

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**AR 603**

In the Matter of	)	
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COMMUNITY SOLAR RULEMAKING	)	COMMENTS OF SMALL BUSINESS
	)	UTILITY ADVOCATES
(SB1547)	)	
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Small Business Utility Advocates (“SBUA”) offers these comments on the Rules for the Community Solar program prepared to implement ORS SB 1547.

SBUA sees the opportunities in community solar among businesses, yet is also is concerned by the practical administration of having, for example, five small businesses, and possibly local government, engaged in a project of 25 kW together. For this reason see some separation of small commercial from government and from residential in comments on the rules. Alternatively, because commercial rates include government, such as local government, SBUA recommends differentiating between percentage to government and percentage to private business. Recent figures for the PGE General Rate Revision Request, provided in a forthcoming supplement to these comments, provide some numerical differentiation between government and private sector ratepayers.

SBUA notes that where small nonresidential (e.g. Schedule 32) rate payers are in both PGE and in Pacific Power territories that the costs and proportions might be born by small nonresidential out of proportion to the projects developed by these ratepayers under these rules. Certain measures should be implemented to ensure fair participation of the small nonresidential community in this effort. For example, a minimum size of 25kW is large for many small commercial entities, and grouping five business (or possibly preparing public/private community solar opportunities w/small commercial) may require more time than for other project development including residential, so the reservation of a certain amount would give more time for businesses in geographic proximity to seek/coordinate with one another to devise a community solar project. In order to help ensure fair distribution of costs and benefits of the project among ratepayer classes, especially residential and small nonresidential, SBUA suggests that a percentage of costs might be born in proportion to the percentage of the number of ratepayers. This could be reviewed and revised in a subsequent year to reflect percentage of participation of ratepayers from the different participating ratepayer schedules.

The third party administrator should be familiar with small business, COBID certified businesses, and the state policy supporting certified business, and reports on implementing community solar must include identifying participation and extent of participation of COBID certified companies. Rationale to integrate this into the rules in some way: the second largest ratepayer group in each utility is small nonresidential, and certification is available to all qualifying firms regardless of the type of business and the measuring impact would be feasible through methods similar to publicly funded projects, or a similar but simplified version of same. This reporting would enables tracking of work and economic impact from this community solar effort.

Regarding the Advisory committee, it must be broad cross-section representative of community. Opportunity for selection process of the members should be advertised in the Business Tribune (Pamplin), across the state through such avenues as small business groups including chambers of commerce statewide, Oregon Association of Minority Entrepreneurs, BESThq LLC. Also, the Advisory committee should include one each of certified firm: minority-owned, veteran-owned, woman-owned, and it would be good to have a benefit company owner as this is reflective of state policy supporting these entities.

Finally, and significantly, SBUA requests careful preparation of the required statement of need and cost of compliance these rules will require of small business per ORS 183.336. Small businesses make up over 90% of the firms in Oregon per previous information provided by SBUA citing State of Oregon produced reports, and in 2016 approximately 2,500 jobs were in the solar sector (See <http://www.oregon4biz.com/assets/e-lib/IndRpt/CT/NtnlSolarJobs17.pdf> , [http://oseia.org/rw\\_common/plugins/stacks/armadillo/media/OregonSolarPlanFINAL3202017.pdf](http://oseia.org/rw_common/plugins/stacks/armadillo/media/OregonSolarPlanFINAL3202017.pdf)). This data supports a more robust look at the cost of compliance on small business since small business is much larger in Oregon than the AR 603 statement of need and cost of compliance seems to reflect currently. More information is available to provide a statement of cost of compliance more reflective of the state's small business and small nonresidential ratepayers.

RESPECTFULLY SUBMITTED,

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