

PUC AR 538

Oregon Solar Energy Industries Association (OSEIA) supplemental comments to RNP and Partners closing comments

While OSEIA is in general agreement with the RNP and Partners closing comments, below are the few topics where our opinions differ.

III (Bidding)

OSEIA strongly favors an incentive program that is structured to facilitate testing an optimum field of viable Solar Photovoltaic Energy Systems. HB 3039 calls for setting a rate. We encourage the PUC to adopt an incentive rate under HB 3039, which is based on RECs, avoided costs and other additional attributes PUC deems appropriate to award these systems. OSEIA believes a set price is needed to facilitate a pilot program that creates a viable test market. However, if PUC ultimately concludes that this will not be its final choice, then OSEIA could support net metering plus a VIR option for the entire program.

III. (Program Administration)

No Position

IV. (2)

For the size of the pilot program, OSEIA believes it makes little sense to shut out IOUs from participating in said program. If the pilot program is designed to ascertain the scope of a viable market, to place these artificial limitations on this market seems distinctly unnecessary and arbitrary. IOUs do have an advantage of knowledge regarding the market, sure, but shutting them out of the program does not hinder IOUs in any real sense per se. The effect would instead limit outside companies seeking aid in their own development of a viable system from possible investors with a real knowledge of the market.

IV. (1) OSEIA is opposed to a Bid Process. While a bid process in name seems fair, it will ultimately create a marketplace that caters to highly capitalized investors at the expense of less funded local companies. These local companies may not have the resources, capital and infrastructure available to submit a successful bid under the Commission-approved RFP bid process. If one of the goals of the program is to create a fair playing field, then a bright line, set rate allows for all companies to compete in a more equitable manner.

OSEIA is also strongly in favor of a process that will award high quality Solar Photovoltaic Energy Systems. The RFP bid process awards lower priced selections that will leave ratepayers with little guarantee of service.

Submitted,

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