

Public Utility Commission of Oregon

201 High Street SE, Suite 100

Salem, OR 97301-3398

Attn: Filing Center

Re: UM 1930— The Community Action Partnership of Oregon (CAPO)

CAPO provides these comments in response to Public Utility Commission of Oregon (Commission) staff's report on Interim Alternative Bill Credit Rate Proposals for the Oregon Community Solar program (CSP)

Introduction:

CAPO would like to thank the commission for its sustained effort during the Community Solar (CS) Docket. However, CAPO would like to comment on the commissions proposed rate structures. One of the major advantages of CS is to provide access to underserved ratepayers who do not currently have access to rooftop solar. We are concerned that the options currently provided by the commission will create another costs-shift and a program unavailable to low-income residents. If the low-income portion of this program isn't fully funded to provide meaningful access then low-income ratepayers will help shoulder the burden of a program they, again, will not be able to access. We urge the commission that if a rate structure creates a cost-shift, no matter the amount, that low-income access be guaranteed through funds set aside from the program. This commission has a long history of providing benefits to low-income ratepayers through fully subsidized programs. Through current rate structures, low-income weatherization and low-income assistance are paid by customer charges and/or in rates. We see this program in the same mold as weatherization. By providing a benefit over a long period of time, Oregon can reduce disconnections, providing a higher quality of life for those in need.

#### 1) Retail Rates

Low-income customers have long subsidized solar programs they will never be to access because of the upfront cost or financing mechanisms used to implement rooftop solar. It would be inherently unfair to ask more from low-income ratepayers if a rate structure was chosen without implementation of a fully subsidized low-income program. We disagree with the utilities that the commissions should not provide investment in a low-income CS program. Subsequently, we do not believe a program should only be concerned with avoiding costs-shift. We ask that the two issues be weighed together to provide the greatest benefit to ratepayers. We believe this can be done by providing a rate-structure for the CS program that provides maximum benefit by allowing costs for developer to be recovered while providing funds for low-income participation.



## 2) RVOS

CAPO understands that RVOS will create the least cost-shift. Our concern is that using this rate structure there will be little to no participation by low-income ratepayers. The legislature made clear that low-income participation should be 10%, and CAPO does not know how using an RVOS rate will achieve that goal. There will be little flexibility for developers and the low-income administrator to attract and retain low-income customers with minimal margins. If a goal of the program is to provide greater access, using a strict RVOS will make it difficult to expand the reach of the program to underserved areas.

### Recommendation

We find that a rate used that will shift costs without providing low-income benefit to be unsatisfactory. The Commission should weigh the value of expanding access through a bill credit rate that can absorb low-income participation in CS.