

June 2, 2017

VIA ELECTRONIC MAIL

Oregon Public Utilities Commission
201 High St SE #100
Salem, OR 97301

RE: Docket AR 603 – Community Solar Rulemaking

In response to the Commission's solicitation for stakeholder feedback in the ongoing Community Solar Rulemaking process, Ampion hereby submits the following comments. For the sake of this filing, Ampion limits the scope of its comments to the role of the Program Administrator in the forthcoming Community Solar Program.

Ampion appreciates the opportunity to contribute to this proceeding and looks forward to the effective and equitable implementation of a community solar program in Oregon.

Respectfully submitted,

A handwritten signature in cursive script that reads "Emily Cosbar".

Emily Cosbar
Market Policy Analyst, Ampion

BEFORE THE PUBLIC SERVICE COMMISSION OF OREGON
Case AR 603 – Community Solar Rulemaking

I. Introduction

Ampion commends and acknowledges the work of Staff and Stakeholders on this proceeding hitherto wishes to recommend the following additional considerations in the Community Solar Rulemaking proceeding.

Ampion is a software as a service (“SaaS”) provider supporting distributed energy resources (“DER”) developers across the United States. Ampion is an active participant in DER-related proceedings in many markets, including: the New York Value of Distributed Energy Resources (“VDER”) program, the Massachusetts Net Metering program, and the development of the future Solar Massachusetts Renewable Target program. In addition to promoting equitable policies for all stakeholders, Ampion has advocated for uniform data exchange and cybersecurity requirements to facilitate efficient data transactions in distributed renewable energy markets.

II. Role of Program Administrator

Ampion generally supports the establishment of a program administrator to facilitate project registration, project verification, contract oversight, and other tasks related to the implementation of a community solar program. However, Ampion asserts the allocation of numerous responsibilities to a single entity poses a significant risk to efficient program implementation, specifically in terms of time required for the entity to develop all functionality as listed in section 0020 of Chapter 860, Division 088. Ampion asserts that this may significantly delay program and market deployment.

Several stakeholders at the AR 603 Hearing held on May 22nd echoed the concern that the complex nature of the proposed community solar rules has already delayed implementation timelines. Given the circumstances, Ampion recommends the Commission outsource certain functions to third party entities capable of fulfilling such responsibilities, namely:

- Facilitate the exchange of data and information between utilities and project managers;
- Facilitate the exchange of data and information between the Commission and project managers;
- Calculate participants’ monthly bill credits and convey bill credit information to electric companies and project managers.

Ampion acknowledges risks inherent outsourcing these responsibilities to entities beyond the program administrator and/or commission. However, adequate data exchange protocols and regular auditing—both of which may be established by the commission

and/or program administrator—will allow oversight of these entities while ensuring the most cost-effective and efficient means of exchanging data in the market.

III. Data Exchange and Cybersecurity Standards

Ampion advocates that the Commission consider developing robust data exchange and cybersecurity standards that leverage modern, secure, and reliable technologies. Ampion further recommends the Commission establish a single method of data exchange protocols for all stakeholders in order to avoid market inefficiencies and facilitate effective program implementation.

To this effect, Ampion recommends that the Commission consider data exchange methods other than standard EDI currently used by the utility and retail energy industry. Ampion acknowledges EDI may be more cost effective and/or less resource intensive for some stakeholders in some cases; however, other technologies, such as a RESTful Application Program Interface (“API), may fulfill data exchange functionality in a more secure and efficient manner than EDI.

In addition, Ampion recommends the Commission consider establishing uniform cybersecurity requirements. This will ensure parties participating in the exchange of sensitive customer data take preventative actions against a breach, as well as robust security measures in the event of said breaches. The Commission may deem it useful to consider the National Institute of Standards and Technology (“NIST”) Cyber Security Framework employed as part of New York State investor-owned utilities’ Community Distributed Generation (“CDG”) Operating Agreement filings¹.

¹ CDG Operating Agreements, filed as part of Docket 15-E-0082 (November 9, 2015)

IV. Conclusion

Ampion commends Staff and Stakeholders' work in this proceeding and thanks the Commission for the opportunity to contribute. Please contact Emily Cosbar (617-202-3143) with any questions regarding this filing.

Respectfully submitted,

A handwritten signature in cursive script that reads "Emily Cosbar".

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