

From: ray@solarizerogue.org
To: [PUC PUC.FilingCenter * PUC](#)
Cc: [BROCKMAN Kacia * PUC](#)
Subject: UM 1930 Comments from Solarize Rogue
Date: Friday, July 30, 2021 12:45:20 PM
Attachments: [PastedGraphic-2.png](#)

Dear Kacia and Joe,

Thank you for the opportunity to comment on UM 1930. Although all the proposals listed are a move in the right direction for the Community Solar program as a whole, we do not see how they will help organizations like ours further promote small, community-driven projects in the short term. The one exception is the addition of the very much needed rate escalator. We hope that the escalator is not only implemented but also retrospectively applied to the existing or in progress Community Solar projects.

The other major obstacles Solarize Rogue has had to overcome to promote and develop small, community-driven CS projects include:

1. Chicken or egg regarding pre-certification and the ability to market/accept funds from participants. Without money upfront, small community projects cannot build on faith.
2. Lack of upfront clarity from the IOUs regarding the requirements, timing and cost of interconnection. Unlike Net-Metered projects, where utility companies disclose upfront what will be needed to connect a project to the grid, CS projects must go through pre-certification process first, then negotiate an interconnection agreement and only then, typically months later, will they find out the requirements for interconnection. Even though inverter technology has come a long way and can provide a safe environment for grid-down situations, IOUs are slow to accept new technology. The result is that they require small projects to install the same safety equipment as those used for Megawatt power plants, which adds significant costs that can overwhelm a project. If the cost of the interconnection is too high and cannot be solved, the project must come to a stop and the community funds spent to get to that point are lost. We recommend that the OPUC and the IOUs come up with a reasonable, affordable, standard interconnection cost for all projects less than 360 kW-DC.
3. Razor-thin financial picture for small projects and the severe need for financial assistance — the smaller the project, the less the savings from economy of scale and the larger percentage of total costs dedicated to interconnection. We recommend that a proposed project is guaranteed financial assistance once it is pre-certified instead of having the proponents sweat through the process and hope that their projects make it.

Unfortunately, it seems that UM1930 kicks these more serious small project concerns down the road to a later unspecified time. When you do decide to tackle these challenges, we look forward to helping you craft revised regulations that directly impact the feasibility of small, community-driven projects in our state.

Thanks,
Ray



Ray Sanchez-Pescador - President
Solarize Rogue, LLC
P.O. Box 1483
Talent, OR 97540
ray@solarizerogue.org
<https://solarizerogue.org>
541-414-6566
541-535-6440 (f)