

Exh. CMM-1T
Docket UE-23 _____
Witness: Christina M. Medina

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFICORP dba
PACIFIC POWER & LIGHT COMPANY

Respondent.

Docket UE-23 _____

PACIFICORP

DIRECT TESTIMONY OF CHRISTINA M. MEDINA

March 2023

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1 (Oregon), and ongoing coordination of access and functional needs initiatives
2 in Washington, Oregon, and California.

- 3 • **Emily Weaver**, Diversity, Equity & Inclusion (DEI) Director. This position
4 was created to provide leadership and support across PacifiCorp to design,
5 develop and implement innovative strategies to cultivate a work environment
6 that advances DEI. Emily Weaver leads the coordination and evaluation of
7 PacifiCorp’s DEI framework, actions, and measurement. Further, she
8 develops and leads implementation of Company-wide programs to support
9 DEI across the employee experience including recruitment, retention,
10 development, and succession planning; assists the Company in evaluating the
11 current state of DEI efforts; identifies gaps and opportunities and supports
12 development and implementation of innovative solutions; supports
13 development and delivery of DEI training; and partners with human resources
14 leaders on policy and practice review, including identifying and developing
15 opportunities for enhancement.

16 **Q. Please explain what the Company is doing internally to promote equity.**

17 A. PacifiCorp is making efforts to promote equity through internal stakeholder
18 development. To achieve results in this arena, PacifiCorp is developing and equipping
19 internal stakeholders with adaptive leadership skills, education to build intercultural
20 competency, and access to a devoted core team supporting an equity lens on
21 stakeholder engagement. This takes the form of:

- 22 • **Outside subject matter expertise and facilitation.** The Company has
23 engaged E Source as its stakeholder facilitator and content support developer,
24 who acts as an accountability partner in internal stakeholder development.
25 This accountability allows a value chain that creates and strengthens our
26 internal equity decision-making lens and ensures that it bears fruit in our
27 deliverables and stakeholder engagement, and this consequently will help
28 achieve equitable results in the communities the Company serves.
- 29 • **Building adaptive leadership skills.** The Company held an adaptive
30 leadership in equity workshop for key PacifiCorp employees who work on
31 external engagement and customer and community solutions. This workshop
32 was held in December 2022 and focused on acknowledging and finding
33 agreement on the value of building a safe and supportive space to grow
34 individual’s adaptive leadership skills and provide tools, resources, and
35 guidance in our shared journey. This workshop is important because
36 developing an equity decision-making lens requires understanding and
37 acceptance on the individual and corporate level of intercultural competency.

1 Further, it requires a commitment to self-awareness, learning, application
2 (success and lessons learned), and growth.

- 3 • **Building intercultural communication skills.** The Company plans to host an
4 internal workshop in the spring of 2023, that will equip its employees with the
5 tools necessary for effective intercultural communication. While it is expected
6 that most subscribe to the Golden Rule – do unto others as you'd like done
7 unto you – in communications, this stops short of intercultural competency.
8 The golden rule is based on a monocultural worldview and assumes all groups
9 value the same thing. This workshop aims to support trust building and the
10 adaptation of one's perspective and behaviors to connect better, communicate
11 and engage others.
- 12 • **Benchmarking and building intercultural competency.** The Company will
13 administer the Intercultural Development Inventory Survey, considered an
14 international benchmark, in the fall of 2023. Core team members will be
15 debriefed privately on their scores and given individual development and
16 coaching plans.

17 IV. EQUITY

18 **Q. Has the Commission provided that equity should inform the Company's**
19 **proposed rates, practices, and operations?**

20 A. Yes. As explained by Company witness Matthew D. McVee, the Commission has
21 provided that equity should inform the Company's proposed rates, practices, and
22 operations.

23 **Q. Has PacifiCorp included equity considerations in this case?**

24 A. In this proceeding, the Company has incorporated equity through proposals by
25 Company witness Robert M. Meredith to replace tiered energy charges with seasonal
26 energy charges, and splitting the Basic Charge into two separate charges for
27 customers living in single-family and multi-family dwellings. Second, as explained
28 by Company witness Richard A. Vail, the Company is constructing two new
29 substations with new 115 kV transmission lines. For these projects the Company
30 considered restrictions by the Yakama Nation on upgrades of distribution facilities

1 that supply areas off the tribal lands. Further, as explained by Company witness
2 Jayson Branch, the Company has chosen to revamp its North Temple Property,
3 located in an area and community that is economically disenfranchised, where it will
4 build new corporate facilities.

5 **Q. What else has the Company done to promote equity outside of this case?**

6 A. The Company is very proud that it has taken the following actions to promote equity
7 within its Washington service area:

8 **Formed Equity Advisory Group (EAG):** The EAG was assembled in 2021
9 to help inform and advise the Company on the issues most important to the
10 communities that PacifiCorp serves in Washington. The EAG comprises nine
11 representatives from highly impacted communities and vulnerable populations within
12 the Company's Washington service area, including Yakima, Yakama Nation, and
13 Walla Walla. These members have expertise on equity-related topics, such as the
14 health of vulnerable populations and programs for low income customers. The EAG
15 meets regularly and provides significant input on the Company's Customer Benefit
16 Indicators (CBIs), metrics included in the Clean Energy Implementation Plan (CEIP),
17 and how the Company plans and operates within its Washington service area.

18 **Development of CBIs:** Consistent with the Clean Energy Transformation Act,
19 the Company is committed to ensuring that the benefits from the transition to clean
20 energy are broadly shared and equitably distributed amongst all customers, with a
21 specific focus on named communities. PacifiCorp has partnered with stakeholders
22 and advisory groups, including the EAG, to identify the highest priority benefits to
23 customers and identify potential barriers and burdens that may prevent some

1 customers from receiving those benefits. These efforts have resulted in nine CBIs and
2 associated weighting factors to evaluate the equitable distribution of benefits. This
3 allows the Company to assess and monitor the impacts of each proposed program,
4 action, and investment. In addition, the CBIs were included in the Company's most
5 recent CEIP to inform utility action, focusing on the named communities that were
6 identified within the Company's Washington service area.

7 **Established Utility Actions within the CEIP:** PacifiCorp committed to and
8 made several changes to residential and non-residential customer energy efficiency
9 programs to increase the focus on delivery of benefits to named communities. These
10 utility actions were informed on input received from the EAG and the CBIs. The
11 same utility actions will be included in the 2022-2023 Biennial Conservation Plan,
12 and updates for 2023 will be included in the 2023 Annual Conservation Plan. These
13 utility actions include modifications to the low-income weatherization program that
14 the Company filed on December 21, 2021. These changes included, but were not
15 limited to, expanding tariff applicability for the installation of energy efficiency
16 improvements. Funds available for repairs were also increased from 15 percent to
17 30 percent of the annual reimbursement on energy efficient measures and income
18 guidelines were updated to be consistent with RCW 19.405.020(25). Before these
19 changes, some income-qualified homes could not receive energy efficiency
20 improvements due to the extent of critical maintenance needed before the energy
21 efficiency improvements could be made.

22 **Modified the Low-Income Bill Assistance Program:** PacifiCorp's low-
23 income bill assistance (LIBA) program was established in 2003. LIBA provides a

1 tiered discount based on income levels. Previously, LIBA was designed to provide
2 credits to income-eligible households on monthly usage over 600 kWh and included
3 an annual enrollment cap. Consistent with the requirements in RCW 19.505.120 and
4 consultation with the Low-Income Advisory Group, the Company proposed
5 modifications to its program. In particular, the Company proposed to (1) increase the
6 maximum income threshold for the program consistent with RCW 19.405.020(25),
7 (2) modify the discount from a “per kWh above 600 KWh” to a “percentage discount
8 of the net bill,” with the discount level based on household size and income; and (3)
9 eliminate the annual enrollment cap. These changes were allowed to go into effect on
10 August 1, 2021.

11 PacifiCorp hired Empower Dataworks to prepare a 2022 Energy Burden
12 Assessment (EBA) for the Company’s residential customer’s in Washington state. In
13 the EBA, Empower Dataworks highlighted that the LIBA program design is very
14 good at targeting benefits to higher burden customers and program administration. It
15 also noted that the overhead costs are very efficient relative to other programs in the
16 state, and praised the great coordination between PacifiCorp and the local community
17 action agencies on providing culturally appropriate marketing and program designs.
18 PacifiCorp partners with three agencies to administer and deliver the program: Blue
19 Mountain Action Council (BMAC) serves Columbia, Garfield, and Walla Walla
20 counties, Opportunities Industrialization Center of Washington (OIC) serves Upper
21 Yakima County, and Yakima Valley Farm Workers Clinic dba Northwest
22 Community Action Center (NCAC) serves Lower Yakima County.

1 **Residential Energy Efficiency:** Utility actions taken in 2022 and continuing
2 in 2023 for the residential energy efficiency program (available to all customers
3 regardless of income) included:

- 4 ○ Continuing direct installation of duct heating and lighting for
5 manufactured homes.
- 6 ○ Direct installation of LED lighting for multi-family homes with a focus on
7 named communities.
- 8 ○ Buying down the cost of general-purpose LED lamps at value retailers
9 such as Dollar Store and Goodwill stores located in named communities,
10 which allow these lamps to be more affordable for consumers to lower
11 their energy usage.

12 **Small Business Energy Efficiency:** Utility actions taken for non-residential
13 customers focused on small businesses located in named communities and small
14 businesses regardless of location in the Company’s service area. For example, in 2022
15 (and continuing in 2023), the Company offered higher incentives for lighting retrofits
16 for small businesses, including those in named communities. These incentives cover
17 up to 100 percent of the project cost. In addition, the Company’s program
18 implementer added bilingual field outreach employees to target previously under-
19 served residential and small businesses in the named communities.

20 **Demand Side Management (DSM) Program Tracking:** The Company has
21 committed to reporting the following information related to DSM programs to track
22 program participation:

23 **Low-Income Weatherization**

- 24 ● Participants located in Highly Impacted communities.
- 25 ● Participants whose primary language spoken is other than English.
- 26 ● Participants who rent or lease rather than own.
- 27 ● Participants living in a manufactured home.

1 **Homes Energy Savings**

- 2 • Participants located in Highly Impacted communities.
3 • Participants whose primary language spoken is other than English.
4 • Participants who rent or lease rather than own.
5 • Participants living in a manufactured home.
6 • Participants living in a multi-family home.

7 **Wattsmart Business**

- 8 • Participants located in Highly Impacted communities.
9 • Participants whose primary language spoken is other than English.
10 • Participants who rent or lease rather than own.

11 **Residential Energy Usage Survey:** PacifiCorp is developing a voluntary
12 residential customer survey to distribute to its residential customers within its
13 Washington service area. This survey aims to track the progress of its first CEIP to
14 help ensure that the benefits of the transition to clean energy are broadly shared and
15 equitably distributed amongst all customers, with a specific focus on named
16 communities.

17 **COVID-19 Bill Assistance Program:** PacifiCorp implemented the
18 Residential COVID-19 Bill Payment Assistance Program on April 1, 2021, consistent
19 with Order 01 in docket U-200281, to assist income-eligible residential customers
20 with their arrears. PacifiCorp’s program was funded at \$3.1 million, one percent of
21 the Company’s 2019 Washington retail revenues.

22 **Disconnection Moratorium:** PacifiCorp has been implementing
23 disconnection moratoriums in Washington in compliance with Commission rules and
24 of its own accord during extreme weather events. In docket UE-220940, the Company
25 proposed language to Rule 11A to memorialize its practice regarding disconnection
26 moratoriums during severe weather and periods of poor air quality. Specifically,
27 PacifiCorp modified Rule 11A to describe the different types of extreme weather and

1 air quality criteria under which PacifiCorp will implement disconnection for a non-
2 payment moratorium in its Washington service area.

3 **On-Bill Financing:** The Company's residential customers have the option of
4 obtaining a loan through Craft3 for Home Energy Savings program-eligible projects.
5 The purpose of this program is to address the upfront costs barriers that may exist for
6 some customers to participate in certain residential energy efficiency programs.

7 Craft3, who administers the on-bill financing program, extended eligibility in 2022 to
8 additional housing types, including manufactured homes on leased land, and homes in
9 Tribal communities where a lien cannot secure loans. Additionally, Craft3 increased
10 the maximum loan amount to accommodate the inclusion of financing for critical
11 repairs such as asbestos remediation, roof repair, mold removal, electrical panel
12 upgrades, etc. Essential maintenance may only be financed in conjunction with and
13 preparation of a rebate-eligible project.

14 **Marketing of programs to increase participation:** PacifiCorp plans to
15 improve and expand its outreach and marketing to better reach all customers,
16 including customers in named communities. The Company currently has existing
17 marketing plans for its various programs that are targeted to English-speaking and
18 Spanish-speaking customers in Washington. PacifiCorp is considering additional
19 innovative ways to better communicate with customers regarding energy efficiency
20 and energy assistance programs. Further, the Company created an Energy Resource
21 Center on its website (PacificPower.net/Resources) where customers can go online to
22 learn more about energy-savings rebates and watch videos pertaining to energy
23 efficiency, renewable energy, electric vehicles, energy assistance, and time of use

1 rates. The idea behind building the Energy Resource Center came from the
2 Washington EAG to provide a better user-friendly experience where customers can
3 find all the information they need.

4 PacifiCorp is also exploring new advertising channels to better reach Spanish-
5 speaking customers more directly in their communities. For example, PacifiCorp is
6 launching a pilot program to increase awareness and participation in its Wattsmart
7 energy efficiency programs. For this initiative, the Company is working closely with
8 a multi-cultural marketing agency to develop an earned media plan that will connect,
9 resonate, and strengthen media and customer relationships to reach the Latine
10 community using culturally relevant messaging and content. Additionally, PacifiCorp
11 is continuing to nurture relationships with local chambers of commerce to better reach
12 communities. Energy efficiency program administrators are also working with their
13 local contacts to connect with Washington customers in named communities.

14 **Q. Is the Company proposing a distributional equity analysis in this docket?**

15 A. No. The Commission recently rejected proposals from Puget Sound Energy and
16 Avista Corporation related to the development of a distributional equity analysis.
17 Instead, the Commission stated that it would “establish a broad, Commission led
18 collaborative process to establish methods and standards for distributional equity
19 analysis.”¹ The Commission provided that all Washington investor-owned utilities
20 should participate in this collaborative process. PacifiCorp intends to participate in
21 this collaborative process once established by the Commission.

¹ See *Avista Corp. v. WUTC*, Docket UE-220053, et al., Order 10/04 (Dec. 12, 2022).

V. CONCLUSION

1

2 Q. Does this conclude your direct testimony?

3 A. Yes.