

WUTC DOCKET: UE-230172 & UE-210852

EXHIBIT: CMM-1T

ADMIT  W/D  REJECT

Exh. CMM-1T

Docket UE-230172

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-230172

**PACIFICORP**

**DIRECT TESTIMONY OF CHRISTINA M. MEDINA**

**March 2023 (REFILED April 19, 2023)**

**TABLE OF CONTENTS**

I. INTRODUCTION AND QUALIFICATIONS ..... 1

II. PURPOSE OF TESTIMONY ..... 1

III. PACIFICORP’S EQUITY TEAM ..... 2

IV. EQUITY ..... 4

V. CONCLUSION ..... 12

1                                   **I.       INTRODUCTION AND QUALIFICATIONS**

2   **Q.     Please state your name, business address, and current position with PacifiCorp**  
3       **d/b/a Pacific Power & Light Company (PacifiCorp or Company).**

4   A.    My name is Christina M. Medina, and my business address is 825 NE Multnomah  
5       Street, Suite 2000, Portland, Oregon 97232. I am currently employed as Stakeholder  
6       Policy & Engagement Manager for PacifiCorp.

7   **Q.     Please describe your education and professional experience.**

8   A.    I have an Innovation in Leadership Bachelor of Science and a minor in Psychology  
9       from Southern Oregon University. I have 20 years of experience in the electric utility  
10      industry, am bilingual, and strive to engage our area leaders and society in a  
11      collective impact approach to build a brighter future for all. My current community  
12      affiliations include:

- 13               • Southern Oregon University, Board of Trustees, Governor Appointed
- 14                Trustee
- 15               • Remake Talent, Executive Board President
- 16               • ASANTE Health System, Executive Board Member
- 17               • City of Medford Vision 2040 Task Force, Chair
- 18               • Rogue Retreat, Community Advisory, Council Member
- 19               • Coalicion Fortaleza Advisory, Council Member
- 20               • American Leadership of Oregon, Fellow Program Graduate 2018

21                                   **II.     PURPOSE OF TESTIMONY**

22   **Q.     What is the purpose of your testimony in this case?**

23   A.    The purpose of my testimony is to discuss equity considerations and explain how the  
24      Company has incorporated equity into its operations and planning in its Washington  
25      service area.

1 **III. PACIFICORP'S EQUITY TEAM**

2 **Q. Before you explain the Company's equity considerations and how they are**  
3 **incorporated in the Company's operations and planning, can you please**  
4 **introduce the Company personnel promoting equity within PacifiCorp and its**  
5 **Washington service area?**

6 A. The equity team includes three essential personnel who support the effort with  
7 targeted equity responsibilities. In addition, all employees are responsible for  
8 promoting equity within the Company and in our service area.

- 9
- 10 • **Christina Medina**, Stakeholder Policy & Engagement Manager. My position  
11 was established by the Company's senior management to design, deliver, and  
12 successfully implement stakeholder processes and outcomes in response to  
13 goals and regulatory requirements in Washington, Oregon, and California. I  
14 am also responsible for identifying and developing opportunities for broad and  
15 diverse stakeholder engagement and incorporation of feedback from  
16 stakeholders into business decision-making and outcomes. My position also  
17 pursues the success of equity-based processes by tracking stated goals and  
18 objectives, statutory and regulatory requirements, and expectations. I also  
19 oversee the implementation and support of Company programs and policies  
20 that directly impact customers and Company goals. Further, I oversee tribal  
21 engagement within the Company's western service areas. Critical deliverables  
22 include ongoing facilitation of the Equity Advisory Group process  
23 (Washington), development and ongoing facilitation of the Community  
24 Benefits and Impacts Advisory Group process (Oregon), and ongoing  
25 coordination of access and functional needs initiatives in Washington,  
Oregon, and California.
  - 26 • **Kimberly Alejandro**, Equity Analyst, is based in Yakima, Washington. The  
27 Equity Analyst position was created to support the delivery and  
28 implementation of equity-based processes and outcomes to support regulatory  
29 requirements in Washington, Oregon, and California. Kimberly Alejandro's  
30 role is to build relationships by collaborating with internal and external  
31 partners, stakeholders, and equity advisory groups to cultivate an environment  
32 of inclusivity with an equity lens. She also provides feedback from the  
33 stakeholder process to inform business decisions and supports equity-based  
34 functions by tracking goals and objectives to meet regulatory requirements  
35 and expectations. Critical deliverables include ongoing facilitation of the  
36 Equity Advisory Group process (Washington), development and ongoing  
37 facilitation of the Community Benefits and Impacts Advisory Group process

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 adaption 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](http://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.”<sup>1</sup> 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.

---

<sup>1</sup> 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.