

AR 603 Proposed Rules
Comments Provided by Carolina Iraheta Gonzalez, Community Energy Advocate, Verde
May 26th, 2017

Overall Concerns:

- I am greatly concerned about the 10% community solar allocation decrease to 5%. Not only does that not sufficiently address the barrier of low-income participation, but the rules in section 860-088-0170, subsection 5a, allow for project managers to find alternative strategies in satisfying the 5% allocation in discretion of the commission. This essentially allows project managers to opt out of meeting the 5% low-income requirement.
- I am also concerned that start-up costs may indefinitely be passed on to consumers and how this may negatively impact low-income residents. I'm disappointed to see that even though the PUC diminished the opportunity for low-income participation, low-income customers are still expected to subsidize community solar through increased electric company rates to fund start-up costs.

Specific Concerns:

860-088-0010, 8

Definitions of Community Solar Program

- I have a concern around the definition of "eligible customer" and the need for a customer to be in the same contiguous service territory as to where the project is located.
- For residents located in Pacific Power's NE Portland territory, I believe this definition of "eligible customer" will greatly restrict the ability of residents in this service territory to participate. This section of PP's territory is a very small portion of the City of Portland and mainly consists of urban space. I think NE Portland residents will not have same amount of opportunities to participate in community solar as residents elsewhere in the state due to this restriction.

860-088-0020, 3, n

Community Solar Program Administrator

- I'm concerned that there is not an estimated amount or a cap on administrative start-up costs, which will be recovered through electric companies' rates and thus community solar costs are being passed down to the consumers.

860-088-0040, 1

Community Solar Program Funding

- I am concerned that start-up cost of community solar will be passed on to utility customers indefinitely. There is nothing that indicates when start-up costs will be concluded, meaning that administrative costs may be recovered through rates of electric companies indefinitely.

860-088-0050, 2

Community Solar Advisory Group

- I'm happy to see that the advisory group will have seats specifically allocated to greater diversity representation, this is important for community solar to be successful and equitable.
 - Many low-income organizations, community of color organizations, and rural organizations are stretched thin to capacity. I suggest providing funds to organizations to be able to participate on this advisory committee. This also builds capacity for new partners to be able to participate in PUC committees and discussions.

860-088-0060, 2, a

Program Level

- I support moving the program capacity tier for each electric company up to 2.5% of the electric company's 2016 system peak

860-088-0170, 1

Low Income

- Disappointed to see that the original 10% low-income designation has been reduced to 5%

860-088-0170, 2

Low Income

- This is very vague language. "5% of total program capacity tier must be designated for projects or portion of projects" --- is this speaking in reference to community solar? Does this mean that 5% of community solar funding for the low-income provision may be awarded to other programs serving low-income residents? More information is needed.

860-088-0170, 3

Low Income

- I'm worried that this provision may lead to greater displacement of vulnerable residents. I'm concerned that a housing provider offering low-cost housing may sign up for community solar on behalf of low-income residents and then raise rents to attract higher income tenants, using community solar as an incentive. While it is smart to facilitate the participation of low-income residents through affordable housing providers, subscriptions should stay with the low-income tenant and not the affordable housing provider.

860-088-0170, 5, a

Low Income

- There needs to be transparency and accountability on alternative strategies to meeting the 5% allocation. I'm concerned that this provides an out to project managers in meeting the 5% allocation.