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June 2, 2017

To: Michael Breish, Oregon Public Utilities Commission

Re: Community Energy Project Response to AR 603 PUC Staff Comments from May 30, 2017

Community Energy Project (CEP), Inc., believes that everyone deserves a safe, healthy, efficient home regardless of income. We advance our mission through education, hands-on training, and distribution of weatherization, and lead poisoning prevention materials. We also provide direct weatherization and safety repair services to low-income seniors and people with disabilities. We deliver these services in partnership with community members and service organizations, utilities, corporations, foundations, and government agencies.

CEP acknowledges with gratitude the way that PUC staff has worked to tactfully balance a wide variety of interests and complications surrounding community solar, and especially the care and attention paid to the low-income component of this bill. We recognize that there are not always easy solutions to complicated challenges. As our area of expertise lies in working with disadvantaged populations, we will restrict the majority of our comments to this part of the bill.

Regarding Low-Income

Responding to PUC staff comments: “Though **Staff believes a full subsidy of subscription costs for low-income participation is not appropriate**, Staff encourages the Commission to consider some sort of intra-program fee that all participants pay in order to bring down the cost of individual low-income customer participation.”

CEP is alarmed and disappointed at the statement that a full subsidy is not appropriate. We take this to mean that staff is saying that low-income customers must pay for their participation. Throughout this process, we have been an advocate for providing free subscriptions for qualified low-income participants, and none of the earlier drafts implied otherwise. We are perplexed as to why it is now “not appropriate” to give people who do not have expendable income the ability to participate in exciting opportunities for free. What is “not appropriate” about people in unstable housing situations having access to Community Solar without the risk of losing precious funds because of situations outside their control? Imagine a household who spends limited money on a Community Solar subscription in October, only to be evicted to another power territory the following May with nearly NO return on investment. In CEP’s view, such a situation would be inappropriate. Our most vulnerable citizens deserve the opportunity to have long-term bill-savings through Community Solar.



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Any fee will either need to be so small that it's offset by the administrative costs of managing the processing of small payments (thus wasting everybody's time and resources) or it will have to be large enough to be a significant barrier.

We, and other low-income advocates, have been brought to the table for our expertise on this topic and see that most of what we've had to suggest has been dismissed, an experience that in itself exemplifies what it is like to be low-income. What we see instead is an arbitrary moralistic "skin in the game" argument that makes some people more comfortable about low-income people who might otherwise get "something for nothing."

We would not like to see a program where our most vulnerable citizens pay for a subscription, has a 10-year contract, and has an unstable ROI; that is a program that is less likely to be successful. At CEP, we work with seniors, people with disabilities, people of color, immigrants, single parents, and many others who are conned into promises of savings if ONLY they pay something up front. They are targeted in hopes that desperation will lead them to make a gamble with money they don't have. We've seen this with predatory payday loans, door-to-door charlatans, and with contractors who take the money and run. We fear that that such a program with upfront costs would be mistrusted because of this history. Agencies that serve our communities act as trusted gate-keepers to inform our clients on ways that they can help survive and thrive, an honor we take very seriously. If this program is a financial risk, then we believe most agencies would be hesitant to recommend this service. We also believe it will be extremely difficult to find participants to meet the 10% goal with these completely unnecessary changes.

A free, no-contract community solar subscription has the potential to be a life-changer for many people; allowing them to move away from energy assistance and spend money on other critical needs such as housing, food and health care.

Sincerely,

Sherrie Pelsma
Program Director, Community Energy Project