



Pacific Power Vulnerable Population Workshop II Public Notes

Thursday, August 29, 2024, 1:00 – 4:00 p.m., Pacific Time

These notes were synthesized and summarized by E Source, Pacific Power’s meeting facilitation partner.

Executive Summary

There were **26 people in attendance**, including members of the public and PacifiCorp representatives, at the second iteration of the Vulnerable Populations workshop this year. The virtual meeting, which was hosted via the Zoom platform, detailed current vulnerable populations, and Condition 14 settlement vulnerability factors, reviewed the approach to defining census tracts that are vulnerable, and discussed options for changes to geographic methodology and anticipated outcomes. To maximize accessibility, the meeting was recorded for those who could not attend and Spanish and ASL interpretation/translation were provided.

The following is a summary of the content and feedback received during the 3-hour public meeting.

Session Objectives

1. Detail current vulnerable populations and Condition 14 settlement vulnerability factors
2. Review approach to defining census tracts that are vulnerable
3. Discussion options for changes to geographic methodology and anticipated outcomes

Opening

Lee Elder, Load Forecasting Manager, opened the workshop by welcoming the attendees and thanking the public for continued participation. Public perspectives are essential to achieving meaningful impacts on communities. Mr. Elder recapped the June workshop which:

- Introduced CBI Settlement Condition 14 to review and improve the Company’s approach to identifying and tracking Vulnerable Populations (VPs)
 - Considered settlement vulnerability factors (SVF) like sensitive populations, energy security/insecurity, and other socioeconomic factors
- Reviewed current approach to defining VPs
 - Defining Highly Impacted Communities (HICs), VPs

- 18 census tracts in Yakima and 1 in Walla Walla show an overall Environmental Health Disparities ranking of 9 or greater
 - 6 census tracts in Yakima and 0 in Walla Walla are located on Tribal lands
 - A total of 20 census tracts in Pacific Power’s service territory are HICs
- Compared approach to other utilities

Mr. Elder reviewed feedback received on the current methodology which indicates there may be issues with using the survey to track impacts on small populations, such as response rate and survey implementation. In the last meeting, the group advised that Pacific Power should not have to choose one methodology over the other, some factors are better tracked geographically, others via surveying efforts, and geographic target areas should be scaled to the level of investment. It was also advised that the method of locating vulnerable populations does not matter as much as the impact of the policy, being too granular with geographic vulnerable populations may not be worthwhile due to Pacific Power’s small service area. Considering that feedback, there have been some updates. The company is proposing using geographic vulnerable population data rather than a single characteristics approach, which would allow for synthesizing across multiple factors to allow more streamlined tracking, focusing impact tracking on the most intensive need, and making it easier to tie impacts to specific areas. Additionally, Pacific Power conducted initial geographic vulnerable population analysis which assessed settlement vulnerability factors and existing vulnerable population data, undertook data collection effort, created composite scores based on vulnerability factor ranking, and determined initial vulnerable geographies based on composite score ranking.

Pacific Power Washington service territory currently serves 114,000 residential customers throughout Benton, Columbia, Garfield, Kittitas, Yakima, and Walla Walla counties. These areas are largely non-urban with some of the lowest median income levels in the state. Pacific Power service area consists of 43% Hispanic or Latino people, 33% of customers who speak other languages at home, 12% impoverished, and 15% working in agriculture, forestry, fishing/hunting, and mining. These numbers are significantly higher than the statewide percentages, with 13% of Washington being Hispanic or Latino, 19% speaking other languages at home, 7% impoverished, and 3% working in agriculture, forestry, fishing/hunting, and mining.

Proposed Geographic Vulnerable Population Methodology

Washington Department of Health (DOH) has created an analysis that identifies census tracts within Pacific Power service territory as being highly impacted communities, the Environmental Health Disparities (EHD) methodology. The DOH uses 4 categories of variables for the EHD score: environmental exposure, environmental effects, sensitive populations, socioeconomic factors. Washington defines highly impacted communities (HICs) as census tracts that meet at least one of two qualifying criteria: 1) the census tract earns a 9 or 10 Environmental Health Disparity score from the Washington Department of Health or 2) the census tract is covered or partially covered by “Indian Country” as defined in 18 U.S.C Sec. 1151.

Mr. Lee detailed the proposed Vulnerable Population adapted geographic methodology:

- Directionality of variables were determined
 - For example, a lower percentage for access to internet would indicate vulnerability, while a higher percentage of low income would indicate vulnerability
- All Washington census tracts were ranked from least impacted to most impacted for 32 variables
- The average rank was calculated for each census tract. Averages were used to create decile scores (1 to 10)
- Census tracts with a score of 9 or 10 considered vulnerable
- Tribal lands, Qualified Census Tracts (QCTs), and Economic Distressed Communities (EDC) were not used in ranking. Automatically promoted to 10 if flagged
- Unlike HICs, all variables were assigned equal weight so variables like SVF 1 – Disability and SVF 8 – Housing Burden were excluded as they were already measured in other factors

A census tract is considered a QCT if 50% of households with incomes below 60% Area Modified Gross Income (AMGI) or have a poverty rate \geq 25% . A census tract is an EDC if any of the following criteria exists:

1. Has at least 20 percent of very-low income households (<50% of median family income) spending more than 50 percent of income on housing,
2. Considered an “Opportunity Zone” under 26 U.S. Code Section 1400Z-1,
3. Is a Low-Income Housing Tax Credit Qualified Census Tract,
4. If greater than 20 percent of households have incomes below the poverty rate with a rental vacancy rate of at least 10 percent,
5. Greater than 20% of households have income below the poverty rate with a homeownership vacancy rate of at least 10%, or
6. If the census tract is an “Underserved Rural Area”

Pacific Power’s current vulnerable populations, as developed with Equity Advisory Group input, include: households with high school diploma or lower educational attainment, older adults (65+ years), young children (<5 years old), people who have a hearing impairment, people with a disability, *people with medical equipment at home*, diverse supplier business owners, energy burdened, *asset limited, income constrained, employed (ALICE), low-income migrants*, low-income, immigration status (outside of US citizen), people who speak limited English, renters, multi-generational households, multi-family households, *people experiencing homelessness*, people living in rural areas, *people living in different land statuses (e.g., land trust vs. fee patent with different regulatory requirements)*, agricultural/farm works, gas-heated homes, and single parents.

The italicized text will be the focal point of the workshop today for further consideration and discussion, as the other factors have already been explicitly accounted for in the analysis for the vulnerable populations geographic approach. The table below outlines some issues the company has faced when trying to gather research about specific metrics of vulnerable populations.

Consideration	Pacific Power approach:
VP 6 - People with medical equipment at home: Issue – lack of published datasets	Population can be measured by VP 4 – Hearing impairment, VP 5 - Disability, SVF 2 – Cardiovascular disease, SVF 3 – Low birth weight, SVF 11 – Access to health care
VP 9 - ALICE Status: Issue – incomplete state-wide data; 239 census tracts out of 1,458	Population can be measured by VP 11 – Low income
VP 10 - Low-income migrant	Excluded to avoid double counting as VP 10 – Low-income migrant can be measured by VP 11 – Low Income and VP 12 - Immigrant
VP 17 - People experiencing homelessness: Issue – unavailable datasets at the census tract level	Excluded given limited data availability
VP 19 - Different land statuses: Issue – trust and fee land status data not documented consistently across all Washington counties	Yakima County Assessor’s Office data available and will update methodology to include by next workshop

Meeting Discussion:

- Kathleen Saul asked what about people on supplemental oxygen?
 - Mr. Elder offered to take that into consideration and research if people on supplemental oxygen are considered as disabled.
- Charlee Thompson asked how customers with medical certificates may be incorporated into the vulnerable populations data set?
 - The company is accounting for hearing impairments, disabilities, low-birth weight, and cardiovascular disease under VP 6 as obtained from the Department of Health. However, there is not any data for customers with medical certificates. **Mr. Elder offered to research medical certificates and circle back.**
- In relation to VP 17 and the lack of homelessness data at the census tract level, Elijah Cetas asked about obtaining data from homeless shelters.
 - Mr. Elder shared that homeless shelters themselves are not factored into the dataset, but the team would be willing to investigate it.

Pacific Power’s current CBI Settlement Condition 14 vulnerability factors, as developed in workshops, include: disability, cardiovascular disease, low birth weight, higher rates of hospitalization, home care, arrearage/disconnections, estimated energy burden, *housing burden*, access to digital/internet resources, access to food, access to health care, *educational attainment level*, *historical redline influence*, linguistic isolation, race/ethnicity, transportation expense, unemployment, poverty, deep poverty, renter status, seniors with fixed income, housing quality, *areas identified as “high need” or “underserved”*, *areas with average energy burden >6% with annual income <200% FPL*, qualified census tracts (QCT), and communities in economic distress (EDC).

Like above, the italicized text will be the focal point of the dialogue today for further consideration and discussion, as the other factors have already been explicitly accounted for in the analysis for the

vulnerable populations geographic approach. The table below outlines the considerations and approaches the company proposes with justification.

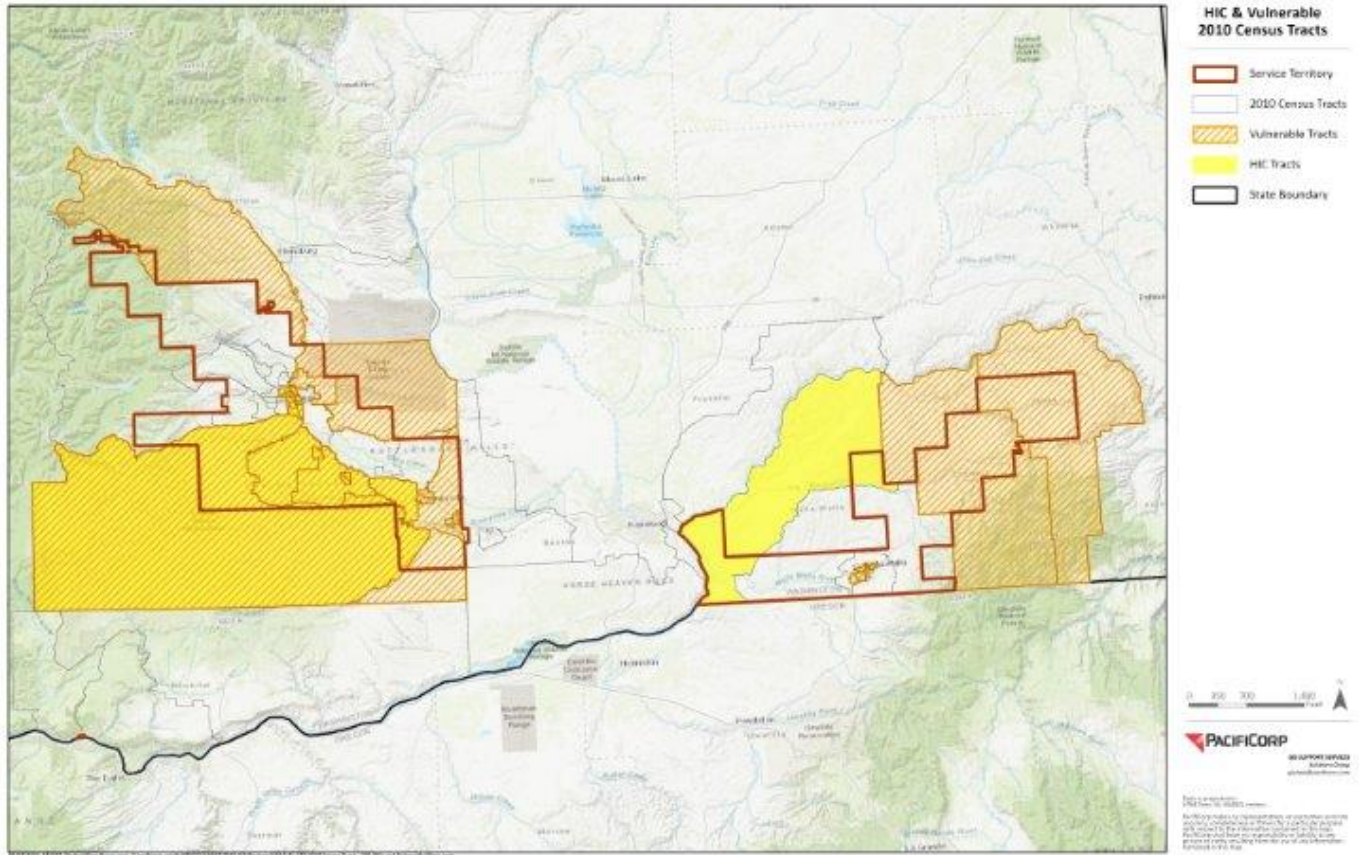
Consideration	Pacific Power approach:
SVF 1 – Disability	Population is measured by VP 4 - People who have a hearing impairment and VP 5 - Disability
SVF 8 – Housing Burden	Excluded SVF 8 – Housing burden to avoid double-counting as it is a component of SVF 22 – Housing quality
SVF 12 – Educational attainment level	Population is measured by VP 1 - Households with a high school diploma or lower educational attainment
SVF 13 – Historical redline influence: Issue – Available datasets only contain data for Washington communities in the Puget Sound area and Spokane	Update methodology to include once dataset becomes available
SVF 23 – Areas identified as “highest need” or “underserved”: Issue – The Biennial Conservation Plan uses CEIP Vulnerable Population methodology to identify areas as “highest need” or are “underserved”	Biennial Conservation Plan (BCP) relies on CEIP processes to determine underserved/highest need. Using BCP as a SVF criterion is circular and inappropriate
SVF 24 - Areas with average energy burden $\geq 6\%$ with annual income $<200\%$ FPL	Vulnerability already measured by VP 8 – Energy Burden and VP 11 – Low income
SVF 5 - Home care: Issue – Unclear population to measure. Home care can be persons in hospice, live-in or partial care at own home, persons needing professional or familial care, those in retirement homes or nursing homes. Counts of Long-Term Care facilities by census tract are available, but this excludes persons living in own home or with family and is not a measure of population size	Similar population can be measured using VP 2 – Older adults, VP 4 – Hearing impairment, VP 5 – Disabilities, VP 15 – Multi-gen household, VP 2 – Cardiovascular disease, VP 3 – Low birth weight, VP 4 – Higher rates of hospitalization, SVF 11 – Access to health care

Meeting Discussion:

- Based on the chart above and the associated constraints, Mr. Elder asked the group what makes the most sense for the company to track.
 - Charlee Thompson expressed gratitude for the post-meeting survey as the group ponders and digests the information presented. The information was presented in a format that makes it easy to follow why certain metrics have been included and tracked and what issues the team is still struggling with.

The company has layered the data and vulnerable populations defined into a singular map to visualize how it looks across Washington. The burgundy outline highlights Pacific Power service territory, and the black border is the Washington state boundary. The solid yellow area represents census tracts within highly impacted communities and the orange striped areas represent vulnerable tracts. This data shows that if a customer is in a highly impacted community, they are more likely to also be in the vulnerable population group, apart from the northwestern corner of the Walla Walla service area. Another

exception is the southeastern portion of the Yakima area, which is a vulnerable population but is not a highly impacted community. Overall, Of the 61 census tracts in Pacific Power’s Washington Service Area, 35 received a VP Score of 9 or 10, 19 of 20 HICs in Pacific Power’s service territory received a VP Score of 9 or 10, QCT and EDC flags promoted 7 tracts to a VP Score of 10, and all census tracts with Tribal Lands received a VP Score of 10.

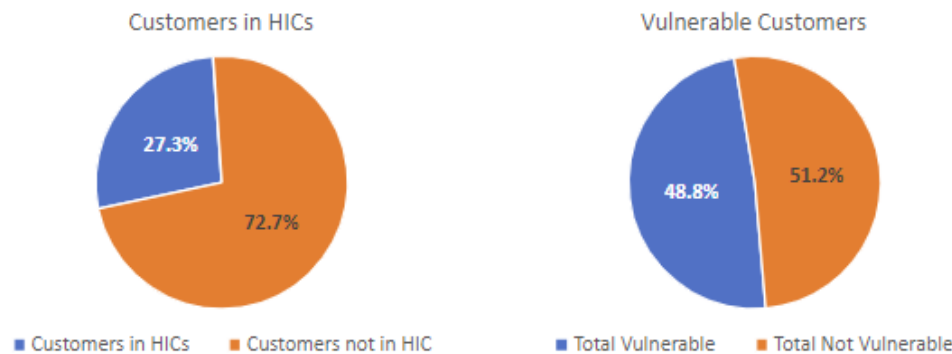


The table below captures the same data from the map in a different format, specifically detailing the amount of highly impacted communities census tracts, vulnerable populations census tracts, and comparing the numbers against total census tracts within the Washington service territory.

Counties in Service Territory	HIC Census Tracts	VP Census Tracts	HIC or VP Census Tracts	Total CTs in Service Territory
Yakima	19	26	26	45
Walla Walla	1	6	7	12
Garfield	0	1	1	1
Kittitas	0	1	1	1
Columbia	0	1	1	1
Benton	0	0	0	1
Total	20	35	36	61

Under Washington Department of Health HIC methodology, 83,224 residents are not considered vulnerable while 31,193 are. Under the Pacific Power proposed geographic vulnerable population methodology, 58,634 residents are considered not vulnerable while 55,783 are. This difference is due to 19 criteria under the HIC approach compared against the company's 32.

These numbers are translated into graph format below.



Meeting Discussion:

Jeffrey Daigle, E Source Facilitator, posed 3 questions to the group.

1. Do the vulnerability factors considered in the proposed geographic analysis reflect the sensitive factors that need to be accounted for?
 - a. Kathleen Saul suggested considering the inequity in access to the benefits that other people are accessing, such as solar electricity and clean water which disproportionately affect migrant communities.
 - b. Elijah Cetas suggested accessing data surrounding whether people have heating and cooling systems. Mr. Cetas also shared a count for the homeless that the Washington Chamber of Commerce conducts by county.
 - i. Mr. Elder expressed gratitude for this information and shared that the team did consider it, but it is not at the geographic level needed and the information is outdated. Nonetheless, the idea of researching homeless shelters may yield better results.
2. Do you believe the expanded vulnerable area reflects locations that are disadvantaged?
 - a. Charlee Thompson answered yes, seeing the expanded set of named communities beyond just what was identified by highly impacted communities and seeing how many more customers are captured through this methodology supports the idea that Pacific Power's approach is more inclusive of vulnerability factors. Ms. Thompson does wonder if there is anything additional to include?
3. Do you have other feedback you would like to provide?
 - a. Mr. Cetas asked what the next steps are following the close of today's meeting.
 - i. After the feedback is reviewed with the team, there will be a 3rd Vulnerable Populations workshop to close the feedback loop. Additionally, the data will be incorporated in the CEIP filing.

Next Steps

Jeffrey Daigle closed the meeting by providing context on next steps, thanking members for feedback and the team for support and putting together a great meeting.

If you have not already, please participate in the post-meeting survey:

<https://forms.office.com/r/R6D3Bgeg4h>