



PGE's Community Benefits & Impacts Advisory Group (CBIAG) Meeting #35

Wednesday, July 22, 2026



Virtual Meeting Participation Tips

- Thank you for joining us today!
- Please join audio by either phone or computer, not both.
- We encourage CBIAG members to turn on your video.
- Please keep your audio on mute when not speaking.
- Observer = you are not a CBIAG member, facilitator or speaker.
- If you experience technical difficulties, please contact program staff at: (832) 535-0731



In-Person Meeting Participation Tips

- We are happy to see those who could join us in-person today!
- Take care of your needs (feel free to stand, move around, etc.)
- Facility logistics (restrooms, exits, allergies, etc.)
- Avoid cross talk and please be mindful of noise level





Facilitation Style & Group Agreements

- Take care of your personal needs as they come up, let facilitator know if you need to step away
- This is a learning space for everyone
- Participate by sharing your responses in the chat, taking written notes, or by raising your hand to speak
- Welcome diverse perspectives; it's okay to disagree
- Facilitator will call on people to speak. This will be done in a way that centers our equity priority communities and not in first come, first serve
- I will use facilitator's privilege and may need to gently interrupt to have you close out your comments and move the meeting forward
- Move up your talking or move up your listening
- Assume and have good intentions
- You do not need to have perfect/fully formed thoughts to share and discuss your ideas with the group
- **These meetings will be recorded with the agreement that access is for CBIAG members, PGE, and third-party facilitators.**
- Any others you all want to add?





AGENDA

- Welcome & Orientation
- Meeting Objectives
- Member Introductions & Check-in Question
- PGE Updates
- Community Based Renewable Energy Request for Offer Update
- Wildfire Community Engagement
- Announcements & Opportunities
- Closing & Next Steps
- PGE Training Center Tour

Meeting Objectives

Agenda Item	Objective	HB 2021 Topic	Engagement
PGE key updates/announcements	Provide key updates on PGE's initiatives and report back on prior questions and follow-up items.	Other items as determined by the electric company and the Community Benefits and Impacts Advisory Group	Inform
Community Based Renewable Energy (CBRE) Request For Offer (RFO) update	Provide updates from CBRE RFO evaluation process.	- Distribution of infrastructure or grid investments and upgrades in environmental justice communities, including infrastructure or grid investments that facilitate compliance with clean energy targets - Actions within environmental justice communities intended to improve resilience during adverse conditions or facilitate investments in the distribution system, including investments in facilities that generate non-emitting electricity	Inform
Wildfire	Provide an update on PGE's wildfire mitigation plan and community engagement efforts. Receive feedback from members on wildfire communications toolkit.	- Actions within environmental justice communities intended to improve resilience during adverse conditions or facilitate investments in the distribution system, including investments in facilities that generate non-emitting electricity - Distribution of infrastructure or grid investments and upgrades in environmental justice communities, including infrastructure or grid investments that facilitate compliance with clean energy targets	Inform & Discuss

Welcome and Introductions



Please state your name and pronouns (if you choose)



Please share what organization(s) you represent, if any



Check-in question: What is something you go back to again and again when you need a pick me up, re-energizer?

PGE Key Updates

Oregon Public Utility Commission (OPUC) Approves POWER Act (UM 2377) Implementation Framework

- OPUC approved PGE's implementation of Oregon's POWER Act on July 7, making PGE the first utility in Oregon to implement the new framework.
- A new rate class (Schedule 96) has been established for large-load data center customers, reflecting their unique energy and infrastructure needs.
- Most existing customer groups will see immediate rate decreases, including:
 - Residential (-1.3%)
 - Small business (-3.7%)
 - Commercial (-2.1%)
 - Industrial (-1.4%)





Community Based Renewable Energy (CBRE) Request for Offer (RFO) Debrief

Presenter: Stasia Brownell, Principal Strategy & Planning Analyst

July 22, 2026

Reflecting on 2024-2025 CBRE RFO

Overall sentiment was positive.

Despite suggestions for improvement, all valued the experience, appreciated the collaborative process, and felt their unique perspectives contributed meaningfully to project evaluation.

Focus areas for future CBRE RFO:



Outcomes: Strengthen community benefit expectations



Credibility: Improve evidence of partnerships and project readiness

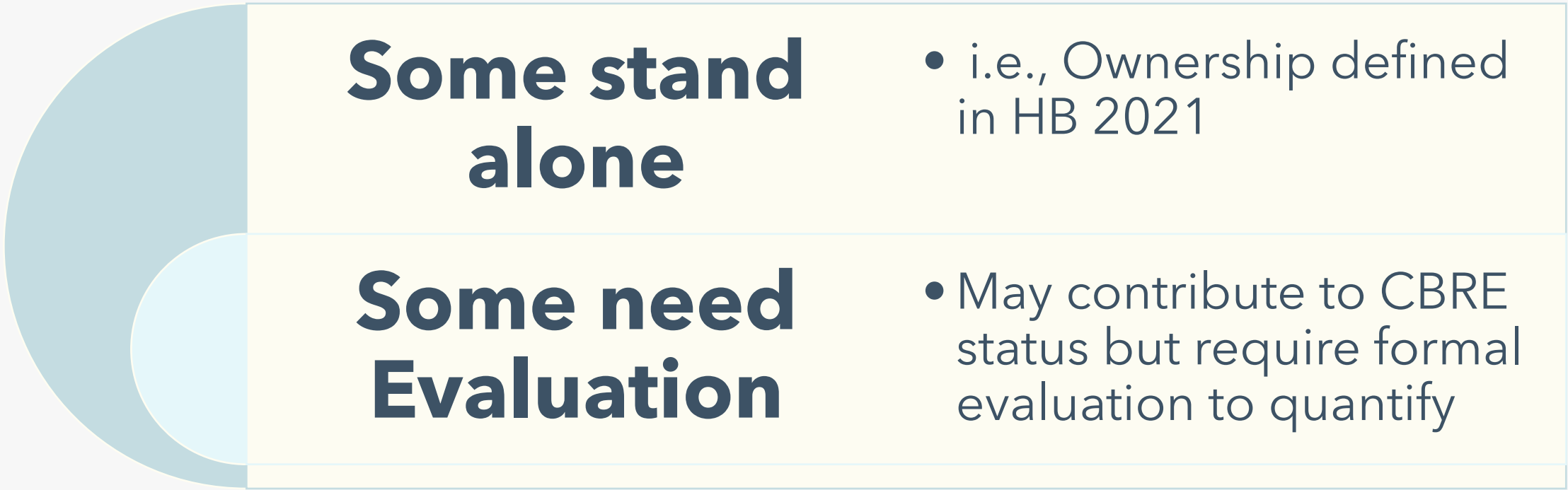


Bid quality: Refine information requested



Evaluation quality: Strengthen evaluation process

CBRE Characteristics



Some stand alone

- i.e., Ownership defined in HB 2021

Some need Evaluation

- May contribute to CBRE status but require formal evaluation to quantify

Near-Term CBRE Eligibility

PGE may consider projects CBRE-qualified if they meet the criteria below to support exploration of non-Request for Offer (RFO) driven CBRE procurement ahead of the 2026 IRP/CEP.


CBRE Characteristics

4/4 CBIAG Debrief Agreement


Majority Owned by Nonprofit 501(c)3
 No external vetting required


Majority Owned by Local Government
 No external vetting required


Majority Owned by Federally Recognized Tribe
 No external vetting required


Conditional Fast-Track

CBIAG Advised Guardrails Required


Public Benefit / Benefit Corporation
 Require legitimacy & accountability evidence (e.g., legally incorporated w/enforceable oversight, formally reported community benefits in PGE area or past project areas) and establish carve-outs to prevent market capture.


Affordable Housing
 Must be at least majority owned by nonprofit 501(c)3, Local Government, or Tribe, cannot *just* be controlled by qualifying entity.

Additional items explored that need more engagement included in appendix.

Focused recommendations

Strengthen Legitimacy and Accountability

Protect Communities and Reduce Harm

Recommendations listed in more detail in Appendix.

Continued Engagement

CBIAG & External stakeholders can expect continued engagement (in no order):

- Community Benefit Indicators work
- Continued exploration of CBRE characteristics and approaches that needed more vetting
- CBREs in IRP/CEP work plan development and/or execution
- Progress / Status reports on CBREs shortlisted from 2025 CBRE RFO
- Future approaches to CBRE evaluation and / or structured procurement processes (i.e., RFO)

Led by **PGE's IRP/CEP Planning** and/or **Clean Energy Acquisition** Teams

Energizer



Wildfire

Presenter: Dani Newcomb, Wildfire Community
Engagement Program Manager

July 22, 2026





Agenda

- **Overview of PGE Wildfire Mitigation Plan**
- **Public Safety Power Shutoffs**
- **Wildfire Community Engagement**
- **Wildfire Communications Toolkit Feedback Discussion**

Discussion Questions for Feedback on Wildfire Communications Toolkit

- What important information, resources, or perspectives should be added to make this toolkit more useful and effective for the communities you serve?
- How do we strike the right balance between sharing utility-specific wildfire information and broader wildfire preparedness resources without it being overwhelming?

2026-2028 Wildfire Mitigation Plan (WMP)



WMP Overview

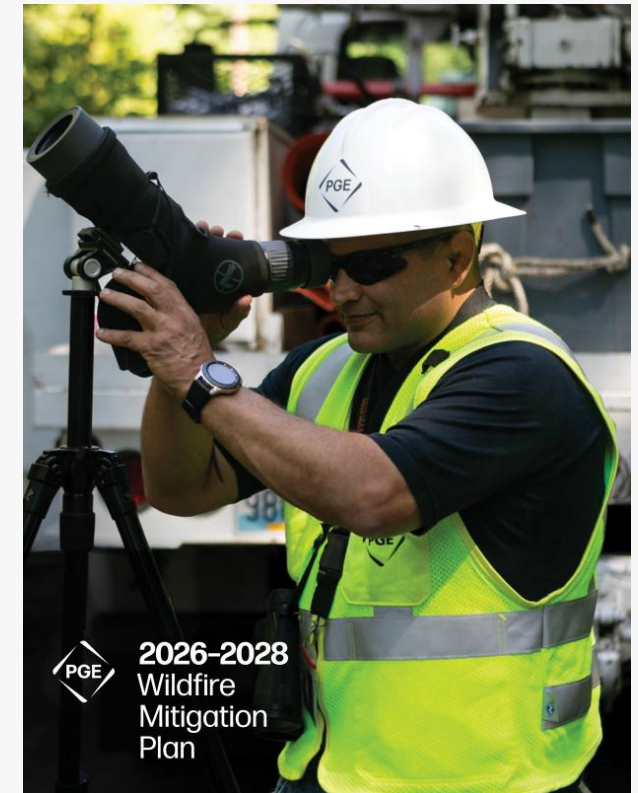
Oregon investor-owned electric utilities (IOUs) are required to develop, file, and operate in compliance with a **risk-based Wildfire Mitigation Plan (WMP)** that is evaluated by the Oregon Public Utility Commission (PUC).

Purpose: Protect public safety and reduce wildfire risk by requiring utilities to proactively identify hazards, mitigate ignition risks, improve emergency response, and strengthen electric system resilience.

WMP Topics Include

- ✓ Wildfire Risk Mitigation Programs & Activities
- ✓ Operating Protocols
- ✓ Public Safety Power Shutoff Events
- ✓ Asset Management & Inspections
- ✓ Vegetation Management
- ✓ Research & Development
- ✓ Community Outreach & Public Awareness

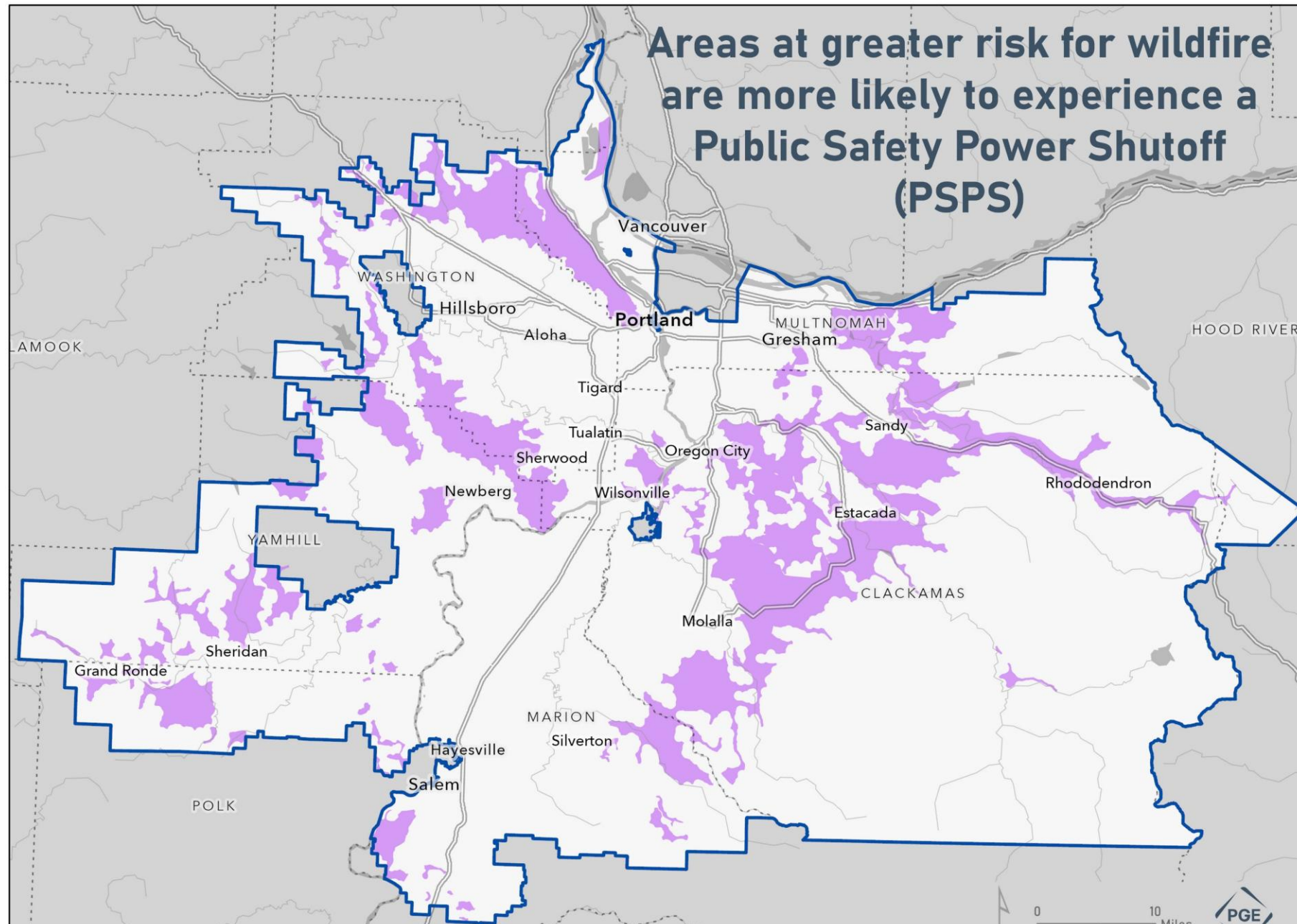
**PGE's 2026-2028 WMP
approved by OPUC on
6.25.2026**



portlandgeneral.com/wildfire



Areas at greater risk for wildfire are more likely to experience a Public Safety Power Shutoff (PSPS)



PGE can shut off power anywhere in the service area if certain conditions arise.
Everyone should be prepared for power outages.

0 10 Miles
4/8/2026



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Sources: Esri, TomTom, Garmin, FDO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Sources: Esri, TomTom, Garmin, FDO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community

Grid Design and System Hardening Investments



Fire mesh pole wrap



A specialized, fire-resistant mesh designed to protect wooden utility poles from wildfires

Ductile Iron Poles



Durable utility poles made from iron that are strong and fire resistant

Points of Isolation

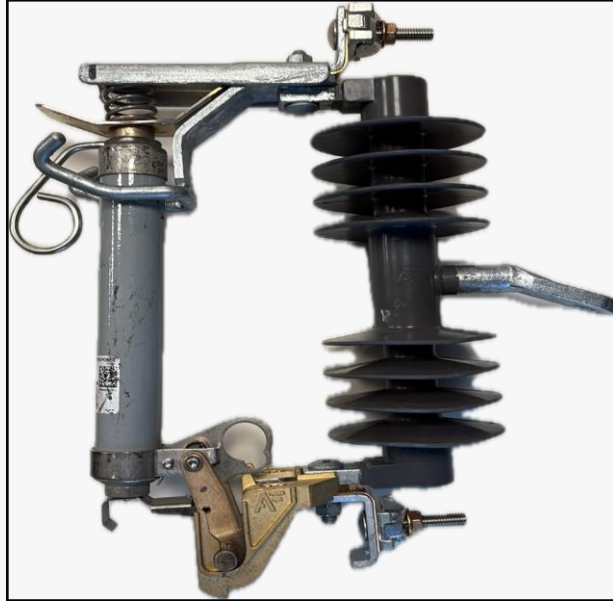


A place on a power line where electricity can be shut off to one section, helping prevent wildfires

Grid Design and System Hardening Investments



Fire Safe Fuses



A specialized electrical safety device that stops the flow of electricity when there is an issue on the line

Covered Conductors



Power lines that are coated with insulating materials, which increases safety and reliability

Undergrounding



Burying power lines below ground instead of placing overhead helps prevent wildfire in higher risk areas

Situational Awareness



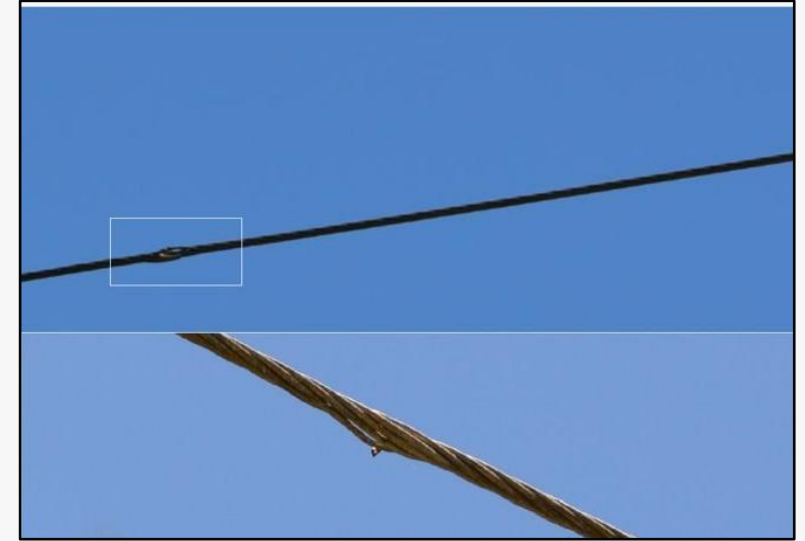
Weather Stations

- **90+ weather stations** enable granular, data-driven PSPS decisions
- 10 more stations planned for 2026 expansion
- Public data sharing improves forecasting & extreme weather analysis weather events



AI Fire Detection Cameras

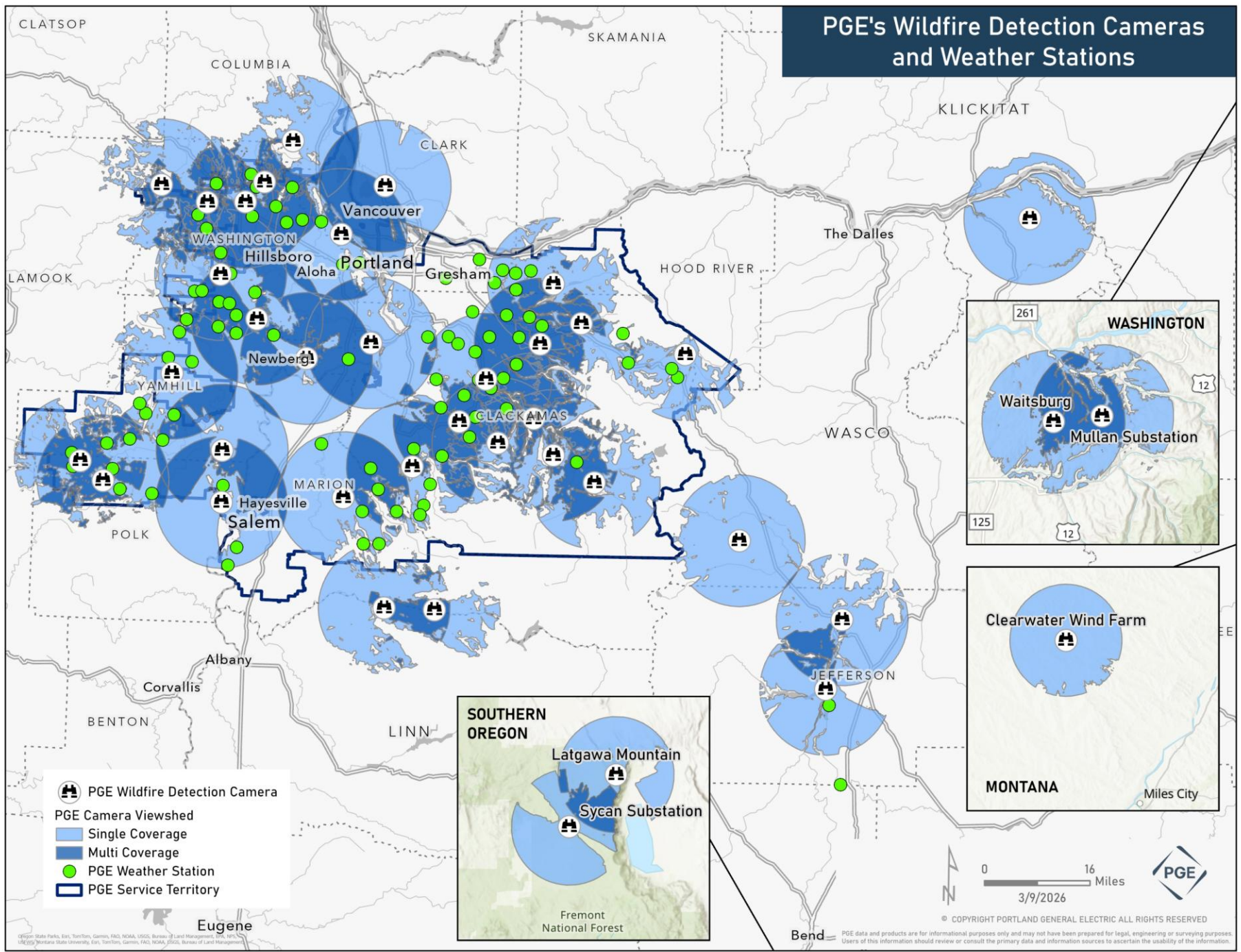
- **39 AI-powered cameras** provide 24/7 wildfire monitoring across high-risk areas
- Alerts PGE and public safety partners of potential ignitions
- 360° detection with triangulation accuracy within ~100 yards



Early Fault Detection

- Early Fault Detection is a technology that uses sensors to identify problems before they cause damage to powerlines, helping prevent fires or outages.

PGE's Wildfire Detection Cameras and Weather Stations



Operational Practices: Line Inspections

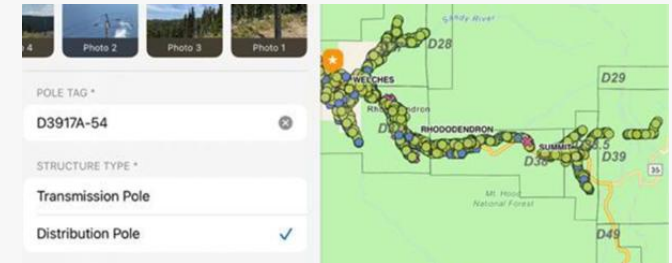


- PGE performs equipment safety check each year in areas of greater fire risk
- Inspectors examine wires, crossarms and even equipment owned by other companies (like phone or cable providers) that share the pole.
- Inspectors use a variety of specialized tools like drones and infrared cameras to see what the human eye might miss.

2025

27,027

pole inspections

2026

30,308

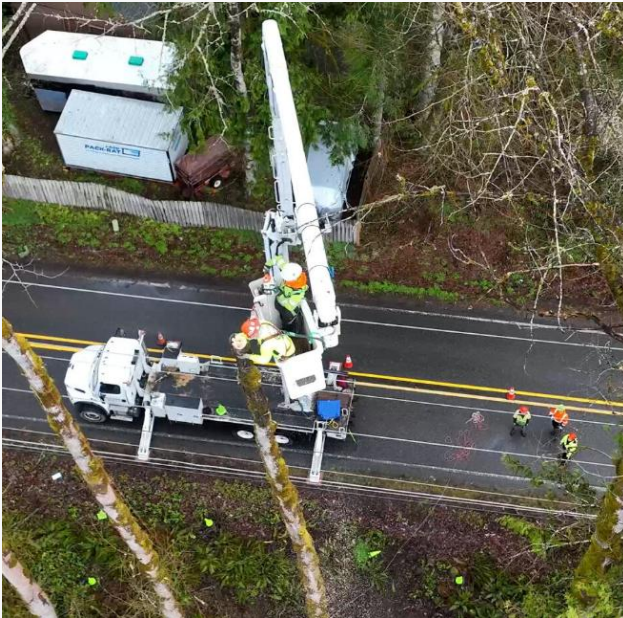
pole inspections



Vegetation Management

PGE has a focused vegetation program for areas with higher wildfire risk. Before fire season each year, we inspect these areas for problem vegetation that could become a fire hazard. We also check these areas throughout the year for trees that may need to be trimmed or removed to help reduce wildfire risk.

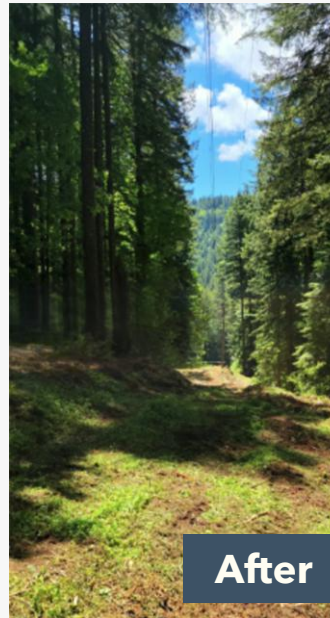
PGE inspects more than **578,000 trees** along **over 1,000 miles of powerlines** in our high fire risk areas.



PGE contract crews partner with Ant Farm, supporting workforce training that helps fire risk communities improve defensible space.



Before



After

These photos show mowing operations in Mt. Hood National Forest to manage vegetation and reduce fuel loading near PGE powerlines.



PGE contract forestry crews use bucket trucks to safely access and remove hazard trees near powerlines.

Enhanced Powerline Safety Settings (EPSS)

What is it?

- Advanced **safety** technology
- Automatically **de-energizes power lines**
- Critical tool during high fire-danger conditions

How does it work?

- **Sensitive sensors** detect faults, like from a tree branch
- **Automatically shuts off power**
- Reduces the chance of sparks

What does it mean for me?

- May result in longer outages if crews need to inspect powerlines
- PGE will provide outage notification
- **Emergency preparedness plan**

Public Safety Power Shutoffs

Public Safety Power Shutoff (PSPS): A timeline

1

I'm preparing
for a possible power outage
all year round



- Create an outage kit and make a plan for your home or business.
- Make sure PGE has your current contact information so you can stay updated.
- If your medical needs require electricity, join our Medical Certificate program.

2

**I've been
given notice**
that my power may be
turned off



- Activate your outage plan by charging electronic devices and checking on family members and neighbors.
- Know how to safely use backup power options like generators, backup batteries and heating, cooling and cooking devices.

3

**I've had my
power turned off**
to help ensure my safety
and that of my community



- Now that your plan is fully activated, make sure you continue checking on neighbors and loved ones.
- Keep checking the PGE website for updates.
- Find out about the different resources available at your local PGE Community Resource Center.

4

**I'm waiting for my
power to come back**
once PGE is able to inspect
lines and repair any damage



- Visit a PGE Community Resource Center to get ice and water while charging your electronic devices.
- Check for regular updates from PGE and share what you learn with friends, family and neighbors. We'll send updates every 24 hours, if not sooner.

5

**I'm glad my power
is back on**
and I'm continuing to refine my
preparation plans for next time



- Check with neighbors to see if they need help getting back to normal.
- Refine your plan based on lessons learned during the outage. Consider what worked well, what could have worked better and if there are any supplies or devices that would be good to have next time.



Community Resource Center—Recharge Relief



PGE Trailer



Water



Ice



Information



Charging



WiFi

What?

Mobile Resource Units placed in communities experiencing a PSPS to provide a few essentials until the power is restored.

Where?

Easy to find locations such as grocery stores or schools. During a PSPS, exact locations will be shared through news outlets, PGE website and social media.

Why?

Being without power can be hard. PGE wants to help provide relief and the most up to date information.



Welches CRC, Sept 2022

September 2022

During this PSPS event, five Community Resource Centers served approximately 2,500 PGE customers.



Wildfire Community Engagement

Wildfire Awareness and Education

- PGE websites like:

portlandgeneral.com/wildfire

- Customer communications

- Emails
- Direct mail
- Bill inserts
- Newsletters

- Media engagement
- Advertising
- Social media
- Partnerships with community-based organizations

Rooted in Safety: Growing the next generation of wildfire prevention arborists

PGE provides demonstration on safe tree-trimming near power lines for local youth work development group



Create a summer outage kit

Having essentials in one place helps everyone feel more at ease. Make sure everyone in your household knows where the kit is kept. Start with:

- Flashlights or headlamps and extra batteries
- A battery-powered or hand-crank radio
- Car chargers for phones and devices
- Bottled water for people and animals
- Emergency contacts, including PGE at 1-800-477-2286

Wildfire safety and prevention

Safety is our top priority. PGE prepares year-round for extreme weather conditions and works every day to help prevent wildfires and protect the communities we serve. We're investing in new technology, upgrading infrastructure and working with community partners to make our system more resilient.

Here's how we're working to help prevent wildfires:

- Moving powerlines underground and insulating lines to reduce fire risk.
- Using metal power poles and wrapping wood poles with fire-resistant mesh.
- Installing fire detection cameras to detect fires early.
- Monitoring weather conditions daily.
- Enhancing our powerline safety settings to reduce fire risks.
- Using Public Safety Power Shutoff protocols when needed to keep communities safe.
- Enhancing vegetation management on plants and trees to lower fire risk.



It takes all of us

We work closely with local, state, tribal and federal land and emergency management agencies, fire districts and emergency responders so we can plan for emergencies before they happen. This coordinated approach allows us to understand each other's unique needs for support and improve our Wildfire Mitigation Plan. It also allows us to identify opportunities for stronger partnerships and prepare for a range of emergencies, such as our wildfire response and Public Safety Power Shutoffs.



What is a Public Safety Power Shutoff?

Sometimes when it's dry and windy outside, we have to turn the power off to keep you, your home and neighbors safe. This is called a Public Safety Power Shutoff.

Learn how you can be ready and help your family be prepared when the power goes out.



Portland General Electric

Aug 28, 2024 · 🌐

It's time to get your home's outage kit ready for summer. Including the essentials is important to keep your family prepared for whatever wildfire season brings our way. Learn more about how you can take power in being prepared. [#PowerToPrepare](#)

https://portlandgeneral.com/outages-safety/safety/wildfire-safety-and-prevention?utm_source=facebook&utm_medium=organic-social&utm_campaign=wildfire-preparedness&utm_content=2024-summer-media-coverage-wildfiresafety-en



Public Safety Partner and Local Government Engagement

- PGE-led Public Safety Power Shutoff exercise
- PGE participation in planning, training, and exercising hosted by public safety partners
- PSPS active incident coordination (as necessary)
 - Notifications
 - Information sharing
 - Real-time monitoring and evaluation
 - Operational coordination
- Provide wildfire briefings and communications to local governments and municipalities
- PGE Wildfire Mitigation Plan improvement coordination engagement



Community Engagement

- 2026 PGE **Wildfire Ready events** (5 in-person, 2 virtual)
- Community-hosted **engagement events**
- **One on one meetings** with community-based organizations to understand preparedness needs and improve outreach
- Developing **partnerships** with CBOs to expand reach of PGE wildfire and PSPS messaging via trusted community partners
 - Thank you to Upstream Access for your partnership, support at community events, and integration of PSPS information into your messaging
- **Expanding engagement/messaging** to non-customers (ex: short-term rentals, migrant farm workers)
- **Wildfire communications toolkits** sent to CBOs, regional Public Information Officers and emergency management personnel
 - Any feedback from the CBIAG?



PGE Wildfire Communications Toolkit

Toolkit Overview

- Toolkit is updated annually and sent to city and county Public Information Officers (PIOs) and CBOs
 - 2026 we expanded the CBO list to +300 organizations
- Goal is to have info in one place that is easy to cut, paste, and share
- Provides key PGE wildfire info, but also broader wildfire preparedness and defensible space information from partner organizations
- Sent in English and Spanish
 - PSPS-specific info is available in 15 languages

What we heard

- Need larger font
- Animated videos that explain key topics and have voice over
- A need for customized outreach and education through trusted local partners
- Communication gaps for non-English speakers, renters, older adults and people with disabilities

Wildfire Communications Toolkit

Portland General Electric Wildfire Communications Toolkit 2026

Portland General Electric is actively reaching out to customers as wildfire season approaches, sharing preparation information and steps we're taking to be ready. We have packaged messaging and communications collateral for you to share with your audiences.

Please share this information on your website, in newsletters and on your social media channels, as appropriate. If you have any questions about these materials, please contact communityconnect@pgn.com.

NOTE: If we need to call a Public Safety Power Shutoff (PSPS), PGE will share event-specific information across multiple channels including our website, social media, outreach to PIOs, community-based organizations, public safety partners and media.



Wildfire Communications Toolkit

ONLINE RESOURCES

Portland General Electric

[Wildfire Safety and Prevention](#) contains information relevant to preparedness activities, PGE's Wildfire Mitigation Plan and FAQs about how to prepare for wildfire.

[Wildfire Season: How You Can Prepare](#) is dedicated to information specific to customer preparedness including how to create an emergency plan and a summer outage kit.

[Public Safety Power Shutoffs \(PSPS\)](#) focuses on PSPS-specific information, how it works, what to expect, and why PGE would need to call one.

[PSPS Multi-Language Information](#) is a page where you can find wildfire safety and PSPS information in 15 different languages.

PGE's [Wildfire Safety Media Gallery](#) is a resource available to the public where we have photos, video and b-roll.

Wildfire Communications Toolkit

State of Oregon

[Oregon's Department of Emergency Management](#) has resources for businesses, including a [checklist](#) to evaluate preparedness steps, what to do during and immediately after a disruptive emergency event and ways to recover. [Be Two Weeks Ready](#) is a resource everyone can use to prepare for emergencies.

Use [ORAlert.gov](#) to sign up for your county's emergency notifications. You can opt-in to receive critical emergency messages via email, phone call, and text during times of disasters. We recommend you sign up for any county you regularly spend time in.

[The Oregon State Fire Marshal](#) is a great resource for ways to prepare your home or business for wildfire season, including [building defensible space](#) to help prevent the spread of wildfire.

Regional and National

The Regional Disaster Preparedness Organization's [Critical Safety Messages](#) page provides over 1,200 messages covering 16 topics in 32 languages. You can use these messages to create social media content, emergency alerts, website information and educational flyers before and during natural disasters and other emergencies.

The Federal Emergency Management Agency provides a [planning guide for businesses](#) that includes a range of planning tools, including power outage toolkits and a [guide specifically designed for healthcare facilities](#). [Ready.gov](#) provides information in multiple languages for individuals to plan and prepare for wildfires.

[Watch Duty](#) is a non-profit organization that shares public safety information in real-time from verified sources.

The American Red Cross provides resources you can use to learn about [wildfire safety](#) and [preparedness toolkits](#) with checklists available in nine languages to support planning.

Wildfire Communications Toolkit

COLLATERAL

These are documents you can print and share or post on your website. You can find these documents and additional content for download on our [Wildfire Safety and Prevention](#) page.

[Wildfire Safety and Prevention info sheet](#)

This one-pager provides an overview of PGE's year-round focus on wildfire protection and steps customers can take to get prepared.

[Public Safety Power Shutoff \(PSPS\) info sheet](#)

This one-pager provides an overview of what a Public Safety Power Shutoff (PSPS) is, the conditions that would lead to one and where PGE is most likely to shut off power.

[5 Steps of a PSPS](#)

This document highlights the general steps of a Public Safety Power Shutoff (PSPS) to help set expectations and educate customers on how a PSPS works.

[Wildfire preparation brochure](#)

This is a comprehensive brochure with wildfire season preparedness tips and information.



Wildfire Communications Toolkit

APPROVED COPY

Please feel free to share the messages below with your respective audiences via email, newsletter, social media or your website.

How is PGE preparing for wildfire season?

More extreme weather, including droughts and heat waves that dry out forests and vegetation, is intensifying wildfire risk. Keeping customers and communities safe is one of Portland General Electric's top priorities, which is why they plan and prepare year-round for inclement and extreme weather conditions. PGE works day-in and day-out to prevent wildfires and protect people, property and public spaces. Regardless of the season or time of year, everyone has a part to play when it comes to readiness. Learn more about how [PGE is preparing](#) and ways [you can prepare](#)!

Newsletter copy

The summer months bring an increased risk of wildfire, and extreme weather conditions could lead to a Public Safety Power Shutoff, also known as a PSPS. Everyone has a role to play when it comes to being prepared.

Make a plan to keep your family or business safe during an outage and know where you'll go if you need to relocate. For those with a medical condition which care requires electricity, or if electricity is needed for livestock or crops, it is essential to have a plan in place.

Create an outage kit by gathering what you'll need to keep your family or business safe if power goes out. Make sure everyone knows where to find it.

Stay in the know by updating your email address and phone number with PGE (or your respective utility) so they can stay in touch in the event of an outage.

Find information and resources at portlandgeneral.com/wildfire.

Discussion Questions for Feedback on Wildfire Communications Toolkit

- What important information, resources, or perspectives should be added to make this toolkit more useful and effective for the communities you serve?
- How do we strike the right balance between sharing utility-specific wildfire information and broader wildfire preparedness resources without it being overwhelming?

Let's
meet the
future
together.





Announcements and Opportunities

Send future announcements to CBIAG@pgn.com

PGE Community Engagement Upcoming Outreach Events

Salem-Keizer Public Schools Title 1 Resource Fair (Salem)

Monday, July 27, 4-6:30 p.m.

Virginia Garcia Free Food Market (Newberg)

Thursday, August 6, 11 a.m.-2 p.m.

Virginia Garcia Free Food Market (Cornelius)

Friday, August 7, 11 a.m.-2 p.m.

Family Building Blocks Riverfront Family Festival (Salem)

Saturday, August 8, 10 a.m.-2 p.m.

Sunshine Division Family Resource Fair (SE Portland)

Thursday, August 20, 7-11 a.m.

North Clackamas School District Resource Fair (Milwaukie)

Tuesday, August 25, 3-7 p.m.

Marianas Alliance for Growth Islanders Festival (Troutdale)

Saturday, August 29, 10 a.m.-6 p.m.

Next Steps

What to expect after this meeting:

- A high-level meeting recap and post meeting survey will be emailed to CBIAG members
- The presentation deck will be available in the CBIAG member hub
- Member self-assessment

Next CBIAG meeting:

- **Wednesday, August 26 from 10:00am - 12:00pm**

- In-person attendance option:

Immigrant and Refugee Community Organization
(IRCO) Pacific Islander & Asian Family Center
8040 NE Sandy Blvd. Portland, OR 97213

Appendix

Acronyms and Abbreviations

\$	Dollar
%	Percent
&	And
/	Or
@	At
~	Approximant
+	Plus
=	Equal
>	Greater than
AI	Artificial Intelligence
CBIAG	Community Benefits & Impact Advisory Group
CBO	Community Based Organizations
CBRE	Community Based Renewable Energy

CEP	Clean Energy Plan
E.g.	Example
Etc.	etcetera
HB	House Bill
i.e.	that is or in other words
IRP	Integrated Resource Plan
PGE	Portland General Electric
PSPS	Public Safety Power Shutoff
PUC	Public Utility Commission
QF	Qualifying Facility
RFO	Request for Offer
WMP	Wildfire Mitigation Plan

Near-Term CBRE Eligibility

Items below were explored with CBIAG members who participated in scoring the 2025 CBRE RFO but there was not enough consensus to justify moving forward without further consideration from CBIAG and stakeholders and / or via formal evaluation process.

 Excluded / Needs Vetting Additional Review	
 Labor Union / 501(c)5 Business leagues & Lobbying Orgs / 501(c)4 also excluded NO 3	 Taxes or fees to finance project Residential customers should have opt-in option for any taxes or fees to cover development costs from local gov to qualify as CBRE. NO 2
 Jail / Police Building Optically & substantively complicated; additional vetting required. Workforce development identified as potential benefit. NO 1 MAYBE 1	 Donation / virtually-paired community benefits Do NOT scale without accountability requirements – exploitation potential and lack of integrated benefit are disqualifying concerns. YES 1 NO 1 MAYBE 2
 Local Branch of Federal Government Bureau of Land Management land in Oregon is an example of ineligible local Federal Government footprint. YES 2 NO 1	 Microgrid serving CBRE qualifying entity Access to a microgrid alone doesn't trigger CBRE status currently. CBIAG leans towards enabling but requires more evaluation. YES 2 NO 1 MAYBE 1
 Cooperative (Co-op) Coop ownership does not automatically qualify as CBRE. Further CBIAG evaluation and additional proof of legitimacy (member composition, direct member benefits) needed; shell Coop risk identified. YES 2 NO 1 MAYBE 1	 Leasing property from CBRE qualifying entity Lease agreement in lieu of ownership doesn't trigger CBRE status currently. CBIAG leans towards enabling but requires more evaluation. YES 3 NO 1

Additional CBRE Recommendations

Strengthen Legitimacy and Accountability

- Require documented community endorsement from any group identified as a current, prospective, or past project partner or beneficiary.
- Require an executed Memorandum of Understanding (MOU) or Community Benefits Agreement (CBA) to be included as a material exhibit to the Power Purchase Agreement.

Protect Communities and Reduce Harm

- Require documented disclosure and acknowledgement of key project impacts and obligations—including property tax liability, end-of-life responsibilities, operational risks, and noise impacts—in MOUs/CBAs with nonprofits, local governments, and Tribes.
- Ensure nonprofits, local governments, and Tribes receive information on all available development pathways (e.g., net metering, QF, CSP, CBRE) for projects proposed on their property, regardless of ownership structure
- Require MOUs/CBAs to clearly define community benefit goals, performance expectations, reporting requirements, and accountability measures.