



October 27, 2020

Megan Walseth Decker, Chair
Letha Tawney, Commissioner
Mark Thompson, Commissioner

VIA EMAIL: Comments regarding Oregon Public Utility Commission Staff Proposed EO 20-04 Work Plans (draft 9-22)

Dear Commissioners:

Farmers Conservation Alliance (FCA) and the Oregon Water Resources Congress (OWRC) appreciate the Oregon Public Utilities Commission (Commission)'s draft workplans in response to EO 20-04. As drafted, we would expect the efforts outlined in these five workplans to help Oregon's diverse rural and urban communities achieve clean energy goals while keeping electricity rates affordable, creating and sustaining energy-related jobs, investing in equitable economic development, promoting community resilience, and supporting a healthy environment.

In particular, we would like to note the following elements of the workplans are well aligned with goals and objectives shared by FCA and OWRC:

- **Workplans 2 & 4: Utility Services and Activities & Impacted Communities**
 - Establish community-wide green tariffs targeted toward reducing utilities' GHG emissions. Green tariffs designed to meet the needs of specific communities could enable local and tribal governments, and local service districts to make decisions regarding the energy sources that power and provide resilience for the residents and businesses in their communities.
 - Streamlined interconnection of clean resources and their valuation & Accelerating beneficial growth of DERs. Interconnection remains a significant hurdle for the incorporation of clean distributed energy generation into the grid. Addressing interconnection challenges could enable communities to invest in resilient distributed generation to power critical resources in the event of a natural disaster or Public Safety Power Shutoff (PSPS) event.
 - With Energy Trust of Oregon, support development of pilots that can reduce energy burden for low-income communities and vulnerable populations & Inform and prioritize PUC regulatory actions in current or new agency proceedings to help protect and benefit impacted communities. If the implementation of the Executive Order considers the needs of and input from

energy-burdened and vulnerable communities we would expect to see better outcomes in and with those communities. We note the Energy Trust of Oregon has unique technical expertise to support this essential stakeholder engagement.

We also suggest three areas for consideration where additions could provide further resilience benefits:

- **Workplan 2: Utility Services and Activities**
 - Establish community-wide green tariffs targeted toward reducing utilities' GHG emissions.
 - **Consideration:** The Commission may want to consider whether more flexibility would enable accelerated adoption of renewable energy. If the language of this section's objective read: "Provide guidance for utilities and communities for Community-Wide Green Tariffs to assist communities that want to use [up to] 100% "green" energy..." FCA and OWRC would expect greater community participation and accelerated adoption of renewable energy as communities that choose a renewable energy target of less than 100% could then participate.
 - Consider how to quantify and incorporate measurable co-benefits beyond energy and financial benefits (e.g., GHG emission reductions, local air quality improvements, health benefits, reduction of energy burden), as relevant to initiatives such as targeted replacement of wood-burning stoves.
 - **Consideration:** We note that resilience is an important co-benefit not listed here. Resilience is called out in Workplan #4: Impacted Communities as a co-benefit, and including in this section could provide additional flexibility and benefits for communities and utility customers.
- **Workplan 5: Wildfire Prevention and Mitigation**
 - **Consideration:** We note that distributed energy generation is not explicitly considered as a mitigation option in this workplan. Given the resilience benefits that distributed generation provides, the Commission may want to consider whether the co-location of utility services with other community infrastructure improvements, such as irrigation district piping, could reduce utility infrastructure upgrade costs for electricity customers while also providing additional energy resilience options.

FCA and OWRC thank the Commission for this opportunity to provide input into the development of these workplans. We look forward to participating in the upcoming stakeholder engagement workshops as green tariffs as are further considered.

Sincerely,



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Farmers Conservation Alliance



April Snell
Oregon Water Resources Congress