

Oregon Public Utility Commission  
201 High Street SE, Suite 100  
Salem, OR 97301-3398

July 30, 2021

Dear Chair Decker, Commissioner Tawney and Commissioner Thompson,

We write today to express our strong support for staff's draft proposal for Tier 2 of the Community Solar Program (CSP). The CSP is the only program that offers the ability for anyone to create clean energy, regardless of whether or not they own a solar appropriate home or building or have the capacity to purchase a solar system themselves. We are encouraged to see the improvements that staff proposed and believe they will make the program more successful.

Increasing the discount for low-income subscribers to 40 percent is a much-needed improvement to the program. Tier 1 of CSP offered only a 20 percent discount, which in some cases was not high enough to overcome other complications of the program. A 40 percent discount will double the much-needed savings for low-income ratepayers while increasing low-income participation in the program. We strongly support this proposal. Likewise, the new requirement that each project have 50% residential subscribers is a good change, which makes the program more "community" subscribed than the current program.

We agree that the change in rate structure should make the new community requirements more feasible to implement and we support the proposed rate changes. With the passage of HB 2475 during the last legislative session, all low-income ratepayers should be protected from any costs associated with the changes in CSP rates needed to make the program a success.

The CSP is an important program for Oregonians; not only is it contributing to reducing global warming pollution, but it also increases access to community solar to low-income Oregonians and others unable to install their own solar. We believe staff's proposal makes the program more equitable and will ultimately make it more successful.

Thank you for your consideration.

Sincerely,

Andrea Axel  
Executive Director  
Spark NW

Meredith Connolly  
Oregon Director  
Climate Solutions