

-----Original Message-----

From: Fred Heutte [<mailto:fred@nwenergy.org>]

Sent: Thursday, October 08, 2015 3:14 PM

To: SADHIR Ruchi

Subject: update on NWECA position on UM 1746 System Ownership Attribute

To: Ruchi Sadhir and Oregon PUC Staff

NW Energy Coalition has been participating in UM 1746 ("Examining a range of community solar programs and attributes to allow individual customers to share in the costs and benefits of solar facilities.")

At a recent Commission workshop and in a joint filing with other organizations, we took the position that utilities should be able to participate as system owners only through non-regulated affiliate entities.

After further consideration and discussions, NWECA now takes the view that in the initial phases of an Oregon community solar program, it is appropriate to explore approaches to utility direct engagement in project development, as long as concerns about maintaining competitive balance and protecting nonparticipating ratepayers from cost shifts can be addressed.

In part, our reasoning is that the development of community solar in Oregon should involve testing a range of projects and offers to ascertain what is attractive to a wide range of Oregon electric customers, and likewise to provide opportunities for the broadest range of project developers and supporting organizations to make those offers.

Thank you for considering this submission and we look forward to further discussion on the full list of potential community solar program attributes at the October 16 Commission hearing on UM 1746.

regards,

Fred Heutte  
Senior Policy Associate

---

Register today for the  
NW Clean & Affordable Energy Conference  
and Awards Gala, Dec. 3-4 in Seattle!  
[www.nwenergy.org/conference](http://www.nwenergy.org/conference)

Fred Heutte | Senior Policy Associate  
NW Energy Coalition  
<http://www.nwenergy.org>  
503.757-6222