

ORDER NO. 25-081

ENTERED Mar 05 2025

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1158

In the Matter of

ENERGY TRUST OF OREGON,

2025 Performance Measures.

ORDER

DISPOSITION: STAFF'S RECOMMENDATION ADOPTED

At its public meeting on March 4, 2025, the Public Utility Commission of Oregon adopted Staff's recommendation in this matter. The Staff Report with the recommendation is attached as Appendix A.

BY THE COMMISSION:



Alison Lackey

Chief Administrative Law Judge



A party may request rehearing or reconsideration of this order under ORS 756.561. A request for rehearing or reconsideration must be filed with the Commission within 60 days of the date of service of this order. The request must comply with the requirements in OAR 860-001-0720. A copy of the request must also be served on each party to the proceedings as provided in OAR 860-001-0180(2). A party may appeal this order by filing a petition for review with the Circuit Court for Marion County in compliance with ORS 183.484.

ITEM NO. CA1

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: March 4, 2025**

REGULAR CONSENT EFFECTIVE DATE March 5, 2025

DATE: February 24, 2025

TO: Public Utility Commission

FROM: Kiran Ayub

THROUGH: JP Batmale and Sarah Hall **SIGNED**

SUBJECT: OREGON PUBLIC UTILITY COMMISSION STAFF:
(Docket No. UM 1158)
2025 performance measures for Energy Trust of Oregon.

STAFF RECOMMENDATION:

Adopt Staff's proposed performance measures for evaluating the performance of Energy Trust of Oregon in 2025.

DISCUSSION:

Issue

Whether to adopt Staff's proposed performance measures for evaluating the performance of Energy Trust of Oregon (Energy Trust) in 2025.

Applicable Rule or Law

Under House Bill (HB) 3141 (2021), the legislature requires the Commission to establish equity performance metrics for Energy Trust related to environmental justice communities and revise them through a public process at least every four years.¹

In Order No. 22-478, the Commission approved four equity metrics for Energy Trust in compliance with HB 3141. The equity metrics and each update required by this section must reflect feedback gathered through a public process that is managed by the

¹ ORS 757.747.

Docket No. UM 1158
February 24, 2025
Page 2

commission and that, at a minimum, includes representatives of environmental justice communities.

On August 19, 2024, the Oregon Public Utility Commission (PUC) and Energy Trust entered into an Agreement to Direct Funding to Nongovernmental Entity (Agreement). Pursuant to Section 4.e. of the Agreement:

The PUC shall establish and update, on a periodic basis, quantifiable performance measures, including equity metrics as required under ORS 757.747, that clearly define the PUC's minimum expectations of Energy Trust's performance in administering and expending Funds directed to Energy Trust under the terms of this Agreement.

Analysis

Background

The purpose of Energy Trust performance measures is to establish the Commission's minimum expectations for Energy Trust's annual performance. These measures are not intended as targets or goals but rather as benchmarks to assess the overall health of Energy Trust programs. They serve as early indicators of underperformance, signaling when operational adjustments may be necessary to ensure compliance.

Although the annual update of performance measures primarily involves collaboration between Energy Trust and Staff, these measures are derived from Energy Trust's specific annual goals. Energy Trust develops these goals in partnership with Staff, utilities, and stakeholders through the annual budgeting and action planning process. Any reference to Energy Trust's budget in this memo refers exclusively to the portion funded by the Oregon Public Utility Commission (OPUC).

Energy Trust presents its annual report and prior year performance to the Commission each year, typically in April. Later each year, utilities, stakeholders and Energy Trust develop Energy Trust's energy efficiency and renewable goals for the following year as a part of the budget development process. Savings and generation goals are based on available conservation and renewable generation as indicated by utility Integrated Resource Plan (IRP) targets and market studies.² Under ORS 757.746(1), Energy Trust develops utility-specific budgets, action plans, and agreements jointly with the utilities and stakeholders. In November each year, Energy Trust presents its draft annual budget and action plan to the Commission. The Commission then offers insight, direction, and recommendations to Energy Trust before finalization of the budget in December by the Energy Trust Board. Energy Trust presented its 2025 budget and

² See Order No. 12-094.

Docket No. UM 1158
February 24, 2025
Page 3

action plan to the Commission at a Special Public Meeting on November 5, 2024, and Staff presented its recommendations, which were adopted by the Commission.³ The Energy Trust Board of Directors approved the 2025 budget and action plan on December 13, 2024.⁴

Energy Trust performance measures cover a wide range of operational aspects as follows:

- 1) Electric Energy Efficiency;
- 2) Natural Gas Energy Efficiency;
- 3) Renewable Energy;
- 4) Financial Integrity;
- 5) Program Delivery Efficiency (administrative costs);
- 6) Staffing;
- 7) Customer Satisfaction;
- 8) Benefit/Cost Ratios;
- 9) NEEA and Market Transformation;
- 10) Equity; and
- 11) Market Infrastructure Investments.

Currently, Energy Trust is in the process of transitioning to multiyear planning, which requires significant engagement with utilities and stakeholder similar to the development of utility-specific budgets, action plans, and agreements. Setting multiyear savings targets will enable Energy Trust and utilities to deploy longer-term strategies to achieve ambitious multiyear goals, while realizing process efficiencies. To achieve interim goals, Energy Trust will implement more adaptive management strategies such as the development of a quarterly forecast of the upcoming six-quarters for savings and expenditures. Future performance measures will be adapted for the multiyear context to ensure progress and performance against multiyear goals.

For 2025, Staff proposes new target values for all savings and generation goals, limited adjustments to equity metrics, and revisions to renewable energy and market infrastructure investment performance measures. For 2025, Staff has attempted to strike the right balance of continuous improvement of performance measures and prioritization of multi-year planning efforts.

Staff and Energy Trust held a meeting with the Oregon Citizens' Utility Board (CUB) on February 11, 2025, to present the proposed 2025 changes and to gather feedback. In

³ See [2025 ETO Budget Memo](#).

⁴ The 2025 budget and action plan can be found on the Energy Trust website, [Budget and Action Plan - Energy Trust of Oregon](#).

Docket No. UM 1158
 February 24, 2025
 Page 4

reviewing 2024 progress on equity metrics, CUB showed interest in Energy Trust's success with manufactured homes, potential application to other programs, and existing barriers. CUB staff also requested equity data breakdown of single-family versus manufactured homes, along with project data breakdown by region, and renter versus owner status. However no major concerns were expressed regarding the proposed performance measures. Per CUB's request, Staff will schedule a follow-up meeting for more time to discuss Energy Trust's Equity Plan.

This memo reviews each performance measure category and identifies proposed changes for 2025. The memo concludes with Staff recommendations.

Measure Categories 1 and 2: Electric and Natural Gas Efficiency Savings and Levelized Costs

The performance measures for savings and levelized costs use the Board-approved savings goal as the basis for their calculations. The single savings objective per utility is calculated each year as 85 percent of Energy Trust's Board-approved savings goal at a levelized cost ceiling. The OPUC's levelized cost ceiling for Energy Trust is 115 percent of the Board-approved levelized cost goal for that year. **Staff proposes to maintain these measures for 2025 with updated targets.** The table below compares the 2024 and 2025 savings and proposes a levelized cost performance measure for each utility. Energy Trust's portfolio-wide levelized costs fluctuate over time based on changes in the mix of efficiency measures, shifts in relative expenditures, and updates to energy savings estimates and measure lifespans.

The reduction in budgeted electric levelized costs is primarily driven by an anticipated increase in highly cost-effective savings from commercial and industrial programs in 2025, particularly from business lighting initiatives and select large commercial projects. The increase in Oregon gas-levelized costs is driven by reduced overall savings. For residential new construction gas savings are lower due to fewer housing starts, stricter energy codes, and updated evaluation findings. For commercial projects customers are shifting to electricity for carbon compliance.

Table 1: Electric and Natural Gas Efficiency Savings and Levelized Costs

Utility	2024 Measure	Proposed 2025 Measure
Portland General Electric	Minimum of 24.3 aMW at no greater than 5.8 cent/kWh.	Minimum of 27.33 aMW at no greater than 5.4 cent/kWh.
PacifiCorp	Minimum of 16.4 aMW at no greater than 6.3 cent/kWh.	Minimum of 21.35 aMW at no greater than 5.2 cent/kWh.
Northwest Natural	Minimum of 4.6 MM therms at no greater than 80 cent/therm.	Minimum of 4.54 MM therms at no greater than 78.4 cent/therm.

Docket No. UM 1158
 February 24, 2025
 Page 5

Utility	2024 Measure	Proposed 2025 Measure
Cascade	Minimum of 0.51 MM therms at no greater than 83 cent/therm.	Minimum of 0.50 MM therms at no greater than 95.6 cent/therm.
Avista	Minimum of 0.31 MM therms at no greater than 82 cent/therm.	Minimum of 0.41 MM therms at no greater than 94.2 cent/therm.

Measure Category 3: Renewable Energy

There are four performance measures related to renewable energy. The first requires Energy Trust to report annual results for project and market development assistance, including the number of projects supported, milestones, and documentation or results from market and technology perspectives. **Staff proposes to maintain the first measure.** The second measure is the net-metered solar generation goal, set at 85 percent of the Board-approved goal, and includes Savings within Reach (for low- and moderate-income customers). In 2024, Energy Trust started a residential battery program and Staff sees the opportunity to add batteries to this performance measure. **Staff proposes to increase this target to 4.76 aMW, and add a target of 5.8 MW for the battery storage program.** In the future, Staff is interested in the number of batteries leveraging Energy Trust incentives that are enrolled in utility storage programs.

For the third performance measure, Energy Trust reported on solar projects outside the standard net-metered offer. **Staff proposes to maintain the measure without any substantive changes.** The fourth measure related to Public Purpose Charge (PPC) revenue for renewables was introduced in 2022 to align with the requirements of HB 3141. The legislation mandates that 25 percent of public purpose charge expenditures allocated for renewables—including contributions from self-direct customers—be directed toward activities, resources, and technologies that benefit low- and moderate-income customers.⁵ **Staff proposes modifying the current measure that Energy Trust spend between 25 and 50 percent of PPC revenue in this area to spend at least 25 percent of public purpose revenue for renewables, to provide activities, resources, and technologies for low- and moderate-income customers.**⁶ This update will be in line with Energy Trust's forecasted spend for the upcoming year that will likely exceed the 50 percent cap. Staff expects to have more in-depth discussion concerning these issues during Energy Trust's transition to multi-year planning.

⁵ OR Laws 2021, Ch. 547, Section 1, codified at ORS 757.612(3)(f).

Docket No. UM 1158
 February 24, 2025
 Page 6

Table 2: Renewable Energy

2024 Measure	Proposed 2025 Measure
For project and market development assistance, report annual results, including number of projects supported, milestones met, and documentation of results from market and technology perspective.	Same as prior year.
For the standard net-metered solar program, obtain no less than 3.5 aMW of installed generation.	For solar and storage program, obtain no less than 4.76 aMW of installed generation and 5.8 MW for the battery storage program.
For custom projects, report criteria for selection and how the project helps achieve sector goals.	Same as prior year.
Spend between 25 percent and 50 percent of public purpose revenue for renewables, to provide activities, resources, and technologies for low- and moderate-income customers.	Spend at least 25 percent of public purpose revenue for renewables, to provide activities, resources, and technologies for low- and moderate-income customers.

Measure Category 4: Financial Integrity

Energy Trust engages a third party to conduct a financial audit every year. **Staff proposes to maintain the current performance measure for financial integrity, which is to receive an unmodified opinion.** Energy Trust has met this measure every year since launching.

Table 3: Financial Integrity

2024 Measure	Proposed 2025 Measure
Receive unmodified opinion from independent audit.	Same as prior year.

Measure Category 5: Program Delivery Efficiency (Administrative Costs)

Program delivery efficiency sets maximums for administrative and program support costs. As a category this comprises:

- Employee Salaries and Fringe Benefits if not directly related to program delivery;
- Agency Contractor Services if not billed to program delivery;
- Planning and Evaluation Services if not billed to program delivery;
- Advertising and Marketing Services if not billed to program delivery;
- Other Professional Services if not billed to program delivery;
- Travel, Meetings, Trainings, and Conferences;
- Dues, Licenses, and Fees;

Docket No. UM 1158
 February 24, 2025
 Page 7

- Software and Hardware;
- Depreciation and Amortization;
- Office Rent and Equipment;
- Materials Postage and Telephone; and
- Miscellaneous Expenses.⁷

Historically, the Commission required Energy Trust to spend no more than 8 percent of revenues on administrative costs with year-over-year increased limited to 10 percent. In 2024, the Commission agreed to start measuring program delivery efficiency as a percentage of expenditures, not revenue, and capping it at 6.5 percent along with measuring administrative costs as defined by Generally Accepted Accounting Principles (GAAP). The Commission also agreed that Energy Trust report increases in administrative costs and compare them to expenditure growth.⁸ **Staff proposes to maintain the current performance measure.**

Table 4: Administrative Costs

Proposed 2024 Measure	Proposed 2025 Measure
Administrative costs must be at or below 6.5 percent of expenditures.	Same as prior year.
Report the year-over-year increase in administrative costs in comparison with the increase in expenditures.	Same as prior year.

Measure Category 6: Staffing

Staffing costs include salaries and wages; benefits (medical, dental, life insurance, and disability insurance); and an “other” category including payroll taxes, 401k, net change in accrued vacation liability, fees for 401k and savings plan administration, and employee recognition. The Staffing performance measure previously included a 7.75 percent expenditure cap on total staffing costs, but in 2019 was changed to a 9 percent cap on year-over-year increases.⁹ In 2022 and 2023, the Commission kept this performance measure, but waived its application to allow for expansion of services.¹⁰ In 2024, the Commission updated total staffing costs to 9.5 percent of

⁷ Last defined in Staff Memo for the November 7, 2019, Special Public Meeting Energy Trust Budget Presentation, https://oregonpuc.granicus.com/MetaViewer.php?view_id=2&clip_id=437&meta_id=23410.

⁸ See Order No. 24-079.

⁹ See Order No. 19-292.

¹⁰ See Order No. 22-360, Order No. 23-082.

Docket No. UM 1158
 February 24, 2025
 Page 8

expenditures and required Energy Trust report on staffing needs and performance.¹¹
Staff proposes to maintain the current performance measure.

Table 5: Staffing Costs

2024 Performance Measure	Proposed 2025 Performance Measure
Total staffing costs are limited to 9.5 percent of expenditures. Report on staffing needs and performance.	Same as prior year.

Measure Category 7: Customer Satisfaction

In the past, the Commission required Energy Trust to maintain a minimum of 85 percent of customers indicating they are satisfied or very satisfied overall, and with their interaction with program representatives. **Staff proposes to maintain the current performance measures.**

Table 6: Customer Satisfaction

2024 Performance Measure	Proposed 2025 Performance Measure
At least 85 percent of responding customers are satisfied or very satisfied with their overall experience.	Same as prior year.
At least 85 percent of responding customers are satisfied or very satisfied with their interaction with program representatives.	Same as prior year.

Measure Category 8: Benefit/Cost Ratios

For benefit/cost ratios of programs, the Commission has required reporting. **Staff proposes to maintain the current performance measures.**

Table 7: Benefit Cost Ratios

2024 Performance Measure	Proposed 2025 Performance Measure
Report benefit/cost ratios from both utility system and societal perspective annually.	Same as prior year.
Report significant mid-year changes to benefit/cost ratios in quarterly reports.	Same as prior year.

¹¹ See Order No. 24-079.

Docket No. UM 1158
 February 24, 2025
 Page 9

Measure Category 9: NEEA and Market Transformation

The Commission has required Energy Trust to report on the benefits generated through NEEA membership and activities related to membership. **Staff proposes to maintain the current performance measures.**

Table 8: NEEA and Market Transformation

2024 Measure	Proposed 2025 Measure
Report annually savings and costs.	Same as prior year.
Report annually savings strategies.	Same as prior year.
Show Energy Trust direction to NEEA through committee membership.	Same as prior year.
Summarize annually Energy Trust direction to NEEA.	Same as prior year.
Summarize annually NEEA initiatives Energy Trust opts out of and why.	Same as prior year.

Measure Category 10: Equity

Under House Bill 3141, the Commission is statutorily required to establish equity metrics to assess Energy Trust performance over time.¹² Following multiple rounds of stakeholder engagements, Staff facilitated the adoption of these metrics at the end of 2022.¹³ Through Order No. 23-082 and 24-079, the Commission later refined specific targets to enhance the measurement of annual performance. **In 2025, Staff proposes continuous improvement of existing metrics and measurable outcomes wherever possible, as shown in the Table 11.** Staff expects to have more in-depth discussion concerning these issues during Energy Trust's transition to multi-year planning.

Staff provides context for each metric below and then proposed targets for 2025:

Metric One - Access to Support for Communities: Increased support to nonprofit organizations with a purpose to serve environmental justice communities or to support nonprofit-led initiatives serving environmental justice communities. Increased support can be incentives, training, and funding for energy efficiency upgrades, solar, or solar-with-storage projects.

Energy Trust collaborates with community partners—such as housing and community-based organizations—to expand clean energy services that align with their missions, providing support through incentives, capacity building, and technical expertise to reach priority customers and environmental justice communities. For 2025, Energy Trust plans

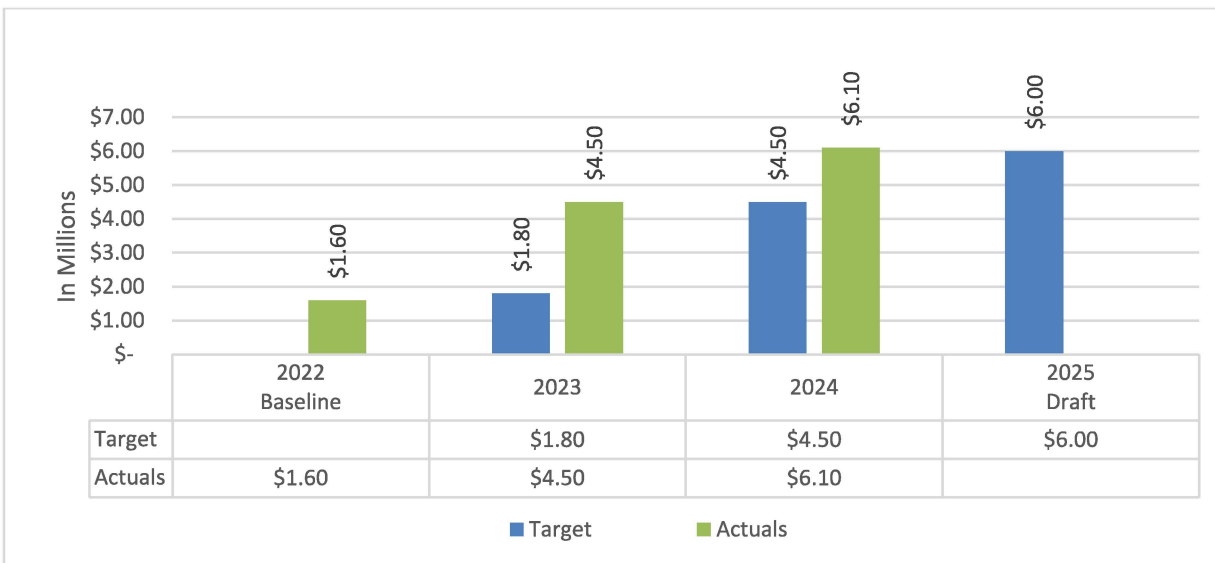
¹² ORS 757.747.

¹³ See Order No. 22-478.

Docket No. UM 1158
 February 24, 2025
 Page 10

to continue to support existing community partners with enhanced incentives, capacity building, technical expertise, and funding resources while fostering relationships with potential new partners through Working Together Grants. Figure 1 below shows annual targets compared to actual spend from 2022 to 2025 (forecasted).

Figure 1: Investment in Nonprofits Serving Environmental Justice Communities: Targets vs Actuals for 2022-2025



Metric Two – Access to Information: Increased funding to support targeted outreach to environmental justice communities, including funding for community ambassadors, education, and workshops.

Since 2022, Energy Trust has expanded outreach resources to support environmental justice communities—rural, low- and moderate-income, Tribal, non-English speaking, and renters—by building relationships and trust to improve access to clean energy services. In 2025, Energy Trust will strengthen community relationships, align customer needs with existing programs, enhance clean energy education and workforce development, and expand outreach teams across Oregon. Energy Trust also plans to increase technical expertise, support rural and low-income communities, and continue its Tribal work group to improve Tribal outreach. The 2024 target for this metric was to increase overall outreach roles serving environmental justice communities to a minimum of 35 full-time employees (FTE). The actual 2024 number was closer to 40 total FTE, an increase of more than ten FTE over 2023.

Given this capacity, for 2025 Staff has decided to move away from a staffing target and toward key activities. These will include hosting at roundtables for community partners,

Docket No. UM 1158
 February 24, 2025
 Page 11

and conducting community energy needs assessments to improve participation in clean energy programs. Additionally, we propose Energy Trust build relationships with at least five new community partners and collaborate with five existing partners to strengthen their roles in program outreach and delivery.

Metric Three – Energy Burden Reduction: New and expanded low-cost and no-cost offers to reduce energy burden created and launched.

Energy Trust is creating and refining energy efficiency programs to better serve low- and moderate-income customers by leveraging insights from communities and partners to enhance delivery and impact. Since 2022, Energy Trust has significantly expanded offerings for low- and moderate-income customers, increasing participation across single-family, multifamily, and manufactured homes. See Table 9 below.

In 2025, Energy Trust will expand energy efficiency programs to better serve low- and moderate-income customers and those experiencing energy burdens. These initiatives will be delivered through community partners, direct program offerings, and trade networks. Efforts will focus on developing targeted offers and delivery channels, including heat pumps, heat pump water heaters, insulation, free services for manufactured homes, and Strategic Energy Management for affordable multifamily housing.

For 2025, Staff recommends a target of increasing the number of customers receiving no- or low-cost offers compared to 2024, with reporting by utility service territory. In multifamily housing, an estimated 1,368 customer sites were served in 2024. Energy Trust targets 1,548 multifamily sites in 2025. Staff also expects Energy Trust to serve energy burdened customers through use of income qualified bill discount data provided by utilities.

Table 9: No- and Low-Cost Offers for Single-Family and Manufactured Homes

	2022	2023	2024 (Estimated)	2025 (Forecasted)
# Projects	579	743	1,476	2,334
Incentives	\$844,368	\$1,862,248	\$4,810,150	\$7,607,039

Metric Four - Community Resilience: Solar and solar-with-storage system projects supported for low and moderate-income residents in areas with limited infrastructure or high energy burden.

Docket No. UM 1158
 February 24, 2025
 Page 12

Energy Trust’s solar and battery storage program supports community energy resilience for Oregon residents, with a focus on expanding access for low- and moderate-income customers. Efforts include enhancing market infrastructure for residential battery storage, providing increased incentives, and prioritizing projects that pair storage with solar—either as new installations or additions to existing solar systems. In 2025, Energy Trust aims to grow contractor and workforce development, establish best practices and industry standards, explore competitive financing solutions, and collaborate with community partners to expand solar plus storage offerings. In 2024, approximately 28 percent of residential solar and storage projects served low- and moderate-income customers, a share expected to grow in 2025, particularly for projects adding storage to pre-existing solar installations.

Table 9 below provides an overview of types of projects for customers experiencing low- and moderate-income. In 2025, Energy Trust plans to increase the overall participation for customers experiencing low- and moderate-incomes with a focus on increasing the share of battery storage projects.

Table 9: Solar and Battery Storage System Projects for Customers Experiencing LMI: 2023 – 2025

	2023 (Actual)	2024 (Estimated)	2025 (Forecasted)
Solar only for LMI	733	620	600
Solar + Storage for LMI	10	122	160
Storage Only for LMI*	0	12	40
<i>Total: All LMI</i>	<i>743</i>	<i>754</i>	<i>800</i>

*“Storage Only” projects are for sites with pre-existing solar installs.

Table 10: Summary of Proposed Equity-Related Performance Targets

Equity Metric	2024 Target	Proposed 2025 Target
1. Access to Support for Communities. Increased support to nonprofit organizations with a purpose to serve environmental justice communities or to support nonprofit-led initiatives serving	Spend at least \$4.5 million in support (including incentives) of nonprofit organizations supporting environmental justice communities. In comparison with 2023, increase the number of participating community-	Spend at least \$6 million in support (including incentives). Provide a narrative on the activities and outcomes of these investments in 2025. For example, report the number of participating

Equity Metric	2024 Target	Proposed 2025 Target
<p>environmental justice communities. Increased support can be incentives, training, and funding for energy efficiency upgrades, solar, or solar-with-storage projects.</p>	<p>based organizations, the number of projects completed, the amount of savings achieved, and amount of incentives delivered. Furnish reports by utility service territory.</p> <p>Report any additional demographic information for customers (e.g. income categories, race/ethnicity, renter/owner) if available.</p>	<p>partners (e.g., community-based organizations), the number of projects completed, and the amount of savings achieved.</p>
<p>2. Access to Information. Increased funding to support targeted outreach to environmental justice communities, including funding for community ambassadors, education, and workshops.</p>	<p>Add staff to a minimum of 35 FTE to support targeted outreach to environmental justice communities.</p> <p>Describe at least ten examples of how outreach efforts have led to new projects that delivered savings to environmental justice communities. Make note of how efforts have been distributed across utility service territories.</p>	<p>Host a minimum of four roundtables (or forums) for existing community partners to provide education, training, and resources to support outreach and program delivery to environmental justice communities.</p> <p>Develop at least four community energy needs assessments for environmental justice communities to better understand how Energy Trust outreach and program services can increase access and participation in clean energy programs.</p> <p>Explore new business relationships with at least five potential new community partners.</p> <p>Deepen business relationships with at least five existing community partners. This can be measured by organizations having increased scopes on program outreach and delivery.</p>

Docket No. UM 1158
 February 24, 2025
 Page 14

Equity Metric	2024 Target	Proposed 2025 Target
<p>3. Energy Burden Reduction. New and expanded low-cost and no-cost offers to reduce energy burden created and launched.</p>	<p>In comparison with 2023, increase the number of community partners and customers receiving no-or low-cost offers. Furnish reports by utility service territory.</p> <p>Report any additional demographic information for customers (e.g. income categories, race/ethnicity, renter/owner) if available.</p>	<p>In comparison with 2024, increase the number of customers receiving no-or low-cost offers. Furnish reports by utility service territory.</p> <p>Report any additional demographic information for customers (e.g. income categories, race/ethnicity, renter/owner) if available.</p> <p>Provide updates on program delivery to customers enrolled in utility income-qualified bill discount (IQBD) programs.</p>
<p>4. Community Resilience. Solar and solar-with-storage system projects supported for low and moderate-income residents in areas with limited infrastructure or high energy burden.</p>	<p>Increase the number of solar and solar plus storage projects in development or completed for low-and moderate-income customers.</p> <p>Report total projects and projects (completed and in development) in census tracts that are rural or have above-average energy burden.</p> <p>Report learnings from program operations and stakeholder feedback. Describe how learnings will be used to improve program offerings.</p>	<p>In comparison to 2024, increase the number of solar and solar plus storage projects in development or completed for low-and moderate-income customers.</p> <p>Report total projects and projects (completed and in development) in census tracts that are rural or have above-average energy burden.</p> <p>Report learnings from program operations and stakeholder feedback. Describe how learnings will be used to improve program offerings.</p>

Measure Category 11: Market Infrastructure Investments

At the Commission's Special Public Meeting on November 2, 2023, Commissioners directed Staff to collaborate with stakeholders to develop performance measures related

Docket No. UM 1158
 February 24, 2025
 Page 15

to Energy Trust’s market infrastructure investments.¹⁴ In 2024, following consultations with Energy Trust, stakeholders, and utilities, Staff proposed new outcome-based measures for some of these investments, which the Commission subsequently adopted.¹⁵

For 2025, Energy Trust has allocated \$2.63 million to develop and expand the Trade Ally Network. In 2024, Energy Trust added 171 new trade allies, bringing the total to 1,757, while also enhancing contractor training, mentoring, and development efforts. The 2025 budget maintains a similar level of investment to continue these initiatives. Notably, this will be the first year Energy Trust offers the Contractor Development Pathway for residential trade allies, equipping them for upcoming funding opportunities and new market programs, such as HOMES and HEAR, expected to launch within the next one to two years.

Additionally, Energy Trust has budgeted \$2.68 million for workforce development in 2025. In 2024, efforts primarily focused on identifying potential partnerships and projects while supporting external organizations. In 2025, Energy Trust, in collaboration with EnerCity Collaborative, will establish a Building Performance Institute training center. Other key initiatives include developing a workforce development resource website and supporting training programs through partner organizations.

Following discussions with Energy Trust, Staff identified challenges in reporting trade ally performance, particularly in tracking workforce development efforts by utility service area and location. While Energy Trust can detail expenditures by activity, it is difficult to determine precisely where contractors apply newly acquired skills and the long-term impacts of workforce investments. Given this limitation, Staff supports removing “utility service area” as a reporting requirement for workforce development. However, Staff recommends retaining the current performance metric with a minor update and anticipates further discussions on these challenges during Energy Trust’s transition to multi-year planning.

Table 11: Market Infrastructure Investments

Area of Investment	2024 Performance Measure	Proposed 2025 Performance Measure
Trade Ally network	In comparison with 2023, increase the number and diversity (women- and minority-owned small businesses) of active trade allies,	In comparison with 2024, increase the number and diversity (women- and minority-owned small businesses) of active trade allies,

¹⁴ See also, Oregon Public Utility Commission letter to Energy Trust of Oregon, December 6, 2023.

¹⁵ See Order No. 24-079.

Docket No. UM 1158
 February 24, 2025
 Page 16

Area of Investment	2024 Performance Measure	Proposed 2025 Performance Measure
	<p>as well as the number of projects completed and savings.</p> <p>Report the number of Trade Allies located in every county.</p> <p>Explain how Energy Trust efforts have helped customers gain access to a broader and more diverse network of qualified contractors.</p>	<p>as well as the number of projects completed and savings.</p> <p>Report the number of Trade Allies located in every county.</p> <p>Explain how Energy Trust efforts have helped customers gain access to a broader and more diverse network of qualified contractors.</p>
Workforce development	<p>Report activities (including their location and utility service area) and spending.</p> <p>Explain how Energy Trust efforts have helped customers gain access to a broader and more diverse network of qualified contractors.</p>	<p>Report activities (including their location) and spending.</p> <p>Explain how Energy Trust efforts have helped customers gain access to a broader and more diverse network of qualified contractors.</p>
Partnerships with community-based organizations	See equity metric 1) Support for Communities.	See equity metric 1) Support for Communities.
Community engagement and support	See equity metric 2) Access to Information.	See equity metric 2) Access to Information.

Summary of Proposed Performance Measures

The proposed 2025 performance measures for Energy Trust are detailed below. Staff includes the previous year's performance measures for comparison.

Table 12: Proposed 2024 Performance Measures

Measure Category	2024 Measure	Proposed 2025 Measure
Electric Savings PGE	Minimum of 24.3 aMW at no greater than 5.8 cent/kWh.	Minimum of 27.33 aMW at no greater than 5.4 cent/kWh.
PAC	Minimum of 16.4 aMW at no greater than 6.3 cent/kWh.	Minimum of 21.35 aMW at no greater than 5.2 cent/kWh.

Docket No. UM 1158
 February 24, 2025
 Page 17

Measure Category	2024 Measure	Proposed 2025 Measure
Gas Savings NWN	Minimum of 4.6 MM therms at no greater than 80 cent/therm.	Minimum of 4.54 MM therms at no greater than 78.4 cent/therm.
Cascade NG	Minimum of 0.51 MM therms at no greater than 83 cent/therm.	Minimum of 0.50 MM therms at no greater than 95.6 cent/therm.
Avista	Minimum of 0.31 MM therms at no greater than 82 cent/therm.	Minimum of 0.41 MM therms at no greater than 94.2 cent/therm.
Renewable Sector	For project and market development assistance, report annual results, including number of projects supported, milestones met, and documentation of results from market and technology perspective.	Same as prior year.
	For the standard net-metered solar program, obtain no less than 3.5 aMW of installed generation.	For solar and storage program, obtain no less than 4.76 aMW of installed generation and 5.8 MW for the battery storage program
	For custom projects, report criteria for selection and how the project helps achieve sector goals.	Same as prior year.
	Spend between 25 percent and 50 percent of public purpose revenue for renewables, to provide activities, resources, and technologies for low- and moderate-income customers.	Spend at least 25 percent of public purpose revenue for renewables, to provide activities, resources, and technologies for low- and moderate-income customers.
Financial Integrity	Receive unmodified opinion from independent audit.	Same as prior year.
Program Delivery Efficiency - Administrative Costs	Administrative costs must be at or below 6.5 percent of expenditures.	Same as prior year.
	Report the year-over-year increase in administrative costs in comparison with the increase in expenditures.	Same as prior year.
Staffing Costs	Total staffing costs are limited to 9.5 percent of expenditures. Report on staffing needs and performance.	Same as prior year.

Docket No. UM 1158
 February 24, 2025
 Page 18

Measure Category	2024 Measure	Proposed 2025 Measure
Customer Satisfaction	At least 85 percent of responding customers are satisfied or very satisfied with their overall experience.	Same as prior year.
	At least 85 percent of responding customers are satisfied or very satisfied with their interaction with program representatives.	Same as prior year.
Benefit/Cost Ratios	Report benefit/cost ratios from both utility system and societal perspective annually.	Same as prior year.
	Report significant mid-year changes to benefit/cost ratios in quarterly reports.	Same as prior year.
NEEA and Market Transformation	Report annually savings and costs.	Same as prior year.
	Report annually savings strategies.	Same as prior year.
	Show Energy Trust direction to NEEA through committee membership.	Same as prior year.
	Summarize annually Energy Trust direction to NEEA.	Same as prior year.
	Summarize annually NEEA initiatives Energy Trust opts out of and why.	Same as prior year.
Equity – Access to Support for Communities	<p>Spend at least \$4.5 million in support (including incentives) of nonprofit organizations supporting environmental justice communities.</p> <p>In comparison with 2023, increase the number of participating community-based organizations, the number of projects completed, the amount of savings achieved, and amount of incentives delivered. Furnish reports by utility service territory.</p>	<p>Spend at least \$6 million in support (including incentives).</p> <p>Provide a narrative on the activities and outcomes of these investments. For example, report the number of participating partners (e.g., community-based organizations), the number of projects completed, and the amount of savings achieved.</p>

Docket No. UM 1158
 February 24, 2025
 Page 19

Measure Category	2024 Measure	Proposed 2025 Measure
	<p>Report any additional demographic information for customers (e.g. income categories, race/ethnicity, renter/owner) if available.</p>	
<p>Equity – Access to Information</p>	<p>Add staff to a total of 35 FTE to support targeted outreach to environmental justice communities.</p> <p>Describe at least ten examples of how outreach efforts have led to new projects that delivered savings to environmental justice communities. Make note of how efforts have been distributed across utility service territories.</p>	<p>Host a minimum of four roundtables (or forums) for existing community partners to provide education, training, and resources to support outreach and program delivery to environmental justice communities.</p> <p>Develop at least four community energy needs assessments for environmental justice communities to better understand how Energy Trust outreach and program services can increase access to and participation in clean energy programs.</p> <p>Explore new business relationships with at least five potential new community partners.</p> <p>Deepen business relationships with at least five existing community partners. This can be measured by organizations having increased scopes in working with Energy Trust on program outreach and delivery.</p>
<p>Equity – Energy Burden Reduction.</p>	<p>In comparison with 2023, increase the number of community partners and customers receiving no-or low-cost offers. Furnish reports by utility service territory.</p> <p>Report any additional demographic information for customers (e.g. income categories, race/ethnicity, renter/owner) if available.</p>	<p>In comparison with 2024, increase the number of customers receiving no-or low-cost offers. Furnish reports by utility service territory.</p> <p>Provide updates on program delivery to customers enrolled in utility income-qualified bill discount (IQBD) programs.</p>

Docket No. UM 1158
 February 24, 2025
 Page 20

Measure Category	2024 Measure	Proposed 2025 Measure
Equity – Community Resilience	<p>Increase the number of solar and solar plus storage projects in development or completed for low-and moderate-income customers.</p> <p>Report total projects and projects (completed and in development) in census tracts that are rural or have above-average energy burden. Report learnings from program operations and stakeholder feedback. Describe how learnings will be used to improve program offerings.</p>	<p>In comparison with 2024, increase the number of solar and solar plus storage projects in development or completed for low-and moderate-income customers.</p> <p>Report total projects and projects (completed and in development) in census tracts that are rural or have above-average energy burden. Report learnings from program operations and stakeholder feedback. Describe how learnings will be used to improve program offerings.</p>
Market Infrastructure Investments – Trade Ally Network	<p>In comparison with 2023, increase the number and diversity (women- and minority-owned small businesses) of active trade allies, as well as the number of projects completed and savings.</p> <p>Report the number of Trade Allies located in every county.</p> <p>Explain how Energy Trust efforts have helped customers gain access to a broader and more diverse network of qualified contractors.</p>	<p>In comparison with 2024, increase the number and diversity (women- and minority-owned small businesses) of active trade allies, as well as the number of projects completed and savings.</p>
Market Infrastructure Investments – Workforce Development	<p>Report activities (including their location and utility service area) and spending.</p> <p>Explain how Energy Trust efforts have helped customers gain access to a broader and more diverse network of qualified contractors.</p>	<p>Report activities (including their location) and spending.</p> <p>Explain how Energy Trust efforts have helped customers gain access to a broader and more diverse network of qualified contractors.</p>

Docket No. UM 1158
 February 24, 2025
 Page 21

Measure Category	2024 Measure	Proposed 2025 Measure
Market Infrastructure Investments-Partnerships with community – based organizations	See equity metric 1) Support for Communities.	See equity metric 1) Support for Communities.
Market Infrastructure Investments – Community engagement and support	See equity metric 2) Access to Information.	See equity metric 2) Access to Information.

Conclusion

Staff proposes to adopt 2025 performance measures for Energy Trust as shown in Table 12.

PROPOSED COMMISSION MOTION:

Adopt Staff’s proposed performance measures for evaluating the performance of Energy Trust of Oregon in 2025.

CA1 – UM 1158