

Diversity, Equity & Inclusion Plan



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Oregon Public Utility Commission



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Oregon Public Utility Commission's Diversity, Equity & Inclusion Plan

INTRODUCTION

This document serves as the Oregon Public Utility Commission's (PUC) strategic plan to address diversity, equity, and inclusion (DEI), and is intended to be responsive to Governor Kotek's directive that agencies develop and submit plans to address these critical and important values. This plan marks a point in time on the PUC's efforts to provide increased attention to the areas of equity, diversity and inclusion in agency programs and activities, and will evolve over time as we increase our understanding of DEI issues and adapt our practices to best address them.

To provide context, we begin with a summary of the directives that laid the foundation for our DEI efforts, and the many actions taken in response to these directives, as well as those driven by our own initiative and others done in response to the COVID-19 pandemic. These include changes to our organizational structure, as well as business practices and external outreach. We also highlight our development of a DEI Framework, which identifies essential principles to guide our DEI planning efforts.

We then identify our key DEI objectives to build upon these efforts. In addition to numerous ongoing DEI-related activities to support and inform our stakeholders, we have identified four internal-facing projects to improve our business practices and effectiveness. These include: (1) Organizational Assessment, (2) Development and Use of an Equity Lens, (3) Continuing Education and Professional Development, and (4) Data Collection and Enhancement. Because our efforts in creating this plan are continuing to grow and are still in process, the approaches and actions set out in this document reflect varied levels of development and will change over time with the goal of achieving the most effective outcomes possible.

Ten Strategies from State DEI Action Plan	Continuing Education and Professional Development					
	Agency DEI Plan	Organizational Assessment	Development of an Equity Lens	Data Collection	Communications & Community Outreach	
1-Agency-Specific Racial Equity Plans	●	●	●	○		
2-State Diversity, Equity, and Inclusion Infrastructure		●		○	○	
3-Inclusive Communications		●	●	○		●
4-Community Engagement		●	○	○		●
5-Disaggregated Data as a Level for Change		●		○	●	○
6-Equitable Budget, Inclusive Budget Process, and Investing in Target Communities		●	○	●	○	
7-Contract Equity and Improving State Procurement Processes		●		○		
8-Diversifying the Workforce and Creating an Inclusive Workplace		●	●	○		
9-No Tolerance for Racism, Hate, and Discrimination		●	●	○		
10-Urgency, Transparency, and Accountability in All Operations		●		●		○
○ Partially Supports						
○ Mostly Supports						
● Fully Supports						

Figure 1 The table summarizes the alignment of our main DEI Strategic Plan initiatives with the strategies outlined in the State DEI Action Plan.

INTERSECTION OF DEI AND THE PUC'S MISSION

We are responsible for regulating privately-owned utilities in Oregon, including electricity and natural gas, as well as certain telecommunications and water services. Our mission is to ensure Oregonians have access to safe, reliable, and reasonably priced utility services that advance state policy and promote the public interest.

We recognize that in order to fulfil our regulatory duties and achieve our mission, we must consider the impacts of our decision making on all utility customers, including those in traditionally under-served communities, such as communities of color, rural communities, tribal nations, and low-income utility customers. Additionally, it is essential to encourage meaningful participation from diverse perspectives in our processes and equitably balance the interests of customers and communities, utilities, and other stakeholders.

In carrying out our regulatory duties, we make decisions that affect the rates that consumers pay for essential services, as well as the quality and availability of these services. We also make other decisions, about priorities, staffing, and strategies for implementing our mission. These decisions have significant impacts on the people of the State of Oregon and the level of services that this agency provides.

With respect to the regulation of utility rates and services, our decisions have a disproportionately significant impact on low-income and marginalized communities, who may have fewer resources to pay for essential services or to advocate for their interests. We also recognize that systemic barriers in society, resulting from historic marginalization and oppression, can be reflected in energy policies and practices that have left certain communities disadvantaged when it comes to their opportunities to influence policies that affect them. This includes disparities in the ability to afford monthly energy bills, access to energy-efficient housing, participation in renewable programs, and the ability to experience the benefits of clean transportation. We recognize that communities of color are generally at a significant disadvantage in these areas compared to their white counterparts.

These inequities may persist, in part, because of a lack of representation in PUC processes, which may be structured so that individuals and parties with greater access to technical information, legal representation, financial resources, and higher education opportunities are better able to participate. Where customers belong to a group that has been disadvantaged because of systemic barriers or discrimination, their voices have been less likely to be heard or understood at the PUC. We recognize that these barriers can exacerbate health disparities and limit economic opportunities for under-represented communities. Regulatory decisions and processes that do not take into account the unique challenges faced by communities of color, low-income individuals, rural communities, or other marginalized or under-represented groups may perpetuate disparities caused by bias or discrimination. This plan exists as part of an agency commitment to address these inequities.

HIGHLIGHTS OF PUC DEI ACTIVITIES TO DATE

Our foundational work to increase attention to equity, diversity, and inclusion began in 2017, following the passage of Senate Bill (SB) 978 (2017). That bill directed us to explore how investor-owned electric utilities are regulated in a rapidly changing industry and policy environment and asked us to identify changes that could “accommodate developing industry trends and support new policy objectives without compromising affordable rates, safety and reliable service.” In collaboration with the Legislature and stakeholders, we hosted a comprehensive public process to explore stakeholder priorities for the electric sector. The process included both experienced and new PUC stakeholders, all of whom brought important perspectives.

In our SB 978 Report, we identified, among other things, the need to improve equitable and affordable access to energy services, and to further promote engagement and inclusion in PUC processes. We noted, however, that legislative action was necessary to more fully address equity, such as providing the PUC with the authority to establish customer discounts through differentiated rates.

Building upon initiatives from the SB 978 public process, we developed an Impacted Communities Work Plan following Governor Brown’s call in Executive Order 20-04 to prioritize actions to help vulnerable populations and impacted communities adapt to the harms associated with climate change. The work plan identified internal organizational and business process changes, as well as external engagement and educational activities, to help the agency become a more diverse, equitable, and inclusive organization that is better equipped to serve all utility customers and the public generally.

PUC’S DEI Strategic Plan and Framework Development

In 2022, we began our effort to create a DEI Strategic Plan. The first step was to develop a DEI Framework upon which the plan could be built. The DEI Framework¹ was presented at the PUC’s public meeting in March 2023.

The DEI Framework outlines essential elements of focus for the DEI Strategic Plan. These elements can also be used to categorize the purposes of our various DEI-related actions to ensure that none of the essential elements of the DEI Framework are being ignored or under-emphasized.

¹ The *Oregon Public Utility Commission Diversity, Equity, & Inclusion Framework* is available at https://oregonpuc.granicus.com/MetaViewer.php?view_id=2&event_id=778&meta_id=35525.

The four essential elements identified in the DEI Framework are:

1) Instilling a **vision and understanding** of DEI among PUC employees

The strategic plan will inspire employees and create a foundational understanding of DEI within the agency. A critical component of this work is determining our purpose for continuously engaging on DEI and justice topics. Without a PUC workforce that is aware of, conversant with, and committed to DEI and justice principles and how those principles relate to their jobs, any DEI plan would be unlikely to be influential or sufficient in promoting real change. With a firm understanding of DEI, PUC employees can apply it within the context of their daily work.

2) Promoting **meaningful and honest engagement** on the topics of disparate impacts, under-representation, inclusion, diversity, race, and other relevant topics

This essential element is meant to ensure meaningful and honest engagement on topics that are important to progress on DEI and includes both internal engagement within the agency as well as with external stakeholders. Achieving this element means diverse interests and views are understood and respected, and that a diversity of views impact PUC processes and decisions under a more equitable lens.

Effective and sustainable decision making requires a full consideration of demographics and other factors that affect customers. These topics range from race to socioeconomic situation as those items relate to utility services. To fulfill our mission, we must seek and understand diverse points of view, recognizing the validity and breadth of experience among those points of view, and acknowledgment that government processes and procedures have historically muffled points of view not aligned with dominant-culture ideology. To serve in the public interest, we must give historically disadvantaged communities a strong voice in shaping the activities that will impact them directly.

3) Ensuring **actions are taken** to promote DEI and social justice

This third essential element is to operationalize the first two elements into action. We must act to identify and respond to the causes and impacts of inequitable norms, policies, and practices, while working to create a culture that centers the agency on equity and social justice. Our actions will manifest themselves through internal business practices and procedures, consideration of DEI in agency proceedings and decisions, and outcomes that we shape, such as offerings from utilities and the Energy Trust of Oregon.

This element requires that we not only engage in conversation and think about important DEI topics, but also actively translates these concepts into our practices, including our regulatory processes. We must ensure that our DEI Strategic Plan results in actions and outcomes and is

appropriately resourced to effectively build organizational capacity to identify and address systematic-institutional barriers.

4) Establishing a **process for improvement** and refinement over time

The final essential element of the DEI Strategic Plan will be to establish a process for ensuring that the DEI Strategic Plan is improved and refined over time. Identifying metrics to measure the impacts of our actions is vital to the progression of the strategic plan. Unless the effect of our work is recorded and measured, we cannot guarantee its efficacy. Meeting this final element also includes an established feedback loop involving PUC employees and stakeholders to inform us on how we are doing and how our plan is working.

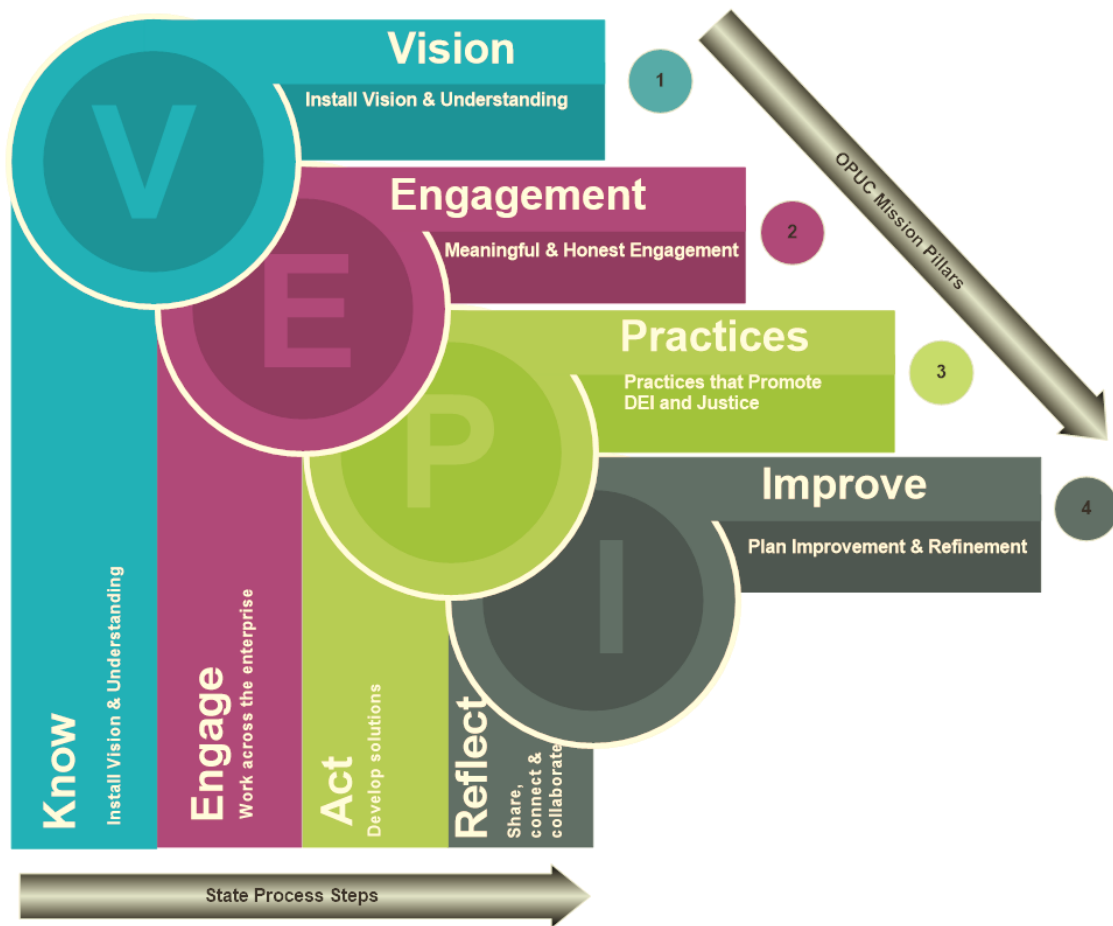
We believe that our DEI efforts will be most successful through emphasizing each of these elements.

We are encouraged to see that there is a striking resemblance between the four essential elements identified in our DEI Framework, and the four “process steps” identified in the state’s DEI Action Plan. Specifically, the four process steps from the state’s DEI Action Plan are to:

- 1) **Know** – identify system and institutional barriers that hinder progress toward a more diverse and inclusive workforce
- 2) **Engage** – work within the agency, across the enterprise when applicable, and with communities to create meaningful, intentional, and inclusive processes for change to result
- 3) **Act** – Develop and implement solutions to address barriers to improve policy, performance, and service delivery to all Oregonians, and
- 4) **Reflect** – Share, connect, and collaborate to expand and scale up efforts²

Because of the similarity of the PUC’s “essential elements” and the state’s “process steps,” we find it appropriate to collapse them into four terms that can be used to characterize the purposes of our DEI actions. Thus, we address the concepts together, referring to them as shown in the next chart, as pillars of the PUC’s mission.

² *State of Oregon Diversity, Equity, and Inclusion Action Plan, A Roadmap to Racial Equity and Belonging*, Aug. 2021, at 14.



The process of creating the DEI Framework yielded benefits in addition to the framework itself. An internal advisory group was established to provide feedback on the DEI Framework, and to develop the initial scope and timeline of the DEI Strategic Plan. That internal advisory group is comprised of thirteen PUC employees from across the agency, including a Commissioner and the DEI Director. It includes representatives from nearly all departments and employee levels. That group has provided a valuable forum for discussions among our employees on important DEI concepts, serving as a learning opportunity for how to best explain and explore the intersection of DEI and the agency's day-to-day work. The internal advisory group continues to meet to vet ideas and serves as a piloting ground for the educational activities that we plan to undertake. The advisory group will also lead the initial implementation of the poverty simulation, discussed further below.

Ongoing DEI Activities and Accomplishments

In this section, we summarize a number of our past and ongoing DEI activities. We will continue to build on these initiatives as we further develop our DEI Strategic Plan.

Creating Dedicated DEI Positions

We hired a DEI Director as part of our Executive Office in January 2021 to initiate and support various DEI efforts. This includes activities to address the disproportionate effect of climate change on impacted communities and those traditionally under-represented in public processes, building and strengthening our relationships with Oregon’s nine federally recognized tribes, and presenting new opportunities to engage with tribal government and their members in more meaningful and sustainable ways.

In May 2022, we hired an Energy Justice Program Manager as part of our regulatory program group. This position adds a layer of analytical expertise and ensures that PUC Staff’s independent analysis and recommendations address environmental justice and equity. This position guides the PUC Staff’s approach to energy burden, environmental justice, accessibility representation, and other equity-related issues.

Building Relationships and Stakeholder Training

Building on initiatives from the SB 978 public process, the PUC allocated additional resources and efforts to engage traditionally under-represented stakeholders in PUC decision making. These stakeholders include environmental justice, social justice, and low-income communities. These efforts recognize the need to not only take action to protect these communities, but to ensure that these communities are engaged in and benefit from agency actions and activities. These efforts also address the roles of the regulated utilities and the PUC in advancing broader societal interests in climate change mitigation, social equity, and inclusion of under-represented communities.

We have enhanced stakeholder engagement and training activities to help stakeholders better understand PUC processes and to encourage participation. Some examples of these community outreach and stakeholder training efforts are summarized below.

- We conducted outreach and held listening sessions with a broad group of stakeholders to inform our Impacted Communities Work Plan in response to the Governor’s EO 20-04 on Greenhouse Gas Emissions. This workplan identified numerous steps to help ensure the ongoing energy transition process provides value to all customers and stakeholders.
- We organized equity focus groups to gather feedback from community members on PUC decisions, including the investigation into the impacts of COVID-19.
- We established the SELFLESS Committee (Social Equity Lenses and Frameworks to Lower Energy Stress Successfully) as an internal focus group to discuss equity considerations in our decision making.
- We improved our training activities to help stakeholder understanding of agency processes and encourage participation. Our expanded trainings to cover procedural and substantive topics,

including participation tips and discussions on climate change, utility investment, and wildfire mitigation.

- We regularly hold listening sessions and conduct outreach to involve stakeholders in PUC proceedings, including activities to implement 2021 legislation (HB 2021—Clean Energy Plans, including PUC Staff facilitation of state-wide coordination in establishing Utility Community Benefits and Impacts Advisory Groups, HB 2475—new low-income relief authority, HB 3141—energy metrics for public purpose charge expenditures, and HB 2165—dedicated transportation electrification investment in under-served communities).
- In our distribution system planning (DSP) investigation, we prioritized accessible community engagement through user-friendly online resources and a workshop series that served to educate stakeholders on distributions systems and utility planning processes and included a presentation by environmental justice advocates on how to meaningfully engage with community. Under the adopted DSP guidelines, enhanced stakeholder engagement is also required of electric utilities, including in their clean energy planning, and community energy needs assessments.

Engagement with Tribal Communities

As part of our efforts to build and strengthen relationships, we have formalized and increased our engagement with tribal communities. Our DEI Program Director serves as the agency’s first dedicated Tribal Liaison and participates in Oregon’s Tribal Natural Resources Working Group and the Cultural Resource Cluster.

The PUC has made various trips to tribal lands to strengthen connections between the PUC and tribal communities. Recent visits include:

- In December 2021, Commissioner Mark Thompson participated in the Oregon Tribal Broadband Summit, which was designed to help ensure that Oregon tribes are well positioned to engage in federal broadband funding opportunities.
- In May 2022, our Tribal Liaison attended the “Regards to Rural” conference in Pendleton Oregon, where leaders from the Confederated Tribes of the Umatilla Reservation and other tribes met to address strengthening relationships with rural Oregonians.
- In October 2022, our Tribal Liaison attended the Annual Tribal Summit, which addressed, among other things, sessions on water, climate, natural resources, and economic development.
- In November 2022, Commissioners Letha Tawney and Mark Thompson traveled to La Grande, Oregon and met with energy staff of the Confederated Tribes of the Umatilla to better understand their energy plan and vision.
- In April 2023, the PUC met with the Columbia River Inter-Tribal Fish Commission to learn more about the tribes’ energy vision for the Columbia River Basin. Their presentation and conversation with Commissioners focused on CRITFC’s mission to ensure there is an

understanding among policy makers that the fate of the salmon is intertwined with the hydropower system.

We also work closely with tribal emergency management personnel engaged in activities related to the state's Emergency Support Function (ESF) 2—Communications and ESF 12—Electricity and Natural Gas. These efforts have included coordination with the Burns Paiute Tribe, Confederated Tribes of the Coos, Lower Umpqua and Siuslaw Indians, Coquille Indian Tribe, Confederated Tribes of Grand Ronde, Klamath Tribes, Confederated Tribes of Siletz Indians, Confederated Tribes of the Umatilla Indian, Cow Creek Band of Umpqua Tribe of Indians, and the Confederated Tribes of Warm Springs.

Covid-19 Impacts and Response

Throughout much of 2020 and 2021, we engaged in various activities to assist Oregonians struggling with the economic impacts of the COVID-19 pandemic. Efforts included hosting a series of workshops focused on the impacts COVID-19 had on utility customers and exploring their recovery from the pandemic. To inform efforts to address the social and financial hardships that customers were facing as a result of the pandemic, the PUC engaged with utilities, the Oregon Housing and Community Services, and representatives from impacted communities, and gathered data through requests and surveys. These efforts included collaborative work with the utilities and stakeholders to suspend service disconnection and development of new arrearage management plans for six energy investor-owned utilities (Portland General Electric Company, PacifiCorp, Idaho Power Company, Northwest Natural Gas Company, Avista Utilities, and Cascade Natural Gas Company). These efforts also led to a revamping of the PUC's rules regarding disconnection of utility services.

Energy Burden and Affordability

House Bill (HB) 2475 (2021) gave us new authority to consider the financial burden of energy costs when making decisions about rates, bill credits, and program discounts for customers of investor-owned electric and natural gas utilities. This bill, known as the Energy Affordability Act, allows us to consider equity in the ratemaking process to make energy more affordable for all Oregonians.

In an effort to balance the need for expedited energy burden relief and the desire to investigate the methodologies and implications of differential rate designs and programs, we took a staged implementation approach for the bill that allowed for immediate engagement with communities, advocates, and utilities on near-term interim program designs. Utilities were encouraged to conduct community outreach in advance of formal filings before the PUC. Staff memorialized community input in publishing key design elements for the interim programs that prioritized low-barrier enrollments and data-informed bill discounts.

As of August 2022, we have approved interim differential rates for five of the six utilities and are working with Idaho Power on options to provide interim low-income relief to its Oregon customers. We continue to work with stakeholders and utilities in planning for the broad implementation effort that will be used to develop long-term rates and programs that address differential energy burden and other factors affecting affordability for utility customers.

Funding for Low-Income and Environmental Justice Organizations

In addition to providing authority for the PUC to set differential rates based on income, HB 2475 (2021) also provided authorization for expanded funding for intervenors in PUC proceedings. We have taken significant steps to implement this bill through engagement with community advocates to design and adopt rules that promoted accessibility and flexibility in the governance of future intervenor funding agreements. Under these rules, financial support is made available to organizations that represent low-income residential customers and residential customers that are members of environmental justice communities to support their involvement in PUC proceedings. In May 2023, we approved \$450,000 of grant funding for advocate activity in PUC proceedings.

PUC'S FUTURE PLANNED ACTIVITIES

Concurrent with, and as part of the creation of our DEI Strategic Plan, we are undertaking various DEI-related activities in the near-term. Our equity lens, continuing education programs, and data collection enhancement initiatives, addressed below, will help us know where systemic and institutional barriers hinder progress toward a more diverse and inclusive administration of the agency's mission and will better instill a vision and understanding within our employees about how their work is related to DEI. They also will require more meaningful and honest engagement on topics we have not historically undertaken. As we implement these programs, we would also expect that we will be put in a better position to act by implementing solutions to address barriers and improve policy, performance, and service delivery to all Oregonians. These planned activities are addressed below.

Organizational Assessment

We recognize the need to implement strategies at all levels of the agency and will use the state's Organization Assessment Tool to evaluate our current equity status, both across the agency and within each department. This tool, which is based on the ten strategies as set forth in the state DEI Action Plan, will assist us in identifying focus areas of improvement and action relative to racial equity, diversity, and inclusion. This initial assessment represents an important step in more comprehensively identifying future actions to effectively implement the ten strategies, and a primary method of obtaining the information needed to further develop our agency's DEI Strategic Plan. To date, as discussed above, we have formed an internal advisory group that will review the organizational assessment. We anticipate that all managers will complete their specific assessments by Q4 of 2023, and we will use the results of those assessment to further develop our DEI Strategic Plan.

Development and Use of An Equity Lens

An equity lens is a tool to address disparities and promote inclusivity. The PUC has determined that an equity lens is an important part of seeking to reverse historic harms within the implementation of its mission and move towards a more equitable energy future by better incorporating the interests of environmental justice, black, Indigenous, and people of color (BIPOC), and under-represented or marginalized communities.

The goals of an equity lens is to help ensure that the PUC's decisions, policies, and practices:

What is an EQUITY LENS?

It's a deliberate and systematic approach to analyzing policies, decisions, and actions by examining how processes impact different individuals and communities.



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- **Mitigate Environmental Injustices:** The PUC must facilitate the reduction and prevention of environmental injustices. This involves addressing the unequal distribution of environmental risks and harms, which often burden marginalized communities more heavily. In this context, environmental justice refers broadly to addressing inequities across the energy system. It is inclusive of issues related to energy burden and poverty, and means the equal treatment, protection from environmental and health hazards, and meaningful involvement of environmental justice communities in the development, implementation and enforcement of regulations and policies that affect the environment in which people live, work, learn, practice spirituality and play. See ORS 757.747(1).
 - **Provide Equitable Access to Clean and Affordable Resources:** The PUC should promote equitable access to clean and affordable utility services, such as electricity, water, and natural gas. This includes addressing disparities in service quality, affordability, and reliability across different demographic groups and geographical areas.
 - **Reduce Energy and Water Poverty:** The PUC should aim to alleviate energy and water poverty by implementing measures that assist low-income households in accessing and affording these essential services. This might involve targeted assistance programs, rate structures that consider income levels, and energy/water efficiency initiatives.
 - **Promote Clean Energy and Sustainability:** The PUC should support the transition to clean energy sources, energy efficiency, and sustainable practices. This can help reduce pollution and associated health risks in communities disproportionately affected by fossil fuel-based generation and contribute to a just and sustainable energy future.
 - **Advance Environmental Justice Principles:** Regulatory policies should reflect the integration of environmental justice principles into PUC decision-making processes. This includes conducting thorough environmental impact assessments, considering cumulative impacts, and explicitly addressing the concerns of frontline communities.
 - **Provide Meaningful Community Engagement:** Regulatory practices should ensure that marginalized communities have a voice in shaping policies, setting rates, and determining infrastructure investments to address their specific needs and concerns.

An equity lens will pose targeted inquiries to PUC decision makers and staff that are designed to help ensure that our collective actions: (1) represent, to the extent possible, a holistic, well-informed response to the breadth of issues that customers, utilities, and stakeholders face, (2) are tailored to be as effective as possible at mitigating inequities that exist for customers with respect to access to utility services and programs, and (3) serve to further our commitment to be more inclusive of the views and challenges of those that have an interest in our actions but may have been historically under-represented.

As an example, our equity lens may ask questions such as the following:

- What groups (by demographic or other characteristic, including race, income levels, or other social factors) are likely to be most impacted by or interested in this proposal or decision?
- What tailored outreach has been done to gain insights and views from these groups? What learnings were specifically had from that outreach?

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- What inequities or other challenges could be caused by the proposal, or exacerbated?
 - What is the primary purpose of the proposed action, and what unintended consequences could result from the proposal for specific customer groups or other stakeholders?
 - Is there any data or reporting that would be appropriate to require related to the measure, to ensure that its consequences, including inequitable or differential impacts, are understood and monitored over time?

Because we operate within a legal framework that requires certain actions to support our decisions, it is important that the equity lens be created in a way that is consistent with and supportive of the applicable legal requirements. This process will take time and is the focus of some of the future efforts described below. Nevertheless, the application of the equity lens remains a priority, as it will contribute to ensuring that decision makers across the agency conscientiously and rigorously examine the impacts of their actions on communities and individuals who have historically faced inequity or may be disproportionately affected by the agency's decisions.

To date, we have taken the following actions with respect to an equity lens:

- Discussed the idea of an equity lens with outside stakeholders, including representatives of environmental justice communities, and received feedback on our proposed use of one
- Tested the types of questions listed above by incorporating them into a PUC Staff memo that analyzed the protections customers needed in response to the COVID-19 pandemic
- Reviewed the use of an equity lens by other organizations, including state and local government agencies
- Created an internal workgroup that is developing expertise on the topic of an equity lens, and is charged with developing a proposal, and
- Begun work to understand how an equity lens can best be incorporated into the agency's work in a manner that is supportive of, and consistent with our statutory and other legal duties

Continuing Education and Professional Development

We recognize the critical importance of continuing education and professional development in advancing our commitment to DEI within our organization. Central to this framework is the engagement of our employees in training and activities that deepen a shared understanding of equity and its significance in our work. These exercises prompt our employees to contemplate how systemic inequalities impact the organization and ultimately have a disparate impact on the Oregonians we serve. As part of this training effort, we are exploring the following questions for reflection by our employees and as a topic of training that guides our collective journey towards a more equitable and just organization.

- Why does equity matter?
- Why is equity work important for the PUC?
- How is equity embedded into our mission, vision, and values?
- What are the opportunities and barriers with respect to equity in the delivery of our work?

All employees have been encouraged to engage with these questions, and we plan to facilitate further engagement through various means and across employees' workflows.

On June 30, 2022, we organized a training session conducted by Clean Energy Works, a nonprofit focused on inclusive investments in the clean energy economy. This training specifically addressed equity issues we face within the context of the energy industry. It explored the alignment of equity with our mission and emphasized the connection between equity and energy justice. Through breakout group discussions and subsequent reporting back to the whole group, employees actively participated in learning on these topics. Additionally, several PUC employees completed a course titled "Including Equity and Energy and Environmental Justice in State Public Utility Commission Decisions," offered by the National Association for Regulatory Utility Commissions (NARUC).

Our DEI Director participated in a poverty simulation at the NARUC's 2022 Summer Policy Summit. This experience shed light on the daily challenges faced by energy burdened consumers, such as making difficult decisions about bill payment priorities. We are planning to extend this exercise to involve all PUC employees, as further detailed below.

We have identified the following continuing education and professional development training opportunities for PUC employees:

Book Studies

Our DEI Program Director will conduct book study sessions to delve into the origins and impact of caste systems, the forgotten history of government-sanctioned segregation, and the economic costs of racism. This exercise will shed light on the deep-rooted structures and policies that have perpetuated inequality and division. We are currently identifying content that will emphasize the need for collective understanding, reflection, and action to challenge and dismantle systemic barriers, promoting a vision of a more inclusive and equitable society. By engaging with this literature, we will deepen our knowledge and foster meaningful discussions on the path towards achieving diversity, equity, and inclusion. The selected books will allow participants to explore equity and justice issues beyond the scope of utility regulation, while additional resources will establish explicit connections to the PUC's work.

Poverty Simulation

We will begin to conduct poverty simulation exercises for all employees. This interactive experience, developed by the Missouri Community Action Network (MCAN), immerses participants in the realities of poverty, simulating the lives of low-income families facing various challenges. Participants will encounter obstacles related to obtaining basic necessities like food, shelter, and other essential resources. The exercise will be followed by a guided debriefing discussion to reflect on the experience and its

implications for the PUC's decision making, policy development, and customer service. The objectives of the poverty simulation include:

- Increasing awareness of the financial barriers faced by low-income individuals
- Identifying opportunities to remove obstacles for low-income utility customers and improve access to resources
- Gaining insights into factors influencing utility consumer decisions
- Identifying opportunities for collaboration between PUC employees, utilities, and community groups to address affordability issues
- Evaluating how existing systems, policies, and practices create barriers for certain individuals or communities
- Fostering empathy and understanding, and
- Considering how utility regulation can impact outcomes

The aim is to involve nearly all PUC employees either as participants or volunteers in the sessions. Volunteers will staff the exercise and be given the opportunity to select roles that align with their lived experience. The simulation is designed to provide participants a glimpse into the structural barriers, as well as some of the personal and emotional repercussions people in poverty face, as well as to create a broader awareness of poverty among policymakers, community leaders, and others.

DEI Training Platform

To further support employees' development, we are in the process of procuring a training platform that offers a comprehensive selection of DEI courses, covering topics such as bias in society, unconscious bias, cross-cultural communication, and inclusive hiring. PUC management will begin completing modules in this training in Q3 of 2023, with specific courses assigned to their teams afterward. The training platform would cover subjects that such as:

- Why We Talk About Race
- Bias and Unconscious Bias
- Communicating Across Differences
- Inclusive Hiring Practices
- Leading with Inclusion
- Disability Rights
- LGBTQI Inclusivity

Data Collection

In 2023, we launched a data enhancement project to further the integration of equity and environmental justice principles into our analysis and decision-making frameworks. This project is intended to formalize and enrich existing efforts to utilize data to gain greater insights into inequities and disparate impacts among customers, and to use data to advance equity and justice across the regulatory programs.

While implementing our COVID-19 response efforts, we became more intentional about collecting utility data and using it to better understand certain energy burden issues and track the impact of a narrow set of utility programs. These efforts have since grown into a broader focus on being data- and metric-driven in the examination of equity and justice in other dockets related to ratemaking, planning, customer programs, and more. As a part of this evolution, we have used publicly available demographic data to enhance the aggregate, anonymized utility data we currently collect. For example, connecting census tract data on median incomes with utility reported arrearages and disconnection rates provided significant momentum for our rulemaking on expanding customer protections from disconnection. We have also begun to engage with the utilities and advocates on data needs and equity goals in areas such as creating low-income rates, examining distribution system planning, and investigating the utilities' Clean Energy Plans.

We will continue to develop a structured process for the ongoing collection, analysis, and publication of data relevant to assessing equity. Future efforts will focus on:

- **Data Stewardship and Collaboration:** Maintaining high-quality, relevant data through active stewardship, governance, and collaboration within the agency and among stakeholders, peer agencies, and utilities.
- **Improved Utility Data Collection:** Establishing a streamlined process for ongoing collection of meaningful utility data, balancing administrative burden while enhancing rigor and granularity. This includes obtaining household-level data and improving demographic data.
- **Open Data Access and Transparency:** Exploring opportunities to increase data openness and accessibility, aligning with the state's transparency goals. Engaging with stakeholders to identify general data and transparency needs.
- **Expanded Data Sources and Partnerships:** Seeking impactful data from other public entities and technical experts through partnerships. Identifying and leveraging additional data sources that can enhance decision-making processes.

Through this effort, we strive for continual improvement at using data to identify areas where disparities exist, developing targeted strategies to address them, and tracking the success of mitigation efforts.

CONCLUSION

The PUC's DEI Strategic Plan represents our unwavering commitment to addressing inequities and fostering a more inclusive future for all Oregonians. As the regulator of public utilities in the state, we recognize the profound impact our decisions have on utility customers, particularly those in underserved communities. We acknowledge that to dismantle racism and effect equitable outcomes as an agency, we must cultivate a diverse and inclusive internal work culture in addition to actively working against the effects of systemic racism and socioeconomic disparities through our role as regulators. This plan is not static—it is a living document that will evolve as we deepen our understanding of DEI issues and adapt our practices.

We look forward to continuing to develop our DEI Strategic Plan through continued education and in coordination with the strategies and goals set forth in the state's DEI Action Plan. Through implementation of our DEI Strategic Plan, we reaffirm our dedication to addressing inequities, amplifying marginalized voices, and playing an active role in the statewide effort to build a more just and inclusive future for all Oregonians.