

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1452

In the Matter of:)	
)	OPENING COMMENTS
Investigation into pilot programs)	of ENERGY TRUST OF
to demonstrate the use and)	OREGON
effectiveness of volumetric incentive)	
rates for solar photovoltaic energy)	
systems)	

Energy Trust of Oregon, Inc., (Energy Trust) submits the following opening comments in support of the development of this pilot program, and to provide additional information regarding rate classes for volumetric incentive rates.

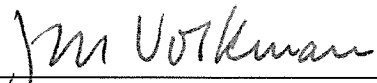
Energy Trust supports OPUC Staff's proposal to vary volumetric rates based on location, to help ensure that the financial incentive for a given system is similar regardless of where it is installed. However, Energy Trust sees a different distribution of solar resource among counties than indicated in the Staff's proposed rate classes. For example, between rate classes 1 and 2, the proposed incentive rate decrease of approximately 17% seems disproportionate to the increase in solar resource of only approximately 5%. Staff developed the rate classes and incentive rates based on project data provided by Energy Trust, but was disadvantaged by the fact that Energy Trust lacks project data in some geographical areas in the state.

Energy Trust urges OPUC Staff to rely primarily on the “local production capacity” for determining (i) which counties are in each rate class and (ii) the appropriate incentive rate for that rate class. “Local production capacity” is an estimate of electricity that a project will generate each year in a given location assuming optimal panel orientation and no shading, and is stated in terms of annual kilowatt-hours per watt of nameplate capacity. Energy Trust believes the local production capacity estimates to be accurate, and has measured performance data from solar photovoltaic systems to confirm this.

Energy Trust’s recommendation for the rate class definitions based on solar resource is shown in the following table. We encourage Staff to consider recalculating the incentive rates based on these figures:

Rate Class	Counties	Approximate kWh/watt annual production capacity
1	Benton, Clackamas, Clatsop, Columbia, Lane, Lincoln, Linn, Marion, Multnomah, Polk, Tillamook, Washington, Yamhill	1.1
2	Coos, Curry, Douglas, Hood River	1.2
3	Gilliam, Jackson, Josephine, Klamath, Morrow, Sherman, Umatilla, Union, Wallowa, Wasco, Wheeler	1.3
4	Baker, Crook, Deschutes, Grant, Harney, Jefferson, Lake, Malheur	1.4

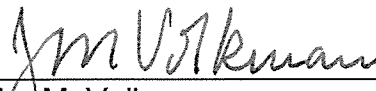
DATED this 14th day of January, 2010.

By: 
 John M. Volkman, General Counsel
 Kacia Brockman, Sr. Solar Program
 Manager, Energy Trust of Oregon

CERTIFICATE OF SERVICE

I, John M. Volkman, hereby certify that on this day I served a copy of the Opening Comments of Energy Trust of Oregon upon all persons indicated on the attached service list via electronic mail, and also by first-class mail to those who have not waived paper service.

Dated this 14th day of January, 2010, at Portland, Oregon.

By: 
John M. Volkman

SERVICE LIST

**W=Waive
Paper
service**

W TEDDY KEIZER 1615 SE 30TH AVE
PORTLAND OR 97214
teddy@goteddygo.com; teddy1a@aol.com

W RAYMOND P NEFF 465-1/2 RIVER RD
EUGENE OR 97404
rpneff@efn.org

W DANIEL WELDON 19790 SOUTH FERGUSON TERRACE
OREGON CITY OR 97045
danweldon@bctonline.com

W **CABLE HUSTON et al.** 1001 SW FIFTH AVENUE, SUITE 2000
PORTLAND OR 97204-1136
RAYMOND S Rkindley@cablehuston.com
KINDLEY

W **CITIZENS' UTILITY
BOARD OF
OREGON**

GORDON FEIGNER 610 SW BROADWAY, SUITE 308
ENERGY ANALYST PORTLAND OR 97205
gordon@oregoncub.org

ROBERT JENKS 610 SW BROADWAY STE 308
PORTLAND OR 97205
bob@oregoncub.org

G. CATRIONA 610 SW BROADWAY - STE 308
MCCRACKEN PORTLAND OR 97205
LEGAL catriona@oregoncub.org
COUNSEL/STAFF
ATTY

**DAVISON VAN
CLEVE**

IRION A SANGER 333 SW TAYLOR - STE 400
ASSOCIATE PORTLAND OR 97204
ATTORNEY ias@dvclaw.com

MELINDA J DAVISON 333 SW TAYLOR - STE 400
PORTLAND OR 97204
mail@dvclaw.com

**DEPARTMENT OF
JUSTICE**

STEPHANIE S REGULATED UTILITY & BUSINESS SECTION
ANDRUS 1162 COURT ST NE
ASSISTANT SALEM OR 97301-4096
ATTORNEY GENERAL stephanie.andrus@state.or.us

W **ECUMENICAL
MINISTRIES OF**

OREGON

KATHLEEN NEWMAN 1553 NE GREENSWORD DR
OREGON HILLSBORO OR 97214
INTERFAITH POWER kneuman@emoregon.org; k.a.newman@verizon.net
& LIGHT

JENNY HOLMES 0245 SW BANCROFT, SUITE B
ENVIRONMENTAL PORTLAND OR 97239
MINISTRIES jholmes@emoregon.org
DIRECTOR

**W ENVIRONMENTAL
LAW ALLIANCE
WORLDWIDE**

JENNIFER GLEASON 1877 GARDEN AVE
EUGENE OR 97403
jen@elaw.org

**W ESLER STEPHENS
& BUCKLEY**

JOHN W 888 SW FIFTH AVE STE 700
STEPHENS PORTLAND OR 97204-2021
stephens@eslerstephens.com

**W IDAHO POWER
COMPANY**

RANDY ALLPHIN PO BOX 70
BOISE ID 83707-0070
rallphin@idahopower.com

CHRISTA BEARRY PO BOX 70
BOISE ID 83707-0070
cbearry@idahopower.com

KARL BOKENKAMP PO BOX 70
GENERAL BOISE ID 83707-0070
MANAGER-POWER kbokenkamp@idahopower.com
SUPPLY PLANNING

RICK GALE
rgale@idahopower.com

BARTON L KLINE PO BOX 70
SENIOR ATTORNEY BOISE ID 83707-0070
bkline@idahopower.com

PO BOX 70
BOISE ID 83707-0070
jmalmen@idahopower.com

LISA D NORDSTROM PO BOX 70
ATTORNEY BOISE ID 83707-0070
lnordstrom@idahopower.com

GREGORY W SAID PO BOX 70
DIRECTOR - BOISE ID 83707

REVENUE
REQUIREMENT gsaid@idahopower.com

MARK STOKES PO BOX 70
MANAGER, POWER BOISE ID 83707
SUPPLY & PLANNING mstokes@idahopower.com

MICHAEL PO BOX 70
YOUNGBLOOD BOISE ID 83707
SENIOR PRICING myoungblood@idahopower.com
ANALYST

**W MCDOWELL &
 RACKNER PC**

WENDY MCINDOO 520 SW 6TH AVE STE 830
OFFICE MANAGER PORTLAND OR 97204
wendy@mcd-law.com

LISA F RACKNER 520 SW SIXTH AVENUE STE 830
ATTORNEY PORTLAND OR 97204
lisa@mcd-law.com

**W MULTNOMAH
 COUNTY**

WARREN FISH 501 SE HAWTHORNE, STE 600
 PORTLAND OR 97214
warren.fish@co.multnomah.or.us

COMMISSIONER JEFF 501 SE HAWTHORNE, STE 600
COGEN PORTLAND OR 97214
district2@co.multnomah.or.us

OREGON AFL-CIO 2110 STATE ST
 SALEM OR 97301
afl-cio@oraficio.org; duke@oraficio.org

JOHN BISHOP 1635 NW JOHNSON ST
 PORTLAND OR 97209
jbishop@mbjlaw.com

**W OREGON DISTRICT
 COUNCIL OF
 LABORERS'**

BEN NELSON 10245 SE HOLGATE BLVD
 PORTLAND OR 97266
nrocnelson@qwest.net

MELODY GUY melodyg@qwestoffice.net

**W OREGONIANS FOR
 RENEWABLE
 ENERGY
 PAYMENTS**

JUDY BARNES 1425 SE 37TH
 PORTLAND OR 97214
jbarnes@hevanet.com

MARK PETE PO BOX 10221
PENGILLY PORTLAND OR 97296

mpengilly@gmail.com

W PACIFICORP

RYAN FLYNN
LEGAL COUNSEL

825 NE MULTNOMAH, SUITE 1800
PORTLAND OR 97232
ryan.flynn@pacificorp.com

PACIFIC POWER
OREGON DOCKETS

825 NE MULTNOMAH STREET, STE 2000
PORTLAND OR 97232
oregondockets@pacificorp.com

**PORTLAND
GENERAL
ELECTRIC
COMPANY**

DOUG KUNS, RATES
& REGULATORY
AFFAIRS

PORTLAND GENERAL ELECTRIC COMPANY
121 SW SALMON STREET, 1WTC0702
PORTLAND OR 97204
pge.opuc.filings@pgn.com

J RICHARD GEORGE
ASST GENERAL
COUNSEL

121 SW SALMON ST 1WTC1301
PORTLAND OR 97204
richard.george@pgn.com

**PUBLIC UTILITY
COMMISSION OF
OREGON**

THERESA GIBNEY

PO BOX 2148
SALEM OR 97308
theresa.gibney@state.or.us

**W RENEWABLE
NORTHWEST
PROJECT**

ANN ENGLISH
GRAVATT
POLICY DIRECTOR

917 SW OAK - STE 303
PORTLAND OR 97205
ann@rnp.org

SUZANNE LETA LIOU
SENIOR POLICY
ADVOCATE

917 SW OAK STE 303
PORTLAND OR 97205
suzanne@rnp.org

**W SOLAR ENERGY
SOLUTIONS, INC.**

ANDREW
KOYAANISQATSI
PRESIDENT

3730 SE LAFAYETTE CT
PORTLAND OR 97202
andrew@solarenergyoregon.com

**W SOUTHEAST
UPLIFT
NEIGHBORHOOD
COALITION**

TIM O'NEIL

3534 SE MAIN ST
PORTLAND OR 97212
tim@southeastuplift.org

W SUNEDISON

JOE HENRI

12500 BALTIMORE AVE
BELTSVILLE MD 20705
jhenri@sunedison.com

W

**SUSTAINABLE
SOLUTIONS
UNLIMITED LLC**

STEVEN MCGRATH

1339 SE 8TH AVE # B
PORTLAND OR 97214
steve@solutions21st.com