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May 12, 2017

To: Michael Breish, Oregon Public Utilities Commission

Re: Community Energy Project Response to AR 603 Proposed Rules

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.

We continue to support the creation of Low-Income Manager

While CEP understands some of the concerns brought up, we agree with the original proposers that the low-income portion of this bill is going to have very different needs, and that an agency with expertise specific to those needs should be running it. It is very likely that the Program Administrator would need to bring in a group to subcontract this very issue anyway, and CEP supports this requirement.

Also, while it's not mentioned in the rules, the original wording of the bill includes a 10-year commitment from each participant, an unrealistic and unnecessarily burdensome requirement for low-income populations who are frequently forced to move between power territories. We believe that the LI Manager should be the agency that holds the 10-year commitment requirement on behalf of the individual subscribers, releasing individual participants from an onerous, intimidating, unenforceable, and unnecessary barrier to disadvantaged groups. This has been brought up as one of the largest barriers to Colorado's success in reaching LI subscribers, an issue we find unsurprising. This along with issues such as income verification, equitable distribution of resources, partnerships with other agencies, targeted outreach, and the prioritization of adaptive, creative ways of reaching our most vulnerable residents are further functions we see the LI Manager performing.



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Regarding section 860-088-0170

CEP is aware that the PUC is trying to juggle several options to reach the 10% LI goal, but we are very concerned about where the second part of the 5% in Section (2)

(1) Every project must provide at least 5 percent of its total nameplate capacity to only qualifying residential low-income customers.

(2) Five percent of the total program capacity tier must be designated for projects or portions of projects that exclusively serve qualifying low-income customers or entities qualifying under subsection (3).

(3) Public or private entities that provide housing services to qualifying-low income residential customers may count towards the capacity requirements described in subsections (1) and (2).

Regarding sections (1) and (2) - we are concerned that now only 5% of each project will go to low-income customers, and have a healthy skepticism regarding how the remaining 5% will be filled, and that it will simply be lost. The idea has been proposed that there will be low-income-only solar gardens built, but that's a large assumption with which to gamble half of what low-income customers are entitled.

(3) We aren't sure why housing is specifically mentioned when there are many types of agencies who could connect with the LI Manager to provide subscriptions to those they serve, such as those providing weatherization, SNAP benefits, energy assistance, services for seniors and people with disabilities, etc.

Community Energy Project is thrilled at the new opportunities that this brings to Oregon, and especially our vulnerable residents. We think there is real potential for new communities to connect with solar, and all the excitement that comes with participating in a solar program.

Sincerely,

Sherrie Pelsma
Program Director, Community Energy Project