



Bureau of Planning and Sustainability

Innovation. Collaboration. Practical Solutions.

Date: April 18, 2018
To: Oregon Public Utility Commission, Caroline Moore
From: Andria Jacob, City of Portland Bureau of Planning and Sustainability
Re: UM 1930 Community Solar Implementation, Interim Alternative Bill Credit Rate Proposals

The City of Portland appreciates the opportunity to comment on the alternative bill credit rate proposals for community solar contained in the April 10, 2018 staff report. The City again wishes to thank PUC staff and Commissioners for their thoughtful deliberation and hard work leading up to this point. As noted in previous comments, Oregon's community solar program is at a critical juncture. The bill credit rate will determine whether there is a value proposition for both consumers and developers in Oregon's community solar program.

The City of Portland encourages the Commission to adopt the Simple Retail Rate as the starting point for an alternate bill credit rate for the entire program capacity tier. The City also encourages the Commission to allow the use of mechanisms (adders) that would incentivize low-income participation (as directed by the Legislature in SB 1547.)

We remain concerned that even the residential rate may not be sufficient to spur development of community solar in the Willamette Valley. We share the perspective of other stakeholders that the Oregon community solar program must succeed in expanding access to – and creating incentives for – customers that have previously not had the opportunity to benefit from solar energy.

Adders would help incent low-income participation, diversify the project portfolio and enable projects to be physically sited in communities west of the Cascades. From the City's perspective, utility-scale community solar in eastern Oregon is certainly a desired outcome, but it is not the only desired outcome. It would be particularly troubling to the City, which is served by two electric utility companies, if community solar options do not materialize for all Portlanders, regardless of which utility service territory they reside in.

The City has adopted policy that supports opportunities for local communities to build, own and operate renewable energy assets themselves. We see Oregon's community solar program as an important mechanism in enabling a just energy transition. A successful community solar program is one in which projects are built in Portland neighborhoods as well as in Eastern Oregon. A successful program is one in which people across Oregon that are experiencing low income are incented to participate by the prospect of bill savings and the opportunity to reduce energy burden.

The City of Portland is grateful for the inclusive and open process that has characterized the development of the community solar program to date. We are committed to continuing our



City of Portland, Oregon | Bureau of Planning and Sustainability | www.portlandoregon.gov/bps
1900 SW 4th Avenue, Suite 7100, Portland, OR 97201 | phone: 503-823-7700 | fax: 503-823-7800 | tty: 503-823-6868

Printed on 100% post-consumer waste recycled paper.



Bureau of Planning and Sustainability

Innovation. Collaboration. Practical Solutions.

collaboration with all the stakeholders in this proceeding. Thank you for consideration of these comments.

Sincerely,

Andria Jacob
Senior Manager, Energy Programs and Policy

