August 10, 2023

Dear Board President Carlson, and EWEB Commissioners,

The undersigned organizations are writing to encourage this Board to continue its role as a national climate leader and ensure a just energy transition for EWEB customers. Specifically, we encourage Commissioners to (1) take steps to develop local, publicly-owned renewable energy generation and battery storage to reduce reliance on ecologically damaging and culturally contentious hydroelectricity from large providers such as Bonneville Power Administration; (2) increase incentives to retrofit homes and buildings to run on high-efficiency electric heat pumps; and (3) expand programs to offer tailored rates and critical bill assistance to low income and vulnerable communities in our City.

1. **EWEB Should Take Advantage of Historic Federal Funding for Clean Energy Investments**

We are in a historic moment. As our community experiences first-hand the impacts of climate change, we have a tremendous opportunity to act with the urgency that the climate crisis demands, thanks to the passage of the Inflation Reduction Act (IRA) and other state and federal legislation. EWEB must take advantage of the significant funding made available by the passage of the IRA and other policies to develop publicly owned renewable energy generation such as utility-scale solar and storage, and to work in collaboration with the City of Eugene, community partners, equity organizations, and organized labor to develop these projects.

The IRA has made available billions of dollars for projects that will reduce emissions, protect the environment, and benefit frontline and historically marginalized communities. Specifically, programs such as the Environmental Protection Agency's Environmental and Climate Justice Block Grants[1] and the Greenhouse Gas Reduction Fund[2] could provide the utility with tremendous resources to develop publicly owned projects that would cut emissions and increase local control of renewable generation, all while creating good paying union jobs.[3] Critically, the utility must prioritize investments in publicly-owned renewable energy generation (including geothermal development)[4], battery storage and load management strategies rather than polluting small modular nuclear reactors and biomass generators, or contracts with fossil fuel power plants that will keep our community from meeting our emissions reduction goals.

EWEB is well-positioned to partner with unions and community-based organizations in Eugene such as the Fossil Free Eugene coalition on projects that develop local renewable energy

[1] Environmental Protection Agency, *Inflation Reduction Act environmental and climate justice program,* https://www.epa.gov/inflation-reduction-act/inflation-reduction-act-environmental-and-climate-justice-program.
[2] Environmental Protection Agency, *Greenhouse gas reduction fund,* https://www.epa.gov/greenhouse-gas-reduction-fund.
[3] Environmental Protection Agency, *Advancing environmental justice,* https://www.epa.gov/inflation-reduction-act/advancing-environmental-justice
[4] Estimates of conventional geothermal potential is about 8% of national capacity by 2050. Given the regional proximity of most known geothermal sources, potential may be even higher for EWEB's energy mix. See U.S. Department of Energy and IEA Geothermal, *2021 United States Country Report* (Oct. 2022), https://drive.google.com/file/d/17c3OLDOZBfu6PzYDDaHQ_S15jBdiTCRp/view.

generation, provide green union jobs, and help the City of Eugene meet its Climate Recovery Ordinance goals. These projects could learn from and build upon the powerful example of existing efforts such as New York State's Build Public Renewables Act, as well as help to serve as a model for other local jurisdictions and utilities nationwide.

Additionally, the Oregon Department of Energy is applying for the Greenhouse Gas Reduction Fund's Solar for All program, which would help low-income ratepayers install rooftop solar.[5] If EWEB strengthened its solar incentive program, that would leverage these federal dollars to help low-income customers receive much needed solar bill savings.

2. **EWEB Should Work with City of Eugene to Support Electric Heat Pump Retrofits and Expand Weatherization Programs**

EWEB is already a leader in incentivizing electrification, with significant subsidies for heat pumps for space and water heating already available.[6] That said, in order to meet the City's goals to reduce fossil fuel consumption by 50% of 2010 levels by 2030, the City will need EWEB's help to dramatically expand the resources and information available to residents to fuel switch retrofit their homes and buildings to use high efficiency electric heat pump technology. Thankfully, the IRA includes significant incentives for weatherization and the installation of heat pumps with direct rebates of up to $14,000 available to low income households.[7] It also includes the above-mentioned grants and other funding that EWEB and the city can jointly apply for to expand these programs**.**

One of the first and most important steps that EWEB could do to expand access to these incentives is to create a benefits navigator web page that provides information about all of the various incentives for weatherization and electrification available from local, state and federal government programs, and how these various programs can be stacked atop one another to maximize benefits. We believe that by taking advantage of all of the subsidies available, many Eugene residents will be able to completely retrofit and weatherize their homes and provide for electric vehicle charging with little to no cost to themselves.

Additionally, EWEB should further explore the potential for heat-pump retrofits and weatherization to serve as a load reduction strategy for existing buildings heated by less-efficient electric appliances. The vast majority of Eugene's residential buildings (76%) are heated by electricity,[8] and many of the space heaters in these buildings are older, vastly less-efficient appliances (e.g. resistance and forced air heaters) than modern heat pump technology. A study from Synapse Energy Economics found that, in Oregon, transitioning the

---

[5] Environmental Protection Agency, *Solar for all,* https://www.epa.gov/greenhouse-gas-reduction-fund/solar-all

[6] EWEB, *Ways to reduce water and energy use,* https://www.eweb.org/rebates-and-savings/residential-incentives-rebates-loans-and-conservation.

[7] Department of Energy, *Home energy rebate programs,* https://www.energy.gov/scep/home-energy-rebate-programs.

[8] The Good Company, *City of Eugene community decarbonization by 2045 for existing residential, commercial, and industrial buildings energy use* (Oct. 26, 2022), 19 (Fig. 10), https://ompnetwork.s3-us-west-2.amazonaws.com/sites/134/documents/cc_agenda_packet_10-26-22_ws_post.pdf?naV3w.ERjy.uRjnMRuRI2kKkbo_c0IuI.

entire residential building stock to high efficiency heat pumps, including fuel switching homes from gas to electric, would actually reduce peak loads in the residential sector because of the significant efficiency increases between electric resistance and heat pump heating.[9] Targeting retrofits for both gas heating *and* low-efficiency electric heating will help alleviate concerns around added load from electrification lower energy bills for EWEB's customers who currently use electric heating, allow the use of existing service capacity for electric vehicle charging and also eliminate for those customers the need for a separate appliance for space cooling (an increasing necessity in a warming climate).

Additional recommendations to expand EWEB's existing electrification subsidies and weatherization programs:

- eliminate the existing $8,000 maximum for aggregated income-based rebates in order to ensure that residents have access to adequate assistance;
- increase length of loan terms for energy efficient appliances like heat pumps and heat pump water heaters from 4-5 years to 10-15 years, to coincide with the expected minimum useful life of the product;
- allow all customers to access both rebates and zero-interest loans, as low-income customers are able to do, rather than having to choose one or the other; and
- allow low-income natural gas customers to access low-income incentives to fuel switch to high efficiency electric heat pumps for space and water heating.

3. EWEB Should Expand its Bill Assistance Programs

As we prepare for the transition to 100% renewable electricity, we must ensure that our community benefits from this transition. Excessive energy burdens force low-income Eugene residents to choose between paying electricity bills and buying food. These impacts are not borne equally: Black, Indigenous, and People of Color households experience disproportionate energy burden.[10] Robust energy assistance programs can alleviate existing energy burden, while also ensuring that historically marginalized communities see reductions, not increases, in future energy burden as Eugene homes and housing transition from polluting fracked gas to renewable electricity.

As our city makes the transition off of fossil fuels, it is critical that we expand programs to protect low income households from increasing costs. EWEB already has strong programs in place to protect ratepayers, including a $280 bill credit for qualifying households,[11] and a Fast Track

---

[9] Takahashi, Kenji et al., *Toward Net Zero Emissions from Oregon Buildings: Emissions and Cost Analysis of Efficient Electrification Scenarios* (Synapse Energy Economics, Jun. 2022), https://www.synapse-energy.com/net-zero-emissions-oregon-buildings.
[10] Drehobl, Ariel et al., *How High Are Household Energy Burdens?* (American Council for an Energy-Efficient Economy, Sep. 2020), https://www.aceee.org/sites/default/files/pdfs/u2006.pdf.
[11] EWEB, *Income guidelines,* https://www.eweb.org/my-account/income-based-assistance/income-guidelines.

application program[12] which allows for qualification with proof that customers are recipients of other government programs such as SNAP, WIC, or SSI. Currently the $280 annual bill credit offers an approximately 10.8% annual discount to the average residential customer paying $2,592 per year.[13] To provide meaningful assistance in the face of the increasing cost of living, EWEB must increase its bill credit to provide at least $1,296 or a 50% discount, matching the progressive programs of other utilities such as Seattle City Light.[14]

Additional recommendations to improve EWEB's bill assistance programs:

- allow for self-attestation, removing time consuming applications and verification processes which create barriers to access to benefits;
- expand bill assistance income eligibility from 60% of state median income (SMI) to match Seattle City Light's low-income discount program, which is available to households with income up to 70% of state median income (SMI)[15];
- automatically enroll customers in bill assistance who have past-due balances;
- allow text message and phone-based enrollment, with support for multiple languages, or Spanish at the very least;
- provide dedicated outreach funding to community-based organizations like churches, senior centers, and energy justice organizations, which are already helping customers enroll in energy assistance; and
- develop a map of energy-burdened homes and businesses in the city, and conduct outreach with those homes and businesses with a view to facilitating heat pump retrofits.

4. Conclusion

EWEB has a critical role to play in Eugene's energy transition, and in the national transition as one of the nation's leading renewable electricity providers. By taking advantage of the historic federal investments in clean energy generation and efficiency upgrades; working with the City of Eugene to expand existing programs and create new programs to support transportation electrification, weatherization and the electrification of homes and buildings; and by reducing barriers to bill assistance, EWEB can make our community a regional and national model for rapid and equitable decarbonization, while protecting ratepayers and creating good paying union jobs.

---

[12] EWEB, *ECC Fast Track Instructions*, https://www.eweb.org/documents/residential-customer-service/ECC-fast-track-instructions.pdf.
[13] EWEB, *Residential pricing*, https://www.eweb.org/my-account/budget-and-rate-information/residential-pricing.
[14] Seattle City Light, *Utility discount program,* https://www.seattle.gov/human-services/services-and-programs/utility-discount-program
[15] City of Seattle, *Utility Discount Program,* https://www.seattle.gov/human-services/services-and-programs/utility-discount-program.

The undersigned organizations urge the utility to take advantage of this historic moment that we find ourselves in, and take the aforementioned steps to ensure clean, affordable energy is available for all Eugene residents.

Signed,

Julia DeGraw, Coalition Director, Oregon League of Conservation Voters

Celine Swenson-Harris, Chair, Democratic Party of Lane County

Patty Hine, President, 350 Eugene

Lisa Arkin, Executive Director, Beyond Toxics

Bethany Cotton, Conservation Director, Cascadia Wildlands

Timothy Morris, Executive Director, Springfield Eugene Tenants Association

Cameo Konfrst, Development Director, Community Energy Project

Sam Tyler, Organizer, Sunrise Eugene

Alexis Griffin, Environmental and Climate Justice Chairperson, NAACP Eugene-Springfield

Samantha Hernandez, Climate Justice Organizer, Oregon Physicians for Social Responsibility

Anne Pernick, SAFE Cities Senior Advisor, Stand.earth

Dylan Plummer, Senior Field Organizer, Sierra Club

Jacob Trewe, Coordinating Committee Member, Eugene-Springfield Democratic Socialists of America

Ron Hess, Co-moderator, Eugene Springfield Interfaith Earthkeepers

Danny Noonan, Climate and Energy Analyst, Breach Collective

Angela Crowley-Koch, Executive Director, Oregon Solar + Storage Industries Association (OSSIA)

Phil Barnhart, President, Emerald Valley Electric Vehicle Association (EVEVA)

Brian Stewart, Founder, Electrify Now

Ashley Haight, Manager, ZERO Coalition

Ethan Kirkham, Public Power Program Manager, Climate Cabinet

Jake Lewis, Architect, Salazar Architect Inc.

David Heslam, Executive Director, Earth Advantage

Jeff Bissonnette, Policy & Legislative Consultant, Northwest Energy Coalition

Josh Salinger, Founder & CEO, Birdsmouth Design-Build, Board Member, Passive House Northwest

Stephen Aiguier, Founder & President, Green Hammer

Mike Steffen, Director of Innovation, Walsh Construction

Clark Brockman, Principal, SERA Architects

Mike Ardeljan, Sustainable Homes Professional, Dream Home Building & Design

Amy Cortese, Director of Programs, New Buildings Institute

Peter Grube, Co-founder, NorthWest AeroBarrier

Heather DeGrella, Sustainable Design Director, Opsis Architecture

Patrick Donaldson, Principal Architect, Harka Architecture

Corey Squire, Sustainability Director, BORA Architecture & Interiors

Juliette Grummon-Beale, Sustainability Lead, Scott Edwards Architecture

Jean von Bargen Root, Principal, Director of Sustainability, MWA Architects

Eli Spevak, Founder & Director, ElectrifyPDX

Linda Craig, Steering Committee Member, Metro Climate Action Team

Diane Hodiak, Executive Director, 350 Deschutes

Neil Baunsguard, Transportation & Climate Advocacy Manager, The Environmental Center

Kraig Buesch, Chapter Chair, Climate Reality Project Portland Chapter