

Arcadia

January 10, 2023

Oregon Public Utility Commission

Docket # UM 1930 - Community Solar Program

Re: Staff's Draft Modifications to Community Solar Program Implementation Manual

I. Introduction

Thank you for the opportunity to provide feedback on Staff's draft modifications to the Community Solar Program (CSP) Program Implementation Manual (PIM). Arcadia previously submitted comments on December 22, 2022. Among other items, Arcadia provided the following recommendation in the comment letter: *"Arcadia believes that the intention of the prohibition on "using additional or separate agreements or contracts" relates to the use of an agency agreement, but does not prohibit contracting for other unrelated services. Arcadia requests that Staff clarify this intention."* Staff requested additional clarification regarding this request, which Arcadia provides herein. Arcadia appreciates Staff's work on this process.

II. Arcadia's Clarification

Staff's draft modifications include the recommendation that Project Managers (PMs) and their Agents include all contracts and agreements in the CSP standard contract template for residential participants. Specifically, Staff's report states,

"Staff proposes to modify PIM Section 3.13.1 to require PMs and their agents to incorporate all agreements, terms, and conditions into the standard CSP contract template when subscribing residential Participants or modifying an existing residential subscription. Staff's proposed PIM modification would also prohibit PMs and their agents from using additional and separate agreements or contracts with residential Participants."

Arcadia requested clarification that the PIM modification does not relate to the use of contracts for other unrelated services. Staff requested clarification on this recommendation.

Arcadia requests that Staff confirm that the above-referenced recommendation would allow customers who participate in the CSP to separately contract for products and services that are unrelated to the CSP. Arcadia requests that the clarification confirm that PMs and their Agents are not prohibited from marketing or offering other services to a residential customer who participates in the CSP. Arcadia is not requesting that the CSP standard contract for residential participants include any terms specific to other program offerings or that participation

in the CSP would be contingent upon participation in any other products and services. Rather, Arcadia seeks clarification that a residential customer who participates in the CSP may, at some point in the future, contract for other products and services.

III. Conclusion

Arcadia thanks you for your time and consideration of these comments and recommendations. We hope that this additional information provides the needed clarification that Staff requested. We look forward to continuing to participate in Oregon's Community Solar Program and working with the Commission and its Staff.

Sincerely,



Angela Navarro
Head of State Regulatory Affairs
Arcadia