



February 14, 2023

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

RE: Proposed Revisions to the Community Solar Program Implementation Manual

Dear Oregon Public Utility Commission,

TLS Capital, Inc ("TLS") submits these comments on behalf of the projects and their related Project Managers it owns, which comprises of projects that are operational, under construction, and still under development.

TLS is specifically concerned with the change to the Community Solar Program Implementation Manual which prohibits Project Managers from creating a functional, contracted waitlist, that will result in lost revenue to the project and fewer bill credits to subscribers. Even with having a list of interested subscribers, the timing it takes to send a contract for a subscriber to sign, have the subscriber execute it, and then enter the subscriber information into the program platform, can take an unknown amount of time as it is influenced by a number of factors, including but not limited to sending paper contracts to low-income subscribers that do not use email. This timing delay is then coupled with the fact that bill credits are credited to a subscriber based on whether that subscriber is enrolled in the program's platform on the last day of the month. If an existing subscriber terminates in the last week of a given month, there is a very high likelihood that without a contracted waitlist, the attributed capacity of that subscriber and the corresponding project revenue for the entire month would be lost, regardless of how fast we are able to obtain a new subscriber.

Many of the projects within the Community Solar Program are financed with outside investment partners providing tax equity and debt. These investment partners are highly sensitive to issues that may create lost revenue, to no fault of the project, and potentially impair their investment. The potential for lost revenue caused by delays in resubscribing a project, when coupled with other events that cause revenue to be lost (such as being turned off due to wildfire risk, which occurred in 2022 in PGE's utility territory) can cause investment partners to question their existing investments and as well as any new potential investments in the state that they may be contemplating.

We are hopeful that they Commission will work towards a solution that will resolve the issue of unnecessary lost revenue to projects and lost bill credits to subscribers as it relates to maintaining a functional, contracted waitlist.

Regards,

A handwritten signature in black ink, appearing to read "Troy Snyder".

Troy Snyder