of Oregonians dead or hospitalized from extreme heat, legislators have emphasized the importance of access to cooling equipment. Examinations of fatalities related to the 2021 heat dome in Multnomah County found that over 90% of the 72 fatalities were of people in their own homes, mostly without access to any or adequate cooling equipment.⁵ A year later, state legislators passed SB 1536 to increase residential access to cooling equipment.⁶ In doing so, state legislators recognized the “disproportionate impact” extreme weather events have on low income households and environmental justice communities.⁷ This law also established a popular program to deliver heat pumps to residents alongside emphasizing the importance of energy efficiency equipment like heat pumps to mitigate energy burdens.⁸ The following year, in HB 3409, the state legislature again recognized the importance of access to cooling equipment, and in particular electric heat pumps, to “provide both heating and cooling benefits that keep people safe during extreme weather events that are becoming more frequent and more intense as a consequence of climate change.”⁹

In Focus Area 3, Energy Trust seeks to bring both energy savings and health and comfort benefits to target customers, goals we agree with. We believe, however, that Energy Trust can do better. Notably, the Plan identifies Energy Trust’s strategy of seeking funding sources “that do not have cost-effectiveness limitations to specifically support priority use customers.”¹⁰ We agree that additional funding sources will help improve Energy Trust’s impacts in this area. But Energy Trust’s rules also provide for the organization to incorporate “non-energy benefits” into

⁵ Multnomah County, *Final Report: Health Impacts from Excessive Heat Events in Multnomah County, Oregon, 2021* (June 2022), https://multco-web7-psh-files-usw2.s3-us-west-2.amazonaws.com/s3fs-public/20220624_final-heat-report-2021_SmallFile-2.pdf.

⁶ S.B. 1536, 2022 Leg. Ses., 81st Leg. (Or.) (codified at various sections of ORS).

⁷ *Id.* at Preamble.

⁸ O.R.S. § 469B.460 (2023).

⁹ H.B. § 3409, Sec. 1(1)(d), 2023 Leg. Ses., 81 Leg. (Or.).

¹⁰ ETO Draft Plan, at 12.

cost-effectiveness calculations.¹¹ Additionally, the Commission’s Order approving the agreement to fund Energy Trust in July 2024 clarified that Energy Trust can seek exceptions to cost-effectiveness requirements for programs with non-energy benefits that cannot be quantified.¹² In 2022, the PUC granted ETO’s request for a cost-effectiveness exception for ETO’s low- and no-cost ductless heat pump pilot—a program that was so successful ETO requested and was granted an additional \$2 million for the pilot.¹³ Given the legislative priorities on efficient equipment reaching priority customers, we think Energy Trust should include strategies to document these instances and seek further exceptions to the cost-effectiveness requirements when the additional short term costs yield long-term health and cost savings.

Additionally, cooling—or heating—equipment is useless to a household that cannot afford to turn on the system during a heat wave or to a home that has had its electricity shut off from missing payments due to high energy costs. Thus, it is essential that Energy Trust, as the entity responsible for delivering much of the information and equipment savings to Oregonians, center the most efficient technology—electric heat pumps—in its outreach over the next six years.

Finally, to further protect homes against extreme heat and other climate threats, Energy Trust must also focus on improving homes through weatherization, including insulation. Insulating and air sealing a home reduces risks of extreme heat exposure.¹⁴ Insulation, like heat pumps, also makes homes more energy efficient, reducing bills by around 15%.¹⁵ And these savings are across the board—not just in summer or winter months. As the future of gas is uncertain in Oregon, as discussed below, Energy Trust must focus on weatherization to help residents both protect their homes and save costs, regardless of the season and what fuels households rely on.

2. *Protect homes and communities from wildfire impacts*

Wildfires are a second climate impact that Oregonians are becoming increasingly familiar with.¹⁶ For communities on the wildfire frontlines, May through October now bring smoke and power

¹¹ Energy Trust of Oregon, 4.06.000-P Cost Effectiveness Policy and General Methodology for Energy Trust of Oregon (Dec. 12, 2014), <https://www.energytrust.org/wp-content/uploads/2016/11/4.06.000.pdf> (“Where non-energy benefits are clear, large, but difficult to quantify, Energy Trust will document this to the Oregon and/or Washington Commissions and propose cost-effectiveness exceptions in Oregon, and application of the UCT in Washington.”).

¹² Order No. 24-243, Agreement to Direct Funding to Non-Governmental Entity between Energy Trust of Oregon and the Oregon Public Utility Commission, Docket No. UM 1158 (July 24, 2024), Appendix 1, at 27 [hereinafter Energy Trust Order] (adopting Staff’s Recommendations), <https://apps.puc.state.or.us/orders/2024ords/24-243.pdf>.

¹³ Docket No. UM 1696, Order No. 22-024 (Jan. 18, 2022); Docket No. UM 1696, Order No 24-142 (May 6, 2024).

¹⁴ Sara Hayes et al., ACEEE, *Making Health Count: Monetizing Health Benefits of In-Home Services Delivered by Energy Efficiency Programs*, at 17 (May 2020), <https://www.aceee.org/sites/default/files/pdfs/h2001.pdf> (“Weatherization addresses inadequate cooling systems and improves home ventilation, decreasing the chances of households experiencing dangerously hot temperatures that can lead to heat-related illnesses.”).

¹⁵ *Methodology for Estimated Energy Savings*, Energy Star, https://www.energystar.gov/saveathome/seal_insulate/methodology (last visited Sept. 18, 2023).

¹⁶ U.S. Dep’t of Agric., *How do Climate and Wildfire Relate?*, USDA Climate Hubs, <https://www.climatehubs.usda.gov/hubs/northwest/topic/climate-change-and-wildfire-idaho-oregon-and-washington> (last visited Sept. 17, 2024).

outages, among other fire threats.¹⁷ Homes that are better weatherized—better insulated and air-sealed—are more protected from wildfire smoke.¹⁸ Better weatherized homes are also more protected in cases where a power outage or shutoff coincides with high heat.¹⁹ Heat pumps and electric appliances can also protect households from wildfire smoke risks. Electric heat pumps are effective air filters, helping homes reduce indoor air pollution from wildfire smoke.²⁰ The U.S. Environmental Protection Agency recommends households refrain from using gas stoves and furnaces during wildfire smoke events to prevent further household exposure to harmful particulates.²¹ While the Draft Strategic Plan does discuss wildfire impacts, it largely discusses these on the community-scale. We agree that community resiliency planning is important, but also want the final Strategic Plan to recognize that individual home energy choices, including weatherization and heat pumps, also impact community resilience in the face of wildfire risks.

3. *Improve indoor air quality with electric appliances*

In recent years, more studies are uncovering the health risks from gas appliances. Combusting natural gas to operate stoves and other appliances releases pollutants known to be harmful to human health and linked to childhood asthma.²² While much of the attention focuses on gas stoves, stoves are not the only source of gas-related indoor air quality harms. Most gas space and water heaters rely on venting systems to reduce indoor air pollution.²³ Malfunctioning vents or failing equipment increase the risk of harms from even vented systems.²⁴ These problems are more prevalent in older homes: up to 25% of homes built before 1980 may have issues with gas equipment or lines, leading to indoor air pollutants.²⁵

¹⁷ See Bob Jenks, *Preparing for Fire Season and Power Outages*, Citizens Utility Board (May 18, 2021), <https://oregoncub.org/news/blog/preparing-for-fire-season-and-power-outages/2341/> (discussing how to prepare for wildfire-related power outages); <https://portlandgeneral.com/outages-safety/safety/wildfire-safety-and-prevention> (noting “public power shutoffs” as a way Portland General Electric manages wildfire risks); *Protect Your Home’s Air Quality During Wildfires*, Energy Trust:Blog: Residential News (July 24, 2024), <https://blog.energytrust.org/protect-your-homes-air-quality-during-wildfires/> (discussing indoor smoke risks from wildfires).

¹⁸ Brendan Bane, *How to Protect Yourself from Wildfire Smoke When Indoors*, Pacific Northwest Nat’l Lab. (Sept. 8, 2022) <https://www.pnnl.gov/news-media/how-protect-yourself-wildfire-smoke-when-indoors> (“The fundamental things we can do to make our homes energy efficient are very similar to things we want to do to be more climate resilient,” said Antonopoulos. “Tightening up the building envelope offers a double win: you can protect yourself from smoke and reduce your home’s energy consumption.”).

¹⁹ John Matson, *How the California Grid Can Become More Resilient to Wildfire*, RMI (Jul. 26, 2021) <https://rmi.org/how-the-california-grid-can-become-more-resilient-to-wildfire/> (“Well-insulated, weatherproofed homes provide more “hours of safety” during an outage by keeping living spaces comfortable in the absence of electric cooling or heating.”).

²⁰ *Do Heat Pumps Provide Air Filtration?*, British Columbia: Clean BC Better Homes, <https://www.betterhomesbc.ca/products/do-heat-pumps-provide-air-filtration> (last visited September 18, 2024).

²¹ *Wildfires and Indoor Air Quality*, U.S. Env’t Prot. Agency, <https://www.epa.gov/emergencies-iaq/wildfires-and-indoor-air-quality-iaq> (last visited Sept. 19, 2024).

²² Tanya Lewis, *The Health Risks of Gas Stoves Explained*, Scientific American (Jan. 19, 2023) <https://www.scientificamerican.com/article/the-health-risks-of-gas-stoves-explained/>.

²³ Sarah Wessler, *Gas Stoves Pose Health Risks. Are Furnaces and Other Appliances Safe to Use?*, *Yale Climate Connections* (Mar. 9, 2023), <https://yaleclimateconnections.org/2023/03/gas-stoves-pose-health-risks-are-gas-furnaces-and-other-appliances-safe-to-use/>.

²⁴ *Id.*

²⁵ *Id.*

Energy Trust serves as a trusted source of information about all things energy and home-comfort related for countless Oregonians. It is thus imperative that Energy Trust continue to ensure residents across the state have access to accurate information, including about the indoor-air quality risks that gas appliances pose to homes. We recommend Energy Trust’s Strategic Plan acknowledge the need to inform residents about the risks associated with gas appliances so that households can make informed decisions in the best interests of their families’ health.

B. Reducing costs, particularly for low and moderate income households

We appreciate that Energy Trust is centering low income households, environmental justice and frontline communities, as well as others who have been historically underserved by Energy Trusts’ programs, in the Strategic Plan. But it is also essential that any plan seeking to serve these populations look beyond merely a few years out, particularly considering the life-span of much of the efficiency equipment Energy Trusts’ programs support.²⁶ Industry experts expect that, as our economies decarbonize from fossil fuels to meet the climate challenge, household bills, particularly natural gas bills, will dramatically increase as more and more households, businesses, and communities phase out fossil fuels.²⁷ This phenomenon will leave “stranded costs” as fewer customers remain connected to gas systems.²⁸ Models predict that customers left on the gas system may see bills increase by as much as 129% or more.²⁹ In contrast, energy efficiency and electrification strategies are already saving consumers money and supporting the electricity grid by helping it run more efficiently.³⁰

To combat a future of rising costs, researchers recommend pursuing energy efficiency and electrification strategies.³¹ Oregon law, through HB 3409, recognizes electric heat pumps as the “most energy efficient space heating option available in the market.”³² The Oregon legislature further found that “[u]pgrading space and water heating appliances with contemporary heat pump technologies can help people to save money on household energy bills” and that “additional support and innovative solutions are needed” to ensure “all households” benefit from efficient appliances like heat pumps.³³

We recognize the regulatory restrictions imposed on Energy Trust that provide challenges to electrification and decarbonization for Oregonians heating homes with natural gas (dual-fuel customers). But any strategies over the next six years that lock customers, particularly low and moderate income customers, into a fossil gas system where they will be faced with rising costs, does not adequately support Energy Trusts’ priority customers, as identified within Focus Area 3.

²⁶ *Find the right heating, cooling for your home to save energy, lower costs*, Energy Trust Blog (Jan. 5, 2024) <https://blog.energytrust.org/find-the-right-heating-cooling-for-your-home-to-save-energy-lower-costs/>.

²⁷ Steve Nadel, *Impact of Electrification and Decarbonization on Gas Distribution Costs*, ACEEE (June 2023) <https://www.aceee.org/sites/default/files/pdfs/U2302.pdf>.

²⁸ *Id.* at 30.

²⁹ *Id.* at iv. Notably, other models show even higher increases with decarbonization pathways such as replacing fossil gas with biogas—where gas customer bills may quadruple. *Id.*

³⁰ Monica Samayosa, *As Northwest Homes and Businesses Get More Energy Efficient, That’s Helping the Power Grid*, Study Finds, OPB (Sept. 13, 2024), <https://www.opb.org/article/2024/09/13/northwest-energy-efficiency-power-grid-report/>.

³¹ Charlotte Cohn & Nora Wang Efram, ACEEE, *Building Electrification: Programs & Best Practices*, at 60-61 (2021), <https://www.aceee.org/sites/default/files/pdfs/b2201.pdf>.

³² H.B. 3409, Sec. 1(1)(d), 2023 Leg. Ses., 81 Leg. (Or.).

³³ Sec. 1(1)(e), (h).

To better serve an equitable climate future, Energy Trust’s Strategic Plan must incorporate “additional support and innovative solutions” to ensure households are not left behind in the energy transition.³⁴ While we appreciate that Energy Trust’s Draft Strategic Plan does incorporate electrification nominally, with a strategy to “support electrification as requested by customers, policymakers or funders,”³⁵ we ask for more detail and greater prioritization of electrification in the final Strategic Plan. Section II.B (Allowing consumers to choose to electrify) below provides more details on some strategies we believe will help Energy Trust meet these needs. But more specific to low and moderate income households, we suggest that Energy Trust prioritize spending funds on weatherization, as opposed to gas appliance rebates, for low and moderate-income households with gas appliances, as well as leverage non-ratepayer funding sources and partnerships, particularly in areas served by gas investor-owned utilities and electric cooperatives or municipal companies. We also recommend that Energy Trust explore methods to adjust its cost effectiveness modeling to account for the costs of gas and the savings of electrification, even for dual-fuel customers. These types of innovative solutions and more are needed to ensure that the costs of decarbonization are not borne by historically underserved communities and priority customers. And Energy Trust’s Strategic Plan covering statewide energy efficiency strategies over the next six years will be central to ensuring these innovations occur.

II. MEETING STATE CLIMATE GOALS

We appreciate that ETO’s Strategic Plan, emphasized under Focus Area 2 (Reducing the cost of decarbonization), recognizes the important role that energy efficiency will play in meeting the state’s electricity decarbonization goals.³⁶ But electricity is only one part of the climate and decarbonization landscape. ETO’s Draft Strategic Plan noted that the state is contemplating gas decarbonization goals.³⁷ And Oregon has state-wide decarbonization goals outlined in EO 20-04.³⁸ Energy efficiency actions often include long-term investments and it is essential that any actions ETO takes—and thus incentivizes Oregonians to make—over the next six years prepare us to not just *meet* climate goals through 2030 but also prepare us for the future. ETO also must ensure that its actions don’t lock households, especially low and moderate income households, into stranded equipment as our economy transitions to a decarbonized future. The strategies we outline in this section will primarily support the Draft Strategic Plan’s Focus Area 2 (Reducing the cost of decarbonization) and Focus Area 3 (creating greater impact for priority customers).

A. Complying with state greenhouse gas and electrification goals and priorities

For both climate-related reasons and the health and cost issues addressed earlier, Energy Trust must ensure that its work over the next six years provides all customers with real energy choices that support Oregon climate goals. In 2023, Oregon passed HB 3409, a bill that, among other priorities, specifically established a statewide goal of installing at least 500,000 new heat pumps across residences and businesses in the state by 2030.³⁹ The law further declared as a goal for the

³⁴ H.B. § 3409, Sec. 1(1)(h), 2023 Leg. Ses., 81 Leg. (Or.).

³⁵ ETO Draft Plan, at 11.

³⁶ *Id.*; O.R.S. § 469A.410 (2023).

³⁷ ETO Draft Plan, at 11.

³⁸ E.O. 20-04 (Or. 2020), https://www.oregon.gov/gov/eo/eo_20-04.pdf.

³⁹ H.B. § 3409, Sec. 1(2), 2023 Leg. Ses., 81 Leg. (Or.).

state to “provide programs and support for accelerating purchases and installations of heat pump technologies to help meet the state’s greenhouse gas emissions reduction goals,” and do so while prioritizing energy justice communities.⁴⁰ In doing so, legislators named heat pumps “the most energy efficient space heating technology available on the market.”⁴¹ In short, this 2023 law identified electric heat pumps as a critical tool to meet the state’s climate goals and priorities.

While not a state agency itself, Energy Trust is beholden to state regulators through the Public Utility Commission. Energy Trust is largely funded through the docket UM 1158, where the Public Utility Commission approves Energy Trust’s ratepayer-funded programs through the appropriation of funds.⁴² Energy efficiency programs, and thus ETO, are also essential elements of regulated utilities’ needed progress towards HB 2021 targets, a role ETO embraces within its Draft Strategic Plan.⁴³ These goals, combined with the state’s prioritization of heat pumps and beneficial electrification point to a new direction for regulators to center electrification in climate and energy strategies.

We believe that Energy Trust should consider these directives as an invitation to support greater electrification. Since ETO works so closely with the Public Utility Commission, an agency responsible for meeting its obligations under HB 3409, ETO is in a position to reliably guide the PUC toward the goals outlined in the law. The Oregon Legislature, under HB 3409, has directed the Public Utilities Commission “to reduce or eliminate... financial or nonfinancial barriers to accessing energy efficiency measures or appliances that will result in the greatest available energy efficiency and reductions of greenhouse gas emissions.”⁴⁴ This law further recognizes electric heat pumps as “the most energy efficient space heating option available in the market.”

B. Allowing consumers to choose to electrify

We hope that Energy Trust will use its position as a trusted, publicly-funded entity to support consumers in choosing their energy sources—including choosing to electrify to improve home health and safety, save money, and reduce reliance on fossil fuels. As we describe in more detail below (in section III.A), supporting consumers with these difficult decisions means educating them about the impact of the decisions they are making.

Supporting customers to move away from fossil fuels is consistent with Oregon’s policy. As mentioned above, Oregon legislators have identified electric heat pumps as “the most energy efficient space heating option available on the market.” Indeed, Oregon consumers have demonstrated a desire to electrify their homes. After the state released funds for heat pumps in 2022, residents jumped at the opportunity to fund efficient space heating and cooling. The residential rental heat pump program allocated two funding rounds for a total of \$19 million, all of which has been exhausted to date.⁴⁵ Overall funds, which include an additional \$10 million,

⁴⁰ *Id.*

⁴¹ *Id.* Sec. 1(1)(d).

⁴² O.R.S. § 757.054; Recommendations for the Performance Measures for the Energy Trust of Oregon, Docket No. UM 1158 (Oregon Public Utilities Commission), <https://apps.puc.state.or.us/edockets/docket.asp?DocketID=11472>.

⁴³ O.R.S. § 469A.410(b) (2023) Requires Oregon Clean Energy Plans to include energy efficiency measures and acquisitions).

⁴⁴ H.B. § 3409, Sec. 2(2)(c).

⁴⁵ *Oregon Rental Home Heat Program*, Or. Dep’t of Energy, <https://www.oregon.gov/energy/Incentives/Pages/ORHHPP.aspx> (last visited Sept. 17, 2024).

have been “largely exhausted.”⁴⁶ Meanwhile, ETO’s initial no- and low-cost ductless heat pump program was so successful that ETO requested and received approval to expand the program by an additional \$2 million.⁴⁷ And heat pump installations in Northwest homes now exceed gas furnace installs.⁴⁸ Contractors are also noticing an increased interest in various electric appliances, from heat pumps to electric induction stoves.⁴⁹ State planning documents have identified a great need for funding, noting that the “amount of total incentive funding that remains available is insufficient to meet heat pump demand within the state.”⁵⁰

Energy Trust’s role has historically not allowed the organization to fully embrace electrification desires from customers—at least not when a customer lives in a home with natural gas appliances. As Energy Trust’s Draft Strategic Plan recognizes, much of the provider’s funds still come from utility-funded programs from investor-owned utilities. But the existing complex funding matrix that requires financial support from investor-owned utilities has largely restricted consumer access to decarbonization technologies.

The idea of “energy choice” has come up in conversations around consumers’ ability to install natural gas appliances in new buildings. But that is just the tip of the iceberg. The larger question of choice arises in households currently relying on natural gas for heating and cooking.

Energy Trust’s fuel-neutral approach to its programs favors gas utilities. Consumers in homes with pre-existing, builder installed, gas systems are restricted by Energy Trust funding to only replacing old gas appliances with new gas appliances.. We believe that HB 3409 provides a regulatory pathway to a greater focus on electric heat pumps and consumer choices to electrify, and hope that the final Strategic Plan embraces this avenue.

C. Leveraging IRA funding to meet climate goals while maximizing savings for Oregon residents

As the Draft Strategic Plan lays out, ETO’s funding includes both ratepayer funds and other funding sources. The IRA, passed by Congress in 2022, provides momentous funding for, among other things, decarbonization strategies.⁵¹ Chief among the IRA’s priority areas is electrification resources, which largely prioritize heat pumps in various forms.⁵² The IRA includes funding to support electric heat pump rebate programs of up to \$8,000 for residential heat pumps, hot water heat pumps, and other electric appliances, as well as additional funding for other “nonappliance” rebates, including insulation and air sealing.⁵³ It is essential that ETO not only leverage these funds, but also find ways to optimize them so that dual fuel customers have both the choice and financial resources to utilize the funds to save energy and money at home. The IRA’s

⁴⁶ Oregon Dep’t of Env’t Quality, Oregon’s Climate Equity and Resilience Through Action Grant Workplan Narrative, at 12 (Mar. 29, 2024) [hereinafter Oregon Climate Workplan], <https://www.oregon.gov/deq/ghgp/Documents/cprgImpGrant.pdf>.

⁴⁷ Docket No. UM 1696, Order No. 22-024 (Jan. 18, 2022); Docket No. UM 1696, Order No 24-142 (May 6, 2024).

⁴⁸ Gosia Wozniacka, *Heat pump popularity soars, but cost and evolving technology remain barriers* (May 28, 2023), <https://www.oregonlive.com/environment/2023/05/heat-pump-popularity-soars-but-cost-and-evolving-technology-remain-barriers.html>.

⁴⁹ *Id.*

⁵⁰ Oregon Climate Workplan, *supra*, at 12.

⁵¹ Inflation Reduction Act (IRA), Pub. L. No. 117-169, Title V, Subtitle A: Energy, 136 Stat. 1817, 2033 (2022).

⁵² *Id.* at 2033, Sec. 50121-50123 (codified at 42 U.S.C. § 18795-18795b).

⁵³ 42 U.S.C. §§ 18795a(c) (2022 supplement).

prioritization of heat pumps and related equipment will also provide further funding opportunities that energy trust should ensure can be accessed by all Oregonians hoping to electrify.

III. PROMOTING TRANSPARENCY, LEADERSHIP, AND INNOVATION

Given the policy and funding constraints that Energy Trust faces at this time, we ask that ETO continue to show leadership through education, reporting, and flexibility to adjust strategies to further climate, environmental justice, and electrification strategies as priorities and policies change over the next six years.

A. Updating education strategies to ensure households have a trusted information source discussing energy issues

As Oregon's primary entity responsible for implementing energy efficiency programs across the state, Energy Trust should embrace its role as an educator. Already, Energy Trust acts as a resource to households seeking to save on energy bills.⁵⁴ But we believe that Energy Trust can do more. The Energy Trust website serves as an important one-stop hub of information that people trust to provide reliable information in making home energy choices. But as it stands, Energy Trust's educational materials lack some essential information that can help households make more informed decisions about home energy choices. More specifically, we ask that Energy Trust include information on its website about GHG emissions, health concerns about using gas appliances, and information for households seeking to electrify.

Health effects from gas appliances are becoming better understood, as discussed above. In fact, California legislators passed a bill requiring health warning labels on new gas stoves sold online and in stores in the state; it is awaiting the governor's signature.⁵⁵ Illinois and New York legislators introduced similar bills.⁵⁶ The City of Portland recently considered an ordinance that would have required landlords to inform tenants of the health harms posed by gas stoves.⁵⁷ Multnomah County's Health Department recommends transitioning away from gas stoves.⁵⁸ In contrast, Energy Trust's cooking appliance webpage contains no information about health-related concerns.⁵⁹ As consumers make decisions about gas appliances, they will naturally turn to ETO's website; Oregonians deserve complete information about health, efficiency, and cost impacts of the decisions they make.

⁵⁴ *Resource Center*, Energy Trust of Oregon (last visited Sept. 17, 2024)

<https://www.energytrust.org/about/who-we-are/mission-vision-values/about-resource-center-2/>

⁵⁵ <https://www.npr.org/2024/09/13/nx-s1-5003074/climate-gas-stove-health-warning>

⁵⁶ Akielly Hu, *Gas Stoves are a Health Problem. Could Warning Labels Help?*, Canary Media (June 24, 2024), <https://www.canarymedia.com/articles/fossil-fuels/gas-stove-health-warning-labels-health-california-new-york-illinois-ge>.

⁵⁷ Draft City Code 17.110 (Portland, Or. 2024).

<https://www.portland.gov/bps/climate-action/multifamily-energy/documents/multifamily-energy-reporting-and-tenant-notice/download>

⁵⁸ Mult. Co. Health Dep't., *A Review of the Evidence, Public Health and Gas Stoves* (Nov. 2022), <https://multco-web7-psh-files-usw2.s3-us-west-2.amazonaws.com/s3fs-public/gas-stoves-health-risk-report-2022-FINAL.pdf>.

⁵⁹ *Kitchen Appliances*, Energy Trust, <https://www.energytrust.org/residential/incentives/kitchen-appliances> (last visited Sept. 17, 2024).

Likewise, as interest and consumer demand for electrification grows, Oregon residents—and businesses—deserve a trusted source of information on how to electrify. Especially as legislators have recognized electric heat pumps as the most efficient space heating option for Oregonians, Energy Trust’s information should be updated to reflect this and to ensure interested residents electrify in ways that are beneficial. A current search of “electrify” on Energy Trust’s website returns no results.⁶⁰ Energy Trust will play an essential role in consumer decisions to electrify, and its Draft Strategic Plan includes a strategy to support consumer requests to electrify; its education strategies must also reflect these priorities.

B. Data Reporting and Tracking

Energy Trust must ensure robust and accurate data tracking and reporting of program use and customer engagement with it and its partners to ensure that Oregonians, and in particular legislators and regulators, are informed about program utilization and customer preferences, as well as progress towards climate goals. As the primary purveyor of energy efficiency programs across the state, it is Energy Trust’s responsibility to provide robust tracking for all dynamics involved with its offerings. HB 3409 recognized this need by directing the Oregon Department of Energy to evaluate “the adoption and use of heat pump technologies regularly to determine whether the rate of adoption and use will enable the state to meet greenhouse gas emissions reduction goals.”⁶¹ And so, it is imperative that Energy Trust track customer and climate trends to report accurate information to lawmakers. Armed with this information, we believe that lawmakers and regulators will have greater motivation to modernize policies to meet customer demand and climate needs.

Below is a non-exhaustive list of some areas we ask Energy Trust to prioritize in its data reporting and tracking over the next six years:

- Consumer engagement from moderate-income households: those who do not qualify for income-qualifying rebates but may not be able to afford appliance upgrades without support;
- Consumer engagement from low-income households;
- Use of state and federal funds for electrification;
- Emissions impacts of appliances for which ETO offers rebates or other programs;
- Quantifiable non-energy benefits from ETO programs.

C. Clarifying sources of funding & restrictions

ETO has historically been funded through ratepayer money from IOUs. As more funding sources, including the above-mentioned IRA and state initiatives, provide additional support for energy efficiency programs, ETO’s ability to take meaningful actions expands. Consequently, it is important that ratepayers and decision-makers understand any limitations associated with each of these funding sources so that each can plan accordingly. In the final version of its Strategic

⁶⁰ Energy Trust, <https://www.energytrust.org/> (search “electrify”) (last visited Sept. 17, 2024). A search of “electrification” turned up one result, the agenda of a 2019 conference. *Id.*

⁶¹ H.B. 3409, Sec. 1(2)(d), 2023 Leg. Ses., 81 Leg. (Or.).

Plan, we ask that ETO provide details about its current funding sources, the restrictions these funding sources place on ETO’s actions, and further opportunities that ETO plans to explore related to funding to expand its reach in the state.

D. Reevaluating cost-effectiveness tests and non-energy benefits

Energy Trust is, of course, required to engage in a traditional cost-benefit analysis for its utility-funded programs. But policies do allow for quantification of “non-energy benefits,” including allowing ETO to propose exceptions to cost-effectiveness tests.⁶² Strategies and priorities outlined above include many non-energy benefits, like protecting residents from pollution, heat and wildfire impacts. HB 3409 directs state agencies, including the PUC, to pursue “innovative solutions” to “ensure all households in this state benefit from energy efficient appliances and cooling upgrades.”⁶³ As the source of energy solutions in the state, ETO should help the PUC meet its statutory obligations by prioritizing non-energy benefits of measures for utility funded programs.

E. Reassessing as needed to prepare for future changes

As the Draft Strategic Plan notes, ETO adopted a longer planning horizon to better align with HB 2021 goals. While we agree it is important to align on-the-ground efficiency strategies with state goals, the longer timeline necessitates a certain degree of flexibility. Both technologies and state priorities around those technologies have greatly advanced over the past five years. Given the influx of federal funding for energy-related manufacturing, research, and training from the IRA and state-led initiatives,⁶⁴ ETO must be able to adapt its strategies to meet needs and policy landscapes as they change. In its 2020–2024 Strategic plan, Energy Trust had a separate Focus Area of “Adapting to Change.” That focus area centered organizational changes, but still signaled a desire for flexibility. We believe that the current moment, where Energy Trust stands at the center of goals to adjust to a changing climate, regulators’ shifting priorities regarding electrification, and adapting consumer preferences, necessitates a flexibility that we don’t see reflected in the proposed Focus Areas. We ask that the final plan recognize an ability to shift focus to meet changing needs and regulations as they occur. Energy Trust’s actions and adaptability may aid or hinder Oregon meeting its goals and priorities.

IV. CONCLUSION

Oregon is lucky to have the Energy Trust of Oregon serving as a central source of information and funding to create energy efficiency and renewable energy pathways for Oregonians. We believe that this Plan contains many solid strategies to accomplish a vision of climate adaptability, resiliency, and reliability. But we also recognize the imperative of achieving meaningful energy savings and efficiency gains over the next six years to set Oregon up for even longer-term energy success. Recognizing the transformative role that Energy Trust plays in achieving energy efficiency, renewable energy, and climate goals in Oregon, we hope these comments provide useful feedback about how ETO can better support a clean energy future for all.

⁶² Energy Trust Order, *supra*, at Appendix 1, p. 27.

⁶³ H.B. § 3409, Sec. 1(1)(h), 2023 Leg. Ses., 81 Leg. (Or.).

⁶⁴ *See id.* Sec. 4 (outlining initiatives to train contractors in energy efficient technologies); 42 U.S.C. § 18795b (2023 Supplement).

Respectfully submitted,

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Seeds for the Sol

/s/ Lisa Adatto

Individual

Energy Trust Strategic Plan Comment From Lake County Resources Initiative (LCRI)

Strengths:

- The focus on maximizing clean energy aligns well with LCRI's mission to promote sustainable practices and supports efforts to increase solar installations and energy efficiency upgrades in rural communities.
- Creating greater impact for priority customers, including low-income and rural populations, is a strong focus. LCRI is well-positioned to help reach these populations as a trusted local organization.
- Supporting community resilience is crucial for rural areas that face unique challenges such as climate change and economic shifts. This emphasis resonates with LCRI's ongoing work in these communities.
- Reducing the cost of decarbonization will make renewable energy and energy efficiency more affordable and accessible for rural communities, where cost is often a major barrier.

Areas for Improvement:

- The plan does not sufficiently reference or emphasize the role of Community-Based Organizations (CBOs) and trade allies, despite their vital role in connecting community members with Energy Trust's resources. While it mentions forming new partnerships, it lacks details on how Energy Trust will continue to support long-standing partners like LCRI.
- Goals and metrics in the plan are vague, lacking specific numerical targets and measurable milestones. Strategies for achieving these goals are similarly non-specific, without clear steps or timelines. Including detailed metrics and timelines would help partner organizations align their efforts and set expectations.
- The plan highlights efforts to gather and train new organizations but overlooks the importance of providing continued training and support for CBOs that have been engaged with Energy Trust on an ongoing basis.

- The plan does not address the importance of maintaining partnerships with CBOs, despite the crucial role they play in delivering on-the-ground services. Energy Trust should explore best practices for collaborating with smaller organizations to ensure that funding and resources effectively reach those in need.
- Extreme weather events are mentioned, but there is no plan to assist low-income clients with equipment repairs, such as heat pumps, after installation. Many low-income customers cannot afford service calls when their systems break down, highlighting the need for ongoing support for equipment maintenance.
- The plan lacks clear strategies for working with CBOs like LCRI. Energy Trust should include specific strategies such as offering targeted funding, capacity-building resources, and opportunities for collaboration in program planning and execution.
- LCRI can play an important role in community education about Energy Trust's programs, but the plan should emphasize ongoing collaboration with CBOs to help bridge the gap between Energy Trust's programs and the needs of rural residents.
- Rural communities have different energy needs and priorities compared to urban areas. The strategic plan should give CBOs the flexibility to adapt Energy Trust programs to fit local contexts, ensuring they are relevant and effective.



Energy Trust of Oregon

421 SW Oak St, Ste 300, Portland, OR 97204

To whom it may concern:

I appreciate the opportunity to comment on Energy Trust's draft strategic plan. For full transparency, I am a former employee of Energy Trust and currently support Energy Trust's Planning department through a small amount of consulting work. These comments, however, represent my interests as an individual, albeit one who is deeply familiar with Energy Trust's work and has the experience of supporting utility demand side planning work throughout the Northwest and across the country.

I have two comments on the draft strategic plan:

- 1. Energy Trust should adopt a Total System Benefit metric.**
- 2. As part of its decarbonization and resiliency focus areas, Energy Trust should prioritize the adoption of flexible grid-enabled technologies that facilitate the integration of variable renewable energy and participation in demand response programs.**

Further discussion on each of these is provided below.

Adopting a Total System Benefit Metric

Energy Trust's current metrics have several limitations. First, Energy Trust has historically focused on its savings goals, which are expressed in first year energy savings. These are the main metrics that program managers track, and the first thing reported in the annual report. These tallies place no value on when the savings happen, how long the savings last, or what other benefits may come with the savings. This encourages program managers to target savings that are cheap and easy to acquire but may not deliver the most value. While first year savings targets may have sufficed in past years where Energy Trust was primarily a mechanism for resource acquisition, they seem ill-suited for the present and future laid out in the strategic plan.

The second limitation is that, while Energy Trust may report on other metrics that include dimensions such as peak demand savings, carbon reductions, or factor in the lifetime of measures, these metrics often lack context. In Energy Trust's 2023 Annual Report, it reported 285,000 metric tons of avoided CO₂. For the dollars spent, is this a good or bad outcome?



This reporting also lacks a way to comprehensively describe the total value Energy Trust is delivering.

Finally, in a—hopefully not too distant—future where Energy Trust can support beneficial electrification, Energy Trust’s current reporting paradigms do not have a good way of reporting these efforts. Do they count as positive gas savings, but negative electric savings?

The Total System Benefit metric can address all of these limitations. Recently adopted in California, the Total System Benefit metric tallies the economic value of the lifetime energy, capacity, and greenhouse gas benefits. It encourages program managers to target high-value energy savings based on the lifetime, the shape of when the savings happen, the associated capacity benefits, and the potential carbon benefits. It can also easily incorporate beneficial electrification programs since it is fuel neutral.

While adopting this metric as one by which Energy Trust’s performance is formally evaluated by would take further steps from the OPUC, Energy Trust could begin reporting on it voluntarily. In addition to surfacing the total value returned from rate payer funding, reporting on it now would build comfort and familiarity, perhaps establishing a baseline for future comparison.

Energy Trust already has many of the pieces in place to begin reporting on it, as many of the elements are developed for the annual report. Incorporating this metric would not be a heavy lift.

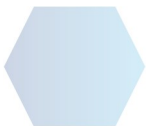
Focusing on technologies enhancing flexibility

While Energy Trust’s second and fourth focus areas rightly call out the importance of decarbonization and resiliency, the draft strategic plan does not explicitly call out the important role that Energy Trust can and should play in supporting the adoption of grid-enabled, flexible technologies. These technologies can support the integration of variable renewable energy resources and support customer participation in demand response programs, reducing the cost of decarbonization, and helping utilities manage stresses on the grid, facilitating resiliency *before* a blackout. In addition to supporting grid-enabled technologies, other efficiency measures such as weatherization can make customer participation in demand response programs more tolerable and support health and safety in the event of a sustained outage.

Combining the energy efficiency and flexibility benefits of some measures could also enable higher incentives or enhanced program delivery efforts, helping Energy Trust reach additional customers through its programs.

These measures provide unique value to the grid. While the Regional Technical Forum is working on quantifying a potential economic value for resiliency, it is currently difficult to place a dollar value on these benefits. They nonetheless deserve special attention and focus in Energy Trust’s work. As laid out in the draft strategic plan, they are essential to meeting our future energy needs.

Thank you for your consideration.



Warm regards,

Ted Light
PRINCIPAL



v

Energy Trust Provided Questions for Comment:

1. How do our strategic plan focus areas and desired outcomes relate to you or your organization's priorities in 2025-2030?

The focus areas outlined in Energy Trust's draft strategic plan align very well with NEEA's own strategic goals for 2025-2029:

1. Transform Markets for Energy Efficiency.
2. Accelerate the Adoption of Grid-Enabled End-Use Technologies through Market Transformation.
3. Advance Strategies to Reduce Greenhouse Gas Emissions through Market Transformation.
4. Advance the equitable delivery of energy efficiency benefits to Northwest consumers through Market Transformation.

Like Energy Trust, NEEA is focused on addressing regional energy system needs, including resilience, resource adequacy, load flexibility, and decarbonization, by advancing as much energy efficiency as possible between 2025-2029. NEEA looks forward to collaborating with Energy Trust to maximize our collective impact for the benefit of all Northwest consumers, including those that have not traditionally benefitted from energy efficiency or Market Transformation programs.

NEEA's upstream market interventions, research and data, emerging technology and codes and standards work will complement Energy Trust's focus areas in several ways:

- NEEA's efforts to identify and advance emerging energy efficient technologies will ensure a continuous pipeline of opportunities to feed into Energy Trust's programs. Furthermore, NEEA's existing relationships with supply chain market actors, along with its focus on building market readiness for efficient products, can be leveraged by Energy Trust to address contractor availability, supply chain and market readiness barriers outlined Focus Area #1.
- NEEA's efforts to advance strategies to reduce greenhouse gas emissions from both electric and natural gas end uses will support Focus Area #2, as will NEEA's work upstream to advance connected products and communications protocols that allow load shifting away from peak load/ peak carbon times.
- As Energy Trust seeks to meet the needs of its priority customers, NEEA's market research and data gathering efforts will support the strategies in Focus Area #3. NEEA is looking forward to working with Energy Trust to better understand how NEEA's work upstream in the market can be tailored/ leveraged to support the

needs of priority customers and reduce the first costs of energy efficiency for all Northwest consumers.

- NEEA is intrigued by Focus Area #4 and is looking forward to working with Energy Trust to explore Market Transformation as an approach to achieving increased customer participation in its programs. For example, NEEA's work to identify and address market barriers to energy efficiency may be leveraged by Energy Trust to develop new strategies and approaches to encourage greater uptake.
- NEEA is pleased to see an entire focus area on resilience and more intention around the intersection between efficient products and resiliency.

2. What in this plan is most exciting to you or your organization or would compel you or your organization to work with us? How can we do a better job of working with you or your organization?

NEEA very much appreciates that Energy Trust is focusing on strategies that will maximize energy savings, reduce peak demand and increase resilience. These are critical needs that the energy system is facing in the near-future and challenges that require multi-faceted, collaborative approaches to address. Moreover, NEEA is pleased to see an explicit focus on reducing the cost of decarbonization, a significant barrier to achieving regional goals, through cost-effective energy efficiency. Finally, NEEA is pleased to see the reference to connected technologies in Focus Area #2 and acknowledgement that managing loads, and the timing of energy efficiency, is becoming increasingly important.

3. The plan identifies how we will measure progress under each focus area. Do these seem like the right measures of progress? How much progress should we aim to achieve by 2030 in these areas?

No comment.

4. Is there anything you or your organization were hoping to see in our strategic plan that is not currently included?

No comment

September 20, 2024

Energy Trust of Oregon
421 SW Oak Street
Portland, OR 972106

Re: Energy Trust of Oregon's Draft 2025 - 2030 Strategic Plan

Multnomah County is committed to a clean energy transition that centers environmental justice. The climate crisis that continues to unfold in our community demands bold action at the local, state, and federal levels. Multnomah County has adopted aggressive decarbonization and clean energy goals, including Resolution 2017-046, "Affirming Multnomah County's Commitment to Meeting Community-Wide Energy Needs in Multnomah County with 100 Percent Renewable Energy by 2050". This resolution, which we refer to as our 100x50 resolution, makes a countywide commitment to using 100% clean and renewable sources of energy for our homes, businesses, and transportation by 2050. This also includes ensuring at least 2% of energy used in 2035 is produced by community-based projects, and that we support and listen to frontline community leadership in this work. The County strongly believes that without an explicit focus on communities that have been historically and strategically undervalued, a clean energy transition may reinforce the same injustices of the energy system that we see today, including cost burden, lack of access to workforce opportunities, and new technologies. The County Board also recognizes that we can only achieve these goals through strong external partnerships and advocacy.

Energy Trust of Oregon ("ETO") has long been a key partner and proven leader in the clean energy transition. The County applauds ETO's decades of success in dramatically reducing energy use across Oregon, and more recently for prioritizing investments in underserved communities. ETO's 2025-2030 Strategic Plan is a strong commitment to continuing these efforts and aligns strongly with the County's vision for a just transition. The County appreciates that the Strategic Plan also seeks to grow ETO's approach to meet the challenges and opportunities ahead. This includes recognizing the significant co-benefits of energy investments, including supporting healthy indoor environments, strengthening community resilience and explicitly naming energy justice as a priority in ETO's work.

Multnomah County's approach to a just energy transition focuses on four priority "pillars": 1) centering justice; 2) maximizing energy efficiency; 3) decarbonization of the electricity supply; and 4) accelerating electrification. ETO has a critical role to play in each of these areas and we are pleased that the Strategic Plan is a clear commitment to do so.

Centering Justice:

Language is important, particularly when institutions are making public statements of their values. The County uses the language of "energy justice" in part because past work to incorporate "equity" as a value has fallen short. "Justice" implies both a recognition of past harms and a commitment to intentionally redress them. This includes moving from simply engaging communities to deep, lasting, and mutually beneficial partnership work. We appreciate that ETO has specifically defined energy justice and committed to it as a core value in your Strategic Plan.

The County also appreciates the significant strides ETO has made in reaching underserved communities. This includes utilizing new funding sources and approaches to deliver investments including heat pumps to low-income households through low and no-cost options; and through investments in and partnerships with community-based organizations who are leading energy justice across the state. In addition, the County applauds ETO's efforts to grow workforce opportunities in energy-related trades for communities that are particularly at risk of being left behind in the energy transition.

Recommendation:

We are eager for ETO to live up to its commitment to justice by joining the County and the many frontline organizations that are leading the energy justice movement in challenging historical conventions about how we deliver energy programs in our state. While the County understands ETO's constraints around program cost-effectiveness determinations, we believe that your work should be driven by what is in the best interest of and provides the most value to community members, particularly those who have been underserved. Especially in this time of utility rate pressures, it is essential that we contemplate different pathways to achieving a just energy future, including scenarios that look beyond what is strictly cost-effective, and instead speak to what we need to do to meet the moment. Without bold action that questions how we have done things in the past, our future will be neither safe from climate change nor will it achieve energy justice.

Recent efforts to alleviate energy burden for low-income ratepayers of investor owned utilities through the creation of income qualified bill discount programs should also be factored into ETO planning. The costs of these essential programs are shared across all ratepayers, as they

should be, and therefore prioritizing investments in energy efficiency and other technologies for participating households presents an enhanced value to all ratepayers. ETO should adjust its planning accordingly to align with both the system benefit and justice benefits of prioritizing low-income households.

Maximizing Efficiency

ETO's achievements in the area of energy efficiency cannot be overstated. Without its decades of leadership on this issue, our communities today would be facing higher energy costs and an even more daunting path to achieve our climate goals at the local and state levels.

While today there is some allowance for ETO to consider non-energy benefits in its cost-effectiveness determinations, we believe that energy efficiency investments continue to be undervalued. The avoided costs of public health impacts broadly, and to households individually, can far outweigh the benefits to our energy system. And while our planning systems may struggle to put a specific price on the well-being of individuals, it isn't hard to understate the profound difference an efficient home with a heat pump can have to a family that struggles with childhood asthma or heat sensitivity when they are faced with extreme temperatures and wildfire smoke. Our collective goal should be that all communities are resilient and thriving, and that goal should drive our priorities and planning.

Recommendation:

Work with advocates, regulators, and utilities to establish program goals that align with the best interests of our communities, particularly those historically underserved and most in need of investment. This should include developing and considering an alternative scenario that aggressively pursues energy efficiency and other distributed energy resources (DERs) beyond what would be considered under a cost-effectiveness approach. This additional planning should include modeling about the impact to household stability, health, and resilience across all scenarios to allow for a full consideration of which resource pathways are most in line with the County's and ETO's shared commitment to justice. To support this modeling, ETO should partner with the Oregon Health Authority to leverage the work of their Healthy Homes Grant Program to gain a more comprehensive understanding of the value of climate resilience and other health benefits resulting from energy related investments.

Decarbonization of Electricity Supply

Multnomah County agrees that distributed renewable generation must play a significant part in our electricity supply decarbonization, and we appreciate that the Strategic Plan recognizes

the opportunity this represents for both the energy system and communities. Distributed generation offers pathways for communities and households to build wealth through asset ownership, workforce opportunities, and cost savings. It also presents the opportunity for households and communities to build resilience when combined with other technologies like battery storage, as well as supporting utility grid stability, as identified in the Strategic Plan.

Recommendation

As a trusted nonprofit that works with communities, utilities, and regulators alike, ETO is uniquely positioned to help decision-makers navigate the complex tensions that will arise on the pathway to electricity supply decarbonization. Multnomah County is eager for ETO to play a more active role in these discussions as an arbiter of real-world experience and data. As such, ETO should publish regular results on how distributed energy projects are impacting households, communities, and the utility system.

Accelerating Electrification

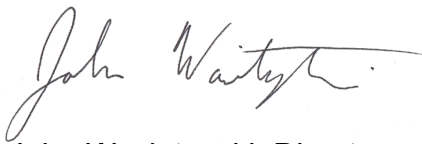
Multnomah County appreciates that ETO is beginning to speak to the value of electrification in its planning and programs, and we recognize the challenge that ETO faces in moving towards a new policy and regulatory paradigm that explicitly supports fuel switching. However, it is time for ETO to incorporate electrification as a core strategy for the benefit of its customers. ETO can and should play a primary role in supporting gas utility decarbonization aligned with state law, including the likely-to-be-adopted obligations under the Climate Protection Program. Multnomah County believes that the transition from gas appliances and heating to all-electric is both in the interest of households and the future of our energy systems, and can be cost-effective today. This is particularly true for new construction, but also when considering the replacement of existing equipment. ETO should develop tools for helping households determine when it is most cost-effective and advantageous to electrify a home, especially in light of state and federal subsidies, and make it plain that ETO subsidies support customer energy-efficiency decisions regardless of the existing fuel source.

Recommendation

While ETO is not a public entity itself, it has an essential role in the implementation of state mandates like Executive Oregon 20-04, significant legislation including HB 2021, implementation of federal grants, and, when adopted, the Climate Protection Program. Each of these policies rely heavily on ETO to not only meet goals in 2030 (aligned with the Strategic Plan) but to move toward a complete decarbonization of Oregon's energy supply. It is therefore critical that ETO's Strategic Plan not only align with the state's 2030 goals but to look for opportunities to move faster than state goals given the challenges of decarbonization beyond 2030. Communities need these investments in clean and resilient technologies today, and

early action to address greenhouse gas emissions is critical if we are to prevent the more severe impacts of climate change. There is simply no time to delay.

Multnomah County appreciates the opportunity to engage in the Energy Trust of Oregon's 2025-2030 Strategic Plan, and we look forward to a lasting partnership between our organizations as we transition to a just clean energy future. Thank you for the opportunity to comment on this important document that will set the course for future decisions by the organization.

A handwritten signature in black ink, appearing to read "John Wasiutynski".

John Wasiutynski, Director

Multnomah County Office of Sustainability

A handwritten signature in black ink, appearing to read "Tim Lynch".

Tim Lynch, Senior Policy Analyst

Name: Alex Alonso

Organization: NeighborWorks Umpqua

City or Region: Roseburg

How do our strategic plan focus areas and desired outcomes relate to you or your organization's priorities in 2025-2030?

The strategic plan really aligns with our commitment to increase services and support with "priority customers". Using the definition set by the Oregon Statute, we recognize that these communities encounter a variety of factors that keep them from accessing our climate resilient programs and engaging with our services. It's great to note that ETO wants to be more collaborative with more nonprofits, CBO's, local municipalities, Utilities, etc. because we would like to increase our partnerships and create more sustainable and impactful electrification initiatives. It's really important for us at NeighborWorks that we begin strategizing about what comes after once this funding concludes. We recognize that these measures will not always be available and it's important that we grow sustainably alongside our climate resiliency work, and we plan on how to be resilient in the face of dwindling funding opportunities and resource.

What in this plan is most exciting to you or your organization or would compel you or your organization to work with us? How can we do a better job of working with you or your organization?

The most exciting plan for our organization that would compel us to keep working with ETO is the workforce training opportunities that are outlined in the 2025-20230 plan. There are a lot of climate friendly initiatives that we can explore but that could be unsustainable or unfeasible if our staff or potential partners are not well trained or up to date with certifications or best practices. In our rural communities, attracting talent is difficult so ensuring our local communities can be self-sustaining via workforce development and training would be very beneficial in the long term. Another plan that we are excited for is the continued partnership we have with ETO and capacity building. Being a community partner has been incredibly beneficial for our organization as we grow and expand our services. It creates more avenues for collaboration directly with ETO or other organizations. We feel confident in our relationship and strengthening those ties to develop plans/goals will be crucial, especially in times of crisis.

The plan identifies how we will measure progress under each focus area. Do these seem like the right measures of progress? How much progress should we aim to achieve by 2030 in these areas?

I think the metrics to measure the progress of each focus area are good especially with Focus area 3. I think there should be a base metric that is public in order to understand the actual participation progress of priority groups. I think one of the metrics for area 5 should be the number of non-profits, community groups, business are engaged with strategic resiliency planning. I think you should aim high, always be aspirational. If we go in with the intention of being ambitious, there is more energy and excitement about fulfilling those goals, even if they seem unattainable in the moment they are written up or thought of, A lot can happen in a year.

Is there anything you or your organization were hoping to see in our strategic plan that is not currently included?

I wish there was a bit more focus on planning or strategizing over these next years about what comes after this historic level of funding dries up. The work ETO is planning on doing is incredible, but if we want to be proactive and future ready, we should be prepared for what comes next in the never-ending cycle of funding.

----- Original Message -----

From: Robert Whitsell;

Received: Fri Sep 20 2024 11:16:39 GMT-0700 (Pacific Daylight Time)

To: Information - Energy Trust;

Cc: ; ; ; **Subject:** Strategic Plan Review - NeighborWorks Umpqua (NWU)

[EXTERNAL: Please take care to verify address]

To Whom It May Concern,

I hope this message finds you well. During the review of your strategic plan, I wanted to take a moment to share some insights regarding two key challenges we're facing: capacity and challenging expectations.

From my perspective, focusing on the ground-level realities is crucial. The Energy Trust of Oregon (ETO) has made commendable strides in addressing capacity by developing funding to cover staffing costs, which is essential for meeting the needs of our customer base. I appreciate this priority moving into the next five years. However, I have two concerns:

1. **Staffing Capacity:** While the initial support funding we have received is a positive step (as demand and funding continue to grow) we will require additional staffing to effectively manage the increased workload. The needs of homeowners are rising, and it is essential that we expand our capacity accordingly. That is leaving out the challenge of rising costs and the inability to provide raises for staff to meet the increased costs in their lives. Many grants do not change with the cost of living.
2. **Contractor Capacity:** The challenge extends to our community contractors. Although HVAC contractors have received considerable support, other trades—such as those specializing in windows, insulation, and electrical work—are struggling to meet community demands. This is further exacerbated by rising costs and a lack of trained personnel.

Regarding challenging expectations, I'd like to provide an example that highlights this issue. We attempted to utilize ETO funding for Windows on two projects, but both were unsuccessful. We faced difficulties in obtaining necessary documentation from contractors, such as ordering invoices and packing slips. Additionally, getting contractors to leave the required stickers on the windows proved problematic, as they prefer to remove them to finalize their work. This situation underscores the importance of aligning grantor expectations with the realities contractors face. Increasing demands can deter contractors from collaboration, as evidenced by one contractor who has ceased communication with us.

Despite these challenges, I want to express my gratitude for the partnership we've developed between ETO and NWU. Your support and engagement have been invaluable as we work to meet the needs of our shared customer base.

Thank you for your attention to these matters. I look forward to continuing our collaborative efforts.

Gratefully,

Robert

Robert Whitsell | Housing Rehab Manager
AgeSafe Senior Home Safety Specialist | Asbestos Inspector
NeighborWorks Umpqua - NMLS# 255912

PH: | F: | | nwumpqua.org
Office: 1984 Sherman Ave, North Bend, OR 97459
Equal Housing Opportunity | Equal Housing Lender

Name: Alma Pinto

Organization: NW Energy Coalition

City or Region: Oregon

What in this plan is most exciting to you or your organization or would compel you or your organization to work with us? How can we do a better job of working with you or your organization?

NWEC generally supports the vision ETO has outlined in its Draft Strategic Plan. We find the shift toward centering customers and communities especially important. In the past, ETO has focused on utility needs and its existing trade allies, which remains important. However, ETO's recognition of the necessity to balance utility priorities with customer and community concerns—and actively involve them in shaping programs—is a significant step forward. Goals and program targets cannot be fully achieved without a balanced approach bringing in customer and community concerns and active involvement.

The plan identifies how we will measure progress under each focus area. Do these seem like the right measures of progress? How much progress should we aim to achieve by 2030 in these areas?

Given the increasing frequency of extreme weather events and the growing demand for energy resilience, we recommend including more specific metrics related to resilience outcomes under focus area 5. For example, tracking how many communities adopt resilience hubs or energy storage solutions as part of their local resilience plans would better reflect the broad impact of ETO's initiatives. We also support GEI's recommendation that ETO consider resiliency and wildfire impacts not just at the community level, but also at the household level, as individual home energy choices play an important role in strengthening community resilience against wildfire risks.

Overall, by 2030, ETO should aim for substantial progress in reducing energy use during peak demand periods, increasing renewable energy adoption, and ensuring that priority customers see tangible improvements in energy affordability and resilience. Specifically, the goal should be to have a significant number of households in priority communities benefiting from clean energy solutions that lower their energy burden and protect them from extreme weather events.

Is there anything you or your organization were hoping to see in our strategic plan that is not currently included?

We believe ETO's strategic plan could benefit from a clearer acknowledgment that Oregon's energy landscape is shifting, with load growth no longer being small and incremental. Decarbonization efforts, the expansion of energy-intensive industries like data centers, and more frequent extreme weather events are reshaping the boundaries for cost-effectiveness and program targets. In this context, it's crucial that ETO not only focuses on making energy use more efficient but also prioritizes load management and flexibility during peak stress conditions, as these challenges are growing at a rapid pace.

We recommend that ETO adopt a more proactive approach, emphasizing not just a gradual evolution of programs but a more immediate step change that accounts for the increasing value of customer-side resources during system peaks. As we saw recently with the grid being stressed during high temperatures, such as during July's record demand, the strain was significant. ETO's programs can play a critical role in mitigating these stress points and reducing exposure to high market prices, which spike

during extreme weather conditions. As PGE, PacifiCorp, and Idaho Power join the EDAM, there are both price risks and opportunities to reduce peak use, and customers should share in the resulting benefits.

Additionally, we would like to see more focus on how ETO can facilitate regional collaboration with other states pursuing similar decarbonization and resilience goals. Leveraging ETO's experience over the past 20 years could enhance broader regional efforts and create opportunities for shared innovation and policy alignment across the Pacific Northwest.

Expanding the support for workforce development, particularly in clean energy jobs within priority communities, would also be a valuable addition. This would help ensure that as Oregon transitions to a cleaner energy future, communities historically underrepresented in the energy sector also benefit from new economic opportunities.

Lastly, we support GEI's recommendations to carefully consider the challenges of fuel switching to ensure that low-income customers are not left stranded with high gas costs over the long term, and that ETO better educate households by including information on your website about the health impacts of gas and GHG emissions. We also agree with GEI in the need to improve ETO's data reporting and to reevaluate the cost-effectiveness tests for non-energy benefits. As highlighted in our recent UM 1893 comments, NWEA would like to see targeted initiatives from ETO to develop and quantify non-energy benefits so that they can be integrated into future cost-effectiveness assessments.

Jeffery C. Allen
Chair
Idaho

Ed Schriever
Idaho

Doug Grob
Montana

Mike Milburn
Montana



Northwest **Power** and **Conservation** Council

KC Golden
Vice Chair
Washington

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Washington

Ginny Burdick
Oregon

Louie Pitt, Jr.
Oregon

September 4, 2024

Michael Colgrove
Energy Trust of Oregon
421 SW Oak St., Suite 300
Portland, OR 97204

Dear Michael:

Thank you for the opportunity to comment on the Energy Trust of Oregon Draft Strategic Plan for 2025-2030. Staff of the Northwest Power and Conservation Council (“Council”) have actively engaged with the Energy Trust on a number of topics, including participation in Conservation Advisory Committee since 2009. The Council is familiar with the Energy Trust and its long-term performance as an implementer of Oregon energy efficiency and renewable energy resource goals.

The Council was established by the states of Idaho, Montana, Oregon, and Washington, pursuant to the Pacific Northwest Electric Power Planning and Conservation Act of 1980 (Public Law 96-501). The Act authorized the Council to serve as a comprehensive planning agency for energy policy and fish and wildlife policy in the Columbia River Basin and to inform the public about energy and fish and wildlife issues as a means to involve the public in decision-making. The Power Act gives priority to the same energy resources as Senate Bill 1149: energy efficiency and renewable resources. As part of its duties, the Council is keenly interested in the implementation of cost-effective energy efficiency and renewable resource development across the four-state region.

Summary

The draft Strategic Plan articulates a future of acquiring all cost-effective energy efficiency and renewable energy to support Oregon’s clean transition and decarbonization goals (Focus Areas 1 and 2), and in doing so, broaden the impact by ensuring all customers with potential are served (Focus Areas 3 and 4). The draft Strategic Plan also highlights the importance of community resilience (Focus Area 5).

These objectives are all consistent with the Council's recommendations in its 2021 Power Plan.

Acquiring All Cost-Effective Energy Efficiency

The Council's 2021 Power Plan recommends that the region acquire all cost-effective energy efficiency as one piece of a robust strategy to ensure an adequate, efficient, economical, and reliable power supply. The Council recognizes that inherent in acquiring all cost-effective energy efficiency is meeting all customers with cost-effective opportunities. This includes customers who have been historically underserved, as well as those who have participated in programs but have yet to acquire all the potential cost-effective efficiency in their homes or businesses.

In addition to acquiring all cost-effective energy efficiency, the 2021 Power Plan also called on the region "to continue to invest in weatherization programs, targeting those homes that are leaky (in need of duct or air sealing) and/or have zero or limited insulation." The Council recognizes that while much of the region has been served with weatherization, there continue to be those customers that remain historically underserved by programs. Council staff analysis showed these households tend to have a higher energy burden, are more likely to be rentals, and more likely to be lower income.¹ Drawing in part on Energy Trust's example, the Council called on the region to consider exploring co-funding opportunities to ensure all customers are served. We highlight this aspect because it is perfect example of the importance of ensuring all customers are served and identifying innovative solutions to help fund those programs when possible.

The cost-effectiveness limit established in the 2021 Power Plan is lower than what is likely appropriate for Energy Trust.² The Council recognized that there are parts of the region pursuing decarbonization goals, such as Oregon, and it called on those jurisdictions to ensure that this is done efficiently. The power plan recognized that energy efficiency that "may not be cost-effective under the Council's current methodology, ... would be for jurisdictions with deep decarbonization initiatives." This is based on the Council's scenario analysis demonstrating significantly more energy efficiency, along with more renewables, storage and other resources, would be needed under a deep decarbonization future.

Since the 2021 Power Plan, the Council has seen on the ground changes that have increased the importance of acquiring all cost-effective energy efficiency. First, some parts of the region have adopted new policies since completion of the 2021 Power Plan analysis, including Oregon's adoption of HB 2021. Collectively, these policies are expected to increase load growth over the long-term, driven in large part by electrification. Second, there has been significant increases in load growth in recent

¹ Staff presentation to the Council's Conservation Resources Advisory Committee on December 15, 2020. <https://nwcouncil.box.com/s/w9yr2aejpdpj0fa4q6aykwx18deu6llf>.

² Council staff is aware of the ongoing process with the Oregon PUC for setting avoided costs, which establish cost-effectiveness for Energy Trust. While the methodology for Energy Trust might vary in some respects from the Council, the overall concepts hold when identifying and pursuing cost-effective energy efficiency.

years, driven primarily by growth in data centers and other high-tech areas such as chip fabrication. A big piece of this load growth is hitting Energy Trust's service territory. As a region, this increased load growth brings significant risks for resource adequacy. The Council's recently released Adequacy Assessment for 2029 showed that (1) just meeting the low-end of the Council's 2021 Power Plan energy efficiency target poses risks for adequacy and (2) this risk is significantly increased if the load-growth is as high as expected based on all regional utilities' reported load forecasts. The Council is keeping a close eye on this as it prepares for its ninth power plan, and staff is expecting a need for more resources (and transmission) development in the region, with energy efficiency continuing to be a critical piece of the picture.

- **Recommendation:** The draft Strategic Plan discusses “acquiring as much energy efficiency as possible” (Focus Area 1) and “maximizing the contributions of energy efficiency” (Focus Area 2). Energy Trust should clarify the strategic plan to focus on cost-effective energy efficiency. Focusing on cost-effective energy efficiency is critical for achieving the desired outcome as described in Focus Area 1 of ensuring that “customers will be paying less for their energy than they otherwise would have.”
- **Recommendation:** The desired outcome for Focus Area 1 highlights a goal that “customers will be paying less for energy than they otherwise would have”. In a time of increasing power costs for consumers, this is important. Cost-effective energy efficiency by its nature is inherently lower cost than its next alternative resource. The challenge is determining the counterfactual, or what the customers would have paid had the cost-effective energy efficiency not been acquired and alternatives resources needed to be developed to meet load. Council staff is willing to participate in discussions as you explore potential metrics to track progress in this focus area.
- **Recommendation:** Achieving all cost-effective energy efficiency requires sufficient budget, and Energy Trust will need to be strategic with its budget to find those opportunities it can be most effective. For example, while energy efficiency programs often only cover a portion of the cost of acquiring efficiency, spending up to the full incremental cost of a measure would still cost less than the next alternative resource. Energy Trust should consider where it might need to focus more budget to achieve cost-effective energy efficiency, considering increasing incentives where necessary to serve all customers, and conversely identify other areas where less focus is needed to still achieve the goals.
- **Recommendation:** Where additional energy efficiency, beyond what is cost-effective, provides value to customers, Energy Trust should pursue co-funding opportunities as described in the draft Strategic Plan.

Energy Efficiency and Resilience

The 2021 Power Plan also recognized the role that some energy efficiency measures play in supporting both home and building resilience. The Council directed its Regional

Technical Forum (RTF) to investigate methods for quantifying the value of resiliency from energy efficiency. The RTF started that work in 2022 and is continuing to enhance this methodology for potential inclusion in the Council's upcoming ninth power plan. The resulting values from this effort may be included as an additional benefit for weather-dependent measures. This work may also provide value to Energy Trust in support of Focus Area 5 as articulated in the draft Strategic Plan.

- **Recommendation:** Energy Trust should engage in the RTF and Council's work regarding quantifying resilience values from energy efficiency and should consider how this work might directly support Energy Trust's proposed efforts to support community resilience.

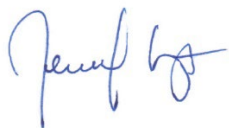
Acquiring Cost-Effective Renewable Energy

On the renewables side, the 2021 Power Plan recommends that the region acquire at least 3500 megawatts of renewables. While the 2021 Power Plan analysis focused on utility scale renewable resources, the Council recommended that the region "be mindful of individual and cumulative impacts when siting new resources so that new renewable resource development is carried out in a manner that also protects the wildlife, fish, and cultural resources of the Pacific Northwest." The Council recognizes that smaller scale projects, such as behind-the-meter or community solar, might be part of this cost-effective solution.

- **Recommendation:** Consistent with the recommendations above for energy efficiency, the Energy Trust should prioritize cost-effective renewable energy development. This will ensure that the funding allocated for resource and efficiency acquisition is utilized effectively to meet energy needs at the lowest cost. This is critical for ensuring Energy Trust can meet all desired outcomes.

In summary, the draft Strategy Plan provides some good high-level direction for the carrying out the vision of the Energy Trust of Oregon. There is alignment with the Council's regional power plan in many areas, including acquiring all cost-effective energy efficiency. We appreciate the Energy Trust's leadership and effective implementation of energy efficiency and renewable energy programs for Oregon.

Thank you again for the opportunity to comment. Please reach out to me if you have any questions.



Jennifer Light
Director, Power Planning

Name: Trevor Weltzer

Organization: Opsis

City or Region: Portland

How do our strategic plan focus areas and desired outcomes relate to you or your organization's priorities in 2025-2030?

ETO's strategic plan aligns well with our priorities, although the goals appear less aggressive than needed to meet the AIA 2030 challenge of net-zero buildings by 2030.

In part this is because building sector decarbonization can only go so far with efficiency. Full electrification is necessary, which also assumes a fully decarbonized electric grid. Fossil-fuel based electricity sources such as methane gas are fundamentally incompatible with these goals.

What in this plan is most exciting to you or your organization or would compel you or your organization to work with us? How can we do a better job of working with you or your organization?

The goals in this plan are too high level to engage with directly. This is understandable for a strategic plan, but doesn't provide any new clarity for the specific ways our organizations can work together.

The plan identifies how we will measure progress under each focus area. Do these seem like the right measures of progress? How much progress should we aim to achieve by 2030 in these areas?

Measurement is important, but an overemphasis on narrow KPIs creates a perverse incentive to chase those KPIs in lieu of actions that get us closer to our actual goals but are harder to measure.

Full decarbonization of new buildings is the AIA 2030 goal. Full decarbonization of all existing building stock and electrical production would be the next target.

Is there anything you or your organization were hoping to see in our strategic plan that is not currently included?

Explicit commitment to the elimination of fossil fuels in the Oregon energy market. I am fully aware of the funding sources for ETO, and this is far too important an issue to remain silent on.

Name: Angela Crowley-Koch

Organization: OSSIA

City or Region: statewide

How do our strategic plan focus areas and desired outcomes relate to you or your organization's priorities in 2025-2030?

These high level goals align with OSSIA's priorities for the next five years.

What in this plan is most exciting to you or your organization or would compel you or your organization to work with us? How can we do a better job of working with you or your organization?

OSSIA greatly appreciates ETO's plan and efforts to work with stakeholders. ETO does an excellent job working with OSSIA and our members. ETO has excellent staff that are always available for stakeholder conversations. OSSIA looks forward to working with ETO to implement this plan.

The plan identifies how we will measure progress under each focus area. Do these seem like the right measures of progress? How much progress should we aim to achieve by 2030 in these areas?

These metrics seem like the correct ones.

Is there anything you or your organization were hoping to see in our strategic plan that is not currently included?

The only thing that seems absent is mention of ETO's work on consumer protection and quality assurance of trade ally work. ETO is doing important collaboration with OSSIA and ODOE to ensure consumer protection, particularly with solar. I'm not sure how exactly this should be addressed, but probably in the reducing costs section.

From: Pam Marsh;

Received: Sun Sep 08 2024 18:37:21 GMT-0400 (Eastern Daylight Time)

To: Information - Energy Trust;

Cc: ; ;

Subject: Energy Trust strategic plan input

Dear Chris and Energy Trust colleagues,

Thank you for the opportunity to provide input to Energy Trust's strategic plan. Energy Trust has always provided key services to utility users, but your work is even more critical at a time when climate tumult is forcing us to accelerate both adaptation and mitigation efforts.

My comments on the plan include:

The importance of local resilience planning and implementation. We know that Public Safety Power Shutoffs necessarily interrupt the provision of electricity to communities. Now we are learning that power interruptions are increasingly common because wildfire sensitivities built into the system are easily triggered even when there are no particular wildfire or weather risks. Here in southern Oregon, the City of Talent and outlying areas have experienced 15-20 sustained outages during the summer months. Some of these are due to predictable factors, including wildlife and failing trees. But when outages occur, the new wildfire protocols mean that communities experience a much longer interrupted period than in the past.

I expect we will identify fixes to some of these immediate problems. But on the long term, we need to encourage and support the installation of local resilience projects that can help power a community when the outside grid goes down. These strategies, including microgrids and battery storage, must be incorporated into utility planning, beginning with our highest risk communities. Barriers, including the inability for local resilience projects to serve community when the power goes down, must be addressed immediately, to be followed by a discussion of funding strategies that will support project implementation.

Please note that "resilience" also means strengthening the capacity of the communities and organizations that hold trust with residents. Here in southern Oregon we've learned a lot about how to respond to crisis and how to keep the community intact during the prolonged recovery period. We now understand that a community that is resilient before a crisis will be much better prepared to cope with whatever comes our way when crisis erupts. Energy Trust should view opportunities to partner with CBOs or local networks with a lens toward building and maintaining the human and organizational resilience that will be necessary for managing the daily and emergent impacts of climate tumult.

Critical investments in rental properties. Traditional energy efficiency programs have focused on homeowners who can afford the investment and will benefit from subsequent energy savings. Unfortunately, those programs exclude the 40% of us who occupy rental properties. Rentals are the low hanging fruit of energy savings — tenants are frequently low or median income individuals/households, and given the age of our rental stock, these units are ripe for upgrades that could capture significant energy savings. But we have struggled to design programs to entice landlords, who typically do not pay the utility

bills for their rental units, to pay for upgrades to benefit tenants. Recently, however, the state's Rental Home Heat Pump Program has demonstrated remarkable success engaging landlords in these upgrades. A significant reason for program success is likely the substantial incentive — up to 60% of costs — provided to landlords.

Renters are our most vulnerable residents. Energy Trust should bolster incentives for landlord-funded improvements, understanding that the substantial incentives needed for this work likely will not meet traditional efficiency metrics. However, investments that result in comfortable, healthy and energy efficient homes that are affordable for low income residents should be measured by social value and equity metrics in addition to cost-effectiveness.

The importance of cooling. The heat dome experienced in 2021 resulted in the documented death of more than one hundred Oregonians; the number was likely much higher given the exacerbation of underlying disease. Similarly, at least 17 Oregonians have died from heat-related disease in 2024. Oregon used to be a place where we didn't need to cool spaces, but climate change and accelerating weather patterns now mean that residential cooling is now an essential protective factor, particularly for our most vulnerable residents.

Accordingly, Energy Trust should encourage the installation of cooling devices, most likely electric heat pumps, through a program of incentives aimed at both homeowners and landlords. A cooling program will need to be structured with nontraditional metrics, since cooling is most often going to expand a household's energy consumption rather than produce energy savings. However, a continuum can certainly be designed to emphasize the most energy efficient devices appropriate for any given environment. An ETO program that incentivizes heat pumps rather than traditional air conditioners will have multiple benefits to ratepayers, utilities and the state's climate goals. More efficient cooling will contain energy bills, mitigate cooling related electric loads that are becoming more of an issue for utilities, and reduce use of gas appliances for heating to help Oregon achieve its climate goals.

Affirming electrification as a consumer choice. As noted in Focus Area 2, decarbonization goals are likely to drive consumer demand toward electrification of home heating and cooling systems and appliances. Energy Trust's original charter has limited the organization's ability to move consumers from one energy source to another. However, specific strategies, including allowing the installation of electric HVAC systems without requiring that older non-electric systems be removed, provides a path that is consistent with consumer demand and the state's decarbonization goals. Energy Trust needs to continue to look for pragmatic approaches to this quandary, while awaiting additional counsel from the PUC and legislature.

The value of a big picture approach. Energy Trust's existing manufactured home replacement program recognizes that homeowners are not always well served by programs that take a myopic approach to energy efficiency. Forty percent of Oregon's manufactured home stock was manufactured before 1980; these homes have been low lying fruit for energy efficiency programs looking to upgrade owner-occupied units. However, the cost of these upgrades often exceeds the actual value of the home and energy efficiency investments alone do nothing to address the underlying construction issues. In contrast, Energy Trust's manufactured home replacement program recognized that in many cases it is a much better investment to

help homeowners move to new energy efficient manufactured homes that are constructed to current standards than to try to upgrade a home that has already exceeded its useful life.

Like other strategies discussed above, the manufactured home replacement program does not meet conventional metrics. But it is an outstanding example of the importance of using our energy efficiency programs in the service of the consumer's best long term interests and a compelling argument for metrics that address public health and equity.

Expanding boundaries. Finally, I want to affirm Energy Trust's move into arenas beyond the traditional ratepayer programs. Climate changes demand that we accelerate the installation of energy efficiency, resiliency and renewable energy programs and projects across the state. Federal and (to a much less degree) state funding may be available for these purposes, but consumers and communities need help identifying and assessing options. Energy Trust should use its organizational capacity, existing statewide relationships, and deep well of experience and knowledge to help communities navigate this new world. This work will go beyond the traditional Energy Trust mission, but it is perfectly aligned with the organization's abilities— and it is critical to the energy challenges that confront the state.

The comments above are consistent with one or more of the Focus Areas described in Energy Trust's draft strategic plan. I applaud the strong leadership of both Board and staff in the development of a thoughtful, long term and comprehensive approach that recognizes the multiple benefits of investments for consumers, especially those most vulnerable.

Many thanks for the opportunity to provide input. Of course, please contact me if I can provide additional clarity.

Best,

Pam Marsh

Name: Julie Williams

Organization: Seeds for the Sol

City or Region: Mid-Willamette Valley

How do our strategic plan focus areas and desired outcomes relate to you or your organization's priorities in 2025-2030?

The Strategic Plan directly relates to our function as a Community Partner Funded CBO with Energy Trust of Oregon. Through the processes included in the 2020-2024 plan, Seeds for the Sol has been able to deliver over 300 free home energy assessments to income qualified households and an equal number of low-cost to no-cost energy efficiency measures. Seeds for the Sol works exclusively with income qualified households.

Sections 1, 2 and 3 of the strategic plan affect us directly and more importantly impact the people we serve. SFTS in collaboration with Energy Trust of Oregon, is making a strong impact in outreach and service to marginalized populations in our region.

What in this plan is most exciting to you or your organization or would compel you or your organization to work with us? How can we do a better job of working with you or your organization?

I believe that the attention to the fair and equitable disbursement of the Inflation Reduction Act funds is the most exciting for me. We are in the field daily. We walk into homes that are in such great need and we are so excited to provide some measure of attention to their home comfort.

When you see multigenerational families struggling to stay warm and forced to use space heaters, and knowing that the heaters are generating an energy burden that they cannot afford...well, you can't unsee that. When we leave a home in dire situations, my staff is affected. We actually are raising funds in order to provide grants for people who have mold, dry rot and other issues that prevent us from installing energy efficiency equipment that they sorely need.

I want you to know that these people appreciate the help we provide to navigate the complex issues and incentives with them, and we provide gap funding to make their home more comfortable, as well as improve the homes longevity. But what strikes us the most is the number of times these clients thank us because they are sure that this is all too good to be true. And then Energy Trust provides programs that truly help them. I would love for Energy Trust staff to see and hear the appreciation that comes from our clients. They go from feeling shame that they cannot pay their full energy bills, to feeling seen, respected and lifted. It is quite moving, every time we witness this.

The plan identifies how we will measure progress under each focus area. Do these seem like the right measures of progress? How much progress should we aim to achieve by 2030 in these areas?

Yes! We must create methods for helping the lowest income households first. They are in situations where, if they cannot get their energy costs down and their homes are not improved, they will have to sell, (at a very low rate of return) and move into rentals. The rental costs and scarcity is incredibly high.

We see great need for mobile home replacement as the best solution for many homes.

Please track the magnification ETO can make on the IRA funds coming into the State.

I am happy to see the Solar for All landing with Energy Trust of Oregon. Who better to administer to income qualified clients? I appreciate that the lines for energy service areas will be blurred by the service required to the entire State of Oregon. If the electricity companies can absorb the loss of income created by solar infiltration, why can't the gas companies absorb the loss of electrification in individual and especially income-qualified homes?

I want Energy Trust of Oregon to embrace the timing of this important strategic plan and their role in climate change and how powerful this moment is! An energy transition is the only path forward for next generations. I encourage you to be innovative in your visioning, thinking, programming. Do not underemphasize the role you are empowered to play in the future of all living things!

Is there anything you or your organization were hoping to see in our strategic plan that is not currently included?

Again, in the field, it is very difficult to be working as a Community Partner for Energy Trust, and we cannot provide what is best economically, or professionally for our clients because the fuel-switching barrier is in place. So the very people that we all wish to serve in focus areas 1, 2 and 3 of the strategic plan, will now be locked into the 2nd or 3rd best options for HVAC because we are not allowed to help them fuel-switch. The marginalized populations cannot access the highly efficient and healthy heat-pump that they deserve. Once again, putting marginalized populations into yet another marginalized position. At the very least, could Energy Trust make an income qualified accommodation for fuel switching for HVAC?

Seeds for the Sol is also a distribution partner with Earth Advantage helping to distribute CHPDP Funds. I cannot tell you the number of customers who were so relieved that they could get aid in purchasing a heat pump for their home by stacking the ETO and EA incentives.

Name: Veena Prasad

Organization: Spark Northwest

City or Region: PNW

How do our strategic plan focus areas and desired outcomes relate to you or your organization's priorities in 2025-2030?

Spark Northwest partners with Tribal and rural communities, local governments and CBOs to clean energy solutions more accessible. We also do policy and advocacy in WA and OR in support of energy and environmental justice solutions. In the next few years, Spark Northwest's program and policy priorities are to

1. Build capacity and capability in partner communities
2. Reduce energy burden
3. Strive towards energy democracy

Some examples of our work:

Tribal communities - Supporting energy planning and resilience, bring energy related workshops and educational opportunities for community members to learn more

Local governments - design and implement heat pump campaigns in priority communities enabling low to zero cost heat pump installations. Our role includes creating and implementing workshops to share information around heat pumps.

It is exciting to see ETO's research and planning echo many similar focus areas the top ones being:

- Creating greater impact for priority customers
- Supporting community resilience

What in this plan is most exciting to you or your organization or would compel you or your organization to work with us? How can we do a better job of working with you or your organization?

ETO has an unusual structure and plays a unique role in the OR energy ecosystem. Efforts such as the Trade Ally network are important in establishing a solid foundation for the clean energy transition.

The landscape in WA is quite different. Many of ETOs approaches would work really well in WA. Organizations in WA would benefit from learning through ETO's experiences.

The Solar Ambassador program was one of the inspirations for Spark NORTHwest to help create a coalition of organizations from across WA that conceptualized "Energy Ambassadors". Pending funding from the state, the coalition anticipates collaborating with the WA dept of commerce to design and pilot Energy Ambassadors across WA.

I would love to see more cross pollination between OR and WA as well as the opportunity to collaborate more deeply with the ETO on energy efficiency and other projects.

The plan identifies how we will measure progress under each focus area. Do these seem like the right measures of progress? How much progress should we aim to achieve by 2030 in these areas?

Each focus area was well articulated. The metrics and strategies felt aligned and appropriate. There was not much detail to understand whether these would lead to 2030 goals being met. It sounds like the multiyear implementation plan will offer more information. In order to get to 80% of net zero by 2030, how much will each of these focus areas contribute?

It wasn't clear to me whether the goal to reduce energy costs for priority communities factored rate increases? Does ETO have energy justice goals?

Is there anything you or your organization were hoping to see in our strategic plan that is not currently included?

In order for communities to achieve resilience goals or for individuals to decarbonize and electrify their homes, there's not one step or milestone but rather a journey that could even require multiple years. I didn't read how ETO is thinking about energy navigation at the individual and community level and would build on the work already done to create these pathways.



September 19, 2024

Energy Trust of Oregon
421 SW Oak Street, Suite 300
Portland, OR 97204

To the Board of Energy Trust of Oregon,

Westside Economic Alliance (WEA) recognizes the complicated balance of providing clean, affordable energy solutions for everyone with the very real capacity and infrastructure limitations in different parts of the state, new development areas and for underserved communities, not to mention other strains on the grid system. On the Westside of the Metro region, the WEA represents hundreds of employers and tens of thousands of employees who work, live and play locally. We promote and encourage a vibrant business environment by supporting the creation and growth of economic opportunities, investments in a well-trained and well-paid workforce, and strategies for healthy and sustainable communities.

Thank you for your support of WEA and the opportunity to support and share our thoughts about Energy Trust of Oregon’s 2025-2030 Strategic Plan. We have not participated in this process previously but many of our members have weighed in on this work and are engaged with the Energy Trust team as a component of their climate friendly and equitable community goals or through clean energy practices in private projects.

Among our members are Intel, Amazon and Genentech, the major hospital systems – Providence, Legacy Health, OHSU and Kaiser Permanente, civil engineers and consultants, the utilities – Portland General Electric and NW Natural and other companies standing up infrastructure like Comcast, Clean Water Services and Tualatin Valley Water District. We have leaders from labor – Columbia Pacific Building Trades Council, IBEW48 and NECA, school districts and Portland Community College in our active membership. Our government agency engagement includes special districts, along with Metro, Washington County, its 13 cities and Clackamas County. We also recently added three new non-profit board seats with leaders from Worksystems, Bienestar and New Narrative who are directly serving your priority customers on a daily basis.

Energy Trust is active with our members’ projects. From the Sexton Mountain Pump Station to the Beaverton Safety Center, we know that preparing municipal operations and systems for resiliency and efficiency are mission critical. We especially appreciate the production efficiency incentives for our water treatment and waste-water facilities at Clean Water Services and Tualatin Valley Water District. Energy Trust’s programs are bringing money to the table for our member owners and public bodies.

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In review of the Strategic Plan, we offer a workforce engagement suggestion:

Acknowledging the workforce challenge, WEA would like to see additional framework mentioned to support Energy Trust's goals. The last sentence of page 6 references the shortage of contractors and clean energy workers to satisfy the upcoming needs. Page 7 reinforces the role of Energy Trust to create a strong network of trade allies, distributors, retailers, etc.

We encourage Energy Trust of Oregon to directly mention labor unions in the partnership mix and formalize an engagement plan to activate this sector.

It may be that Energy Trust is engaging labor informally but their distinct qualities can not be understated in the quest to efficiently build out the region with clean energy solutions. The skilled trades directly impact the goals of Energy Trust and decarbonizing the state. As the leading source of skilled workforce in Oregon, engagement with the unions can only amplify the collective goals. Additionally, the unions have a superior knowledge of projects large and small and the details of public-private collaborative work. Labor is positively impacting workforce trends, investing in pre-apprenticeships and training programs and can deploy communications and opportunities in a strategic manner to their members.

We look forward to working with you on all of your initiatives and welcome the opportunity to support your work as you do ours. If there is anything we can do to help lift our suggestion off the ground, please consider us your partner. Thank you for your time and commitment to the growth of our region.

Sincerely,

A handwritten signature in blue ink that reads "elizabeth mazzara myers". The signature is written in a cursive, lowercase style.

Elizabeth Mazzara Myers, Executive Director

Cc:

Danielle Siver, WEA, Director of Membership
Marshall McGrady, IBEW 48, Political Director
Todd Mustard, NECA, Executive Manager

Name: Hal Nelson

Organization: Portland State University

City or Region: Portland

How do our strategic plan focus areas and desired outcomes relate to you or your organization's priorities in 2025-2030?

Congrats on finishing the strategic plan. I applaud the focus on priority customers and enhancing community resilience.

What in this plan is most exciting to you or your organization or would compel you or your organization to work with us? How can we do a better job of working with you or your organization?

I encourage strategic efforts for increasing ETO's collaboration with other organizations. My experience with ETO staff on an individual basis has been excellent, but getting ETO to collaborate meaningfully is often not easy. I have heard representatives of other organizations in the area say that ETO can do a better job of collaborating as well. ETO could develop metrics and collect data from stakeholders specifically on this topic. As the City, State, CBOs and other organizations get into the energy efficiency program business, efficient and effective collaboration from ETO becomes even more essential.

The plan identifies how we will measure progress under each focus area. Do these seem like the right measures of progress? How much progress should we aim to achieve by 2030 in these areas?

I don't see a lot of numerical key performance indicators in most of the focus areas. I suggest explicit (and transparent) methodologies for setting KPIs as well as measuring progress on them in each focus area.

Is there anything you or your organization were hoping to see in our strategic plan that is not currently included?

The focus on "renters" in Focus Area #3 isn't enough. ETO needs a dedicated multifamily whole building retrofit program immediately that targets naturally occurring affordable housing. Full stop. This is where the regions most vulnerable resident reside.

Also, ETO needs to begin to mitigate tenant displacement from its programs. ETO's EE programs are investment in real estate and will increase property values and associated rents WILL go up without program covenants/elements to limit displacement of vulnerable. THANKS FOR ALL YOU DO!

Name: Jan O'Hara

Organization: not affiliated, had a role in creating Grants Pass's Energy Sustainability Plan last year

City or Region: Grants Pass

How do our strategic plan focus areas and desired outcomes relate to you or your organization's priorities in 2025-2030?

I agree with your stated priorities. It's hard to know how the priorities can be supported with Energy Trust's available resources; should there be a weighting system (relational or absolute) to indicate how many resources will be available for each priority?

In particular, my opinion is that the first focus area is the most important, because reduced carbon inputs benefit everyone and continue to benefit everyone for generations, especially if carbon is significantly reduced.

What in this plan is most exciting to you or your organization or would compel you or your organization to work with us? How can we do a better job of working with you or your organization?

Not affiliated with an organization

The plan identifies how we will measure progress under each focus area. Do these seem like the right measures of progress? How much progress should we aim to achieve by 2030 in these areas?

The measurement concepts are fine. I would have like more specificity where possible, but I expect that specificity will be in the reporting out.

The end of the document mentions other types of metrics Energy Trust uses to measure progress; stating briefly how these relate to the focus areas would be helpful. For example, are some staff assigned to focus areas and others to ongoing/baseline work?

Is there anything you or your organization were hoping to see in our strategic plan that is not currently included?

The strategic plan is well-thought out. It clearly shows the areas Energy Trust will focus on in the next 5 years. This work will be invaluable to Oregonians.

From: Suresh Srinivas;
Received: Wed Sep 18 2024 20:18:43 GMT-0400 (Eastern Daylight Time)
To: Information - Energy Trust;
Subject: Strategic Plan Comments

[EXTERNAL: Please take care to verify address]

Dear Energy Trust Team

I hope this email finds you well. As someone who has briefly reviewed your organization's strategic plan, I'd like to offer some feedback and suggest ways to enhance your approach to reducing consumption.

Feedback

- * I appreciate the emphasis on energy efficiency and carbon reduction goals within your strategic plan.
- * However, I noticed an opportunity to further emphasize and develop strategies specifically focused on reducing consumption. This would help reinforce your mission and provide a clear direction for efforts aimed at minimizing energy use.

Suggestions

Considering the importance of consumption reduction in achieving long-term sustainability goals, I propose that you:

1. Strengthen language around consumption reduction: Emphasize the value of reducing consumption as a key aspect of your overall mission and strategy.
2. Define clear targets for consumption reduction: Establish specific, measurable goals for reducing energy consumption across various sectors (e.g., residential, commercial, industrial).
3. Develop strategies to promote lifestyle changes: Explore initiatives that encourage individuals, businesses, and communities to adopt behaviors that reduce energy consumption.
4. Provide incentives for existing buildings to reduce their consumption through strategies like better insulation etc. Similarly for technology companies and providers to make it easier to monitor and reduce consumption.

Some potential ideas for implementing these suggestions include:

- * Developing a "Consumption Reduction" program within your existing portfolio of services

- * Creating partnerships with other organizations focused on sustainability and consumption reduction
- * Establishing a task force or working group to explore new approaches to reducing energy consumption
- * Incorporating education and outreach initiatives into your community engagement efforts

Next Steps

I'd love to hear your thoughts on these suggestions. If you're interested in discussing this further, I'd be happy to schedule a call with the relevant team members.

Thank you for considering my feedback and suggestions! I look forward to hearing from you soon.

Best regards,

Suresh Srinivas

Name: Matthew Rosen

Organization: Grants Pass Sustainable Energy Action Committee member

City or Region: Grants Pass

How do our strategic plan focus areas and desired outcomes relate to you or your organization's priorities in 2025-2030?

They generally align with our city's adopted Sustainable Energy Action Plan, with the exception that the plan does not address areas related to transportation (such as transitioning to electric vehicles). This area may well be outside Energy Trusts' purview.

What in this plan is most exciting to you or your organization or would compel you or your organization to work with us? How can we do a better job of working with you or your organization?

Efforts to improve the energy efficiency of buildings are very helpful. Periodic updates on available programs and incentives would be helpful as we plan our work each year.

The plan identifies how we will measure progress under each focus area. Do these seem like the right measures of progress? How much progress should we aim to achieve by 2030 in these areas?

Focus Areas 1, 3, and 4 are clear and the metrics seem relevant.

Focus Area 2, 1st metric is confusing: "Source carbon savings associated with savings and generation for each utility compared to carbon savings targets in utility's Clean Energy Plans." Either restate or provide clear explanation about what this metric is and why it demonstrates progress toward the stated outcome.

Focus Area 2, 3rd metric is about "Gas savings". Assuming this is methane / natural gas? It is unclear how "gas savings" will translate into reducing the cost of decarbonization. From my own study, natural gas currently costs less than electricity-based methods for providing heat, which is a significant obstacle for decarbonization in this area. If the goal is to help address the increased cost that customers will face as a result of electrification, then it is not clear that this metric is applicable (or what it actually is).

Focus Area 5 is fairly clear. Personally, I believe support for neighborhood scale resilience programs is a frequently under emphasized and potentially effective area to consider. Much attention is on utility and city scale programs. Often events that are relevant to resilience impact individual neighborhoods, and plans which help prepare responses using neighborhood resources could be highly cost effective.

Is there anything you or your organization were hoping to see in our strategic plan that is not currently included?

Resilience and in particular support for electricity storage solutions are critically important. From a strategic level these seem to be discussed. Hopefully the specific tactical programs and incentives will help realize this strategic vision.

From: Amanda Duncan;
Received: Fri Sep 20 2024 10:16:48 GMT-0400 (Eastern Daylight Time)
To: Information - Energy Trust;
Subject: Strategic Plan Comment

Thank you for the opportunity to comment on the ETO's strategic plan. I appreciate the focus on energy efficiency and distributed energy generation. I want to emphasize that electrification and energy efficiency are critical for meeting Oregon's climate goals. The strategic plan should help the state meet its overall decarbonation goals, in addition to achieving 100% clean electricity. I would like to see the ETO help Oregonians decarbonize by providing information and incentives for electrification. Like many Oregonians, I did not choose to have gas appliances in my home. A developer chose that for me a number of years ago. The process of electrifying an existing home can be expensive and overwhelming for the average homeowner, but it's essential for reducing greenhouse gases. Electrification will make the home healthier and more efficient by swapping out a gas stove with an electrical one and utilizing heat pumps for cooling and heating. Incentives and resources from the ETO could make this process much easier and more viable for many families.

Thank you for your consideration.

Sincerely,

Amanda Duncan, PhD
Beaverton, Oregon 97005

Name: Linda Ganzini

City or Region: Lake Oswego

How do our strategic plan focus areas and desired outcomes relate to you or your organization's priorities in 2025-2030?

Unfortunately, my organization was not made aware of this opportunity to comment in a timely manner, so I am commenting as a individual.

What in this plan is most exciting to you or your organization or would compel you or your organization to work with us? How can we do a better job of working with you or your organization?

Electrification and energy efficiency are the most cost-effective paths to decarbonizing our homes and buildings. Electrification is critical for reaching our decarbonization goals. The state, the federal government, the PUC all are focused on energy efficiency, reducing greenhouse gas emissions and clean electricity goals. ETO should fully align itself with these goals.

Many Oregonians with existing gas appliances, did not make the choice to install those appliances or that fuel source, those choices were made by builders or previous owners. ETO programs should not lock customers into someone else's choices but empower them with resources to make their own choices for their health, safety, affordability, and values. ETO should provide factually-based information on the impact of fossil gas on the environment and concerns about fossil gas in people's homes. Incentives for switching from fossil gas to electricity should be clearly available. ETO incentives should help Oregonians decarbonize and electrify, not stand in their way by locking them into their existing systems.

The plan identifies how we will measure progress under each focus area. Do these seem like the right measures of progress? How much progress should we aim to achieve by 2030 in these areas?

Focus area 1--we cant "efficient" our way out of our climate problem. All of our energy must ultimately be clean and renewable as soon as possible. This is a good idea, but side steps the need to focus on the need to remove fossil fuel from the energy system

Name: Richenda Fairhurst

City or Region: Ashland, Oregon

How do our strategic plan focus areas and desired outcomes relate to you or your organization's priorities in 2025-2030?

I am not sure if further boxes on the form will allow me to say more about myself as commenter. I am a pastor ordained in the United Methodist Church and I serve on the board of Ecumenical Ministries of Oregon where I chair the Creation Justice Committee and Oregon Interfaith Power and Light. I draw from those experiences as I write this comment, but in commenting, I do so as myself.

The effort to bring resilience to Oregonians cannot be understated. We know the history of resource extraction in Oregon, and of the growing impacts of climate change. We can acknowledge that there are always stresses in a system, even when healthy. Yet rapidly, as the impacts pile up, our natural world is unhealthy. Remedy requires strategic focus, planning, and resourcing. I appreciate the plan Energy Trust has put together as it seeks to find, build, and resource those remedies.

What in this plan is most exciting to you or your organization or would compel you or your organization to work with us? How can we do a better job of working with you or your organization?

The main comment I would make is that I would like to see the strategic plan address faith communities. Faith communities do not function simply as community groups. There are specific ways that faith communities build inter-relationships and express themselves. Faith communities have a unique place in Oregon's cities, towns, and rural stretches. They often have a heart to serve their neighbors. Many are true community organizations with long histories. The possibility here is to identify where faith communities can be a true and unrealized asset to the communities where they are planted. Resourcing will be a tremendous help to building resilience. Resourcing including support for identifying worship communities where relationships can be developed and resilience efforts can find willing hands for good work. Please consider the possibilities worship communities and faith communities could offer to further the strategic plan and resilience efforts in Oregon. Thank you.

Name

Joseph Becker

Organization

ShelterWorks

City or Region

Corvallis, OR

What in this plan is most exciting to you or your organization or would compel you or your organization to work with us? How can we do a better job of working with you or your organization?

Encourage more participation and community engagement

Is there anything you or your organization were hoping to see in our strategic plan that is not currently included?

I was excited to see a section related to increased public engagement...which seems to be mostly related to Signing up, for the the current program

Be great to see more energy efficacy related "hands on" education and physical participation. Things done in formats that are accessible to schools and others. Ways of learning the principals, applied science, math, etc...

I got some grants in 2008 for a "Home Empowerment Project", that facilitated Weatherization Work-parties, and insulating window insert building work-parties. Ultimately they were facilitated through church organizations and the NW Ecobuilding Guild. They could be through any NGO or volunteer networks

It had some success and people loved learning...I would love to help stuff like this happen in OR. See attached example/testimonial docs

I have spent 20+ years working on on physical participation and DIY culture. The operating this, that participation encourages understanding, intimacy, responsibility and stewardship (from this generation to the next)

Name: Divya Singh

Organization: Intel alum

City or Region: CedarMill (Portland)

How do our strategic plan focus areas and desired outcomes relate to you or your organization's priorities in 2025-2030?

As a first timer looking at Energy trust's 2025-30 strategic plan, its aligned with the state of Oregon's climate action roadmap to 2030 as well as the strategic plans of Oregon based member companies in the semiconductor and data center value chains where my professional roots are.

What in this plan is most exciting to you or your organization or would compel you or your organization to work with us? How can we do a better job of working with you or your organization?

Decarbonization focus

The plan identifies how we will measure progress under each focus area. Do these seem like the right measures of progress? How much progress should we aim to achieve by 2030 in these areas?

Energy trust could be doing more by

1. by advocating and partnering with area community colleges to create the workforce needed to electrify everything, drive digitalization and resiliency of grid infrastructure.
2. driving knowledge sharing between schools & school districts that have been left to figure out on their own how to make use of federal dollars to make their facilities climate resilient.

Is there anything you or your organization were hoping to see in our strategic plan that is not currently included?

1. Focus area1: The data center industry that's growing at double digit rates not just in Oregon has accelerated on-boarding of renewable power to the grid across the northwest. As data centers themselves become a class of "utilities", the battery & UPS systems they are invested in present significant opportunity to add resiliency to the grid. Several industry segments are listed in the engagement plan, but new or expanded (if they exist already) partnerships, engagement plans with the hyper-scale as well as medium to smaller data center stakeholders could enhance the plan and open partnership model.
2. Focus area2: to accelerate de-carbonization while keeping costs affordable will require partnerships among players in and across a specific industry segment. Electrification is a significant cost burden in many industries, but with the right partners, pooling of funds for community renewables makes clean energy more affordable. Such models needs to be replicated across different sectors of Oregon's economy. Also partnership with companies like Home depot could make it easier for home owners to grasp financing models, incentives etc.
3. Focus area3: Energy trust could take a more proactive role in driving energy efficiency mindset in the general public, schools etc. by creating age appropriate content in partnership with Portland's artsy community, comic-con, launching competitions in local schools.

4. Focus area5: navigating the renewable energy market for residential or small business requires investment in time. Energy trust could provide professional training to serve rural and tribal communities with microgrid concepts along with local schools, small datacenters and if not already.