

**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 of Northwest SEED et al., Additional Comments of NW Energy Coalition

NW Energy Coalition (“NVEC”) joins with the Community Solar Program Design Proposal of Northwest SEED, et al., submitted on August 7. NVEC is unable to appear at the August 11 workshop due to scheduling conflicts, and would like to add our perspective on one point.

It is NVEC’s view that an eligible Site Host property for a Community Solar Asset photovoltaic facility (CSA) should not be restricted to a utility service territory or adjoining counties but should be anywhere in the state of Oregon.

We agree that subscriptions to a specific CSA facility should be offered only to customers within a specific utility service territory to reduce transaction costs and provide clarity for marketing efforts emphasizing the collaborative community-based aspect of the program. However, we are concerned that Site Host location restrictions would create additional administrative complexity and possibly give rise to disparate treatment of consumers and communities.

The reason is the unusual distribution of the solar resource in Oregon, compared with many other states. Because the climate varies considerably east and west of the Cascade Range, locations in different areas have very different insolation potential. For example, NREL data¹ indicates that for a single-axis tracking collector, the available solar radiation is 4.9 kWh/m² per day in Portland, but 6.9 kWh/m² per day in Bend, a 41% difference. The actual difference for installed facilities may be somewhat less, but clearly the east side solar resource is more abundant. In addition, land and maintenance costs may have an advantage on the east side. While east side to west side transfers might increase wheeling costs, overall it is likely that subscriber investment there offers a higher total return.

As a result, restricting Site Host locations to a utility service area or other geography could create disparate treatment for consumers. Consider houses across the street from each other in northeast Portland. One has PGE service and one has Pacific Power. With a Site Host restriction to the utility service area, the PGE customer will only have access to the west-side solar resource, while the Pacific Power customer could have access in Pendleton, Bend and Medford. With a Site Host restriction to a county and adjacent counties, there would be further differences. A Washington County customer would be restricted to the west side resource, but a Multnomah County customer could get access to the better solar resource in Hood River County.

Overall, NWECC believes that community solar should be about “Oregon renewable energy for Oregonians.” We believe that it makes sense for Subscriber Organizations and Subscribers to be within the community of interest defined by utility

¹ National Renewable Energy Laboratory, Solar Radiation Data Manual for Flat-Plate and Concentrating Collectors. The Oregon data can be accessed at <http://rredc.nrel.gov/solar/pubs/redbook/PDFs/OR.PDF>

service territory, neighborhoods, community organizations, etc., but that access to the solar resource itself should be statewide.

Thank you for considering these additional comments, and again, we are in full support otherwise of the proposed program design by NW Seed et al.

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