

TO: Commissioners Decker, Tawney, and Thompson

FROM: Michael Grant, Executive Director

DATE: November 12, 2020

On behalf of the PUC's Work Team,¹ I present the proposed work plans to identify and manage the numerous actions and activities the agency plans to undertake to implement Governor Brown's Executive Order (EO) 20-04. This executive order establishes 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.

I have attached two documents for your review. First, we circulated draft versions of the work plans for stakeholder comment in October. We received 28 comments with over 200 separate recommendations or questions. The feedback was constructive in improving the work plans' focus and direction. The first document summarizes this feedback and, where appropriate, include responses or changes to the work plans. These summaries are organized by work plan, and broken down by broad topic areas.

The second documents represent the final draft work plans, which contain visible tracked changes based on stakeholder feedback. Following your review and the Special Public Meeting on November 19, 2020, we will finalize the work plans following your review and incorporate any requested changes. The final plans will then be posted on the agency's website.

Before you turn to those documents, I want to address four matters. First, I want to emphasize that these plans, while separately stated, will be managed in coordination and collaboration with the interrelated and reinforcing activities undertaken in the other plans. This will be most apparent with regard to the Impacted Communities work plan, which is, in practical terms, a foundational work plan that governs and informs the work of the other work plans (and agency work). Although the work plans for GHG Reduction and Wildfire Prevention and Mitigation may not explicitly reflect this underlying structure, the PUC will—in all activities performed under EO 20-04—“[p]rioritize actions that will help vulnerable population and impacted communities adapt to climate change impacts.”²

Second, I want to acknowledge some general comments from stakeholders that did not fall within any specific work plan for discussion. These included suggestions for improved communications tools, as well as engagement and collaboration with all affected stakeholders. As an agency committed to transparency and public engagement, the PUC will regularly update the Executive Order page on our website to include explanatory briefs, maps and other resources to make these efforts as accessible as

¹ The PUC's EO 20-04 Work Team consists of Bryan Conway, JP Batmale, Lori Koho, Sarah Hall, Kim Herb, Robin Freeman, and Garrett Martin.

² EO 20-04 Section 3(C)(2).

possible to all stakeholders. We will also be sure to engage representatives from non-traditional stakeholders to attend and participate in any EO-related activities. Other general comments addressed broadening the PUC's legal authority to include environmental outcomes in our work. While we appreciate these suggestions—and expect these issues will be addressed in other forums—fully exploring these issues is outside the work envisioned in the Governor's EO 20-04, which explicitly directed the PUC to take action under its existing legal authority.

Third, I want to highlight the fact that these work plans are a tool to help identify and manage the primary activities to be undertaken by the PUC in response to EO 20-04 for the first of many years. While we realize that many areas of the work plan require more detail and more fully developed processes, these documents are intended to be a high-level overview and were never intended to be a detailed accounting of all the work that will be performed. The PUC team looks forward to further refining these actions and activities with stakeholder input as part of the identified proceedings and activities.

Finally, I want to emphasize that these plans are aggressive, and that the delivery of these activities will be challenging under the best circumstances. Circumstances will change—2020 has certainly made that clear—and I ask for our stakeholders to recognize that the PUC will need flexibility in these plans as we undertake our best efforts to implement EO 20-04. This work will be done while balancing the existing (and growing) regulatory work and taking actions to respond to new legislative directives and regulatory developments.