



Oregon Legislative Assembly

June 2, 2017

Community Solar Rulemaking (SB 1547) AR 603
Public Utility Commission
Administrative Hearings Division
Salem, OR 97308

Dear Commissioners,

In our efforts to diversify Oregon's energy portfolio and expand the utilization of solar across Oregon, we were particularly optimistic about the prospect of establishing a robust community solar program in Oregon. Such efforts culminated in the inclusion of implementing language for community solar in SB 1547 during the 2016 Oregon legislative session.

The legislation was intentionally broad, in part to allow details to be refined by the Commission, but also because we did not want to restrict the market opportunity for customers or to prevent innovation by developers of solar projects.

We appreciate the effort of the Commission and its staff in coordinating the development of the proposed rules through a public process with stakeholder engagement, and we are generally supportive of the direction taken in the proposed rules.

However, there are also areas of concern and uncertainty with the direction the Commission may be taking. Among these concerns are the use of the word "contiguous" in describing the service territory. It was our intent that the owner or subscriber be a customer located in the utilities service territory to enable the receipt of the on-bill credit for the proportional share of electricity generated from the project and that each customer location should be able to be involved in a community solar project. Although the project itself is likely to be located in that same service

territory, the rules should provide flexibility for a utility to locate a project anywhere in the State of Oregon through an agreement with another utility that represents a different territory.

Additionally, the on-bill credit should be established to reflect a net metering system based on the retail price of electricity that also accounts for recovery of costs associated until the development and integration of that project into the system. Furthermore, the credit rate was envisioned to be flexible in order to accommodate market changes and innovation.

We ask that the Commission work diligently to establish a successful program measured by the level of the project capacity developed and the number of customers participating.

Respectfully,

Representatives



Paul Holvey
Oregon State Representative
District 8



Ken Helm
Oregon State Representative
District 34