



Oregon Citizens' Utility Board

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9/20/2022

Public Utility Commission
Attn: Filing Center
P.O. Box 1088
Salem, OR 97308-1088

RE: UM 1930 – Community Solar Programs – CUB's Comments

Oregon Citizens' Utility Board (CUB) appreciates the opportunity to comment on Staff's recommendation on the use of an agent subscription model for the Community Solar Program. CUB supports Staff's recommendation.

CUB continues to recommend that the Commission not allow the use of an agent subscription in the Community Solar Program. CUB's primary concern with the agent subscription model is its impact on residential customer participants. The second capacity tier of the community solar program is approximately 79000 kW. Fifty percent of the 79000 kW of capacity is reserved for residential customers. The average residential customer of an investor-owned utility uses 880 kWh per month, which equates to an average community solar subscription size of 4.5 kW. This means that the remaining capacity for community solar has at least enough space for 17,000 households to participate in the CSP. CUB is concerned that if the agent subscription model is allowed to proceed, these customers will be placed outside of the existing regulated billing and communication systems which may have unintended consequences for these customers.

CUB has made prior comments detailing their concern with this program. Briefly, CUB will summarize our concerns.

1. The agent subscription program requires customers to sign up for auto pay, which reduces risk for the CSP subscription manager, but may have adverse impacts on residential subscribers. Residential customers could lose the flexibility of utility payment options. Customers should not be required to enroll in autopay to participate in the community solar program.
2. The agent subscription program may unenroll customers from an equal pay program. CUB is supportive of Oregon households having a variety of billing options. Utilities equal pay programs are an excellent tool to reduce the volatility of monthly utility bills and are beneficial to some residential customers.
3. CUB is concerned that under an agent subscription model, subscribing customers may experience reduced ability to receive utility communications. Under the agent

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subscription model, a third party oversees communication between the utility and the customer, which adds an additional layer of complication on utility to customer's communication. It is important that the electric utility can communicate directly with Oregon households.

4. CUB does not see a significant rate payer benefit to offering the agent subscription model. It is CUB's understanding that additional ratepayers' funds would be required to offer the agent subscription program. The Community Solar Program already has a consolidated bill program which can track credits and surcharges due to the Community Solar enrollment.

CUB supports Staff's recommendation and is available for questions from the Commission.

Respectfully submitted,

/s/ William Gehrke

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