

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 1716

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON,

Investigation to Determine the Resource  
Value of Solar.

PETITION TO INTERVENE OF  
THE ALLIANCE FOR SOLAR CHOICE

The Alliance for Solar Choice (TASC) petitions to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information (name, address, email address) of the Petitioner is:

Company: The Alliance for Solar Choice  
Street Address: 595 Market St. 29<sup>th</sup> Floor  
City, State, Zip: San Francisco, CA 94105  
Email Address: info@allianceforsolarchoice.com  
Telephone: (925) 989-7615

Please do not include this contact on the service list.

- 2a. The Petitioner will be represented by counsel in this proceeding. The contact information for petitioner's counsel to be included on the service list is:

Name: Kevin T. Fox (Oregon Bar # 052551)  
Company: Keyes, Fox & Wiedman LLP  
Street Address: 436 14<sup>th</sup> Street, Suite 1305  
City, State, Zip: Oakland, CA 94612  
Email Address: kfox@kfwlaw.com  
Telephone: (510) 314-8200

Petitioner's counsel waives paper service.

- 2b. Additional contacts to be included on the service list: None

3. If the Petitioner is an organization, the number of members in and the purpose of the organization:

TASC represents the majority of the nation's rooftop solar market including Demeter Power Group, SolarCity, Silevo, Solar Universe, Sunrun, Verengo Solar, and ZEP Solar. TASC advocates for maintaining successful distributed solar generation (DSG) policies throughout the United States. TASC's members are responsible for tens of thousands of residential, school and commercial solar installations across the country and have brought thousands of jobs and many tens of millions of dollars of investment to the nation's cities and towns. TASC was formed on the belief that everyone should have the option to switch to DSG for at least a portion of their energy supply and to realize the financial benefits thereof.

4. The nature and extent of the Petitioner's interest in the proceeding is:

TASC's members play an active role in the growth of DSG in Oregon. As a result, TASC has a strong interest in promoting policies that encourage solar energy development in the state. TASC's members' business operations include planning, developing, installing, selling or leasing, monitoring and maintaining solar and solar-storage energy systems located on customers' property and interconnected to utility distribution systems. This proceeding will address the resource value of solar, which "refers to the sum of benefits that accrue to the utility system due to solar generation."<sup>1</sup> As such, the Commission's findings and determinations regarding the resource value of solar will have a substantial impact on TASC's members' core business models and product offerings in Oregon. As a result, TASC's members have a direct and substantial interest in this proceeding. Only through direct participation in this proceeding can TASC protect its members' interests.

5. The issues the Petitioner intends to raise at the proceeding are:

TASC intends to comment on the methodology and inputs for determining the resource value of solar and on the myriad benefits of DSG to ensure that customer-generators receive the fair value for any power they produce. This issue is well within the scope of this proceeding as indicated by the Oregon Public Utility Commission's Report to the Legislative Assembly titled *Solar Photovoltaic Volumetric Incentive Program*. Therefore, TASC's participation will not unreasonably broaden the issues.

6. The special knowledge or expertise of the Petitioner that would assist the Commission in resolving the issues in the proceeding is:

TASC's members have substantial knowledge of the economic, technical and policy issues concerning the development, interconnection and operation of DSG. As a

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<sup>1</sup> Oregon Public Utility Commission, *Solar Photovoltaic Volumetric Incentive Program*, 2015 Report to the Legislative Assembly (Jan. 1, 2015), at 15.

result, TASC is particularly well suited to assist the Commission in resolving the issues in this proceeding. TASC has participated, and is currently active, in regulatory proceedings in over 20 states, many of which are addressing issues similar to those raised by this proceeding. TASC was also an active participant in Oregon PUC Docket # 1673. TASC has developed extensive experience and expertise concerning solar policies. In particular, TASC is uniquely and intimately familiar with the technological, operational and regulatory elements of net metering and customer generation. TASC requests intervenor status to assist the Commission in resolving the issues in this proceeding.

7. Based on the information provided above in accordance with the Commission's rules of procedure, I request to participate in this proceeding as an intervenor. I, or the organization that I represent, will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-001-0300.

DATED this 11<sup>th</sup> day of February, 2015

Respectfully Submitted,

KEYES, FOX & WIEDMAN, LLP  
***For The Alliance for Solar Choice***

/s/ Kevin Fox

Kevin T. Fox, OSB# 052551  
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## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the *Petition to Intervene of The Alliance for Solar Choice* upon the following parties on the service list for UM 1716, via electronic mail.

DATED this 11th day of February 2015.

KEYES, FOX & WIEDMAN LLP

/s/ Kimberly L Kooles

Kimberly L Kooles  
Research Analyst  
Keyes, Fox & Wiedman, LLP.

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