



Solarize Rogue

Promoting the adoption of solar energy in the Rogue Valley

Residential, Business, Community

September 2, 2021

Oregon Public Utility Commission
201 High St. SE #100
Salem, OR 97301

RE: UM1930 Community Solar Program, Comments to Recommended Modifications to Program Implementation Manual

Dear OPUC Commissioners,

Thank you for providing us with an opportunity to express our thoughts regarding the recommended modifications to the PIM. We very much appreciate the effort that you and the OPUC Staff are making to ensure that the OCSP becomes a viable program in our state. The Staff's 24 AUG 2021 recommended changes to the PIM continue to be steps in the right direction. We support the recommended modifications with the following adjustments.

ITEM 1. Simplify Residential and Low-Income Participant Contracts

As Staff reworks the contracts to make them simpler and more accessible, it would be desirable for us to create a separate version that applies only to participant-owned projects. For example, the current contracts are written from the perspective of a Project Manager (owner) entering in an agreement to sell energy to subscribers. For a community-owned project, the contract would be more akin to the owners agreeing to pool resources to build a PV system and delegate administrative responsibilities to the Project Manager. Both types of contracts should explain how to become a participant, changes while a participant and how to stop being a participant.

ITEM 3. Adjust the Entity Signing the Community Solar Power Purchase Agreement (PPA)

In the first sentence: "Staff proposes to permit the owner of the solar project to sign the Community Solar Power Purchase Agreement with utilities..." We recommend replacing the word "owner" with "Project Manager."

Under Rationale, we propose replacing the text "...Staff Proposes to allow the project owner to be..." with "...Staff proposes to allow the Project Manager to be..."

The reason for our recommendation is that a project may have multiple fractional owners and for the sake of efficiency it would be best if the Project Manager signs the PPA on behalf of all the owners instead of each owner having to sign an individual PPA with the utility.

ITEM 4.b. Adjustments to Certification Requirements

We are concerned that the three month term is not consistent with the current requirement for the project to become operational within SIX months of Certification and can create confusion. The three month period also does not allow sufficient time to address backordered parts or weather delays in construction. We recommend that the three month proposal be extended to six months.

ITEM 4.c. Adjustment to Certification Requirements

This item is redundant and is not needed. The Certification process already requires an executed PPA which in turn requires an executed Interconnection Agreement and Environmental Study Report.

Under **Rationale**, last paragraph starting with “The fourth proposed modification...”. We support this recommendation, but we suggest that the PA and the utilities disclose energy usage by meter number upon request even if it is before Pre-Certification. In participant-owned projects, the fractional allotment of the PV system is done prior to Pre-Certification. Knowing whether a potential owner falls within the regulatory limits early in the process saves a lot of time and effort as opposed to making adjustments after contracts are signed and the project is ready for Certification.

As an example, we had an instance where a participant-owner had recently moved in to his property and thus did not have a full year worth of energy consumption data available at the time of allocating project fractions and signing contracts. Instead of guessing, it would have been very helpful if the PA could have informed us of the annual energy consumption of the property so that appropriate ownership could be assigned.

ITEM 7. Adjust Eligibility Criteria for the Program Carve-out

Under **Rationale**, second paragraph. We support the recommendation to allow professional Project Managers manage a project on behalf of a community group. The last sentence is a bit unclear but we believe that what is intended here is that project carve-out capacity eligibility would still apply for projects less than 360 kW and that the organizational status of the Project Manager (e.g. to include contractor status as opposed to owner) will no longer be a limitation.

ITEM 8. Clarify the Timing of Contracting for Participant Owners

While we agree with the current proposal, we would also like to add allowing the project proponent to market and advertise for recruitment of participant-owners prior to Pre-Certification. Subscription projects can build whatever they want and then subscribe participants at will. Participant-owned projects must enroll before deciding what to build. Given that the Pre-Certification process requires filing a specific project size and design with engineering drawings, it is imperative that participant-owned projects can enroll participants and finalize the project’s specifications prior to Pre-Certification. Without this allowance, there is no way that a participant-owned project can provide the

information required for Pre-Certification. We would also recommend allowing Project Managers to sign contracts with participant-owners prior to Pre-Certification.

ITEM 9. Pursue a Simplified Interconnection Project for Small Projects

We support the intent of this item and will await to read more about the specifics. We support implementing a simple formula available to the public to estimate interconnection costs for small projects (e.g. one based on PV size and distance from the substation). Said formula should be easily used to calculate interconnection costs before the project spends money on enrollment of participant-owners, designs and Pre-Certification only to be terminated because of high interconnection costs.

Furthermore, we'd like to add that the purpose of this Item should not only be to reduce complexity. It should also address why it costs so much more to interconnect a CS project than a similar NEM project. Our specific example should be informative to the PUC: Two PV systems, 141 kW CS and 100 kW NEM, built at the same time on the same roof, same installer, same commercial-grade inverters, same substation. The CS project required the installation of a custom SEL 751 breaker switch at a cost of \$41,000. The NEM project required no such breaker switch. Explanation? Different rules! Therefore, we strongly recommend tying small CS projects to the NEM interconnection process and away from the Small Generator Interconnection Queue.

Again, we thank the OPUC and Staff for these thoughtful modifications and we thank you for the opportunity to comment. We look forward to working together with you to make the Oregon CS a successful alternative for Oregon communities.

Sincerely yours,

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