



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

July 30, 2021

RE: Docket No. UM 1930 – Staff’s draft proposal for Tier 2 of CSP

Dear Chair Decker, Commissioner Tawney and Commissioner Thompson,

Oregon Shines and the Project Managers (PMs) it represents thanks staff and the Program Administration team for putting together the draft proposal for Tier 2 of the Oregon Community Solar Program. We are looking forward to creating more avenues for residential participation and appreciate the diligent work that has gone into thinking through solutions to make this possible. We are supportive and appreciative of an escalator to assist with residential and low-income recruitment and believe this will go a long way in supporting this recruitment.

We do agree that offering a higher discount percentage to low-income qualified customers may help with recruitment efforts, but we share staff’s concern that this may cause attrition of Tier 1 low-income participants. Since there are no penalties for terminating, there are no incentives for a participant to stay subscribed to the original project that they were matched with which could potentially cause PMs to lose subscribers close to or after commercial operation of their projects.

We believe this will be a group effort in brainstorming solutions to this issue, but some preliminary suggestions may be barring any meters subscribed during Tier 1 from subscribing during Tier 2 or establishing a program fund that will allow PMs to offer Tier 1 low-income subscribers a 40% discount. All efforts should be taken in order to level the playing field for subscribers, despite what Tier of the program they happen to sign up for.

Overall, we believe the program has had many successes over the duration of Tier 1’s implementation and are optimistic for the success of Tier 2. With an escalator for the Bill Credit Rate for residential subscribers coupled with programmatic changes such as a shorter contract and a reduced oversubscription risk, we believe that Tier 2 has the potential to bring the ORCSP closer to its goals of providing solar energy and savings directly to individuals. We appreciate the effort and time that has been put into solutions thus far and look forward to working with the PA team and PUC staff to implement workable solutions.

Sincerely,

Carly Sellers
Program Manager, Oregon Shines