



August 26, 2021

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

Re: Oregon Community Solar Program Tier 2 Recommendations

Dear Chair Decker, Commissioner Tawney, Commissioner Thompson

Bonneville Environmental Foundation (BEF) is a 20 year-old non-profit organization based in Portland. Its Renewables Program is focused on innovative applications of clean energy technologies. BEF partners with utilities, businesses and stakeholders to offset the environmental impacts of CO₂ output and invests in clean energy projects. BEF has assisted with the development of more than thirty community solar projects in Oregon and Washington over the last six years. BEF has a strong mission toward projects that benefit underserved communities, frontline environmental justice communities and individuals experiencing low-income. With Portland community-based organization Verde, BEF is co-developing a 1.4 MWdc community solar project near the Portland International Airport. The project has been pre-certified in the Oregon Community Solar Program, and currently we are working through the interconnection process with Pacific Power.

BEF supports the release of the Tier 2 capacity in the Oregon Community Solar Program, and we support the combining of carve-out project capacity from Tier 1 into Tier 2. As a non-profit project developer and as a collaborator with other non-profits, such as Solar Oregon, the carve-out capacity is very important to us. We are certain that the public and non-profit sectors can fulfill all of the Tier 1 and Tier 2 carve-outs provided adequate time. In our experience, a single project requires eighteen to twenty-four months to complete. Project timelines can be affected by grant cycles for programs such as the Portland Clean Energy Fund. Also, carve-out projects tend to be smaller than privately developed projects. As a result, costs are higher for small projects. Adding a 2% escalator to the credit for both Tier 1 and Tier 2 carve-out projects will help those projects pencil financially. We believe that the 2% escalator will balance out the increase from 20% savings to 40% savings for low-income subscribers.

In BEF's development of community solar projects region-wide, we strive for a minimum of 50% savings for low-income subscribers. We feel that this amount provides meaningful savings and makes it worthwhile for low-income subscribers to enroll in a community solar program. We support the increase to 40% savings for low-income subscribers in the Oregon CSP. We also believe it is important that the savings is realized by individuals, not by non-profit organizations who provide services to them. One goal of the Oregon CSP has been to allow low-income individuals, members of frontline communities and people who do not own their homes to

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experience the benefits of solar that previously has belonged only to more affluent individuals and businesses who can afford to put net-metered solar projects on their homes or businesses. This is an important distinction of the Oregon CSP: to allow individuals to benefit from solar who have not had the means to benefit previously. Increasing the residential subscription requirement to 50% also helps achieve this goal for the program.

BEF thanks the Commissioners, PUC staff and Program Administrator staff for their inclusive, hard work in establishing the Oregon Community Solar Program in a fair, equitable and sustainable manner.

Respectfully,

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