OREGON PUBLIC UTILITY COMMISSION EXECUTIVE ORDER 20-04 WORK PLANS

Executive Order 20-04 establishes Governor Brown's new greenhouse gas (GHG) emissions goals for Oregon and directs state agencies to identify and prioritize actions to meet those goals. EO 20-04 also provides specific directives to the PUC on GHG emissions, impacted communities, and wildfire safety.

Based on input from our stakeholders and internal agency discussions, the PUC has developed the following work plans to identify and manage the numerous activities the agency plans to undertake to help reduce GHG emissions in accordance with the goals set forth in EO 20-04. The work plans specify the various actions and activities that will be prioritized for the following year, and offer some insight into activities to be taken up in the following year. The PUC plans to update these work plans with stakeholder's input through a yearly planning process that reviews accomplishments and identifies priorities and goals for the following year.

The PUC has identified three themes for action in response to EO 20-04: (1) GHG Reduction Activities, (2) Impacted Communities, and (3) Wildfire Prevention and Mitigation. From those three areas, we have developed five separate work plans; given the scope of work to be performed under GHG Reduction Activities, we divided that theme into thirds. Thus, the five work plans, as well as the page at which they may be found, are as follows:

Each work plan has been assigned a sponsor, project manager, and support team. Although presented together in this unified report, each plan will be separately managed, but in coordination and collaboration with the interrelated and reinforcing activities undertaken in the other plans. Due to the separate management, the work plans—while generally consistent—reflect some variation in format and style. Each plan, however, identifies the applicable directives from EO 20-04, establishes goals and objectives and near term priority activities to meet those goals, and contains a schedule.

The PUC has not waited for the adoption of formal work plans to begin work on many of these important activities. Because issues related to GHG Reductions are of relevance to much of our pending regulatory work, we have already begun to incorporate the principles and direction of EO 20-04 into current dockets and proceedings. Similarly, because many of the directives in EO 20-04 build on the PUC's existing activities related to impacted communities and wildfire safety, many of the activities identified are already underway.

GREENHOUSE GAS REDUCTION ACTIVITIES: PART 1— UTILITY PLANNING

Sponsor: Bryan Conway, JP Batmale

Project Manager: Kim Herb

Support Team: Rose Anderson, Anna Kim, Caroline Moore, and Shelly Maye

EXECUTIVE ORDER 20-04 DIRECTIVES

Section 5.A – It is in the interest of utility customers and the public generally for the utility sector to take actions that result in rapid reductions of GHG emissions, at reasonable costs, to levels consistent with the emission reduction goals set forth in paragraph 2 of this Executive Order, including transitioning to clean energy resources and expanding low carbon transportation choice of Oregonians.

Section 5.B(1) – Determine whether utility portfolios and customer programs reduce risks and costs to utility customers by making rapid progress towards reducing GHG emissions consistent with Oregon's reduction goals;

Section 5.B(3) – Prioritize proceedings and activities, to the extent consistent with other legal requirements, that advance decarbonization in the utility sector, and exercise its broad statutory authority to reduce GHG emissions, mitigate energy burden experienced by utility customers, and ensure system reliability and resource adequacy;

GOALS AND OBJECTIVES

Rapidly establish new analyses and actions within existing dockets and investigations, and consistent with the PUC's authorities and duties, so as to place the regulated utilities on sustainable pathways toward achieving the Governor's 2035 GHG reduction goals. As part of this goal, the PUC will seek to empower stakeholders by imparting key GHG information and by encouraging, where possible, the adoption of activities that balance current best-practices with GHG reductions.

To help meet the overall goal listed above, the objectives of the PUC's GHG Reduction work in the area of Utility Planning are to identify, prioritize, and deploy strategies to enhance and refine our existing least-cost, least-risk framework to ensure energy utilities are focusing their system-wide resource strategies on making rapid, large-scale, and sustained progress to meet GHG reduction goals.

IDENTIFY

Building off the activities articulated in the PUC's response to the Executive Order and feedback from stakeholders, the PUC will continue to refine the list of activities it intends to undertake in the next two years, but has identified near term activities around which there is significant stakeholder alignment.

PRIORITIZE

Activities were prioritized to facilitate GHG emission reduction goals, considering additional costs and benefits and the ability to leverage existing processes and dockets. The impact any particular action would have on GHG emission reductions was approximated in terms of speed, scale, and longevity of those reductions *and/or* the ability of that particular action to surface information that would enable stakeholders to take action. The other factors used in selecting GHG reduction actions included use of agency resources (costs), streamlined coordination with other implementing agencies (benefit), impacts to ratepayers generally, impacts to those more severely impacted by climate change and climate change policies, the timeframe to "see" results, and stakeholder support.

In an ongoing effort to ensure we prioritize equitable outcomes from our actions, the PUC, with guidance from its DEI Program Director, will refine and enhance our stakeholder engagement strategies for these identified activities to increase meaningful inclusion and engagement by impacted communities. These strategies will include the development of an "Explanatory Brief" for key activities to provide a short and concise explanation of the issues to be addressed and their potential consequences to impacted communities.

DEPLOY

Activities deemed impactful, within existing authority, and supported by stakeholders will be prioritized by the PUC and agency resources will be dedicated to support implementation.

FIRST YEAR PRIORITY ACTIVITIES

In light of the goals and objectives, Utility Planning activities over the next twelve months include GHG reduction planning activities that enable heightened awareness and reduction of GHG emissions in utility integrated resource plans (IRPs), utility procurement processes, and natural gas operations. Anticipated outcomes include (1) increased awareness of GHG emissions and activities by Oregon's investor owned utilities (IOUs), (2) ease of ensuring accountability to state goals, and (3) simplification of engagement for all stakeholders on this topic.

1 - INTEGRATED RESOURCE PLANS

The PUC will work within existing IRP proceedings to establish new analyses designed to surface current and future GHG emission levels and further explore reduction activities via planning decisions. This includes more work utilizing the Social Cost of Carbon (SCC). All IRP work will be within existing guidelines. No rulemakings or investigations will need to be opened to support this work in the first year. Some of the near-term IRP work overlaps with DEQ's development of a statewide Cap and Reduce program, which will likely have an impact on utility planning. At a minimum, this inserts a level of policy uncertainty that may affect the schedule and scope of planning over the next year.

Broadly, PUC will explore all EO 20-04 related updates to IRPs, as well as strategies to address planning uncertainty associated with the concurrent development of DEQ's Cap and Reduce program, by the end of Q4 2020. This guidance will be used to drive pre-filing engagements in IRP planning proceedings. Current IRPs afford opportunities to start this conversation, but may not necessarily include the proposed analysis. In addition, the PUC will develop accessible guidance materials for use by new stakeholders, such as community-based organizations working with impacted communities.

The schedule below identifies IRPs in which the PUC can initiate EO 20-04 related updates in a company's pre-filing workshops and through stakeholder meetings over the next year. :

Table 1: EO 20-04 Guidance and IRP Schedules

	Q3 2020	Q4 2020	Q1 2021	Q2 2021	Q3 2021	Q4 2021
EO 20-04 Guidance	Development	Introduction		Adoption		
DEQ CnR					Draft Rules	
Cascade	Proceedings		Decision			
Avista	Pre Filing			Proceedings		Decision
PacifiCorp	Pre Filing			Proceedings		
Northwest Natural		Pre Filing		Proceedings		
PGE	Pre Filing					Proceedings
Idaho Power	2019 Proceedings		2019 Decision	2021 Development[1]		

Based on this schedule, PUC can begin addressing IRP-related EO activities in stakeholder workshops in Q4 2020 and initiate implementation in Q1 2021. Milestones include seeing changes reflected in the following IRPs: Avista 2021, PacifiCorp 2022, NW Natural 2022, PGE 2022 and Idaho Power 2021.

1.1 UPDATE IRP GUIDELINES FOR GHG COSTS & RISKS

IRPs can surface a tremendous amount of useful information on utility GHG reduction activities in a manner that fully supports the intent of the IRP guidelines, poses minimal additional cost to the utilities, and is in-line with the existing least-cost, least-risk framework. Existing IRP Guidelines indicate that IRPs "must be consistent with the long-run public interest as expressed in Oregon and federal energy policies."[2] As such, IRP Guidelines updates would reflect Oregon energy policy direction as articulated EO 20-04.

Various strategies could be used to surface useful GHG emission impacts in IRPs that could enable and encourage utilities and stakeholders to identify paths utilities could take to reduce GHG emissions. These strategies represent IRP guideline updates that could take place within the next year and include:

- **Portfolio Development**
  - Include a portfolio sensitivity of meeting EO 20-04 emission targets on an absolute/mass basis.
  - As applicable, describe the key Cap and Reduce program design elements driving GHG mitigation implementation strategies and costs.
  - Assess Costs/Risk of missing EO 20-04 emission targets (e.g. future GHG legislation/regulation).
  - Require the reference portfolio to meets EO 20-04 emissions targets in each year leading up to 2035.
  - Calculate each portfolio's annual GHG emission levels

[1] Idaho Power is not required to submit an IRP in Oregon in 2021, but because it is are expected to submit an IRP in Idaho in June of 2021, we anticipate receiving an IRP on a similar timeline that may be named the 2021 IRP.
[2] Order No. 07-002, Item 1d.

    - NPVRR of EO 20-04 portfolios, e.g. 100% RPS or Clean Peak Standard
    - 12x24 Matrix of emissions of portfolios
    - For gas utilities
        - All portfolios report carbon intensity (CI) and impact of Renewable Natural Gas (RNG) on CI to help illustrate different pathways to reduce GHG emissions.
        - Review top portfolios' GHG emissions on an absolute/mass basis and carbon intensity basis and whether or not they meet EO 20-04 goals.

- **Forecasting**
    - GHG Forecast on absolute/mass basis (Actual v. Projected)
    - Carbon intensity per customer class (Actual v. Projected)
    - Load reduction: Recognize communities adopting Green Tariffs or decarbonization goals in planning
    - Load-Duration Curves for price & GHG (historical and for top portfolios) along with analysis assessing the correlation of hours in each year
    - Document and forecast GHG emissions associated with annual "sales for resale" from fossil fueled resources (actual v. projected)
- **Decarbonization**
    - Always include an assessment of non-emitting, baseload, generation resources in preferred portfolio development
    - Include analysis of the distribution grid as a decarbonization resource in terms of GHG emission reductions through fossil fuel generation displacement and as flexible load for renewables integration
    - Develop a portfolio sensitivity for a high level of near-term, beneficial electrification and electric vehicle adoption
    - For electric utilities, continue to assess NPVRR of early-retirement of all fossil fuel generation in every IRP
    - Model a cap on total emissions in the action plan timeframe (e.g., any new increases require reductions elsewhere in the system)
    - Consider risk of customers leaving utility service for lower-carbon options to meet carbon reduction requirements or goals and stranding remaining customers with system costs
    - Modeling cost to match renewables growth with TE load growth
    - Modeling the costs and benefits of using renewables to produce hydrogen as a transportation fuel
- **Stakeholder engagement**
    - Utilities host decarbonization plan workshops to solicit and incorporate stakeholder feedback prior to IRP
- **Other**
    - IRP as forum for discussion of pilots to develop supply chains for low-carbon resources and to decrease carbon risks and future costs
    - Importance of climate leadership and the risks to reputation and confidence[3]

[3] See the Task Force on Climate Related Financial Disclosures for examples https://www.tcfdhub.org/Downloads/pdfs/E06%20-%20Climate%20related%20risks%20and%20opportunities.pdf

Table 2: IRP Guideline Updates Activities

	Activity	Start	End	Status
1.1.1	Develop an approach for IRP Guideline Updates for GHG Costs and Risks	~~October~~ November 2020	~~November~~ December 2020	In Progress
1.1.2	Stakeholder engagement on IRP Guideline Updates • Host 2 stakeholder meetings • Conduct Commissioner briefings • Create IRP activities Explanatory Brief	~~October~~ December 2020	~~December~~ February 2020	Not Started
1.1.3	Adoption of IRP Guideline Update Approach • Presentation of staff recommendations to Commission	~~January~~ March 2021	~~January~~ March 2021	Not Started
1.1.4	Integrate IRP Guideline Updates in concert with existing IRP cycles (see Table 1: EO 20-04 Guidance and IRP Schedules)	~~January~~ April 2021	---	Not Started

1.2 INCORPORATE SCC IN FUTURE IRPS

The SCC is already used as a sensitivity analysis in IRPs. However, there are other opportunities to apply the SCC in the IRP development process without requiring any changes to guidelines. The PUC will explore two new IRP development first year activities:

- SCC in IRP Net Present Value of Revenue Requirement (NPVRR)
- SCC as sensitivity in all valuations to show difference
- Portfolios include high (SCC), medium, and low gas and coal price forecasts in stochastic analysis to reflect the impact of potential carbon policy on company-owned resources.

Table 3: SCC in Future IRPs Activities

	Activity	Start	End	Status
1.2.1	Develop an approach for SCC incorporation in IRPs	~~October~~ November 2020	~~November~~ December 2020	In Progress
1.2.2	Stakeholder engagement on SCC in IRP approach • Host 2 stakeholder workshops (part of IRP Guidelines workshops) • Conduct commissioner briefings • Include activities in IRP Explanatory Brief	~~October~~ December 2020	~~December~~ January 2020	Not Started
1.2.3	Adoption of SCC in IRP approach • Presentation of staff recommendations to Commission	~~January~~ February 2021	~~January~~ February 2021	Not Started
1.2.4	Integrate SCC approach in concert with existing IRP cycles (see Table 1: EO 20-04 Guidance and IRP Schedules)	~~January~~ March 2021	April 2021	Not Started

2 - IDENTIFY CARBON PRICE APPROACHES

By the time the societal impacts of GHG emissions are fully realized in the market, it will be too late to mitigate these impacts. In the short term, utilities and their customers may need to develop more sustainable, reliable energy systems sooner to mitigate these impacts. To better quantify the value of early action, the PUC will explore a more explicit and transparent approach to utilizing a carbon price, such as the SCC, where applicable in our planning activities.

The expanded use of the carbon prices in PUC planning activities is an activity that extends across multiple areas (e.g. Utility Planning and Transportation Electrification). This may include the consideration of a range of carbon pricing scenarios (e.g. California cap and trade market prices, Social Cost of Carbon, or others). In order to facilitate this activity, area leads and teams will collaborate on developing the agency's approaches for using carbon prices by October 2020 that includes communications and meetings designed to work with stakeholders that are new to OPUC process but want to impact our activities.

Table 4: Carbon Pricing Approach Activities

	Activity	Start	End	Status
2.1	Develop an approach for expanded use of carbon pricing in OPUC activities	November 2020	February 2021	Not Started
2.2	Create SCC Explanatory Briefing for new stakeholders.	~~October~~ December 2020	~~October~~ December 2020	Not Started

3 - INCORPORATE SCC IN AVOIDED COST (AC) FILINGS

The SCC is not fully or consistently captured in updates to a utility's avoided cost calculations. Utilities employ different strategies in the formulation of their AC calculations and the way that carbon costs and impacts are captured in those AC calculations also varies. The PUC will attempt to develop an approach to consistently identify, isolate, and highlight the SCC in applicable AC filings. As part of the PUC's work in developing expanded applications of pricing carbon risk, it will identify strategies for and direction on how to use the SCC in such things as regular (annual and post-IRP) avoided cost updates applicable to PURPA QFs, and energy efficiency. For this first year, the PUC will concentrate its efforts on incorporation of SCC into energy efficiency avoided cost filings and building a successful path forward. The PUC anticipates~~envisions eventually~~ exploring~~, at some future point,~~ the incorporation of SCC into (a) annual and post-IRP avoided cost updates and (b) more broadly as part of UM 2000, which is expected to begin being active again in Q2 2021.

3.1 ENERGY EFFICIENCY AVOIDED COST UPDATES

In docket UM 1893, the PUC established guidelines for the data used by Energy Trust of Oregon (ETO) for calculating avoided costs. Energy Trust, with input from the PUC, generally controls the method of calculating avoided costs.

Under those guidelines, utilities file data for avoided cost calculations on October 15th of each year. The PUC then has 60 days to approve for ETO to use in calculating avoided costs. Currently, natural gas avoided costs include a "cost of compliance," which represents the need to potentially pay compliance costs for GHG emitted in the future. Incorporating SCC would result in replacing this compliance cost and is expected to result in higher avoided costs, but not at the full SCC amount (because the compliance cost formula is calculated at 50% of the carbon price). On the electric side, carbon costs are

incorporated into the forward market price for electric energy efficiency. The PUC must address whether this results in a double counting of SCC if applied to electric energy efficiency.

In 2021, the PUC can direct ETO to apply a simplified calculation, assuming each unit of energy saved accounts for the average regional GHG emitted. In 2021, the PUC can engage with stakeholders to discuss a more sophisticated approach, using data from the utilities.

Below is a table of activities to undertake over the next ten months:

Table 5: AC Updates for Energy Efficiency Activities

	Activity	Start	End	Status
3.1.1	Develop an approach to capture SCC in AC Updates used for energy efficiency	April 2021	May 2021	Not Started
3.1.2	Stakeholder engagement on SCC in AC Updates used for energy efficiency • Host 1 stakeholder workshop • Conduct commissioner briefings	June 2021	August 2021	Not Started
3.1.3	Adopt SCC in AC Updates used for energy efficiency and direction to ETO for AC methodology for use in October 15 update	October 15, 2021		Not Started
3.1.4	SCC in AC for EE at Public Meeting	December 1, 2021		Not Started

3.2 PURPA AVOIDED COST UPDATES

The PUC will explore a more explicit and transparent approach to adding a carbon price, such as the SCC, to the forward market prices in UM 2000 and future avoided cost updates (annual and post-IRP). UM 2000 is a broad investigation of PURPA that is expected to address the issue of avoided cost methodology and applications. It is internally scheduled to become active again in Q2 2021, or after the completion of UM 2011. PUC will seek opportunities to include consistent carbon pricing as applicable dockets are active. These will ultimately include annual and post-IRP AC updates, but Staff will rely on discussion and decisions arrive at through UM 2000 to inform the application of such pricing.

Table 6: Carbon Price in AC Updates

	Activity	Start	End	Status
3.2.1	Develop an approach to capture carbon price in AC Updates used for PURPA	February 2021	March 2021	Not Started
3.2.2	Stakeholder engagement on carbon price in AC Updates for PURPA (within UM 2000) • Host 2 stakeholder workshops • Conduct commissioner briefings	April 2021	June 2021	Not Started
3.2.3	Adoption carbon price in AC Updates for PURPA • Presentation of staff recommendations to Commission	April 2022	April 2022	Not Started

4 - PROCUREMENT

As utilities advance from their IRPs into developing RFPs for procurement, an opportunity exists to ensure GHG related risks are visible and considered as part of the procurement process. This will likely need to be addressed differently for electric and gas utilities. Because of this, the strategies to address GHG emissions in procurement for gas utilities will be explored separately as part of an investigation specific to GHG emission reductions for gas companies (see section 5, Natural Gas GHG Reductions). To capture ~~this~~ GHG emission reduction opportunities~~y~~ for electric utilities, the PUC will explore the use of an approach to incorporate GHG reduction benefits as a non-price scoring factor in:

- RFP scoring criteria, and
- Short-list analyses

To ensure all stakeholders share a common understanding of the proposed changes, Staff will create a Procurement Explanatory Briefing.

Table 7: GHG Reduction in Procurement Activities

	Activity	Start	End	Status
4.1	Develop an approach for GHG reduction benefits in procurement	~~October~~ November 2020	December 2020	Not Started
4.2	Create Procurement Explanatory Brief	~~October~~ November 2020	~~November~~ December 2020	Not Started
4.3	Stakeholder engagement on GHG reduction benefits in procurement • Host 2 stakeholder workshops • Conduct commissioner briefings	January 2021	March 2021~~0~~	Not Started
4.4	Adoption of GHG reduction benefits in procurement • Presentation of staff recommendations to Commission	April 2021	~~April~~ May 2021	Not Started
4.5	Integrate GHG reduction benefits in procurement in concert with existing RFP cycles	~~April~~ May 2021	December 2021	Not Started

5 - NATURAL GAS GHG REDUCTIONS

Oregon has gained momentum in developing incentive programs to reduce GHG emissions from natural gas utilities. In 2013 the Oregon Legislature enacted SB 844 to create a voluntary incentive program for natural gas utilities to invest in projects that reduce GHG emissions. In September 2019, the Oregon Legislature enacted SB 98 to create a path to develop Oregon's RNG program. Each are intended to encourage natural gas projects that reduce GHG emissions while supporting a smooth transition to a low carbon energy economy in Oregon.

To date, no SB 844 projects have been approved. Given the additional programs designed to incentivized GHG emission reductions (e.g. SB 98 and EO 20-04), and the underutilization of SB 844, it is important to evaluate existing policy effectiveness and interactions to determine the most impactful and cost effective implementation paths forward.

Because it is likely that natural gas providers in Oregon will be subject to DEQ's Cap and Reduce program, the PUC will work closely with the Department of Environmental Quality (DEQ) to develop

coordinated responses and programs, especially with regards to efforts to mitigate the energy burden to low-income natural gas customers.

Activities over the next twelve months to reduce GHG emissions from natural gas utilities fall into ~~three~~ four categories: SB 844 policy interactions and updates; Collaboration with DEQ on Cap and Reduce; ~~and~~ SB 98 Implementation and Compliance; and two efforts to better inform policy decisions around decarbonization and gas ratepayer impacts and risks.

To facilitate increased meaningful inclusion and engagement by impacted communities, PUC staff will create a Natural Gas GHG Reduction Explanatory Brief targeted to new stakeholders and coordinate with the DEI Program Director and the Executive Office on strategies for engagement.

5.1 - SB 844 POLICY INTERACTION ANALYSIS:

Include a policy interaction analysis of SB 844, with respect to SB 98 and EO 20-04 in the SB 844 biennial report due to the legislature in February 2021. This report is intended to determine whether SB 844 is still warranted. If the report indicates that SB 844 is still warranted, convene stakeholders to identify ways to increase utilization and ensure that it is complementary to SB 98 and EO 20-04. This would likely include updating the rules for SB 844.

5.2 - COLLABORATE WITH DEQ ON CAP AND REDUCE

Working in close collaboration with the DEQ on the development and deployment of the Cap and Reduce program to ensure complementary programs and activities. The PUC will also work alongside community-based organizations, DEQ, and gas companies to ensure any tariffs developed to support low-income customers are thorough and well reported.

5.3 - SB 98 IMPLEMENTATION & COMPLIANCE

Develop capacity to manage SB 98 compliance with MRETs and in coordination with DEQ. This includes developing a strategy to share reporting on the carbon intensity for all RNG procured / delivered to ratepayers in an annual RNG Compliance Report.

5.4 – DECARBONIZATION & GAS RATEPAYER IMPACTS & RISK

First, to better understand the customer dimensions and impacts of different decarbonization scenarios and thus help inform future decision making, we propose to initiate a fact-finding effort to be completed before September 2021. The purpose of the fact finding will be to inform policy decisions to be considered in the second year of the EO work plan. The timing of the report will be designed to leverage the completed DEQ rulemaking process and any analysis from IRP filings in 2021. Staff will workshop the scope of this report in early 2021.

Second, Staff will facilitate development of a joint electric and natural gas utility pilot to explore the leveraging of resources for the in-state production of hydrogen as a storage and transportation fuel.

Table 8: Natural Gas GHG Reduction Activities

	Activity	Start	End	Status
5.1.1	Conduct policy interaction analysis on SB 844, SB 98, and EO 20-04, including cap and reduce to the extent possible	October 2020	February 2021	Not Started

5.1.2	Create Natural Gas GHG Reduction Explanatory Brief	~~October~~ November 2020	~~November~~ January 2021~~0~~	Not Started
5.1.3	Stakeholder engagement on proposed changes to SB 844 • Host 2 stakeholder workshops • Conduct commissioner briefings	February 2021	March 2021	Not Started
5.1.4	Develop recommendations regarding 844 next steps • Presentation of staff recommendations to Commission	April 2021	April 2021	Not Started
5.2.1	Hold regular meetings with DEQ staff on implementation	July 2020	October 2021	In progress
5.3.1	Train staff on MRETs	September 2020	~~Nov~~Dec 2020	~~Not Start~~ In Progress
5.3.2	Develop process for capturing and sharing RNG compliance reporting data	January 2021	May 2021	Not Started
5.4.1	Fact-Finding on Decarbonization and Gas Companies	February 2021	September 2021	Not Started
5.4.2	Facilitate Joint Utility Pilot on Sustainable Hydrogen Production	March 2021	December 2021	Not Started

SCHEDULE

The schedule below outlines anticipated timeline of the Utility Planning GHG Reduction activities.

Table 9: GHG Reduction, Utility Planning Activities Schedule

Area	Activity	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul
IRP	IRP Guideline Updates	Development ~~SE~~ ~~SE~~				SE~~CB~~	SE~~A~~	CB	A	Integration			
	Carbon Price in Future IRPs	Development ~~SE~~ ~~SE~~				~~CB~~SE/CB ~~A~~		A~~int egra tion~~	Integration				
	~~Carbon Price in EE AC~~									~~Development~~		~~SE~~	~~SE~~
C$	Carbon Price Approach	Development											
	Carbon Price in EE AC									Development		SE	SE
	Carbon Price in PURPA AC							Development		SE	SE	SE	CB
RFPs	GHG Scoring & Shortlist			Development			SE	SE	CB	A	Integration		
NG	RNG		MRETs Training				RNG Compliance Reporting						
	SB 844			Policy Interaction Analysis				SE	CB	Rec.			
	Impacts & Risks							Fact Finding & Joint Utility Pilot Dev.					

	Development
SE	Stakeholder Engagement
CB	Commissioner Briefing
A	Adoption
I	Integration

Table 10: Activities by Quarter

Quarter	Task	Activity	Start	End	Status
Q3-20	5.2.1	Hold regular meetings with DEQ staff on implementation	Jul-20	Oct-21	In Progress
	5.3.1	Train staff on MRETs	Sep-20	~~Nov~~Dec -20	~~Not Started~~In Progress
Q4-20	1.1.1	Develop an approach for IRP Guideline Updates for GHG Costs and Risks	~~Oct~~Nov -20	~~Nov~~Dec -20	In Progress
	1.2.1	Develop an approach for SCC incorporation in IRPs	~~Oct~~Nov -20	~~Nov~~Dec -20	In Progress
	1.1.2	Stakeholder engagement on IRP Guideline Updates • Host 1 stakeholder workshop • Conduct commissioner briefings • Create IRP activities Explanatory Brief	~~Oct~~Dec -20	~~Dec~~Feb -21~~0~~	Not Started
	1.2.2	Stakeholder engagement on SCC in IRP approach • Host 2 stakeholder workshops (part of IRP Guidelines workshops) • Conduct commissioner briefings • Include activities in IRP Explanatory Brief	~~Oct~~Dec -20	~~Dec~~Jan -21~~0~~	Not Started
	4.1	Develop an approach for GHG reduction benefits in procurement	~~Oct~~Nov -20	Dec-20	Not Started
	4.2	Create Procurement Explanatory Brief	~~Oct~~Nov -20	~~Nov~~Dec -20	Not Started
	5.1.1	Conduct policy interaction analysis on SB 844, SB 98, and EO 20-04, including cap and reduce to the extent possible	Oct-20	Feb-21	Not Started
	5.1.2	Create Natural Gas GHG Reduction Explanatory Brief	~~Oct~~Nov -20	~~Nov~~Jan -21~~0~~	Not Started
	2.1	Develop an approach for expanded use of carbon pricing in PUC activities	Nov-20	Feb-21	In Progress
Q1-21	1.1.3	Adoption of IRP Guideline Update Approach	~~Jan~~Mar -21	~~Jan~~Mar -21	Not Started
	1.1.4	Integrate IRP Guideline Updates in concert with existing IRP cycles (see Table 1: EO20-04 Guidance and Schedules)	~~Jan~~Apr-21	---	Not Started
	1.2.3	Adoption of SCC in IRP approach • Presentation of recommendations to Commission	~~Jan~~Feb-21	~~Jan~~Feb-21	Not Started
	3.2.1	Develop an approach to capture carbon price in AC Updates used for PURPA	Feb-21	Mar-21	Not Started
	5.4.1	Fact-Finding on Decarbonization and Gas Companies	Feb-21	Sep-21	Not Started
	1.2.4	Integrate SCC approach in concert with existing IRP cycles (see Table 1: EO 20-04 Guidance and IRP Schedules)	~~Jan~~Mar -21	Apr-21	Not Started
	4.3	Stakeholder engagement on GHG reduction benefits in procurement • Host 2 stakeholder workshops • Conduct commissioner briefings	Jan-21	Mar-21~~0~~	Not Started
	5.3.2	Develop process for capturing and sharing RNG compliance reporting data	Jan-21	May-21	Not Started
	5.4.2	Facilitate Joint Utility Pilot on Sustainable Hydrogen Production	Mar-21	Dec-21	
	5.1.3	Stakeholder engagement on proposed changes to SB 844 • Host 2 stakeholder workshops • Conduct commissioner briefings	Feb-21	Mar-21	Not Started

Quarter	Task	Activity	Start	End	Status
Q2-21	3.1.1	Develop an approach to capture SCC in AC Updates used for energy efficiency • Presentation of recommendations to Commission	Apr-21	May-21	Not Started
	3.2.2	Stakeholder engagement on carbon price in AC Updates for PURPA (within UM 2000) • Host 2 stakeholder workshops • Conduct commissioner briefings	Apr-21	Jun-21	Not Started
	4.4	Adoption GHG reduction benefits in procurement • Presentation of staff recommendations to Commission	Apr-21	~~Apr~~May -21	Not Started
	4.5	Integrate GHG reduction benefits in procurement in concert with existing RFP cycles	~~Apr~~May -21	Dec-21	Not Started
	5.1.4	Develop recommendations regarding 844 next steps • Presentation of staff recommendations to Commission	Apr-21	Apr-21	Not Started
	3.1.2	Stakeholder engagement on SCC in AC Updates used for energy efficiency • Host 1 stakeholder workshop • Conduct commissioner briefings	Jun-21	Aug-21	Not Started
Q4-21	3.1.3	Adoption SCC in AC Updates used for energy efficiency and direction to ETO for AC methodology for use in October 15 update	15-Oct-21	15-Oct-21	Not Started
	3.1.4	SCC in AC for EE at Public Meeting	1-Dec-21	1-Dec-21	Not Started

GREENHOUSE GAS REDUCTION ACTIVITIES: PART 2—UTILITY SERVICES AND ACTIVITIES

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EXECUTIVE ORDER 20-04 DIRECTIVES

Agency Decisions – To the full extent allowed by law, agencies shall consider and integrate climate change, climate change impacts, and the state's GHG emissions reduction goals into their planning, budgets, investments, and policy making decisions. While carrying out that directive, agencies are directed to:

Section 3.C (1) Prioritize actions that reduce GHG emissions in a cost-effective manner;

Section 5.B(3) – Prioritize proceedings and activities, to the extent consistent with other legal requirements, that advance decarbonization in the utility sector, and exercise its broad statutory authority to reduce GHG emissions, mitigate energy burden experienced by utility customers, and ensure system reliability and resource adequacy;

GOALS AND OBJECTIVES –

Undertake GHG reduction activities that build on existing authority and activities to encourage greater awareness of GHG emissions, and their reduction. Activities were selected with an eye toward stakeholder alignment, interagency coordination, and equity benefits. Year 1 objectives will promote community-wide green tariffs; streamlined interconnection of clean resources and their valuation; co-benefit identification and incorporation; and raising awareness by measuring, tracking, and reporting of the GHG reduction impacts of existing customer programs.

Focus areas and related objectives for Year 1 are:

1. **Establish community-wide green tariffs targeted toward reducing utilities' GHG emissions.**
   Objective: Provide guidance for utilities and communities for Community-Wide Green Tariffs to assist communities that want to use 100% "green" energy, exceeding the Renewable Portfolio Standard.

2. **Consider how to prioritize actions that streamline and modernize safe, reliable methods to connect clean resources, from renewables to demand side management, to the electric and natural gas systems and appropriately value their system contributions, especially when deployed to support low- to moderate-income customers.**
   Objectives:

a. Continue the launch of interconnection reform investigation (UM 2111) and ensure it is integrated with related dockets such as Distribution System Planning (UM 2005), PGE's net metering agreement solution (UM 2099), and Community Solar Program (UM 1930), treatment of transmission additions for qualifying facilities (UM 2032), and PAC queue reform (UM 2108).
b. Establish Distribution System Planning (UM 2005) that results in successful utility plan filings in 2021 that advance long-term planning to effectively connect clean resources.

3. **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.**
   Objectives:
   a. Direct new utility pilots to quantify and assess estimated GHG emissions impact at scale.
   b. Require Energy Trust of Oregon to report on GHG emissions avoided through energy efficiency programs on behalf of utilities.
   c. Begin research into addressing energy burden reduction benefit within energy efficiency programs and/or avoided costs.

4. **Measure the GHG reduction impacts of existing customer programs and products, such as voluntary customer renewable energy purchasing programs, to inform work with stakeholders to make recommendations to improve the GHG reduction benefits of the programs.**
   Objective:
   Through the Community Solar Program and all of the Public Purpose Charge Programs, quantify GHG emission reduction impacts from annual activities.

FIRST YEAR PRIORITY ACTIVITIES

Internal –

- **Strategy Development**
  - Coordinate internally on development of GHG measurement and social cost of carbon methodology, for application to Energy Trust and Community Solar Program (CSP) objectives.
- **Report Template Development**
  - Develop report on 12-month findings and recommendation to continue Community Solar Program interconnection process.
  - Direct CSP Program Administrator and all administrators of PPC funded programs to analyze and report GHG impacts of activities on regular reporting basis.
- **DSP Infrastructure**
  - Develop and present guidelines for utility Distribution System Planning (DSP) filings that include an emphasis on activities directly supporting EO 20-04.

- Provide regular internal reporting on DSP activities related to stakeholder outreach by the utilities.

External –

- **DSP Implementation**
  - Facilitate stakeholder/utility meetings to inform community engagement activities by utilities within their DSP plans.
- **Voluntary Program Activities**
  - Through several stakeholder workshops, develop guidance for utilities and communities that allows implementation of Community-Wide Green Tariffs.
  - Develop and release an interconnection roadmap showing milestones for Comprehensive Interconnection Reform (UM 2111).
- **Accelerating Beneficial Growth of DERs**
  - Implement Interconnection roadmap by hosting technical working group meeting for stakeholders to continually advance Interconnection reform efforts.
  - Continue to socialize Staff's 'Pilots to Programs' with utilities and Energy Trust in context of GHG reporting requirement.
- **Raising Awareness**
  - Begin annual posting of GHG emission reductions associated with OPUC-related programs and pilots. Encourage the utilities to do the same for voluntary programs.
  - With Energy Trust of Oregon, support development of pilots that can reduce energy burden for low-income communities and vulnerable populations.
  - Post biannual docket Gantt chart for stakeholders to better track OPUC activities.

SECOND YEAR

Year 2 will be a continuation of many Year 1 objectives. The following new objectives are anticipated for focus areas 1, 3 and 4. A new focus area (5) may be added, addressing demand side management opportunities for transport or distribution-only customers.

1. **Community-wide green tariffs:**
   Objective: Reorient and launch the Portfolio Options Committee (POC), UM 1020. Meet with diverse stakeholders to re-envision POC to reflect broader stakeholder representation and offerings in voluntary renewable products. Assess emissions reduction potential of products as criteria during design phase, informed by new load duration/GHG datasets.

2. **Quantify and incorporate measurable co-benefits beyond energy…as relevant to initiatives such as targeted replacement of wood-burning stoves.**
   Objectives:

   a. Support Energy Trust to implement programs with high GHG emission reduction impacts, particularly related to replacement of wood-burning stoves. Support a targeted pilot for ductless heat pump technology, accounting for the secondary impacts of enhanced incentives.

b. Explore pathway to quantify and incorporate measurable GHG co-benefits in demand side management (DSM) and distributed energy resource (DER) programs.
c. Support OHCS's 10 year plan to reduce energy burden in affordable housing by aligning activities.

3. **Measure GHG reduction impacts of existing customer programs and products.**
Objectives:
a. Issue GHG reporting guidance for all "customer choice" programs beyond the Renewable Portfolio Standard.
b. Measure the GHG reduction impacts of existing and new customer programs and products offered through the Portfolio Options Committee (POC). Create a reporting process, working with stakeholders to make recommendations to improve the GHG reduction benefits of programs and pilots within the portfolio.

4. **Evaluate expansion of demand-side management programs to customers taking only transportation or distribution service from the utility.**
Objective: Engage with gas utilities to create voluntary DSM program for large customers with only utility distribution services, assessing health equity benefits in addition to GHG impacts. Hold public input forums on initial utility DSP plans, and use feedback to inform improvements to process and reporting.

YEAR 1 SCHEDULE

Area	Activity	Q3 2020	Q4 2020	Q1 2021	Q2 2021	Q3 2021
Strategy Development	Internal coordination on GHG / SCS methodology and reporting		X	X		
Report Template Development	Community Solar Program 12-month IX report			X		
	Direct GHG reporting by CSP and PPC administrators			X - Develop reporting		X - Reporting
DSP Infrastructure	Develop and present DSP filing guidelines for Commission approval		X - Guidelines			
	Internal reporting on DSP utility outreach				Ongoing	Ongoing
DSP Implementation	Stakeholder/utility meetings to inform community engagement plans				X	

Area	Activity	Q3 2020	Q4 2020	Q1 2021	Q2 2021	Q3 2021
Voluntary Program Activities	Community -Wide Green Tariffs guidance		X - Workshops	X - Guidance (Ongoing)	X - Guidance (Ongoing)	X - Guidance (Ongoing)
	Interconnection Reform (UM 2111)	X - Draft Roadmap		X - Final Roadmap, Workshop		
Accelerating Beneficial Growth of DERs	Interconnection technical working group			X	X	X
	Socialize Pilots to Programs framework with utilities	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
Raising Awareness	Annual GHG reporting for OPUC pilots and programs			X		
	Biannual Docket Gantt chart for stakeholders		X		X	
	Support pilots that can reduce energy burden, with Energy Trust			X	X	X

GREENHOUSE GAS REDUCTION ACTIVITIES: PART 3—TRANSPORTATION ELECTRIFICATION

Sponsor: JP Batmale and Bryan Conway

Project Manager: Sarah Hall

Support Team: Eric Shierman, Sabrinna Soldavini, Robin Freeman, and Garrett Martin

EXECUTIVE ORDER 20-04 DIRECTIVES

Agency Decisions – To the full extent allowed by law, agencies shall consider and integrate climate change, climate change impacts, and the state's GHG emissions reduction goals into their planning, budgets, investments, and policy making decisions. While carrying out that directive, agencies are directed to:

Section 5.B (2) –

Encourage electric companies to support transportation electrification infrastructure that: supports GHG reductions, helps achieve the transportation electrification goals set forth in Senate Bill 1044 (2019), and is reasonably expected to result in long-term benefit to customers.

GOALS AND OBJECTIVES –

Rapidly research new analyses and investment frameworks, and promote robust data collection, so that electric utilities can achieve the goals set forth in SB 1044 to beneficially electrify the transportation sector. Transportation Electrification (TE) has the potential to saves customers money, makes the grid more flexible, contributes positively toward utilities' bottom-line, and significantly reduces GHGs.

The near-term objectives for transportation electrification will be to conduct research and enact policies that establish the foundations of a new framework plan for utilities and stakeholders to guide future TE investments. This includes:

1. Prioritizing appropriate TE infrastructure investments within distribution system planning;
2. Collaborating on new rate schedules and tariffs that encourage transportation electrification, grid-efficient electric vehicle charging behavior, and is beneficial to all ratepayers, including those in impacted communities;
3. Beginning a stakeholder dialogue to improve our TE planning guidelines and program requirements to streamline utility processes and clarify cost-recovery criteria;
4. Exploring approaches to assess cost-effectiveness of TE activities beyond load planning, which promote GHG reduction goals and the transition to clean energy resources. The PUC will undertake various activities described below to address the greenhouse gas emissions of motor vehicles.
5. Initiate a new robust data collection process into market transformation indicators to be tracked by the utilities and shared annually with the OPUC, in addition to TE plans.

In addition, DEQ and the Environmental Quality Commission (EQC) are tasked with expanding the Clean Fuels Program (CFP). The PUC stands ready to serve as a resource on any changes to the CFP that require expertise in regulated utilities or energy markets. This expansion could result in more credits flowing to utilities as aggregators for residential customers, resulting in more utility funds to accelerate GHG reductions in the transportation sector.

6. Provide supporting technical expertise in DEQ rulemakings and continue to provide a forum for stakeholder engagement through workshops. The PUC will continue to require regular reporting to oversee complementary interactions between CFP- and ratepayer-funded transportation.

FIRST YEAR PRIORITY ACTIVITIES

Internal –

1. Establish a Transportation Electrification team of cross-departmental staff to consider and socialize innovative regulatory and programmatic approaches that support beneficial electrification by electric utilities.
2. Conduct a series of internal workshops, supported by the Regulatory Assistance Program (RAP), to establish an internal plan and regulatory framework for the beneficial electrification of the transportation sector. This effort will include research on best practices and inform public workshop dialogue on these topics.
3. Guide current and future TE dockets effectively and in a coherent, forward-looking way sensitive to rural and low-income customer opportunities. Dockets will include grid-connected level-2 charging across residential/home, and business/public charging applications and transportation line extension allowance proposals.
4. Monitor and report quarterly to PUC leadership on Transportation Electrification efforts across the state, and by regulated utilities.

External –

Update Investment Approaches

1. Hold public workshops on topics such as cost-effectiveness methodologies, guidance for prioritization of transportation electrification infrastructure expenditures, impacts of program costs on energy-burdened households, tariffs that better link EV charging to decarbonization (e.g., peak shifting; charging during times of solar curtailment in CA), and streamlined approval of EV-related programs. Workshops will culminate in the introduction of a plan and regulatory framework to guide PUC strategy and utility actions, which reflects public input and internal deliberations with RAP.
2. Request the utilities propose a strategy in their next TE Plans to transition all of their light, medium, and heavy-duty company vehicles to either natural gas or electric vehicles, including service trucks, by 2035.
3. Consider line extension allowances for transportation electrification that scale the multiplier with greater grid integration capabilities (e.g., including storage), utility control of dispatch, and/or in locations with feeders or substations impacted by high levels of DER penetration.

Track Impacts and Improve Data Collection

4. Within the public workshop series, develop with stakeholders key market transformation data to be tracked by the utilities and shared annually with the PUC, ~~in addition to~~building on top of the TE plans.[4] Such data would be anonymized, made available to trusted 3rd parties for analysis, and include, but not be limited to:
   - General:
     - EV registrations in service territory; percent of charging off-peak and on-peak; estimated fuel savings and GHG reductions; survey users of services for data on awareness and uptake; infrastructure location (rural vs. urban)
   - Incentives:
     - Numbers of chargers deployed in territory and use of TE incentives and tariffs (e.g., Level-2 home chargers and TLEA); business days from application for interconnection to utility approval; site owner expense to interconnect; % of EVSC providing charging services.
   - Grid Integration:
     - Data on fast chargers deployed and operating; charging stations that install batteries; track TOU adoption by residential customers with EVs; calculation of new load and peak load impacts; submission of load shapes for various charging locations for future tariff development (e.g., fleet; business; home with and without TOU; neighborhood pole drops; hotels; grocery stores, etc.)

Support DEQ Clean Fuels Program

5. Provide analytic assistance for DEQ and collaborate with DEQ and all stakeholders on changes to the CFP.
6. Hold public workshops for stakeholder input on PGE and PacifiCorp's CFP plans and use of funds. Explore deploying Low Carbon Fuel Standard to pay for infrastructure outside utilities service territory in key EV corridors across the state.

SECOND YEAR

Year 2 will assess progress and effectiveness and produce a coherent, forward-looking and strategic framework and plan that effectively guides utility investment to achieve our policy goals. We will continue to convene internal and external workshops to build expertise and leverage learnings and best practices from other states.

YEAR 1 SCHEDULE

Area	Activity	Q3 2020	Q4 2020	Q1 2021	Q2 2021	Q3 2021
Internal Processes and Planning	Cross-Functional TE Team		X	X	X	X
	Agency Briefings		X	X	X	X

[4] Ideas for data collection come from the Regulatory Assistance Project (RAP), "Metrics to Measure the Effectiveness of Electric Vehicle Grid Integration." May 2020, Little D., Shipley J., and O'Reilly M.

Area	Activity	Q3 2020	Q4 2020	Q1 2021	Q2 2021	Q3 2021
	Internal Workshops with RAP		X	X	X	X
	Framework Development & Data Collection	X	X	X	X	X
External Events	Public Workshops		X	X	X	X
	TE Plan updates to include utility vehicle transition			X		
Utility Dockets - Current and Upcoming	ADV 1148: PacifiCorp TLEA		X			
	ADV 1149: PGE TLEA		X			
	ADV 1151: PGE Residential Rebate Pilot		X			
	ADV 1155: PGE Business Rebate Pilot		X			
	PAC Residential Rebate Pilot (TBD)			X		
	PAC Business Rebate Pilot (TBD)			X		
	PGE pole charging pilot (TBD)				X	
DEQ Clean Fuels Program	Review 2021 CFP plans at Commission		X			
	Support EQC rulemaking			X		X

IMPACTED COMMUNITIES

Sponsor: Michael Grant

Project Manager: Robin Freeman

Support Team: Shelly Maye, Kandi Young, Garrett Martin, Sarah Hall, Matt Muldoon, and Nolan Moser

EXECUTIVE ORDER 20-04 DIRECTIVES

Agency Decisions – To the full extent allowed by law, agencies shall consider and integrate climate change, climate change impacts, and the state's GHG emissions reduction goals into their planning, budgets, investments, and policy making decisions. While carrying out that directive, agencies are directed to:

Section 3.C(2) Prioritize actions that will help vulnerable population and impacted communities adapt to climate change impacts."

Section 3.C (3) Consult with the Environmental Justice Task Force when evaluating climate change mitigation and adaptation priorities and actions.

Section 3.E Participate in the Interagency Workgroup on Climate Change Impacts to Impacted Communities

Section 5.B(3) Prioritize proceedings and activities, to the extent consistent with other legal requirements, that advance decarbonization in the utility sector, and exercise its broad statutory authority to reduce GHG emissions, mitigate energy burden experienced by utility customers, and ensure system reliability and resource adequacy.

Section 5.B (6) In cooperation with Oregon Housing and Community Services, establish a public process to address and mitigate differential energy burdens and other inequities of affordability and environmental justice, including rate design and other programs to mitigate energy burden.

GOALS AND OBJECTIVES

Undertake various activities to address the disproportionate effect of climate change on impacted communities and those traditionally underrepresented in public processes. These activities recognize the need to not only take action to protect these communities, but to ensure that these communities are engaged in and benefit from actions and activities to reduce GHG emissions. They also address the roles of regulated utilities and the PUC in advancing broader societal interests in climate change mitigation, social equity, and inclusion of underrepresented communities.

The directives, goals and objectives found in the Impacted Communities Work Plan have been used to inform, guide and support the implementation of the activities identified in all the work plans the PUC has developed to implement the Governor's Executive Order.

***NOTE*:** A threshold activity is to create a DEI Program Director position; the PUC is currently recruiting to fill the position. With the addition of this position, we anticipate that our Impacted Communities Work Plan may be modified to reflect the leadership and expertise of the new DEI Program Director. The DEI Program Director will lead efforts, with the support of the Executive Office and agency leadership, to make recommendations for a DEI agency-wide program, and work with management and other partners to deliver an action plan.

Change our structure and business operations

a. Establish a Diversity, Equity, and Inclusion (DEI) Program Director position to provide a PUC point of contact to lead engagement activities.
b. Continue and expand the recently formed Low Income Roundtable to raise PUC employee awareness of issues impacting vulnerable customers and to ensure the agency serves as an effective advocate for all utility customers.
c. Through the leadership of the DEI Program Director and with the support and help of PUC leadership, initiate efforts to develop an agency DEI Operations Plan to help the PUC become a more diverse, equitable, and inclusive organization that is better equipped to serve all customers and the public generally.

Increase awareness and build new tools to help inform utility actions and agency decision-making processes

a. Expand and enhance utility reporting of service disconnects and develop a publicly accessible database to inform state actions on energy burden
b. Quantify energy burden in Oregon through stakeholder workshops, informed by Depart of Labor Statistics and other resources

Inform and prioritize PUC regulatory actions in current or new agency proceedings to help protect and benefit impacted communities

a. Consider 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.
b. Requiring GHG reduction activities and pilots to include dedicated actions to serve low-income communities.
c. Examine rate design options to benefit low-income customers.
d. Revisit rules regarding utility service connection, bill payment arrangements, and disconnection requirements.

e. Explore utility pilots and tailored programs to deploy advanced technology in low-income settings to provide bill savings and non-energy benefits, such as resiliency during extreme events.

Fulfill the Governor's directive to engage customers, communities, and partners in government to ensure Oregon's GHG reduction goals provide value for all customers

a. Engage the Environmental Justice Task Force as a trusted partner in PUC activities to assist vulnerable populations and impacted communities
b. Engage the Governor's office interagency workgroup to develop strategies to guide state climate actions
c. In cooperation with the Oregon Housing and Community Services, conduct a public process to raise awareness of issues impacting vulnerable customers and populations to minimize impacts related to GHG mitigation activities

FIRST YEAR PRIORITY ACTIVITIES

Internal –

- Create DEI Program Director Position ***(Currently in progress)***
    - Inform position duties and recruitment support through outreach and relationship building with representatives of impacted communities through listening sessions
    - Facilitate contact with the representatives of impacted communities to increase awareness of the DEI job announcement
    - Recruit experienced representatives from impacted communities to review candidate applications or serve on a PUC hiring panel
    - Conduct interviews and fill position in October

- Identify dockets for potential and real DEI changes to promote greater outreach to, participation from, and consideration of impacts to, impacted communities ***(Currently in progress)***
    - Create accessible, approachable, non-technical presentations and materials that encourage public involvement in PUC proceedings ***(Currently in progress)***
    - Work with ERP to design and deliver a "OPUC 101" presentation geared toward helping organizations new to the PUC understand how the agency operates, what its purpose is and how to participate in docket proceedings
    - Explore and design new formats and venues to reduce barriers, such as in-person listening sessions and lower-technology formats to address the digital divide
    - Work alongside ERP staff to assist in proposing and assessing "utility community engagement plans" to encourage utilities to proactively interact with stakeholders on proposed projects that impact underserved communities

- Initiate development of an agency DEI plan that includes long-range plans, goals, objectives and milestones, and tools for evaluating program effectiveness
    - Gather data for policies and procedures to be used in the development of an equity and inclusion framework and an associated action plan that outlines equity goals, metrics and implementation plans; and draft policies and procedures to guide agency DEI initiative development
    - Conduct outreach and engage stakeholders and DEI professionals
    - Evaluate operational practices, processes, rules and business systems to identify areas of enhancement of program effectiveness as it relates to DEI policies and outreach

- Initiate a review of the activities and membership of the Low-Income Roundtable. Make recommendations and initiate changes to strengthen the work of the group

- Lead collaborative efforts with the ETO to ensure ETO programs and utility programs overseen by the PUC represent and benefit low-income electric and natural gas customers and vulnerable populations

External –

- Engage with representatives from impacted communities and utilities to address impacts customers are facing from the COVID-19 pandemic
    - Gather data through information requests and surveys to inform COVID-19 workshops and shape recommendations for addressing social and financial hardships on customers of regulated utilities ***(Currently in progress)***
    - Initiate discussions around development of a "social equity framework" through which the Commissioners and PUC staff can consistently examine the impact of its actions on vulnerable/impacted communities

- Engage stakeholders and participate in activities that increase awareness of and participation in the activities and services of the PUC, and improve the PUC's awareness of the needs of low-income and vulnerable populations

- Engage Community Action Agencies on low-income energy assistance programs that serve the customers of electric, natural gas, water and telecommunications utilities.
    - Identify and build relationships with organization that provide services to underserved communities

- Represent the PUC to the Environmental Justice Task Force
    - Complete the annual EJTF report in accordance with ORS 182.550

- Appoint new DEI Program Director to represent the PUC as the key contact and tribal liaison to the nine federally recognized tribes in Oregon and the Legislative Commission on Indian Services
    - No later than December 15 complete and submit the annual report to the Governor and the Legislative Commission on Indian Services on activities of the PUC in accordance with ORS 182.162 to 182.168
    - Engage Oregon's nine federally recognized tribes through outreach activities dictated by the Legislative Committee on Indian Services and provide them with educational material and key contact information
    - Attend the Governor's annual meeting with representatives of state agencies and tribal leaders

- Engage Oregon Housing and Community Services (OHCS) to initiate collaboration efforts to establish a plan for a public process to address and mitigate differential energy burdens and other inequities of affordability and environmental justice, including rate design and other programs to mitigate energy burden

Internal and External –

- Develop a communications outreach plan and avenues to ensure key messages are communicated, implemented and are measurable
- Conduct internal engagement activities with PUC Staff to refine and enhance our stakeholder engagement strategies for PUC proceedings and activities to develop meaningful inclusion and engagement by impacted communities
- Facilitate internal and external stakeholder workshops, work groups and task forces on DEI issues as necessary
- Develop and conduct training for new stakeholders to increase awareness of PUC activities and participation options
- Work with the COVID-19 Team on the agreed-upon terms from the COVID-19 Workgroup deliberations that are focused on low-income, social justice and environmental justice activities
    - Engage in discussions on improved utility service for low-income customers and development of a framework to analyze utility proposals through the lens of environment and social justice
    - Participate and assist in development of workshops hosted by the PUC to identify arrearage management best practices for energy and water utilities

SECOND YEAR

- Research and prepare legislative concepts, if needed, for introduction in the 2023 Legislative Session to authorize the PUC to create a rate class for low-income customers of regulated utilities.

- Research and prepare policy option packages, if needed, for introduction in the 2023-25 budget
- Evaluate progress and effectiveness of changes undertaken during the first year of operational practices, processes, rules and business systems to identify areas in further need of enhancement of program effectiveness as it relates to DEI policies and outreach
- Develop and implement government-to government tribal relationship policy as required by ORS 182.164

Light shaded boxes means work is happening

Darker shaded boxes indicate potential ending months

SCHEDULE

Activities	Status	Aug.	Sept.	Oct.	Nov.	Dec.	Jan	Feb	Other
Develop, recruit and hire DEI Program Director	On-going				Fill Position				
COVID-19 Impact Workshops	Completed								
Engage OHCS re Collaboration									
Initiate DEI Planning Process	TBD								
Review Membership/ Activities of Low Income Roundtable	TBD								
Engage Oregon's nine federally recognized tribes						File Report			
Engage Community Action Partners/ Impacted Communities									
Represent PUC at EJTF	On-going								

WILDFIRE PREVENTION AND MITIGATION

Sponsor: Bryan Conway

Project Manager: Lori Koho

Support Team: Yassir Rashid, Mark Rettmann, Lisa Gorsuch, Garrett Martin, Robin Freeman, Caroline Moore, Sabrinna Solvadini, Michelle Scala

EXECUTIVE ORDER 20-04 DIRECTIVES

Section 4.B(4) – Evaluate electric companies' risk-based wildfire protection plans and planned activities to protect public safety, reduce risks to utility customers, and promote energy system resilience in the face of increased wildfire frequency and severity, and in consideration of the recommendations made by the Governor's Council on Wildfire Response 2019 Report and Recommendations.

Section 4.B(5) – Convene periodic workshops for purposes of assisting electric companies, consumer-owned utilities, and operators of electrical distribution systems to develop and share best practices for mitigating wildfire risk.

GOALS AND OBJECTIVES –

Engage in two separate but closely related activities. First, the PUC will promulgate rules requiring regulated utilities to develop and implement wildfire mitigation plans. The rules will address at least:

- demonstrating that the plan is risk–based and actions are based on best practices and appropriate technologies,
- creating robust plans for community outreach, and
- demonstrating the utility is proactively evaluating and managing to the ways wildfire risk is changing.

The rulemaking will be an open, inclusive, and accessible public process intended to safeguard the interests of the diverse stakeholders who may not be familiar with Commission processes. Stakeholder engagement and review of emerging practices in other states will identify additional issues to include in the rules and provide guidance on how to prioritize issues.

Second, the PUC will continue its efforts to develop and facilitate the Oregon Wildfire and Electric Collaborative. The Collaborative will regularly convene workshops with both regulated and consumer owned utilities, electricity providers, and other key stakeholders to discuss technical wildfire issues pertaining to the state's electricity grid. The group will help quickly identify and share best practices for mitigating wildfire risk across the state, with a focus on adaptation to local circumstances.

Wildfire Mitigation Plan Rules

a. Conduct rulemaking and develop rules to define the requirements for future utility submissions of wildfire mitigation plans. At minimum, the draft rules will cover the specific plan requirements of risk analysis, mitigation actions (including system hardening, configuration and operations) and prioritization, plans for de-energization of lines, vegetation management plans, methods and timelines for routine inspection of utility facilities, and community outreach. The rules will also address plan evaluation, vegetation management standards, data gathering and metrics.
b. Enlist assistance from stakeholders~~traditional parties~~ and engage in outreach to impacted communities, agencies, local jurisdictions, emergency managers, first responders, and others to identify affected stakeholders to promote and assist their participation in this rulemaking to better inform PUC decision-making.
c. Work with partners (i.e., electricity providers, the Governor's Office, state and federal agencies, etc.) to develop, review, and finalize a timeline and process for holding workshops as the foundation for the development of wildfire mitigation plan rules.
d. Ensure operators of other impacted critical infrastructure are included in the planning process. Examples include natural gas utilities, communication providers including incumbent and competitive local exchange carriers, wireless and broadband providers, water and waterwater operators, and the Oregon Department of Transportation.
~~d.~~e. Utilize elements included in recommendations from the Governor's Council on Wildfire Response and proposed SB 1536 as a foundation for discussions on what should be required in utility wildfire mitigation plans.
~~e.~~f. Engage regularly with regulated electric utilities to understand current wildfire mitigation practices currently in place and how utilities are updating them with new information and learnings, throughout the rulemaking process.

Continue to develop and strengthen the Oregon Wildfire and Electric Collaborative (OWEC)

a. Plan, develop, and hold regular workshops on topics of interest to collaborative participants that address wildfire risk and mitigation issues. Develop workshop agendas and presenters, and manage the logistics for conducting the workshops.
b. Develop an outreach plan to achieve participation from IOUs, COUs, energy service provider as well as additional agencies and organizations for which collaborative participants are seeking greater communication and partnership.
c. Develop plan for facilitation of larger collaborative meetings to review 2020 wildfire season, prepare for 2021 wildfire season, and/or increase communication and resource sharing between electric sector and local, state, and federal agencies.

FIRST YEAR PRIORITY ACTIVITIES

Internal –

- Conduct both informal and formal rulemaking activities to develop rules to address the requirements for future utility submissions of wildfire mitigation plans.
- Collect data and develop expertise on the components of successful wildfire mitigation plans and requirements used in other states/regions, including which mitigation actions have data backing their effectiveness, latest research in system hardening, etc.
- Work closely with Administrative Hearings Division, the Executive Office, and Commissioners throughout rulemaking process.

External –

- Foster engagement from traditional and non-traditional parties in the wildfire mitigation plan rulemaking process.
- Conduct a series of workshops and town hall meetings to discuss the requirements for utility wildfire mitigation plans.
- Plan, develop, and hold regular OWEC workshops on topics of interest to collaborative participants that address wildfire risk and mitigation issues.
- Provide OWEC participants with periodic updates on the PUC's wildfire mitigation plan rulemaking process and discussion

Light shaded boxes means work is happening
Darker shaded boxes indicate potential ending months

SCHEDULE

Wildfire Mitigation Plan Rulemaking Schedule

	Status	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	Other
Staff Technical Development	On-going								
Game plan with Staff, agencies & utilities	On-going								
Kick-off Workshop									
1st Round of comments									
2nd Workshop – ~~Wildfire Mitigation Plan Elements~~Scoping	.								
Staff distributes scoping document for comment									
3rd Workshop ~~Wildfire Mitigation Plan Elements~~Establish working groups									
~~Town Hall~~	~~Planning beginning in November.~~								
Further workshops								⇨	⇨

Oregon Wildfire Electric Collaborative Schedule

	Status	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	Other
Workshop #2	On-going								
Workshop #3	On-going								
Additional Workshops	On-going							⇨	
Post-2020 Wildfire Season Roundup	Planning beginning in Sept.								

Collaborative Update on Wildfire Plan Rulemaking	Waiting for rulemaking to get underway								
Pre-2021 Wildfire Season Preparation	Planning beginning in Feb.								