Hello Garrett,

Small Business Utility Advocates offers these few comments to the Work Plan for EO 20-04:

There should be some articulation of the relation between "small commercial customers" and "impacted communities".

Because they are a discrete user group it should be possible to measure, and then consequently manage better, the impact of small commercial customers' energy use on the GHG emissions, and PUC activity targeting reduction of these emissions. Example—include bona fide representation of small commercial customers in the Portfolio Options Committee reoriented.

The PUC is in a great position to measuring the equity impact of the PUC regulation by participation of COBID firms in PUC or utility work.

SBUA is available for questions or other follow up.

Respectfully submitted,



Diane Henkels Attorney, Small Business Utility Advocates 541-270-6001 / utilityadvocates.org