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September 15, 2022

Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
P.O. Box 1088
Salem, OR 97308-1088

Re: UM 1930 Community Solar Program; PGE Supplemental Comments on Staff Recommendation on Use of Agent Subscription Model

Dear Filing Center:

PGE respectfully submits these supplemental comments in response to the Public Utility Commission of Oregon (OPUC or Commission) Staff Recommendation on Use of Agent Subscription Model, posted to Docket No. UM 1930 on August 23, 2022. PGE appreciates Staff's attention to this important topic and the opportunity to reiterate our support for Staff recommendations.

PGE urges the OPUC to adopt Staff's recommendation prohibiting use of the agent subscription model in the Community Solar Program (CSP). We support initial comments made by CUB, PacifiCorp and Community Energy Project in support of Staff's recommendations. The customer and program risks and lack of benefits of the agent subscription model have been thoroughly documented in the UM 1930 docket. We applaud Staff's commitment to this program's founding vision, which includes expanding access to renewable energy. The agent subscription model reduces program access while disrupting the utility's primary communication channel with its customers.

We also applaud Staff's interest in supporting an easy path for subscribers, particularly as the program responds to new residential enrollment mandates. We support Staff's recommendations to allow Project Managers and Subscription Managers to initially size and adjust a participant's subscription, and to transfer a subscription from one project to another prior to billing.

We are readily available to answer any questions that may arise concerning the model's impact on our customers, and our experiences partnering to implement the program. PGE thanks Staff and the Commission for consideration of these comments.

Sincerely,

/s/ Jason Salmi Klotz

Jason Salmi Klotz
Manager, Regulatory Strategy & Engagement

JSK/SN

cc: Sam Newman
Joe Abraham OPUC