

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1452

In the Matter of)	
)	
PUBLIC UTILITY COMMISSION)	RESPONSE IN OPPOSITION TO
OF OREGON)	RENEWABLE NORTHWEST PROJECT'S
)	AND CITIZENS' UTILITY BOARD'S
)	MOTION FOR ORDER ALLOWING
Investigation into Pilot Programs to)	SUPPLEMENTAL COMMENTS ON SOLAR
Demonstrate the Use and)	COST DATA SUBMITTED BY
Effectiveness of Volumetric)	ECUMENICAL MINISTRIES OF OREGON
Incentive Rates for Solar)	AND ITS PROJECT OREGON INTERFAITH
Photovoltaic Energy Systems)	POWER AND LIGHT
)	

Oregon Interfaith Power and Light opposes the motion of RNP and CUB for an order allowing another round of opening and closing comments on the issue of solar cost data.

All parties had opportunity to submit data in their closing comments on February 12, 2010. As far as we can discern no new data has been discovered since that time. Fourth quarter of 2009 was well over; the first quarter of 2010 is still not closed at time of writing.

Furthermore, our review of current installation cost data indicates that it is very close to the installation costs used by PUC Staff in the Volumetric Incentive Rate analysis presented in Staff's closing comments. We find that using the current data instead of the numbers used by Staff will have an effect smaller than the 5 cent rounding error.

The FIT Pilot Program includes a mechanism for reassessing the VIR every six months. To reopen the subject for comments now is without justifiable cause and would be a burden of time and expense to the parties involved. We ask that the commission be allowed to complete their work without interruption.

DATED this 25th day of March 2010.

ECUMENICAL MINISTRIES OF OREGON
AND
OREGON INTERFAITH POWER AND LIGHT

/s/ Jenny Holmes

CERTIFICATE OF SERVICE

I certify that I have caused to be served the foregoing RESPONSE IN OPPOSITION TO RENEWABLE NORTHWEST PROJECT'S AND CITIZENS' UTILITY BOARD OF OREGON'S MOTION FOR ORDER ALLOWING SUPPLEMENTAL COMMENTS ON SOLAR COST DATA SUBMITTED BY ECUMENICAL MINISTRIES OF OREGON AND ITS PROJECT OREGON INTERFAITH POWER AND LIGHT'S, PUC Docket No. UM 1452, by electronic mail to the PUC Service list as of this date, and by US mail to the parties listed below who have not waived paper service.

Dated this 25th day of March, 2010.

ECUMENICAL MINISTRIES OF OREGON
OREGON INTERFAITH POWER AND LIGHT

IRION A SANGER
DAVISON VAN CLEVE
333 SW TAYLOR - STE 400
PORTLAND OR 97204

DOUG KUNS
PGE
121 SW SALMON ST, 1WTC0702
PORTLAND OR 97204

MELINDA J DAVISON
DAVISON VAN CLEVE
333 SW TAYLOR - STE 400
PORTLAND OR 97204

J RICHARD GEORGE
PGE
121 SW SALMON ST, 1WTC1301
PORTLAND OR 97204

STEPHANIE S ANDRUS
DEPARTMENT OF JUSTICE
1162 COURT ST NE
SALEM OR 97301-4096

THERESA GIBNEY
OREGON PUC
PO BOX 2148
SALEM OR 97308