

Energy Trust of Oregon Written Comments to Oregon Public Utility Commission COVID-19 Workshop #1 Questions

June 29, 2020

Energy Trust of Oregon welcomes the opportunity to participate in the OPUC's workshops to discuss current and potential solutions to ease the impacts of COVID-19 on utility customers.

We serve Oregon customers of Portland General Electric, Pacific Power, NW Natural, Cascade Natural Gas and Avista with energy efficiency and renewable generation information, services and financial incentives. Serving low-income customers aligns with Energy Trust's Diversity, Equity and Inclusion objectives, and is part of broader efforts to deliver benefits to underserved customers in rural communities and communities of color. This includes targeted incentives and outreach for low- to moderate-income customers, and coordination and partnership with government agencies and community-based organizations to serve low-income customers.

In response to the list of [COVID-19 Workshop #1 – Questions](#) provided in advance, we are providing written feedback on questions 2, 6 and 9, and will reference these comments during the verbal presentation at the public workshop on Tuesday, June 30, 2020.

We remain a resource to the state, utilities and low-income stakeholders as subsequent discussions and workshops contemplate recommendations to the OPUC commissioners on ways we can all support customers disproportionately impacted by the coronavirus.

If there are comments or questions for Energy Trust after the June 30 workshop, please email Sr. Communications Manager Hannah Cruz, hannah.cruz@energytrust.org.

2. What opportunities and resources are available, or could be made available to assist customers with their utility costs, or to assist them with utility programs? (Including voluntary assistance programs as well as increased programmatic and assistance funding; also including Energy Trust).

Energy Trust services and incentives for customers impacted by COVID-19 are available through our Residential, Multifamily and Solar programs. Using increased incentives, modified eligibility requirements, customized programs, community partnerships and targeted marketing, we aim to increase participation from moderate- to low-income customers. The following lists currently available incentives and program offers, including some recently launched in response to the pandemic. While a good representation of our activities, it is not a comprehensive list.

- *Low- and no-cost services*
 - *Free LED Bulb Distribution:* Launched in May 2020 a website where community action agencies, food banks and other social services providers can order free LED bulbs in bulk to distribute to communities they serve. While the market shows signs of broad adoption of LEDs, there are different levels of adoption by customer type. This distribution approach is to ensure Energy Trust reaches all customers with LED technology, including low-income customers.

- *Energy Saver Kits*: Distributing free kits to homes – single-family and apartments – for customer installation of energy-efficient light bulbs, faucet aerators and showerheads. Targeting distribution to low-income customers, rural customers and communities of color.
- *Home Energy Audits*: Recently launched a Home Energy Audit offer to inform residents and learn more about the energy drivers in low- and moderate-income homes, rural homes and communities of color. This approach leverages in-home services provided by community-based organizations and trade ally contractors by paying an incentive to capture demographic information, housing characteristics and bill reduction and energy-saving opportunities.
- *Increased Incentives, Savings Within Reach Incentives and On-Bill Repayment Financing*: Enhanced incentives and low-interest financing options for moderate-income customers installing select energy-efficiency upgrades.
 - *Savings Within Reach and On-Bill Repayment*:
 - Modified eligibility criteria to allow access to Savings Within Reach incentives and financing support for any customer who is receiving unemployment benefits or other financial assistance as a result of the pandemic.
 - Savings Within Reach incentives are delivered by a subset of Energy Trust trade allies that commit to providing an upfront discount on customer invoices. These incentives were originally designed for homeowners who have some willingness to pay; the targeted income population are households with incomes between 80-120% of state median income.
 - For renters, higher Savings Within Reach incentive payments are available through a network of contractors installing select energy-efficiency measures in single-family rental homes.
 - In 2020, Savings Within Reach incentives will be available at Multifamily properties, including bonuses for furnaces and insulation.
 - *Smart Thermostats*: Energy Trust has identified lower-income customer segments as under-participating in this offer and adjusted increased incentives and marketing approaches to better reach them.
 - *Air and Duct Sealing*: Energy Trust pays the full cost of air and duct sealing services provided for manufactured homes.
- *Manufactured Homes Replacement*
 - Active since April 2017, this pilot is implemented through strong partnerships with public, nonprofit and private sector organizations. So far, 26 aging, inefficient manufactured homes have been replaced with new, highly efficient homes. This brings not only energy savings to some of Oregon's lower- and fixed-income residents, but also delivers affordable housing solutions and significant quality-of-life improvements.

- *Community Partnerships:* Establishing partnerships with organizations serving low-income communities
 - Launching this year, Energy Trust is forming relationships with community-based organizations (CBOs) to offer the highest levels of cost-effective incentives to the underserved populations that they work with and support. Customer groups include low- to-moderate income customers, rural customers, communities of color, veterans and people with disabilities. For example:
 - *Community Energy Project (CEP) Partnership:* A collaboration with CEP to provide 30 no-cost heat pump water heaters and 100 no-cost smart thermostat installations annually to income-qualified customers in the Portland Metro area. In addition, Energy Trust covers CEP's costs to deliver 50 Home Energy Assessments and four weatherization workshops to income-qualified customers. Later this year, Do-It-Yourself Cooling Workshops (virtual) will be delivered by CEP to tenants of multifamily affordable housing properties.
 - *Verde Partnership:* In 2019, Energy Trust and Verde designed a unique ductless heat pump installation offer that combines Energy Trust incentives with existing Verde funding to reduce the cost of ductless heat pump installations to as low as \$800. In June 2020, Verde launched this program with a goal of performing 30 low-cost installations, providing free energy assessments and connecting customers in North Portland with other free or low-cost offers.
 - Additional planning is underway for collaborations with Euvalcree in Eastern Oregon and the African American Alliance for Homeownership (AAAH) in Portland.

- *Community Action Agency Partnerships:* Establishing partnerships with community action agencies that provide no-cost low-income weatherization programs, in coordination with Oregon Housing and Community Services.
 - *Community Action Organization of Washington County (CAOWA):* Launched a demonstration project with CAOWA in Quarter 3 2019 with a goal of serving more low-income customers and exploring how OHCS-derived funding sources can be leveraged with Energy Trust incentives to support project installations. The results of this demonstration were presented to the OPUC in May 2020 and indicate that CAOWA was able to deliver additional energy savings to customers as a result of this co-funding opportunity.
 - Energy Trust is currently assessing strategies to advance the learnings from this effort to more customers in Washington County as well as with other community action agencies in the state.

- *Co-funding With Other Programs to Serve Multifamily Properties*
 - *Oregon Housing and Community Services:* Developing a co-funding proposal to enable Multifamily customers to access both Energy Trust and OHCS incentives for energy-efficiency measures.
 - OHCS has extended funding to include natural gas in their multifamily energy program and Energy Trust is evaluating the opportunity with our partner natural gas utilities.

- **Regional Initiatives:** Offering enhanced incentives on a regional basis. For example:
 - *Eastern Oregon:* Providing Pendleton and Hermiston residents with enhanced incentives to increase heat pump installations, and Ontario single-family residents with enhanced natural gas incentives.
 - *Energize South Coast:* Enhanced ductless heat pump incentives are part of this regional group purchase campaign (organized by Spark NW, Rogue Climate and others) to install units at discounted rates.
 - *Cave Junction & Hwy 99 Corridor:* Energy Trust is working to implement an enhanced ductless heat pump incentive in 2020. This region was identified through census data analysis and energy usage information as an area with high energy usage, low income and low Energy Trust participation rates.

- **Solar Solutions:** Providing enhanced incentives, grants and early development assistance. For example:
 - *Solar Within Reach:* A solar incentive that is five times the standard residential incentive for income-qualified customers.
 - *Low-income Solar Innovation Grants:* Energy Trust is completing an initiative that provided funding to community groups to develop program models to deploy solar to benefit low-income families.
 - *Solar Development Assistance:* Funding to help nonprofits and governments plan projects and apply for other funding sources, usually PGE's Renewable Development Fund and Pacific Power's Blue Sky grants
 - *Community Solar Development Assistance:* Funding to help public and nonprofit organizations plan community solar projects, and to help private developers working on smaller community solar projects.

6. What recommendations do you have to improve programs for low-income utility customers?

Improving services and access to those services for low-income utility customers can be advanced by more partnerships and coordination among existing programs, including government, nonprofit, and increasingly of importance, community-based organizations. Energy Trust is exploring a few such partnerships and will continue to identify areas to expand and develop new ones.

There is a need to address the economic distress now and also longer-term. Investing in community partners is a longer-term strategy that can carry the objectives and benefits of this group's initial relief and recovery measures.

Energy Trust also references the [OPUC's agency response report](#) to Governor Brown's Executive Order 20-04. It includes proposed actions within the Impacted Communities section, actions like "Considering updates to the cost-effectiveness exception policy to allow streamlined approval for measures and programs targeted toward low-income ratepayers, up to a defined percentage of program costs", "Requiring GHG reduction activities and pilots to include dedicated actions to serve low-income communities" and others.

9. What data is currently available to evaluate changes over time and effectively maintain situational awareness? What additional data is needed that's not currently available?

Discussions on the type of utility data available and at what level of granularity could support the OPUC's explorations and how Energy Trust incentives and outreach can help utility customers impacted by the coronavirus.