



Portland General Electric Company
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Richard George
Assistant General Counsel

October 15, 2015

Via Electronic Filing and U.S. Mail

Oregon Public Utility Commission
Attention: Filing Center
PO Box 1088
Salem OR 97308-1088

Re: UM 1746 – Community Solar Program Designs and Attributes

Attention Filing Center:

On September 25, 2015, Portland General Electric Company (“PGE”) submitted Comments in docket UM 1746. Upon further review of the Comments, PGE noticed an error in the following statement:

The process does not guarantee or advantage the utility; in recent RFPs, for the Tucannon Wind Farm and ~~Port Westward 2~~ **Carty** generation plants, PGE’s benchmark proposal was not selected.

In light of this error, PGE requests that the enclosed Errata page be substituted for the originally filed Comments page.

If you have any questions regarding this filing, please contact me. Thank you for your assistance with this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Richard George", is written over a horizontal line.

J. RICHARD GEORGE
Assistant General Counsel

JRG:jrb
Enclosures

the affiliate is contracting with the utility, as utility transactions. There is no added benefit with a utility affiliate; it likely would only increase costs, making community solar choices more expensive to participating customers.

There are rules in place that the regulated utility must abide by that help avoid concerns of harm to competition. *See, e.g.*, OAR 860-038-0560. If PGE were to develop, own, and market a community solar project and program, the PUC would have oversight over all aspects and could direct the process as they believe best suits customers. While these rules would not apply to a third-party developer in Oregon, PGE believes that a regulated utility would be able to develop and own the lowest cost, with the most attractive program characteristics, community solar programs for customers. While lowest cost may not always be the most important consideration to every subscriber, it is likely important for many of them. Subscribers should have the option of obtaining such a product from their trusted energy partner, PGE.

If the regulated utility were included among eligible developers and owners of community solar projects, there could be a process similar to the Request For Proposals (RFP) process for a supply-side resource acquisition stemming from the utility's Integrated Resource Plan (IRP). Community solar project bids would be solicited and the utility would submit a bid in the RFP along with other developers. In the IRP context, principles of least cost and least risk govern bid selection. In the community solar context, these or other principles could apply. Or the utility could develop a larger scale project with others developing projects at a smaller scale. The process does not guarantee or advantage the utility; in recent RFPs, for the Tucannon Wind Farm and Carty generation plants, PGE's benchmark proposal was not selected.

There is national precedent for using an RFP process for utility owned community solar. Central Hudson Gas & Electric, an IOU in New York, used an RFP process in September 2014 for a