



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

January 12, 2021

RE: Proposed Revision to the Community Solar Program Implementation Manual (PIM)

Dear Chair Decker, Commissioner Tawney and Commissioner Thompson,

The Oregon Solar Energy Industries Association (OSEIA) and the Project Managers (PMs) it represents submit the following comments on the Proposed PIM changes, specifically the revisions made to section 6.3.6 Annual Bill Credit Reconciliation.

OSEIA appreciates the acknowledgement by staff of the mistake made in the initial PIM and the acknowledgement of the hardship it creates for PMs that already have signed contracts under the original guidance. We also appreciate staff's willingness to explore options to lessen the harm caused by these changes.

While we recognize the legal constraints the PUC faces, it must be acknowledged that the change is causing considerable disruption. At least one anchor subscriber is questioning their participation in the program due to this change; if a new customer is uncertain about their load – especially during the pandemic - and does not want to face a large penalty, they may cancel their contract, even though they may be subscribed at 80% of their load. The PM then must spend additional time and money to recruit new subscribers. This is especially concerning since it is more likely to be large subscribers that cancel, due to concerns about potentially large penalties. Project economics are too tight to allow for these kinds of delays and fiscal uncertainties.

Finding and subscribing new participants is already a challenge in a brand-new program. Needing to sign a new contract, after the first contract has not yet officially started, creates more doubts in the stability of the program and adds to the unwillingness of potential subscribers to be in the first group of community solar projects. Especially for larger commercial subscribers, the uncertainty of what other changes may be coming reduces their willingness to try something new.

OSEIA appreciates the two changes that staff made regarding data sharing and applying credits to oversubscription payments.

Sincerely,

A handwritten signature in black ink that reads "Angela Crowley-Koch". The signature is fluid and cursive.

Angela Crowley-Koch
Executive Director