

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1452
AND
AR 538

In the Matter of)	
)	
PUBLIC UTILITY COMMISSION)	
OF OREGON)	FINAL COMMENTS OF
)	ECUMENICAL MINISTRIES
Investigation into Pilot Programs to)	OF OREGON – OREGON
Demonstrate the use and effectiveness of)	INTERFAITH POWER AND
Volumetric Incentive Rates for Solar)	LIGHT
Photovoltaic Energy Systems.)	

Ecumenical Ministries of Oregon and its project, Oregon Interfaith Power and Light, thank the Commission for the opportunity to participate in the formal comments on the UM 1452 Straw Proposal and the Proposed Administrative Rules for Solar Photovoltaic Programs. We write to address the Commissioners question #6 *Carve-outs and/or Rate Differentials: Should the Commission provide 'carve-outs' and/or higher rates for non-profit organizations? For other groups? Why or why not?* and to recommend other revisions to the Staff proposal. We thank you for your time and attention in taking these comments into consideration.

#6. Yes we should provide carve-outs and higher VIRs for entities that are unable to access the federal tax credits. This group includes schools, public libraries, municipal buildings, and houses of worship.

Public Education and Engagement:

As all of us involved in this process are aware, solar energy is still expensive. Solar energy is especially expensive relative to the cheap power we are accustomed to in this country and in this bountiful northwest region in particular. The transition to solar and other renewable energies will be more expensive than the status quo, at least until economies of scale exert the market pressures to bring prices down (as they have in other markets as technologies and efficiencies develop). Whether funded by taxpayers or ratepayers, this transition is going to cost the general public. It is therefore necessary to have public buy-in.

Solar energy is a wonderful tool for public education and engagement. Children and adults alike are captivated by seeing solar panels on the roof and watching the electricity meter run in the lobby of a school, library, town hall or church. It's the magic of nature harvested by the ingenuity of humans! And it can be located right in everyone's neighborhood!

We believe that installations of solar photovoltaic systems on schools, libraries, municipal buildings, and houses of worship have a value beyond the electricity they generate. That value lies in the public education and engagement they engender. Putting the energy issue literally in public view not only develops a sense of ownership and support for renewable energy technologies, but, with education, creates an awareness and consciousness that promotes conservation of electricity and fossil fuels. Thus, we believe that solar panels prominently displayed on public and nonprofit buildings support the transition to a renewable energy economy by both decreasing energy use and increasing political will.

Capacity Allocation and Deployment Schedule

Ecumenical Ministries of Oregon and Oregon Interfaith Power and Light requests that the Commission create a capacity allocation carve-out for public and nonprofit entities as shown in the table below (a modification of Figure 1, page 6 of Staff's Opening Comments, UM 1452, January 14, 2010.)

Capacity Distribution and Number of Projects				
Pilot Program Year	Smaller Systems (Less Than or Equal to 10 kW)	Medium Systems (Greater Than 10 kW and Less Than or Equal to 100 kW)		Large Systems (Greater Than 100 kW and Less Than or Equal to 500 kW)
		Public and Nonprofit	General	
4/2010 thru 3/2011	5% = 1.25 MW 180 - 625 systems (7kW - 2 kW)*	3% = 0.75 MW 11 - 38 systems (70 kW - 20 kW)	5% = 1.25 MW 18 - 63 systems (70 kW - 20 kW)	5% = 1.25 MW 3 - 10 systems (420 kW - 125 kW)
3/2011 thru 3/2012	10% = 2.5 MW 360 - 1250 systems (7kW - 2 kW)	4% = 1.0 MW 14 - 50 systems (70 kW - 20 kW)	5% = 1.25 MW 18 - 63 systems (70 kW - 20 kW)	5% = 1.25 MW 3 - 10 systems (420 kW - 125 kW)
3/2012 thru 3/2013	15% = 3.75 MW 536 - 1875 systems (7kW - 2 kW)	4% = 1.0 MW 14 - 50 systems (70 kW - 20 kW)	2.5% = 0.63 MW 9 - 31 systems (70 kW - 20 kW)	5% = 1.25 MW 3 - 10 systems (420 kW - 125 kW)
3/2013 thru 3/2014	20% = 5.0 MW 714 - 2500 systems (7kW - 2 kW)	4% = 1.0 MW 14 - 50 systems (70 kW - 20 kW)	2.5% = 0.63 MW 9 - 31 systems (70 kW - 20 kW)	5% = 1.25 MW 3 - 10 systems (420 kW - 125 kW)
Total Capacity by Category	50%	15%	15%	20%
	65% Community Systems		35% Commercial and Industrial Systems	

* the two average sizes shown in parenthesis were used to generate boundary case estimates for the range of number of systems

This represents no change to the Staff's allocations of 50%, 30% and 20% to the Smaller, Medium, and Large size ranges. The 30% of the pilot project allocated for the Medium size is evenly split to give public and nonprofit entities access to capacity in a separate pool that will have its own deployment schedule, process for enrollment, and VIR schedule. The capacity distribution we are recommending brings the total capacity set aside for residential and community projects up to 65%, within range of the governor's original objective of 75% for "individuals and communities" (Governor Kulongoski's 2008 Energy Plan, (http://governor.oregon.gov/Gov/pdf/climate_change_agenda_1008_final_3.pdf)).

We believe that schools, libraries, town halls, churches, synagogues, mosques, and other public and nonprofits encompass enormous, pent-up, aggregate demand that will easily use the capacity requested. However, as assurance that all pilot capacity will be used, we further suggest that any unused public and nonprofit capacity be folded back into general “medium” deployment for the following year.

Ecumenical Ministries of Oregon and Oregon Interfaith Power and Light request a deployment schedule of 3%, 4%, 4%, and 4% over each of four years as shown in the table above. We believe that 3% in first year (11 to 38 systems) is reasonable given pent-up demand in this sector. The slightly lower capacity in year one allows for publicity and stakeholder processes to ramp up before the higher allotments take over for the following years.

Process for Enrollment (see Staff Proposal, Section D – Capacity Reservation)

Public and nonprofit entities are subject to complex and prolonged multi-stakeholder decision making processes. Under the current proposal, most public and nonprofit entities will be applying for participation in the Medium size class. Therefore it is vitally important to separate these entities from the intense competition expected in the commercial sector for the Medium capacity allocation. The Public and Nonprofit carve-out serves this purpose by allowing the public and nonprofit sector to work on their appropriate time frames. This is perhaps the most important function of the carve-out. We recommend that capacity in the carve-out be distributed throughout the year (first come first serve) until capacity for the year is reserved (as put forth for the Smaller size category in Staff’s proposal.)

Volumetric Incentive Rates (see Staff Proposal, Section H – Volumetric Incentive Rates)

As has been discussed in Ecumenical Ministries of Oregon and Oregon Interfaith Power and Light’s previous comments (see Appendix 1), under the current system of incentives it has been very difficult for entities without tax liability to access the federal tax incentives that make solar affordable. (See also Appendix II, Congregational Petitions.)

Therefore, EMO-OIPL is asking the Commission to set a VIR for the Public and Nonprofit Carve-out that accounts for inability to access that 30% incentive. This is an issue in flux as efforts are in play at the federal level to correct the situation. We anticipate that when the federal solution is in place, the PUC will recalculate the VIR accordingly. In fact, once the federal solution is in place (and depending on rulings going forward regarding the taxability of FIT payments by federal and state government) there may be occasion to set a VIR for nontaxable entities that is substantially lower than that for commercial and residential participants to compensate for lack of associated business expenses and tax liability on the VIR payments. Note that the existence of a finite carve-out, in the meantime, limits ratepayer exposure to the higher VIR that may be set for nontaxable entities.

Staff proposal should be amended in 860-084-0410 to require certification that no investor participating in the Public and Nonprofit Carve-out in will accept incentives from the federal government.

Ecumenical Ministries of Oregon and Oregon Interfaith Power and Light support OREP’s approach to calculating the VIR to cover costs incurred by participants of the program. We have used their spreadsheet (SolarFITRate-tk-v18.xls) to calculate VIRs needed to make solar installation affordable for community scale (40kW) systems in different areas of the state where the owner of the system is a nontaxable entity. This means taking out the federal incentive, but also taking out various costs associated with filing as a small business. We have used a lower-than-market loan interest rate to reflect opportunities churches and other nontaxable entities may have to access credit at a reduced rate.

(see http://www.emoregon.org/pdfs/OIPL_Denominational_Loans_for_Energy_Green_Building.pdf for a listing of institutions that lend within religious denomination). In order to minimize the VIR required, we have also lowered the risk premium on the grounds that broad ownership of a system by many individuals (be it the general public or members of a congregation) buffers any one individual against risk.

We have used the following inputs for our calculations:

- No federal tax credit
- Installation cost per watt = \$7.70
- Monthly Service Charge for Meter = \$10
- Insurance Rate = \$0.22%
- Operation & Maintenance = 0%
- Tax Preparation and all tax and depreciation calculations eliminated
- Business License Fees = \$0
- Loan Interest Rate* = 6.00%
- Loan Fee Rate = 0.5%
- Risk Premium = 0.5%
- kW Output Factor = 1.1, 1.2, 1.3, 1.4 for zones 1, 2, 3, and 4 respectively
- Annual Panel Degradation Rate = 0.7%
- Solar Resource Fraction = 89%

* There are loan opportunities available to some nonprofits that are a little below market rates.

Results are shown in the table below.

VIR for Medium Sized Projects without Tax Liability			
Insolation Zone	kW output factor	Size Category	FIT Rate
Zone 1	1.1	Medium	\$0.90
Zone 2	1.2	Medium	\$0.82
Zone 3	1.3	Medium	\$0.76
Zone 4	1.4	Medium	\$0.70

Note that because of the lower installed cost of “Medium” versus “Smaller” and the compensating factors that come with non-taxable entities, the needed VIRs are actually within pennies of the VIRs needed for residential installations. Thus, the cost for community installations is expected to be fairly consistent across size scales.

Summary of answer to Commissioners’ Question #6

- Solar installations on public and nonprofit buildings have public educational and engagement value beyond the value of the electricity produced
- A carve-out for this sector provides for:
 1. Participation by a valuable sector that has been largely left out under the current system of incentives. (This will make an interesting area of comparison for the pilot.)
 2. A pool of capacity protected from the intense competition expected in the commercial sector for the general Medium (10kW to 100kW) capacity allocation.
 3. A year-long (first come first serve) application process suited to this sector without competition from commercial interests (although commercial interests will have access to any unused capacity the following year)

4. VIR set in keeping with the actual cost of the system
5. VIR rates independent from rates set for the taxable sector and therefore easily adjustable (to a lower rate) as federal policy adapts to the growing number of FITs around the country and develops a process for incentives for public and nonprofit entities
6. A demonstration of demand in this sector that will help drive reform at the federal level

Other Comments

Permanence of System

EMO-OIPL is in agreement with ELAW and OREP on this issue and appreciate the Staff revision to 860-048-0240 that has eliminated the explicit option for de-installation of the system at the end of the contract. It is unethical for Oregonians to pay a premium for solar installations without some reasonable assurance that the system will be in operation for its useful life.

Net metering

We are in agreement with ELAW and OREP in considering the modified Net Metering approach to the FERC issue as cumbersome, loaded with perverse incentives, and unnecessary since it is not the lonely viable work-around. We refer to ELAW's comments on this matter.

We thank you for the opportunity to contribute in this public process.

Ecumenical Ministries of Oregon – Oregon Interfaith Power and Light (EMO-OIPL)

DATED this 11th day of February, 2010

/s/ Jenny Holmes

EMO Director of Environmental Ministries

Appendix 1: History of OIPL and Solar Energy (from opening comments)

OIPL represents a wide range of faith communities. Our constituents share a deep commitment to Stewardship of the Earth and awareness of the social injustice of Global Climate Disruption. Our vision is a rich, abundant life for all Creation rooted in renewable resources for a society moving into a post-fossil-fuel era. The principles guiding our vision are justice, equality, compassion and respect for the sacredness of Earth. In practical terms, Oregon Interfaith Power and Light has worked with over 500 congregations in Oregon to improve the energy efficiency of their buildings and member's homes. We work with congregations of all faiths and in all regions of the state.

In response to demand from congregations, OIPL began the Solar Congregations Program and, back in 2007, created a corporation, Solar Congregations Inc, for the purpose of helping congregations take the full benefit of available tax incentives for PV-solar installations through third party financing arrangements.

Unfortunately the Solar Congregations Program has been stymied both by the complexity of the models that allow non-profits to access the federal incentives and by difficulty in finding for-profit partners. Despite great interest and enthusiasm, our combined efforts have borne very little fruit. We have a backlog of interested congregations (over 60 just now, of which more than 25 have performed on-site solar assessments, checking available insolation, roof structure, inverter location, etc.). Most of the proposed systems have been in the 10 kW to 35 kW range and thus are too small to be attractive to larger investors, but too large for most congregations to pay the up-front costs on their own. Overall, the current system of incentives has not been

effective for the faith community. The feed-in-tariff is an opportunity to level the playing field and make solar installations a reality for congregations and other nonprofits such as schools, libraries, and other public buildings.

Appendix II: Congregational Petitions

At the eleventh hour of this process it occurred to us that the Commissioners might appreciate evidence of interest beyond the say-so of EMO-OIPL. Late on Saturday the 30th of January we sent out a petition letter to congregations that have engaged with OIPL in exploring ways to fund solar photovoltaic systems, asking that responses be received by end of workday Wednesday. Given the lengthy process generally involved in individuals getting formal consent to speak on behalf of their church, we were doubtful of receiving many responses in the short time allowed. We were please by the rapid outpouring of replies. Included here are the letter and the 22 electronic signatures and three extra comments we received from congregations.

February 2010

Dear Members of the Public Utility Commission,

We represent congregations in PGE and PacifiCorp territory that have been working for up to three years to install solar energy on the site of our religious congregation. We are motivated by a commitment to stewardship of Creation and a desire to contribute to our nation's energy independence and to educate our members and the community about renewable energy.

We have had at least a preliminary assessment of the potential and feasibility of PV solar. Some of us have solicited bids and costs estimates. Some of us have raised our portion of the costs for a system that would be installed under a third-party agreement. We have faced in two main barriers in moving forward.

1. In order to access the 30% federal tax incentives, it has been necessary for a non-profit to partner with a third-party investor. It has been difficult to find third-party investors for our projects. Congregational solar projects are too small on their own to attract most investors. In 2008, OIPL worked with a contractor to aggregate multiple systems so as to be more attractive, but no large investors were ready to invest in this model because of its newness and inherent complexity.
2. Congregations rely heavily on volunteers to make decisions and implement projects. Third-party financing models needed to access the 30% federal incentives are complex and require extensive education to get and keep all the decision-makers on board.

The feed-in tariff is much simpler. It fits better with the decision making processes typical of congregations. In addition, it works better with their key means of financing capital improvements--loans and capital campaigns.

Therefore, we respectfully request the Oregon Public Utility Commission to include an allocation 'carve out' for non-profits with a higher volumetric rate to make solar electric systems affordable without the federal tax incentive.

Signed,

Wendy Herrett, Trustee Committee Chair, First United Methodist Church, 600 State Street, Salem 97301,
wherrett@comcast.net

William L. Zuiches, Chairman, Building and Grounds Committee, First Presbyterian Church of Newberg, Oregon, 501 Mission Dr., Newberg, OR 97132-1656, bzuiches@yahoo.com

Robert Buchholz, St. Andrew Lutheran Church, 12405 SW Butner Rd, Beaverton, OR 97008,
btbuchholz@comcast.net

Gabe Genauer, Havurah Shalom, 825 NW 18th Ave., Portland, OR 97209, gabe@bandgweb.com

Martha Connell, Energy Task Force Chair, First United Methodist Church, 1824 SW Market St., Portland, OR, cooperconnell@hevanet.com

Allison Anderson, Chair of Planet Church Committee, First United Methodist, Portland, Ama1031@hotmail.com

Judith Havis, Temple Beth Sholom, 1230 Rafael N. Salem, OR 97303, admin@tbsholom.org

David DeVore, Chair of Green Team, Milwaukie Presbyterian Church, 2416 SE Lake Rd., Milwaukie, OR 97222, David.devore@comcast.net

Stanley Clarke, Vice Chair, Trustees, Tabor Heights United Methodist, 6161 SE Stark St., Portland, OR 97215, srclarke@ix.netcom.com

The Rev. Brian E. Brandt, Pastor, Central Lutheran Church, 1820 NE 21st Avenue, Portland, OR 97212, pastor@centralportland.org

Gardner Grice, BOC II, Facilities Manager, First Unitarian Church, 1034 SW 13th Ave, Portland Oregon 97205, 503-228-6389 ext 43, ggrice@firstunitarianportland.org

Sr. Patricia Nagle, St. Philip Neri, 2408 SE 16th Ave., Portland, OR 97214, earthome@igc.org

Bill Becker, Former Vestry member and Chair, Environmental Group, (Episcopal) Church of the Good Samaritan, 333 NW 35th Street (church address), Corvallis, bwjfbecker@hotmail.com

Our parish had got far along in the design process, had selected a contractor, but ran into insurmountable problems trying to put a financial package together. We experienced exactly the kinds of problems described above.

William Gazeley, Parishioner/Solar Power Committee, Good Samaritan Church, 333 NW 35th St., Corvallis, Oregon 97330, 541 757-6647. At Good Sam parish, Corvallis, gazeleyfamily@comcast.net we have a ~25 kW system we'd like to install, and have selected a contractor by competitive bid, but have not been able to navigate the difficulties of spreading tax credits across multiple business and individual investors, and thus our project has not moved out of the planning phase.

Carolyn A. Bella, Eucharistic Minister and Episcopalian, Environmental Group member
Church of the Good Samaritan, 333 NW 35th Street, Corvallis, OR 97330
bellacd@peak.org

Dr. Steve Amsberry, member of the congregation, Episcopal Church of The Good Samaritan, 333 NW 35th St, Corvallis Oregon 97330, amsdvm@comcast.net

Linda Gelbrich, Parishioner and member of the diocesan Environmental Commission, Church of the Good Samaritan, Corvallis, OR, lindaw@exchangenet.net

Joyce Sluss, Clergy, Woodburn United Methodist Church, 701 N. Cascade Dr, Woodburn, OR 97071, Themom123@aol.com

The Rev. Jim Monroe, Woodburn United Methodist Church
"Jim Monroe" <jim@woodburn-umc.org>

Date: Wed, February 3, 2010 3:07 pm

To: OIPL@EMOREGON.ORG

The Woodburn United Methodist Church wholeheartedly endorses this program. We see ourselves as potential user/providers of solar power under this programs guidelines. We encourage you to do everything in your power to facilitate its implementation.

Thank You, James P. Monroe, Pastor

Jim Leeman, Jim Leeman, Reedwood in Action Committee, Reedwood Friends Church, 2901 SE Steele St., Portland, OR 97202, jcleeman@yahoo.com

Public Power Congregations

The Rev. John Pitney, First United Methodist, 1376 Olive St. Eugene, Oregon 97401, compost@cmc.net

Barry McPherson, Chair of Eco-Justice Team, First Presbyterian Church of Newport, 905 NE 7th St., 227 NE 12th St. Newport, OR 97365, bdmcperson@coho.net; Church office@newportfpc.org

Rev. Gary Langenwalter, Pastor
Dundee United Methodist Church
1110 N. Highway 99W
PO Box 66
Dundee, OR 97115

PastorGary@DundeeUMChurch.org

Dear members of the PUC;

As a member of the Church of the Good Samaritan Episcopal Church in Corvallis, Oregon, I have been working with others of our congregation in planning a photovoltaic installation for our church building. Our estimated cost would be around \$200,000. Since we are a non-profit institution we do not qualify for state and federal tax incentives. However, we have investigated third-party financial assistance but could not find any investors since ours is a pretty small installation. Also, the financial picture of the past couple of years has not been favorable to this sort of investment.

I was excited to learn that we may have another avenue of attack if the Oregon Public Utility Commission includes an allocation 'carve out" for non-profits to make photovoltaic systems affordable without the federal tax incentive. I, therefore, request that you include this allocation in order that we might proceed with our plans.

Henry C.. Burrige
Member, Church of the Good Samaritan Congregation
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Corvallis, OR 97330
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[Download](#)

February 2, 2010

Dear Members of the Public Utility Commission,

I am writing as a representative of a congregation in PGE territory. We are currently undergoing renovations to our building and surrounding property and discussing additional changes. All of our discussions and actions include a strong sense of shared stewardship of the earth. Improvements to our sanctuary were made with re-use and recycling in mind. We have entered into a partnership with key supporters to address the water runoff issues with our parking lot. Projects to reduce lawn and include more natives and low maintenance plants are underway and more programs are being discussed. Like many other leaders from local congregations, I attended a meeting sponsored by Oregon Interfaith Power & Light to learn about Solar Congregations. I left the meeting inspired by the potential in our own community, but discouraged by the prohibitive costs and level of volunteerism it would take to put such a plan into action in our small community. OIPL summarized it best as follows:

1. In order to access the 30% federal tax incentives, it has been necessary for a non-profit to partner with a third-party investor. It has been difficult to find third-party investors for our projects. Congregational solar projects are too small on their own to attract most investors. In 2008, OIPL worked with a contractor to aggregate multiple systems so as to be more attractive, but no large investors were ready to invest in this model because of its newness and inherent complexity.
2. Congregations rely heavily on volunteers to make decisions and implement projects. Third-party financing models needed to access the 30% federal incentives are complex and require extensive education to get and keep all the decision-makers on board.

The feed-in tariff being suggested is much simpler. It fits better with the decision-making processes typical of congregations, including ours. In addition, it works better with our key means of financing capital improvements--loans and capital campaigns.

As our community moves forward with our Long Range Plan, we respectfully request that the Oregon Public Utility Commission include an allocation "carve out" for non-profits with a higher volumetric rate to make solar electric systems affordable without the federal tax incentive. I continue to believe that our current building and property are well suited to this energy solution, if cost and execution issues were more "congregation friendly".

Sincerely,



Judith Howell, Treasurer, Long Range Planning Team member, Green Team member, Landscape Team member

The statements above are supported by our clergy, the members of the Long Range Planning Team, and the members of the Steering Team.

Email: mota.welcome@gmail.com

CERTIFICATE OF SERVICE

I certify that I have caused to be served the foregoing "Opening Comments of Ecumenical Ministries of Oregon – Oregon Interfaith Power and Light" regarding Oregon PUC Docket No. UM 1452 by electronic mail and US mail to those parties who have not waived paper service on the attached service list.

Dated this 11th day of
February, 2010.

/s/ Jenny Holmes
Jenny Holmes

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**Milwaukie Presbyterian Church
Stewardship Commission
Green Team Committee**

February 3, 2010

Members of the Public Utility Commission,

I represent a committee of Milwaukie Presbyterian Church members that have worked to become a Solar Congregation since 2008.

We have had our physical plant evaluated, a plan proposed and at one time had a private funding opportunity with an investment potential of more than \$100,000 and were able to raise our portion of matching funds within five days.

For various reasons the funding opportunity was lost, most specifically due to a short window for finalizing the legal commitments related to the private investor's expectations and timing for project completion related to tax benefits for the investor.

We believe that the initiative of OIPL Solar Congregations for a much simpler program for investment in solar power systems is critical for our effort to install solar and help contribute to USA energy independence and increase our commitment to environmental stewardship.

We respectfully request the Oregon Public Utility Commission to include an allocation 'carve out' for non-profits with a higher volumetric rate to make solar electric systems affordable without the federal tax incentive

Respectfully,
John M. Armentrout, Elder
Milwaukie Presbyterian Church
503-658-8797
jarmenrock@gmail.com

Ecumenical Ministries of Oregon
0245 SW Bancroft St., Suite B
Portland, OR 97239
TEL 503-221-1054
FAX 503-223-7007

February 12, 2010

Via Electronic and U.S. Mail

Public Utility Commission
Attn: Filing Center
550 Capitol St. NE #215
P.O. Box 2148
Salem, OR 97308-2148

Re: In the Matter of THE PUBLIC UTILITY COMMISSION OF OREGON
Investigation into Pilot Programs to demonstrate the use and effectiveness of Volumetric
Incentive Rates for Solar Photovoltaic Energy Systems.

Docket No. UM 1452 and AR 538

Dear Filing Center:

Enclosed please find the original and one copy of the Closing Comments of Ecumenical
Ministries of Oregon's Oregon Interfaith Power and Light in the above referenced matter.

Thank you for your assistance.

Sincerely yours,

Jenny Holmes

Enclosures

Cc: Service List