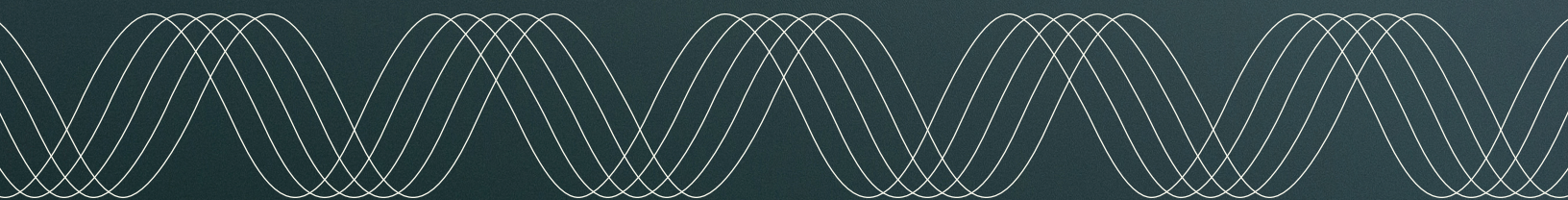




Strategic Tribal Engagement Plan



Acknowledgment

“Everywhere you are, Indians have been...
Every hill, every creek, every meadow, every forest,
every inch of Oregon has a story of its connection
to the indigenous peoples who lived here.”

— *Testimony of Jeremy Fivecrows (Nez Perce)
to Portland City Council, 2005*

We take this opportunity to honor the Indigenous Peoples who continue to care for the lands that we work in since time immemorial, and who continue to remind us that living in a place creates responsibilities to the water, air, animals, land and its people.

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Introduction

PGE is committed to proactive, strategic, and effective Tribal engagement and partnership in recognition of Tribal sovereignty. As a company, we have deep respect for Tribal wisdom, worldviews and work. Developing a programmatic approach to Tribal relations will ensure that meaningful Tribal engagement is standard practice across PGE. PGE’s Strategic Tribal Engagement Plan (STEP) provides a framework for PGE’s approach to working with Tribes.

Purpose of STEP

PGE’s STEP provides a framework for PGE teams to develop and maintain successful Tribal partnerships by setting goals, identifying actions and implementing best practices to ensure desired outcomes through Tribal relations.

This document is intended for PGE employees who work with Tribes, to provide consistency in how we approach Tribal relations. PGE is invested in and thoughtful about our Tribal engagement strategy, which informs our work at the highest level. This document does not replace any existing guidance specific to individual work spheres.

PGE currently has the opportunity to work closely with federally recognized Tribes in Oregon, Washington and Idaho, including:

- Confederated Tribes of Grand Ronde
- Confederated Tribes of Siletz Indians
- Confederated Tribes of the Umatilla Indian Reservation
- Confederated Tribes of Warm Springs
- Confederated Tribes and Bands of the Yakama Nation
- Cowlitz Indian Tribe
- Nez Perce Tribe

In the future, we may have the opportunity to engage with other Tribes not listed above. Tribes are PGE’s customers, business partners, stakeholders and regulators. As such, PGE’s mission is to be thoughtful and strategic when working with Tribes. We are a leader among businesses nationally in Tribal consultation and partnerships.

Alignment with PGE strategy

We acknowledge that our journey toward a clean energy future must include Tribes as partners. Tribes are sovereign governments, economic drivers, political influencers and nation builders. PGE's service territory and generation sites are part of Tribal Ceded¹ and Usual and Accustomed² lands. The Confederated Tribes of Warm Springs has been PGE's business partner on the Pelton Round Butte hydroelectric project for over six decades. The Confederated Tribes of Grand Ronde are one of our key customers. Tribal governments support the regulatory process when they review PGE's environmental and licensing permits. All regional Tribal governments act in a stakeholder capacity and review our Federal Energy Regulatory Commission (FERC), Energy Facility Siting Council (EFSC) and other licenses and permits. We work closely with Tribes to negotiate franchise agreements for transmission lines. Our service territory and generating areas are also home to multiple individuals and communities who identify as Native American and Alaska Natives. Last but not the least, individuals who identify as Native American are part of our employee workforce.

As such, Tribal relations are a critical part of our company's overall strategy and operations. We have multiple touch points with Tribes across the company, be they in Operations, Public Affairs, Transmission Services, Strategy and Integration, Distributed Systems Planning, Key Customer, Power Operations, Environmental and Licensing, including fish passage, recreation facilities or managing our cultural resource impacts. Moreover, it aligns with PGE's Diversity, Equity and Inclusion best practices.

STEP is one tool that strengthens PGE's overall purpose

We exist to power the advancement of society. We energize lives, strengthen communities, and drive advancement in energy that provides social, economic and environmental progress.

Our company vision is to lead the clean energy future. Together with our customers, stakeholders, and communities, we will lead the energy transformation by decarbonizing, electrifying, and performing. As an important and multifaceted demographic, Tribes and Tribal interests are intrinsically connected to our imperatives. PGE's success with Tribal relationships will help our path towards our three long-term imperatives — decarbonize, electrify and perform.

1. Ceded lands: Areas where a Tribe did "cede, relinquish, and convey to the U.S. all their right, title, and interest in the lands and country occupied by them" at treaty signing or when reservations were established.

2. Usual and Accustomed lands: Lands within and adjacent to areas to which a tribe(s) usually traveled or was accustomed to travel to hunt, fish, gather roots and berries or for any other cultural or spiritual purposes.

STEP goals

PGE's Strategic Tribal Engagement Plan describes three goals to ensure desirable outcomes:

1

Tribal sovereignty

2

Tribal partnerships

3

Program weave

Tribal sovereignty

Ensure the company learns, understands and respects Tribal legal interests and perspectives as they pertain to PGE's strategy and operations. And how those operations may directly or indirectly impact Tribal governments and their members.

OBJECTIVE	ACTION	OUTCOME
Support the company's understanding of Tribal perspectives and its application to our responsibilities of consultation.	Provide STEP training to heighten cultural competence and humility on Tribal rights, federal and state law, Tribal history, cultures, traditions and best practices to company leaders, key managers and appropriate staff whose work interfaces with Tribes.	Policy and resource management decisions that appropriately integrate Tribal rights and interests.
PGE staff to engage with Tribes in substantive and meaningful consultation in support of PGE objectives.	<ol style="list-style-type: none">1. Develop best practices for Tribal consultation.2. Educate staff to identify and advance Tribal partnership opportunities.3. Evaluate emerging policy issues with Legislative Affairs staff and provide recommendations. Confer annually with Tribal leaders and staff to identify emerging policy and project work to proactively address Tribal consultation requirements.	Meet and exceed compliance with required regulations around Tribal outreach and consultation.

Tribal partnerships

Leverage partnerships to maximize mutual success.

OBJECTIVE	ACTION	OUTCOME
Identify partnership opportunities with Tribal governments, inter-Tribal organizations, Tribal Affairs teams in other organizations, Tribal community organizations and Tribal employees to further PGE's strategic goals of decarbonization, electrification and performance.	Identify, organize, and participate in relevant events and programs that offer networking and relationship-building opportunities between PGE and Tribal personnel.	<ol style="list-style-type: none">1. Increase mutual trust between Tribes and PGE, which provides a foundation for long-term successful partnership.2. PGE's management decisions and actions appropriately consider Tribal issues.3. Enhanced capacity building in Tribal communities.

Program weave

Promote integration and use of STEP throughout the company.

OBJECTIVE	ACTION	OUTCOME
STEP is effectively integrated into PGE's programs that interface with Tribes.	<ol style="list-style-type: none">1. Provide STEP Training to identified staff.2. Advise leadership on relationship building, communications and messaging in speeches, briefings and updates, where appropriate.3. Co-organize on-the-ground events and opportunities with PGE leadership and Tribes.4. Identify opportunities to highlight STEP at trainings, conferences and professional society meetings.	<ol style="list-style-type: none">1. Increased awareness of Tribal concerns and needs, and PGE's success in addressing those appropriately.2. Tribes regard PGE as an engaging partner across horizontal and vertical lines, with appropriate alignment and relationships between individuals at the right level.

STEP roles

At PGE, every employee has an opportunity to be a champion of Tribal relations. We encourage learning about area Tribes, developing a deep regard and respect for Tribal worldviews and being a diligent company representative.

There are several roles that are responsible for PGE's Tribal relations. These are generally described below.

Tribal Liaison

PGE's Tribal Liaison is part of the company's Government Affairs team. This position is responsible for the overall programmatic implementation of PGE's STEP. It reports to the Director of Government Affairs. Primary responsibilities of the Tribal Liaison include:

EXTERNAL

- Conduct regular and sustained outreach to Tribal government, leadership and staff in support of PGE's initiatives.
- Identify common interests with Tribes when consistent with PGE's overall objectives.
- Coordinate PGE involvement and Government Affairs efforts as needed in federal, state, local agency and community forums on legislative efforts and other matters related to Tribal issues or interests.
- Establish and maintain favorable strategic relationships with state and federal agency personnel, other utilities, customer representatives and interest groups on issues of mutual Tribal interests.
- Serve as a company spokesperson at appropriate forums; represent PGE at Tribal events.
- Organize and host meetings with Tribal Leaders and PGE leadership and staff.

INTERNAL

- Provide expertise and timely support to other PGE groups on Tribal matters, including supporting business initiatives with Tribes.
- Monitor and report on topical or pertinent regional and national Tribal energy issues.
- Maintain awareness of regional inter-tribal relations.
- Advise front line staff and key managers who interact with Tribes on conflicting/competing interests or possible impacts of proposed PGE actions on Tribes.
- Develop training materials for use by PGE management and staff on Tribal relations.
- Regularly report to management on status of major initiatives, agency rulemakings or similar proceedings, and activities related to Tribes.
- Assist in NEPA or NHPA Section 106 consultation where Tribes' interests intersect with regional issues where likely to be political or sensitive.
- Review major communication going to Tribes.
- Be aware of Tribal issues imminent in other parts of the company and support staff, as needed.
- Serve as a facilitator with Tribes that we do not have relationships with currently.
- Serve as a cultural consultant and advise on culturally appropriate responses for a variety of events such as seasonality of communications, the death of a Tribal leader, elder or community member.
- Advocate to preserve confidential Tribal files, photos and records with PGE's Records and Information Management (RIM) team to create a virtual and physical storage system for Tribal records with controlled access. Note that privileged documents are handled separately by PGE Legal which has its own document storage system.

When should PGE's Tribal Liaison be involved?

- Any direct communication with Tribal leaders, elected Tribal positions or Tribal elders.
- Projects that have connections between Tribal interests and a larger PGE issue or strategy.
- Issues with ongoing litigation involving Tribes where appropriate.
- NEPA and NHPA consultation involving a Tribe with issues where likely to be political or sensitive.
- Sensitive Tribal issues involving but not limited to burials, human remains, Traditional Cultural Properties (TCPs) and Historical Properties of Cultural and Religious Significance to Indian Tribes (HPCRIT).
- When a new Tribal point of contact needs to be identified.
- New transmission interconnect requests from potential developers on Tribal lands.
- Legislative issues involving Tribes.
- Tribal issues with potential regional trigger.
- Tribes have interest in PGE property.
- Property disputes involving Tribes.
- Identifying the right Tribes on specific projects.
- Tribal elders or Tribal leadership are invited to PGE's facilities.

Director, Public Affairs

- Provides regular oversight to STEP and Tribal Liaison.
- Has overall oversight of STEP program.
- Leads key PGE communications to federal and state delegations, Governor's office or other elected officials on Tribal issues.
- Advises, supports and advocates for effective Tribal consultation at appropriate levels.
- Present at social and cultural gatherings with area Tribes.
- Cover for Tribal Liaison when they are not available.

Vice-President, Public Affairs

- Executive sponsor of STEP.
- Involved in high-risk and high-visibility issues pertaining to Tribes.
- Key advocate on Tribal relations to PGE leadership, including CEO.
- Primary communicator to Tribal Council members and other Tribal leadership when executive engagement is needed.
- Represents PGE at high-profile meetings, visits, and cultural and traditional events when Tribal dignitaries are present.
- Present at annual social and cultural gatherings with area Tribes.

CEO

- Represents PGE in strategic communication to Tribal chairs and elders, as appropriate.
- Present at high-profile meetings, visits, and cultural and traditional events when Tribal dignitaries are present.
- Present at annual social and cultural gatherings with area Tribes.

Legal team

- Will be involved whenever a Tribe is represented by legal counsel and whenever a communication is to or between PGE and Tribal lawyers.
- Leads discussions and authors communication related to dispute negotiations, resolutions, mediation and litigation involving Tribes.
- Reviews legal documents to and from Tribes.
- Oversees communication from other departments to Tribes when issues have potential legal impacts.
- May be involved in other actions and activities as part of advising clients.

Technical staff

PGE technical staff correspond and interact with Tribal technical staff on routine issues or tasks. These include routine FERC and EFSC filings, routine project correspondence to lead federal agencies, established coordination on plant operations, key customer manager communication on routine issues, standard consultation, preservation of confidential Tribal files, photos and records, coordinating access for Tribal staff to PGE facilities or routine franchise agreements.

Technical staff include the following departments:

- Operations
- Company hydrolicensing (biological, cultural, recreation)
- Cultural Resources
- Corporate Communications
- Structure and Origination
- Property
- Record and Information Management (RIM)
- Office of Diversity, Equity and Inclusion
- Key Customer Manager

The above are broad guidelines for Tribal engagement and there might be circumstances where various PGE groups play different roles based on the issue.

Tribal consultation best practices

“I would consider any consultation successful in which there has been a collaborative effort and all parties acknowledge and respect the observations, comments and concerns of the other.”

— Dr. Richard L. Allen, Policy Analyst, Cherokee Nation
A Traditional Cultural Property of New Echota

While PGE does not have government-to-government consultation mandates, we may seek delegated authority from federal agencies to conduct Tribal consultation, in support of environmental and cultural resources protection laws, including National Environmental Policy Act (NEPA) and National Historic Preservation Act (NHPA). PGE also undertakes numerous informal consultations for projects in areas of significance to Tribes for historical, cultural, religious or spiritual reasons. Tribes have traditional ecological knowledge (TEK) owing to their deep connections to place as stewards since time immemorial. With proactive consultation, PGE stands to better understand Tribal geographic landscapes and their elements, which help us make well-informed decisions during planning, design and execution of our projects.

For consultation to be successful, it should be ongoing, timely and ensure positional equity.

DO THE HOMEWORK

The basis for effective Tribal engagement is a foundational knowledge of the Tribes that we are working with. Learning about Tribal culture will help us appreciate Tribal worldviews and understand Tribal behaviors. This includes the Tribes’ governance structure, food preferences, spiritual practices, natural resource values, family structure, education system, territorial interests (which may and often do overlap), legal rights and authorities

and Tribal economic engines.

- When you know one Tribe, you know only that one Tribe. Every Tribe has its unique culture, governance and social structure as it is a product of its unique geography, history, legal status, treaties, rights, interests and other factors. For example, Tribes such as the Yakama Nation and the Nez Perce were largely single groups that stayed intact. Other disparate groups were lumped into large Confederations and therefore experienced different historic trajectories. Tribes can also differ depending on whether their treaties were made during peace or during war, what their relationship with the federal government has been, whether their membership are beneficiaries of a per capita model or a service model and what kind of alliances they have nurtured with neighboring Tribes. Tribes’ legal history, including termination and restoration, can be another compounding factor. Some Tribes have sizable economic establishments and investments, while others, such as the Burns Paiute Tribe of Oregon — the smallest Tribe in the country with 410 members — have a single source of Tribal income. Therefore, it is very important to avoid generalizations.

- Understand each Tribe's governance model and decision-making process. These vary widely between Tribes and are key determinants of successful consultation. Gaining an appreciation of meeting protocols related to prayer, seasonality, food sharing and gift giving are a few practices that may affect consultation outcomes. Tribes often have two tiers of government including a legal/political tier and traditional approach. The tribal representative is not always the decision-maker.
- Tribes themselves are the best source of information about their past, present and future. Staff are encouraged to go to the official Tribal website to hear their own story. Some Tribes have museums and public relations staff that are willing to provide information. It is critical to provide sufficient time to solicit all views from a Tribe and to allow adequate time for a Tribe to gather views from its members, staff and leadership.
- Understand the Tribe's perceptions of time and allow enough time to form ongoing relationships. Perceptions of time vary across cultures. Non-native sense of time is often more linear compared to Tribal seasonal rhythms, ceremony and grieving periods. PGE staff should be aware of differences and work to accommodate Tribal schedules. Likewise, PGE staff should be clear with Tribal contacts about any exigent circumstances driving our schedule. Further, consider that true collaborative decision-making may take a long time.
- Acknowledge that Tribes have a long history of broken commitments made by federal and state partners. Trust is a critical element of any Tribal relationship.

INCORPORATE TRIBAL OUTREACH INTO PROJECT PLANNING

Beginning Tribal consultation as early as feasible is paramount.

- Distinguish Tribes from stakeholders, environmental groups and nonprofit organizations.
- Identify the Tribes who need to be part of a

project. Use both official sources, such as Commission on Indian Services (CIS), and informal sources, such as Tribally-identified Usual and Accustomed land boundaries and natural features that Tribes consider for property demarcation.

- Consult official consultation guides that some Tribes maintain.
- Budget resources and time for building relationships before decisions are required. Establish the formal and informal preliminary contacts and the appropriate authorities needed for proceeding. Assess and define roles, organizational attributes and explicit procedures. It is in PGE's interest to work toward building Tribal capacity. It is recommended that we consider if there are opportunities for PGE to help build institutional capacity through our projects. Consider and plan for compensation/participation funding for Tribal input and engagement in PGE projects. Construct flexible protocols while planning projects. These protocols will allow tribes to execute on their own contributions with due consideration of project resources and procedural fairness.
- In case of anticipated conflict, PGE should make efforts to establish procedural neutrality, including using independent facilitators.
- PGE's project managers should have a plan to protect sensitive and confidential Tribal information.
- Do not depend overly on lead federal agencies for consultation outcomes. PGE must play an active role with Tribes throughout a project.
- For NEPA projects, sometimes Tribal consultation may be appropriate even if a proposed action is covered by a Categorical Exclusion that relieves the lead federal agency of the need to prepare an Environmental Impact Study (EIS) or an Environmental Assessment (EA). PGE should take care to consider that the proposed action covered by the categorical exclusion does not involve "extraordinary circumstances" relating to potential impacts to Tribal land uses, access, or cultural or religious values, as articulated in the Council on

Environmental Quality and Department of the Interior's NEPA regulations. If for any reason a NEPA document will not be prepared, an appropriate non-NEPA document should be used for consideration of Tribal concerns. Such non-NEPA documentation may consist of Tribal consultation logs or data recovery reports.

- PGE's licensing and cultural resources staff must contact their Tribal counterparts prior to sending out permits for their official review and approval.
- When feasible, offer to travel to Tribal Offices recognizing that resource issues may be affecting a Tribe's participation. It is appropriate to consider paying for costs associated with consultation.

CONSULTATION AND COLLABORATION

At PGE, we regard consultation as an ongoing process conducted in a timely, intentional, and respectful two-way manner. Successful consultation begins early in the planning stages and is predicated on both PGE and the Tribes being knowledgeable about the project and priorities.

- Respect tribal sovereignty and self-determination and be aware that Tribes have discretion and control over their means of reaching desired outcomes according to their own cultural values and norms.
- Be aware that Tribal authority can be nested in many layers, both formal and informal, and can change over time. Formal authority may rest with Tribal Council, committees or commissions, regulatory offices or Tribal Historic Preservation Officer (THPO), but at times elders alone may be the authority to speak on oral traditions and cultural matters. Also, it will be necessary to clarify if individual leaders can speak on behalf of the Tribe.
- When meeting with Tribes, positional compatibility and horizontal alignment between roles must be followed.

Tribal governments, tribally recognized experts, and a Tribe's view of itself as well as of its past, present and future, all legitimately represent a Tribe's interests. Accordingly, each Tribe has the discretion to collect and manage its data according to its own standards and practices.

Next steps

PGE has identified several promising implementable initiatives as part of STEP. These are organized around projects, processes, programs and policies.

PROJECT	LEAD TEAM	CROSSFUNCTIONAL TEAMS
Tribal Ecological Knowledge projects (TEK)	Wildfire Mitigation and Resiliency	Government Affairs Cultural Resources
Community volunteer projects with Tribes (GED completion, STEM)	Corporate Social Responsibility	Government Affairs
Tribal art installations at PGE locations	Facilities Management	Property Government Affairs
Support relevant exhibits at Tribal Museums	Cultural Resources	Government Affairs

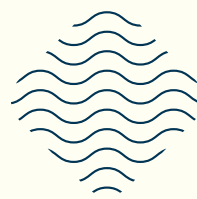
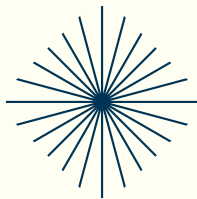
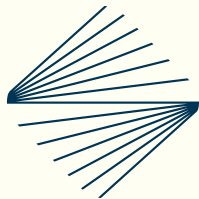
PROCESS	LEAD TEAM	CROSSFUNCTIONAL TEAMS
Apply equity lens to supplier diversity and PGE Foundation grant process	Supply Chain	DEI Government Affairs
Land Acknowledgement Statement	Government Affairs	DEI Brand Marketing Communications
Observe Oregon's Indigenous Peoples Day	Government Affairs	Brand Marketing Communications
Consider blessing ceremony/ethnographic place names at new PGE locations (generations, substations, parks)	Facilities Management	Property Legal Government Affairs
Replanting with traditional plant species	Vegetation Management	Environmental Landscaping
Consider cultural easement	Properties	Legal Government Affairs
Invite Tribes to Environmental Roundtable	Environmental	Government Affairs

PROGRAM	LEAD TEAM	CROSSFUNCTIONAL TEAMS
STEM Training	Government Affairs	HR — Learning and Development
Incorporate Tribal history into Parks Junior Ranger Program	Environmental-Parks	Brand Marketing Communication
Recruit Tribal members for cultural resource monitor positions	Cultural Resources	HR
STEM partnership with Tribal schools	Corporate Social Responsibility	Government Affairs
Line Apprentice program for Tribal youth	HR Workforce Planning	HRBPs Line Apprenticeship Program DEI Government Affairs
Internship Program. Partner with the American Indian Science and Engineering Society (AISES), NRCS and DOE. Recruit from native conferences and posting with appropriate job boards/schools like Tribal Colleges to further recruit Native employees	Corporate Social Responsibility, Project Zero	HR
Continue agreements to provide hands-on training to help Tribes run their own hydroelectric operations, hands-on training on PGE's trading floor and power operations.	HR	Government Affairs
Tribal fire crews work in our vegetation management program in fire off-season	Vegetation Management	HR Legal
Establish Native American BRG at Pelton Round Butte	DEI	Brand Marketing Communications

POLICY	LEAD TEAM	CROSSFUNCTIONAL TEAMS
Tribal community energy plans collaboration	Government Affairs	Project Symphony team
Partnerships with key Tribal organizations such as Affiliated Tribes of Northwest Indians (ATNI)'s Climate Change and Energy division	Community Impact	Government Affairs
Capacity building through START program (Strategic Technical Assistance Response Team)	Government Affairs	
Tribal mentorship through Oregon's Association of Minority Entrepreneurs	DEI	Supply Chain Government Affairs
Increase visibility of Native led and Native serving non-profit organizations during PGE's Employee Giving Campaign.		
Develop guidance for PGE employees on found migratory bird feathers and/or carcasses at our facilities to positively contribute to increasing the availability of culturally important feather materials through the eagle repository in Denver and the SIA repository for non-eagle feather materials.	Environmental-Biologists	Government Affairs

Conclusion

PGE has worked closely with Tribal governments, businesses, elders, employees, and organizations for many years. STEP provides the framework and tools to strengthen our existing relationships and forge new ones in a dynamic world. We will continue to listen to and learn from Tribes, while relaying in a timely manner information on our needs and priorities. STEP will help us have a programmatic approach to PGE's Tribal relations. Being intentional about our work with Tribes and in alignment with our overall company strategy is critical to the future of our business. Working with Tribes intentionally, in alignment with our overall company strategy, is critical to the future of our business.





An Oregon kind of energy.SM

Cover photo: Deschutes River near Pelton Dam, Madras, Oregon