



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

December 7, 2021

Dear Chair Decker, Commissioner Tawney and Commissioner Thompson,

Oregon Solar + Storage Industries Association (OSSIA) would like to express our support for Staff's Proposed Modifications to the CSP Program Implementation Manual (PIM). We appreciate Staff's sustained effort in incorporating stakeholder comments in the proposed revisions and overall support the direction that the modifications have taken. To that end, we'd like to contribute to refining the proposed modifications through the comments below:

Proposed Modifications Resulting from Written Comments

3. Define and Limit Participation of Affordable Housing Providers as LI Participants (PIM Section 3.15.2)

OSSIA supports this requirement but would recommend that "adequate notice" be defined regarding the LIF's obligation to provide programmatic referrals for 5% of a project's total capacity. We recommend that "adequate notice" be defined as not less than six months before project certification. If the LIF is not able to provide programmatic referrals in this timeframe, the project should be able to apply for a temporary waiver from the Low-Income requirement (10% of a project's total capacity at certification) and continue with the certification process. We then recommend the Project Manager be able to fill the remaining Low-Income requirement with either affordable housing providers or through the LIF.

6. Adjustments to Certification Requirements (PIM Sections 5.2, 5.3.2)

This modification is supported overall but we recommend that this language specify that the schedule *at the time of attestation* must have commercial operations commence within six months of Certification.

New Proposed PIM Modifications

2. Project Manager Status Revocation and Dispute Resolution (AR 644, PIM Sections 2.4.1, 2.7, 2.9, 4.8, 5.4.1)

OSSIA notes that the final language in this section should align with what's finalized in AR 644.

5. Referral of Program-recruited low-income customers (PIM Section 3.15.3)



OSSIA supports this modification but believes that any element of a PM's customer agreements that are deemed "disadvantageous elements" should be made public so that all PMs registered through the program have insight into what is and is not allowable. It is recommended that these postings do not include the name of the PM or project, but transparency is preferable in this scenario so that everyone is held accountable and to the same standards.

6. Billing changes (PIM Section 6.3.3)

OSSIA strongly supports this change as it gives Low-Income Participants less risk through their participation in the program. However, suggest the following changes in order to make this process clearer for Participants and PM:

- The language surrounding partial payments should be written in plain language so that a subscriber could understand exactly how this mechanism will work.
- There are several questions not answered through this language. What happens if someone makes partial payments or no payments indefinitely?
- This language also does not mention the PM continuing to be paid despite partial payments. This should be clearly stated so that PMs can provide this to banks and other project investors to ensure that payments will continue despite partial utility bill payments.

Conclusion

With these small clarifications, OSSIA believes that the PIM modifications will aid in a successful Tier 2. As always, we appreciate the opportunity to provide our comments and thank you for your time and attention.

Sincerely,

A handwritten signature in black ink that reads "Angela Crowley-Koch".

Angela Crowley-Koch

Executive Director