



Oregon Public Utility Commission
201 High Street SE, Suite 100
Salem, OR 97301-3398

May 19, 2021

RE: Docket No. UM 1930 – Community Solar Program Interconnection queue pause

Dear Chair Decker, Commissioner Tawney and Commissioner Thompson,

The Oregon Solar + Storage Industries Association (OSSIA) and the Project Managers (PMs) it represents appreciate the work of staff and the Program Administrator to manage the issues that have arisen with the Community Solar Program (CSP) Interconnection queue. While OSSIA understands the reasons for the staff recommendation, we have concerns with potential ramifications on the future of the program.

Interconnection challenges are one of the biggest problems the CSP faces. Timing and cost have been a challenge to many projects, especially small projects and those run by non-profits. While we understand the technical challenges of daytime minimum load calculations, it is clear that the CSP interconnection queue has not worked as intended and we hope to see further attention to the issue so that it functions better in the future.

OSSIA is concerned that a CSP queue pause may send a negative market signal about the future of the program. Since the conversations about Tier 2 are just starting, OSSIA believes that changes in the queue process should wait until after decisions are made about the next phase in the process. It makes sense to have a separate conversation about the CSP queue in addition to discussing it as part of the next phase of the program. While it is true that CSP projects could apply to the CSP queue, only to have to leave their position and enter the QF queue process, that is a risk that a PM can decide to take or not, as they weigh the risks and benefits about each queue. While we appreciate the attention to this critical issue, pausing the CSP queue at this moment may not help the overall program at this particular moment.

Lastly, OSSIA asks the commission to make clear that even if a project is not in the CSP queue, that project can still have an independent engineer review according to CSP rules, even if the project is in the standard QF queue.

Sincerely,

A handwritten signature in black ink that reads "Angela Crowley-Koch". The signature is written in a cursive, flowing style.

Angela Crowley-Koch
Executive Director