



February 1, 2021

To: Representative Pam Marsh, Chair, House Committee on Energy and Environment
Members, House Committee on Energy and Environment
From: Max Greene, Regulatory & Policy Director, Renewable Northwest
Re: Support for HB 2475

Dear Chair Marsh,

Renewable Northwest is a regional, non-profit renewable energy advocacy organization based in Oregon, dedicated to the responsible development of renewable energy resources throughout the Pacific Northwest. Our members are a combination of renewable energy businesses and environmental and consumer groups. **Renewable Northwest supports HB 2475, which would facilitate greater stakeholder engagement in utility regulatory processes and support a just transition to an electricity system capable of achieving Oregon's carbon and climate goals.**

HB 2475 amends ORS 757.072 by adding “organizations that represent ... [t]he interests of low-income residential customers; or ... residential customers that are members of environmental justice communities” to the categories of organizations eligible for financial assistance from utilities to support engagement in regulatory proceedings. This form of financial assistance presently supports the engagement of groups such as the Citizens’ Utility Board of Oregon (“CUB”) and the Alliance of Western Energy Consumers (“AWEC”). Low-income and environmental justice communities, however, may have unique interests that would be best advanced through specific support to groups representing these communities.

Providing funding for broader stakeholder participation in regulatory processes was a key recommendation in the Oregon Public Utility Commission’s (“PUC”) September 2018 report to the legislature following the SB 978 process, in which Renewable Northwest played an active role.¹ This approach is also consistent with the Oregon Environmental Justice Task Force’s recommendation that “[m]eaningful involvement requires ... ensuring that impacted communities not only have the technical ability but also the resources to meaningfully participate” in public processes.² HB 2475 would bring these recommendations to fruition.

¹ See Oregon Public Utility Commission, *SB 978: Actively Adapting to the Changing Electricity Sector* (Sept. 2018), e.g., on page 3 the Commission announced that it would “implement a strategy for **engagement and inclusion in PUC processes**, particularly from community based groups new to the PUC ... including by promoting discussion of new funding mechanisms for participation” (emphasis in original).

² State of Oregon Environmental Justice Task Force, *Environmental Justice: Best Practices for Oregon’s Natural Resource Agencies* (Jan. 2016).

Moreover, at a time when renewable resources are out-competing traditional generators on cost, HB 2475 does another important thing, amending ORS 757.230 and explicitly allowing the PUC to consider differential energy burdens on low-income customers and environmental justice communities in its approach to utility regulation. Addressing differential energy burdens is an important element of a just transition to a clean, renewable-powered electricity system: As our grid undergoes rapid physical and operational changes, it makes sense to give the PUC tools to ensure the benefits and costs associated with this transition are fairly allocated. For this reason and those set forth above, Renewable Northwest supports HB 2475.

Sincerely,



Max Greene
Regulatory & Policy Director
Renewable Northwest