

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 1452  
AND  
AR 538

In the Matter of	)	
	)	
PUBLIC UTILITY COMMISSION	)	
OF OREGON	)	FINAL COMMENTS OF
	)	ECUMENICAL MINISTRIES
Investigation into Pilot Programs to	)	OF OREGON – OREGON
Demonstrate the use and effectiveness of	)	INTERFAITH POWER AND
Volumetric Incentive Rates for Solar	)	LIGHT
Photovoltaic Energy Systems.	)	

Ecumenical Ministries of Oregon and its project, Oregon Interfaith Power and Light, thank the Commission for the opportunity to participate in the formal comments on the UM 1452 Straw Proposal and the Proposed Administrative Rules for Solar Photovoltaic Programs. We write to address the Commissioners question #6 *Carve-outs and/or Rate Differentials: Should the Commission provide 'carve-outs' and/or higher rates for non-profit organizations? For other groups? Why or why not?* and to recommend other revisions to the Staff proposal. We thank you for your time and attention in taking these comments into consideration.

**#6. Yes we should provide carve-outs and higher VIRs for entities that are unable to access the federal tax credits. This group includes schools, public libraries, municipal buildings, and houses of worship.**

**Public Education and Engagement:**

As all of us involved in this process are aware, solar energy is still expensive. Solar energy is especially expensive relative to the cheap power we are accustomed to in this country and in this bountiful northwest region in particular. The transition to solar and other renewable energies will be more expensive than the status quo, at least until economies of scale exert the market pressures to bring prices down (as they have in other markets as technologies and efficiencies develop). Whether funded by taxpayers or ratepayers, this transition is going to cost the general public. It is therefore necessary to have public buy-in.

Solar energy is a wonderful tool for public education and engagement. Children and adults alike are captivated by seeing solar panels on the roof and watching the electricity meter run in the lobby of a school, library, town hall or church. It's the magic of nature harvested by the ingenuity of humans! And it can be located right in everyone's neighborhood!

We believe that installations of solar photovoltaic systems on schools, libraries, municipal buildings, and houses of worship have a value beyond the electricity they generate. That value lies in the public education and engagement they engender. Putting the energy issue literally in public view not only develops a sense of ownership and support for renewable energy technologies, but, with education, creates an awareness and consciousness that promotes conservation of electricity and fossil fuels. Thus, we believe that solar panels prominently displayed on public and nonprofit buildings support the transition to a renewable energy economy by both decreasing energy use and increasing political will.

## Capacity Allocation and Deployment Schedule

Ecumenical Ministries of Oregon and Oregon Interfaith Power and Light requests that the Commission create a capacity allocation carve-out for public and nonprofit entities as shown in the table below (a modification of Figure 1, page 6 of Staff's Opening Comments, UM 1452, January 14, 2010.)

<b>Capacity Distribution and Number of Projects</b>				
<b>Pilot Program Year</b>	<b>Smaller Systems</b> (Less Than or Equal to 10 kW)	<b>Medium Systems</b> (Greater Than 10 kW and Less Than or Equal to 100 kW)		<b>Large Systems</b> (Greater Than 100 kW and Less Than or Equal to 500 kW)
		<b>Public and Nonprofit</b>	<b>General</b>	
<b>4/2010 thru 3/2011</b>	<b>5%</b> = 1.25 MW 180 - 625 systems (7kW - 2 kW)*	<b>3%</b> = 0.75 MW 11 - 38 systems (70 kW - 20 kW)	<b>5%</b> = 1.25 MW 18 - 63 systems (70 kW - 20 kW)	<b>5%</b> = 1.25 MW 3 - 10 systems (420 kW - 125 kW)
<b>3/2011 thru 3/2012</b>	<b>10%</b> = 2.5 MW 360 - 1250 systems (7kW - 2 kW)	<b>4%</b> = 1.0 MW 14 - 50 systems (70 kW - 20 kW)	<b>5%</b> = 1.25 MW 18 - 63 systems (70 kW - 20 kW)	<b>5%</b> = 1.25 MW 3 - 10 systems (420 kW - 125 kW)
<b>3/2012 thru 3/2013</b>	<b>15%</b> = 3.75 MW 536 - 1875 systems (7kW - 2 kW)	<b>4%</b> = 1.0 MW 14 - 50 systems (70 kW - 20 kW)	<b>2.5%</b> = 0.63 MW 9 - 31 systems (70 kW - 20 kW)	<b>5%</b> = 1.25 MW 3 - 10 systems (420 kW - 125 kW)
<b>3/2013 thru 3/2014</b>	<b>20%</b> = 5.0 MW 714 - 2500 systems (7kW - 2 kW)	<b>4%</b> = 1.0 MW 14 - 50 systems (70 kW - 20 kW)	<b>2.5%</b> = 0.63 MW 9 - 31 systems (70 kW - 20 kW)	<b>5%</b> = 1.25 MW 3 - 10 systems (420 kW - 125 kW)
<b>Total Capacity by Category</b>	<b>50%</b>	<b>15%</b>	<b>15%</b>	<b>20%</b>
	<b>65%</b> <b>Community Systems</b>		<b>35%</b> <b>Commercial and Industrial Systems</b>	

\* the two average sizes shown in parenthesis were used to generate boundary case estimates for the range of number of systems

This represents no change to the Staff's allocations of 50%, 30% and 20% to the Smaller, Medium, and Large size ranges. The 30% of the pilot project allocated for the Medium size is evenly split to give public and nonprofit entities access to capacity in a separate pool that will have its own deployment schedule, process for enrollment, and VIR schedule. The capacity distribution we are recommending brings the total capacity set aside for residential and community projects up to 65%, within range of the governor's original objective of 75% for "individuals and communities" (Governor Kulongoski's 2008 Energy Plan, ([http://governor.oregon.gov/Gov/pdf/climate\\_change\\_agenda\\_1008\\_final\\_3.pdf](http://governor.oregon.gov/Gov/pdf/climate_change_agenda_1008_final_3.pdf))).

We believe that schools, libraries, town halls, churches, synagogues, mosques, and other public and nonprofits encompass enormous, pent-up, aggregate demand that will easily use the capacity requested. However, as assurance that all pilot capacity will be used, we further suggest that any unused public and nonprofit capacity be folded back into general “medium” deployment for the following year.

Ecumenical Ministries of Oregon and Oregon Interfaith Power and Light request a deployment schedule of 3%, 4%, 4%, and 4% over each of four years as shown in the table above. We believe that 3% in first year (11 to 38 systems) is reasonable given pent-up demand in this sector. The slightly lower capacity in year one allows for publicity and stakeholder processes to ramp up before the higher allotments take over for the following years.

#### **Process for Enrollment (see Staff Proposal, Section D – Capacity Reservation)**

Public and nonprofit entities are subject to complex and prolonged multi-stakeholder decision making processes. Under the current proposal, most public and nonprofit entities will be applying for participation in the Medium size class. Therefore it is vitally important to separate these entities from the intense competition expected in the commercial sector for the Medium capacity allocation. The Public and Nonprofit carve-out serves this purpose by allowing the public and nonprofit sector to work on their appropriate time frames. This is perhaps the most important function of the carve-out. We recommend that capacity in the carve-out be distributed throughout the year (first come first serve) until capacity for the year is reserved (as put forth for the Smaller size category in Staff’s proposal.)

#### **Volumetric Incentive Rates (see Staff Proposal, Section H – Volumetric Incentive Rates)**

As has been discussed in Ecumenical Ministries of Oregon and Oregon Interfaith Power and Light’s previous comments (see Appendix 1), under the current system of incentives it has been very difficult for entities without tax liability to access the federal tax incentives that make solar affordable. (See also Appendix II, Congregational Petitions.)

Therefore, EMO-OIPL is asking the Commission to set a VIR for the Public and Nonprofit Carve-out that accounts for inability to access that 30% incentive. This is an issue in flux as efforts are in play at the federal level to correct the situation. We anticipate that when the federal solution is in place, the PUC will recalculate the VIR accordingly. In fact, once the federal solution is in place (and depending on rulings going forward regarding the taxability of FIT payments by federal and state government) there may be occasion to set a VIR for nontaxable entities that is substantially lower than that for commercial and residential participants to compensate for lack of associated business expenses and tax liability on the VIR payments. Note that the existence of a finite carve-out, in the meantime, limits ratepayer exposure to the higher VIR that may be set for nontaxable entities.

Staff proposal should be amended in 860-084-0410 to require certification that no investor participating in the Public and Nonprofit Carve-out in will accept incentives from the federal government.

Ecumenical Ministries of Oregon and Oregon Interfaith Power and Light support OREP’s approach to calculating the VIR to cover costs incurred by participants of the program. We have used their spreadsheet (SolarFITRate-tk-v18.xls) to calculate VIRs needed to make solar installation affordable for community scale (40kW) systems in different areas of the state where the owner of the system is a nontaxable entity. This means taking out the federal incentive, but also taking out various costs associated with filing as a small business. We have used a lower-than-market loan interest rate to reflect opportunities churches and other nontaxable entities may have to access credit at a reduced rate.

(see [http://www.emoregon.org/pdfs/OIPL\\_Denominational\\_Loans\\_for\\_Energy\\_Green\\_Building.pdf](http://www.emoregon.org/pdfs/OIPL_Denominational_Loans_for_Energy_Green_Building.pdf) for a listing of institutions that lend within religious denomination). In order to minimize the VIR required, we have also lowered the risk premium on the grounds that broad ownership of a system by many individuals (be it the general public or members of a congregation) buffers any one individual against risk.

We have used the following inputs for our calculations:

- No federal tax credit
- Installation cost per watt = \$7.70
- Monthly Service Charge for Meter = \$10
- Insurance Rate = \$0.22%
- Operation & Maintenance = 0%
- Tax Preparation and all tax and depreciation calculations eliminated
- Business License Fees = \$0
- Loan Interest Rate\* = 6.00%
- Loan Fee Rate = 0.5%
- Risk Premium = 0.5%
- kW Output Factor = 1.1, 1.2, 1.3, 1.4 for zones 1, 2, 3, and 4 respectively
- Annual Panel Degradation Rate = 0.7%
- Solar Resource Fraction = 89%

\* There are loan opportunities available to some nonprofits that are a little below market rates.

Results are shown in the table below.

<b>VIR for Medium Sized Projects without Tax Liability</b>			
<b>Insolation Zone</b>	<b>kW output factor</b>	<b>Size Category</b>	<b>FIT Rate</b>
<b>Zone 1</b>	<b>1.1</b>	<b>Medium</b>	<b>\$0.90</b>
<b>Zone 2</b>	<b>1.2</b>	<b>Medium</b>	<b>\$0.82</b>
<b>Zone 3</b>	<b>1.3</b>	<b>Medium</b>	<b>\$0.76</b>
<b>Zone 4</b>	<b>1.4</b>	<b>Medium</b>	<b>\$0.70</b>

Note that because of the lower installed cost of “Medium” versus “Smaller” and the compensating factors that come with non-taxable entities, the needed VIRs are actually within pennies of the VIRs needed for residential installations. Thus, the cost for community installations is expected to be fairly consistent across size scales.

**Summary of answer to Commissioners’ Question #6**

- Solar installations on public and nonprofit buildings have public educational and engagement value beyond the value of the electricity produced
- A carve-out for this sector provides for:
  1. Participation by a valuable sector that has been largely left out under the current system of incentives. (This will make an interesting area of comparison for the pilot.)
  2. A pool of capacity protected from the intense competition expected in the commercial sector for the general Medium (10kW to 100kW) capacity allocation.
  3. A year-long (first come first serve) application process suited to this sector without competition from commercial interests (although commercial interests will have access to any unused capacity the following year)

4. VIR set in keeping with the actual cost of the system
5. VIR rates independent from rates set for the taxable sector and therefore easily adjustable (to a lower rate) as federal policy adapts to the growing number of FITs around the country and develops a process for incentives for public and nonprofit entities
6. A demonstration of demand in this sector that will help drive reform at the federal level

## **Other Comments**

### **Permanence of System**

EMO-OIPL is in agreement with ELAW and OREP on this issue and appreciate the Staff revision to 860-048-0240 that has eliminated the explicit option for de-installation of the system at the end of the contract. It is unethical for Oregonians to pay a premium for solar installations without some reasonable assurance that the system will be in operation for its useful life.

### **Net metering**

We are in agreement with ELAW and OREP in considering the modified Net Metering approach to the FERC issue as cumbersome, loaded with perverse incentives, and unnecessary since it is not the lonely viable work-around. We refer to ELAW's comments on this matter.

We thank you for the opportunity to contribute in this public process.

Ecumenical Ministries of Oregon – Oregon Interfaith Power and Light (EMO-OIPL)

DATED this 11th day of February, 2010

*/s/ Jenny Holmes*

EMO Director of Environmental Ministries

## **Appendix 1: History of OIPL and Solar Energy (from opening comments)**

OIPL represents a wide range of faith communities. Our constituents share a deep commitment to Stewardship of the Earth and awareness of the social injustice of Global Climate Disruption. Our vision is a rich, abundant life for all Creation rooted in renewable resources for a society moving into a post-fossil-fuel era. The principles guiding our vision are justice, equality, compassion and respect for the sacredness of Earth. In practical terms, Oregon Interfaith Power and Light has worked with over 500 congregations in Oregon to improve the energy efficiency of their buildings and member's homes. We work with congregations of all faiths and in all regions of the state.

In response to demand from congregations, OIPL began the Solar Congregations Program and, back in 2007, created a corporation, Solar Congregations Inc, for the purpose of helping congregations take the full benefit of available tax incentives for PV-solar installations through third party financing arrangements.

Unfortunately the Solar Congregations Program has been stymied both by the complexity of the models that allow non-profits to access the federal incentives and by difficulty in finding for-profit partners. Despite great interest and enthusiasm, our combined efforts have borne very little fruit. We have a backlog of interested congregations (over 60 just now, of which more than 25 have performed on-site solar assessments, checking available insolation, roof structure, inverter location, etc.). Most of the proposed systems have been in the 10 kW to 35 kW range and thus are too small to be attractive to larger investors, but too large for most congregations to pay the up-front costs on their own. Overall, the current system of incentives has not been

effective for the faith community. The feed-in-tariff is an opportunity to level the playing field and make solar installations a reality for congregations and other nonprofits such as schools, libraries, and other public buildings.

## Appendix II: Congregational Petitions

At the eleventh hour of this process it occurred to us that the Commissioners might appreciate evidence of interest beyond the say-so of EMO-OIPL. Late on Saturday the 30<sup>th</sup> of January we sent out a petition letter to congregations that have engaged with OIPL in exploring ways to fund solar photovoltaic systems, asking that responses be received by end of workday Wednesday. Given the lengthy process generally involved in individuals getting formal consent to speak on behalf of their church, we were doubtful of receiving many responses in the short time allowed. We were please by the rapid outpouring of replies. Included here are the letter and the 22 electronic signatures and three extra comments we received from congregations.

February 2010

Dear Members of the Public Utility Commission,

We represent congregations in PGE and PacifiCorp territory that have been working for up to three years to install solar energy on the site of our religious congregation. We are motivated by a commitment to stewardship of Creation and a desire to contribute to our nation's energy independence and to educate our members and the community about renewable energy.

We have had at least a preliminary assessment of the potential and feasibility of PV solar. Some of us have solicited bids and costs estimates. Some of us have raised our portion of the costs for a system that would be installed under a third-party agreement. We have faced in two main barriers in moving forward.

1. In order to access the 30% federal tax incentives, it has been necessary for a non-profit to partner with a third-party investor. It has been difficult to find third-party investors for our projects. Congregational solar projects are too small on their own to attract most investors. In 2008, OIPL worked with a contractor to aggregate multiple systems so as to be more attractive, but no large investors were ready to invest in this model because of its newness and inherent complexity.
2. Congregations rely heavily on volunteers to make decisions and implement projects. Third-party financing models needed to access the 30% federal incentives are complex and require extensive education to get and keep all the decision-makers on board.

The feed-in tariff is much simpler. It fits better with the decision making processes typical of congregations. In addition, it works better with their key means of financing capital improvements--loans and capital campaigns.

Therefore, we respectfully request the Oregon Public Utility Commission to include an allocation 'carve out' for non-profits with a higher volumetric rate to make solar electric systems affordable without the federal tax incentive.

Signed,

Wendy Herrett, Trustee Committee Chair, First United Methodist Church, 600 State Street, Salem 97301,  
[wherrett@comcast.net](mailto:wherrett@comcast.net)

William L. Zuiches, Chairman, Building and Grounds Committee, First Presbyterian Church of Newberg, Oregon, 501 Mission Dr., Newberg, OR 97132-1656, [bzuiches@yahoo.com](mailto:bzuiches@yahoo.com)

Robert Buchholz, St. Andrew Lutheran Church, 12405 SW Butner Rd, Beaverton, OR 97008,  
[btbuchholz@comcast.net](mailto:btbuchholz@comcast.net)

Gabe Genauer, Havurah Shalom, 825 NW 18<sup>th</sup> Ave., Portland, OR 97209, [gabe@bandgweb.com](mailto:gabe@bandgweb.com)

Martha Connell, Energy Task Force Chair, First United Methodist Church, 1824 SW Market St., Portland, OR, [cooperconnell@hevanet.com](mailto:cooperconnell@hevanet.com)

Allison Anderson, Chair of Planet Church Committee, First United Methodist, Portland, [Ama1031@hotmail.com](mailto:Ama1031@hotmail.com)

Judith Havis, Temple Beth Sholom, 1230 Rafael N. Salem, OR 97303, [admin@tbsholom.org](mailto:admin@tbsholom.org)

David DeVore, Chair of Green Team, Milwaukie Presbyterian Church, 2416 SE Lake Rd., Milwaukie, OR 97222, [David.devore@comcast.net](mailto:David.devore@comcast.net)

Stanley Clarke, Vice Chair, Trustees, Tabor Heights United Methodist, 6161 SE Stark St., Portland, OR 97215, [srclarke@ix.netcom.com](mailto:srclarke@ix.netcom.com)

The Rev. Brian E. Brandt, Pastor, Central Lutheran Church, 1820 NE 21st Avenue, Portland, OR 97212, [pastor@centralportland.org](mailto:pastor@centralportland.org)

Gardner Grice, BOC II, Facilities Manager, First Unitarian Church, 1034 SW 13th Ave, Portland Oregon 97205, 503-228-6389 ext 43, [ggrice@firstunitarianportland.org](mailto:ggrice@firstunitarianportland.org)

Sr. Patricia Nagle, St. Philip Neri, 2408 SE 16<sup>th</sup> Ave., Portland, OR 97214, [earthome@igc.org](mailto:earthome@igc.org)

Bill Becker, Former Vestry member and Chair, Environmental Group, (Episcopal) Church of the Good Samaritan, 333 NW 35th Street (church address), Corvallis, [bwjfbecker@hotmail.com](mailto:bwjfbecker@hotmail.com)

Our parish had got far along in the design process, had selected a contractor, but ran into insurmountable problems trying to put a financial package together. We experienced exactly the kinds of problems described above.

William Gazeley, Parishioner/Solar Power Committee, Good Samaritan Church, 333 NW 35th St., Corvallis, Oregon 97330, 541 757-6647. At Good Sam parish, Corvallis, [gazeleyfamily@comcast.net](mailto:gazeleyfamily@comcast.net) we have a ~25 kW system we'd like to install, and have selected a contractor by competitive bid, but have not been able to navigate the difficulties of spreading tax credits across multiple business and individual investors, and thus our project has not moved out of the planning phase.

Carolyn A. Bella, Eucharistic Minister and Episcopalian, Environmental Group member  
Church of the Good Samaritan, 333 NW 35th Street, Corvallis, OR 97330  
[bellacd@peak.org](mailto:bellacd@peak.org)

Dr. Steve Amsberry, member of the congregation, Episcopal Church of The Good Samaritan, 333 NW 35th St, Corvallis Oregon 97330, [amsdvm@comcast.net](mailto:amsdvm@comcast.net)

Linda Gelbrich, Parishioner and member of the diocesan Environmental Commission, Church of the Good Samaritan, Corvallis, OR, [lindaw@exchangenet.net](mailto:lindaw@exchangenet.net)

Joyce Sluss, Clergy, Woodburn United Methodist Church, 701 N. Cascade Dr, Woodburn, OR 97071, [Themom123@aol.com](mailto:Themom123@aol.com)

The Rev. Jim Monroe, Woodburn United Methodist Church  
"Jim Monroe" <[jim@woodburn-umc.org](mailto:jim@woodburn-umc.org)>

Date: Wed, February 3, 2010 3:07 pm

To: [OIPL@EMOREGON.ORG](mailto:OIPL@EMOREGON.ORG)

-----  
The Woodburn United Methodist Church wholeheartedly endorses this program. We see ourselves as potential user/providers of solar power under this programs guidelines. We encourage you to do everything in your power to facilitate its implementation.



Thank You, James P. Monroe, Pastor

Jim Leeman, Jim Leeman, Reedwood in Action Committee, Reedwood Friends Church, 2901 SE Steele St., Portland, OR 97202, [jcleeman@yahoo.com](mailto:jcleeman@yahoo.com)

### **Public Power Congregations**

The Rev. John Pitney, First United Methodist, 1376 Olive St. Eugene, Oregon 97401, [compost@cmc.net](mailto:compost@cmc.net)

Barry McPherson, Chair of Eco-Justice Team, First Presbyterian Church of Newport, 905 NE 7th St., 227 NE 12th St. Newport, OR 97365, [bdmcpherson@coho.net](mailto:bdmcpherson@coho.net); Church [office@newportfpc.org](mailto:office@newportfpc.org)

Rev. Gary Langenwalter, Pastor  
Dundee United Methodist Church  
1110 N. Highway 99W  
PO Box 66  
Dundee, OR 97115

[PastorGary@DundeeUMChurch.org](mailto:PastorGary@DundeeUMChurch.org)

Dear members of the PUC;

As a member of the Church of the Good Samaritan Episcopal Church in Corvallis, Oregon, I have been working with others of our congregation in planning a photovoltaic installation for our church building. Our estimated cost would be around \$200,000. Since we are a non-profit institution we do not qualify for state and federal tax incentives. However, we have investigated third-party financial assistance but could not find any investors since ours is a pretty small installation. Also, the financial picture of the past couple of years has not been favorable to this sort of investment.

I was excited to learn that we may have another avenue of attack if the Oregon Public Utility Commission includes an allocation 'carve out" for non-profits to make photovoltaic systems affordable without the federal tax incentive. I, therefore, request that you include this allocation in order that we might proceed with our plans.

Henry C.. Burrige  
Member, Church of the Good Samaritan Congregation  
1059 NW Fuchsia Drive  
Corvallis, OR 97330  
PH. 541-758-5033  
e-mail: [burrige5@comcast.net](mailto:burrige5@comcast.net)  
[Download](#)



*A Community of Lutherans  
and Roman Catholics*

February 2, 2010

Dear Members of the Public Utility Commission,

I am writing as a representative of a congregation in PGE territory. We are currently undergoing renovations to our building and surrounding property and discussing additional changes. All of our discussions and actions include a strong sense of shared stewardship of the earth. Improvements to our sanctuary were made with re-use and recycling in mind. We have entered into a partnership with key supporters to address the water runoff issues with our parking lot. Projects to reduce lawn and include more natives and low maintenance plants are underway and more programs are being discussed. Like many other leaders from local congregations, I attended a meeting sponsored by Oregon Interfaith Power & Light to learn about Solar Congregations. I left the meeting inspired by the potential in our own community, but discouraged by the prohibitive costs and level of volunteerism it would take to put such a plan into action in our small community. OIPL summarized it best as follows:

1. In order to access the 30% federal tax incentives, it has been necessary for a non-profit to partner with a third-party investor. It has been difficult to find third-party investors for our projects. Congregational solar projects are too small on their own to attract most investors. In 2008, OIPL worked with a contractor to aggregate multiple systems so as to be more attractive, but no large investors were ready to invest in this model because of its newness and inherent complexity.
2. Congregations rely heavily on volunteers to make decisions and implement projects. Third-party financing models needed to access the 30% federal incentives are complex and require extensive education to get and keep all the decision-makers on board.

The feed-in tariff being suggested is much simpler. It fits better with the decision-making processes typical of congregations, including ours. In addition, it works better with our key means of financing capital improvements--loans and capital campaigns.

As our community moves forward with our Long Range Plan, we respectfully request that the Oregon Public Utility Commission include an allocation "carve out" for non-profits with a higher volumetric rate to make solar electric systems affordable without the federal tax incentive. I continue to believe that our current building and property are well suited to this energy solution, if cost and execution issues were more "congregation friendly".

Sincerely,

A handwritten signature in black ink that reads "Judith Howell". The signature is written in a cursive style.

Judith Howell, Treasurer, Long Range Planning Team member, Green Team member, Landscape Team member

The statements above are supported by our clergy, the members of the Long Range Planning Team, and the members of the Steering Team.

Email: [mota.welcome@gmail.com](mailto:mota.welcome@gmail.com)

## CERTIFICATE OF SERVICE

I certify that I have caused to be served the foregoing "Opening Comments of Ecumenical Ministries of Oregon – Oregon Interfaith Power and Light" regarding Oregon PUC Docket No. UM 1452 by electronic mail and US mail to those parties who have not waived paper service on the attached service list.

Dated this 11<sup>th</sup> day of  
February , 2010.

/s/ Jenny Holmes  
Jenny Holmes

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	<b>CABLE HUSTON BENEDICT HAAGENSEN &amp; LLOYD, LLP</b>	
	RAYMOND S KINDLEY	1001 SW FIFTH AVENUE, SUITE 2000 PORTLAND OR 97204-1136 rkindley@cablehuston.com
W	<b>CITIZENS' UTILITY BOARD OF OREGON</b>	
	GORDON FEIGHNER ENERGY ANALYST	610 SW BROADWAY, SUITE 308 PORTLAND OR 97205 gordon@oregoncub.org
	ROBERT JENKS	610 SW BROADWAY STE 308 PORTLAND OR 97205 bob@oregoncub.org
	G. CATRIONA MCCrackEN LEGAL COUNSEL/STAFF ATTY	610 SW BROADWAY - STE 308 PORTLAND OR 97205 catriona@oregoncub.org
	<b>DAVISON VAN CLEVE</b>	
	IRION A SANGER ASSOCIATE ATTORNEY	333 SW TAYLOR - STE 400 PORTLAND OR 97204 ias@dvclaw.com
	<b>DAVISON VAN CLEVE PC</b>	
	MELINDA J DAVISON	333 SW TAYLOR - STE 400 PORTLAND OR 97204 mail@dvclaw.com
	<b>DEPARTMENT OF JUSTICE</b>	
	STEPHANIE S ANDRUS ASSISTANT ATTORNEY GENERAL	REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 stephanie.andrus@state.or.us

<b>W</b>	<b>ECUMENICAL MINISTRIES OF OREGON</b>	0245 SW BANCROFT, SUITE B PORTLAND OR 97239 jholmes@emoregon.org
	JENNY HOLMES ENVIRONMENTAL MINISTRIES DIRECTOR	
<b>W</b>	<b>ECUMENICAL MINISTRIES OF OREGON</b>	1553 NE GREENSWORD DR HILLSBORO OR 97214 knewman@emoregon.org; k.a.newman@verizon.net
	KATHLEEN NEWMAN OREGON INTERFAITH POWER & LIGHT	
<b>W</b>	<b>ENERGY TRUST OF OREGON</b>	851 SW SIXTH AVE - STE 1200 PORTLAND OR 97204 kacia@energytrust.org
	KACIA BROCKMAN	
	JOHN M VOLKMAN GENERAL COUNSEL	851 SW 6TH AVE SUITE 1200 PORTLAND OR 97204 john.volkman@energytrust.org
<b>W</b>	<b>ENVIRONMENTAL LAW ALLIANCE WORLDWIDE</b>	1877 GARDEN AVE EUGENE OR 97403 jen@elaw.org
	JENNIFER GLEASON	
<b>W</b>	<b>ESLER STEPHENS &amp; BUCKLEY</b>	888 SW FIFTH AVE STE 700 PORTLAND OR 97204-2021 stephens@eslerstephens.com
	JOHN W STEPHENS	
<b>W</b>	<b>IDAHO POWER COMPANY</b>	rallphin@idahopower.com
	RANDY ALLPHIN	
	CHRISTA BEARRY	PO BOX 70 BOISE ID 83707-0070 cbearry@idahopower.com
	KARL BOKENKAMP GENERAL MANAGER-POWER SUPPLY PLANNING	PO BOX 70 BOISE ID 83707-0070 kbokenkamp@idahopower.com
	RICK GALE	rgale@idahopower.com
	BARTON L KLINE SENIOR ATTORNEY	PO BOX 70 BOISE ID 83707-0070 bkline@idahopower.com
	JEFF MALMEN	PO BOX 70 BOISE ID 83707-0070 jmalmen@idahopower.com
	LISA D NORDSTROM ATTORNEY	PO BOX 70 BOISE ID 83707-0070 lnordstrom@idahopower.com

GREGORY W SAID  
DIRECTOR - REVENUE REQUIREMENT

PO BOX 70  
BOISE ID 83707  
gsaid@idahopower.com

MARK STOKES  
MANAGER, POWER SUPPLY &  
PLANNING

PO BOX 70  
BOISE ID 83707  
mstokes@idahopower.com

MICHAEL YOUNGBLOOD  
SENIOR PRICING ANALYST

PO BOX 70  
BOISE ID 83707  
myoungblood@idahopower.com

**W MCDOWELL & RACKNER PC**

WENDY MCINDOO  
OFFICE MANAGER

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

LISA F RACKNER  
ATTORNEY

520 SW SIXTH AVENUE STE 830  
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

**W MULTNOMAH COUNTY  
COMMISSIONER**

COMMISSIONER JEFF COGEN

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

**OREGON AFL-CIO**

JOHN BISHOP

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

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

**W OREGON DISTRICT COUNCIL OF  
LABOERS**

BEN NELSON

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

**W OREGON DISTRICT COUNCIL OF  
LABORERS'**

MELODY GUY

melodyg@qwestoffice.net

**W OREGONIANS FOR RENEWABLE  
ENERGY PAYMENTS**

JUDY BARNES

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

MARK PETE PENGILLY

PO BOX 10221  
PORTLAND OR 97296  
mpengilly@gmail.com

**W PACIFICORP**

RYAN FLYNN

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

**W PACIFICORP, DBA PACIFIC POWER**

PACIFIC POWER OREGON DOCKETS

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

**PGE RATES & REGULATORY AFFAIRS**

DOUG KUNS

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

**PORTLAND GENERAL ELECTRIC  
COMPANY**

J RICHARD GEORGE

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

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

SUZANNE LETA LIOU

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

**W**

**SOLAR ENERGY SOLUTIONS, INC.**

ANDREW KOYAANISQATSI

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

**Milwaukie Presbyterian Church  
Stewardship Commission  
Green Team Committee**

February 3, 2010

Members of the Public Utility Commission,

I represent a committee of Milwaukie Presbyterian Church members that have worked to become a Solar Congregation since 2008.

We have had our physical plant evaluated, a plan proposed and at one time had a private funding opportunity with an investment potential of more than \$100,000 and were able to raise our portion of matching funds within five days.

For various reasons the funding opportunity was lost, most specifically due to a short window for finalizing the legal commitments related to the private investor's expectations and timing for project completion related to tax benefits for the investor.

We believe that the initiative of OIPL Solar Congregations for a much simpler program for investment in solar power systems is critical for our effort to install solar and help contribute to USA energy independence and increase our commitment to environmental stewardship.

We respectfully request the Oregon Public Utility Commission to include an allocation 'carve out' for non-profits with a higher volumetric rate to make solar electric systems affordable without the federal tax incentive

Respectfully,  
John M. Armentrout, Elder  
Milwaukie Presbyterian Church  
503-658-8797  
jarmenrock@gmail.com