

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1746

In the Matter of

OREGON PUBLIC UTILITY COMMISSION

Examining a range of community solar programs and attributes to allow individual customers to share in the costs and benefits of solar facilities.

Community Solar Program Design Proposal and Comments of :

The Community Action Partnership of Oregon

I. INTRODUCTION

The Community Action Partnership of Oregon (CAPO) appreciates the time and effort the Oregon Public Utilities Commission has put forth developing solar programs in Oregon. CAPO has a direct interest in low-income energy matters, since Community Action Agencies deliver energy assistance and energy efficiency programs. These programs are meant to offset the high cost of energy and provide relief to struggling families. We welcome the opportunity to provide input to the Oregon Public Utility Commission (the Commission) regarding community solar programs and attributes for the development of recommendations to the Legislature.

It is widely acknowledged that the cost of transferring from carbon-based generation to renewable energy will fall hardest on low-income ratepayers. Many times, low-income households do not have the means to buy distributed generation technologies or projects that bring the cost of energy down over time. This leaves families struggling to pay increased utilities bills. Further, low-income families pay into system costs that support renewable generation, without being able to access tax

credits and efficiency upgrade financing. However, there is a large segment of customers interested in accessing solar energy, though only a fraction of customers have the site conditions, ownership, and/or access to financial resources necessary to install solar at their service location.

CAPO requests the commission adopt the 10% low-income participation carve-out, which stakeholders have requested during docket proceedings and comments. This carve-out would follow Oregon precedent and socialize the cost of low-income participation. The Oregon Energy Assistance Program is a system charge, paid by all ratepayers, that directly benefits low-income qualified households. Similarly, low-income participation in solar programs will lower disconnection rates, stabilize rates, and increase renewable generation awareness. All of these goals fit within the Commission's directive.

Solar has long been seen as a technology reserved only for environmentalists and the wealthy. And, historically, the high cost of solar and the emphasis on incentives in the form of tax credits has put solar out of reach for the majority of Americans. There is a critical need now to begin deploying solar in low-income communities and to develop effective project models and policies to scale this deployment quickly and broadly. On an individual level, low-income households spend an average of 15 to 20 percent of their income on energy bills. This puts a strain on already tight budgets and makes families significantly more susceptible to rising energy costs. Helping households save money on electricity directly translates into a family's ability to better cover other basic needs, including food, housing costs, education, and medical expenses. On a macro level, renewable energy provides broad community benefits, including local jobs,

economic growth, private investment, and lower rates of pollution. In short, solar can provide significant benefits to the members of society that need them most.

III. CONCLUSION

CAPO appreciates the opportunity to comment on the matter. We hope that the commission will continue its support of low-income Oregonians. Solar energy may be another tool that can be deployed to help those in need out of poverty and closer to self-sufficiency. While many utility customers are interested in accessing solar energy, not all are in a position to have solar PV installed on their own property. Appropriately designed community solar programs will enable low-income utility customers to gain access to— and share in—tangible benefits from solar energy arrays that are not necessarily located on their property.

The Community Action Partnership of Oregon

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