



Oregon Citizens' Utility Board

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January 5, 2022

Via Electronic Filing

Public Utility Commission of Oregon
Chair Megan Decker
Commissioner Letha Tawney
Commissioner Mark Thompson
P.O. Box 1088
Salem, OR 97308-1088

Re: UM 1930 – Letter to the Commission on Consolidated Billing with the Community Solar Program

Dear Chair Decker, Commissioner Tawney, and Commissioner Thompson:

The Oregon Citizens' Utility Board (“CUB”) submits this letter regarding the Oregon Community Solar Program and its associated unregulated billing programs. It is CUB’s understanding that some of the community solar programs are being marketed to customers through a third-party billing program. CUB has concerns about how unregulated billing programs would impact communications between Portland General Electric (PGE) and customers. CUB requests that the Commission suspend the use of unregulated billing programs for the Community Solar Program. CUB’s concerns are twofold: First, unregulated billing programs may not provide as many consumer protections compared to a customer receiving service through PGE’s billing system. Second, unregulated billing programs may provide barriers to customers participating flexible load programs.

CUB’s first concern is around the consumer protections associated with being located off PGE’s billing system. In recognition of the hardship experienced by customers due to the COVID-19 pandemic, utilities in Oregon have been offering consumer protections such as a moratorium on shutoffs, increased energy assistance funding, and ratepayer funded bill arrearage programs. Later this year, CUB expects that PGE will offer low-income programs to help reduce some Oregonians’ overall energy burden. CUB expects that PGE will need to promote these consumer protection programs to eligible residential accounts and provide them with bill relief. CUB’s concern is that some residential customers will lose access to information about these valuable customer protections if they are put on unregulated billing systems. This concern is not unfounded. Several PGE residential customers are located in multi-family apartment buildings which are located on a single service point. These customers are classified as non-residential and are billed with unregulated billing systems and are not subject to Commission bill regulation. It is essential that residential customers have access to a regulated billing system that ensures communications around customer protection measures.

Since the passage of HB 2021, the policy of the state of Oregon is that electric utilities must decarbonize their electric systems. CUB expects that, kilowatt by kilowatt, PGE will develop a diverse portfolio of demand response programs to meet Oregon’s climate goals and help ensure the

provision of reliable electricity service for customers. In particular, CUB is interested in flexible load programs that reduce system capacity costs and increase PGE's system load factor. This will be no small task for PGE and will require customers allowing PGE to shift load to reduce system costs for customers.

CUB is supportive of these consumer protection programs and flexible load programs and is concerned that the Community Solar Program's third-party billing system creates barriers to access these important programs. In CUB's view, customers that are moved to a third-party unregulated billing platform will be less likely to be contacted by PGE's outreach efforts or review the Company's website. PGE uses its email, customer bills, and website to reach and notify customers about new programs. As PGE offers new programs to their customers, CUB believes that it is important that PGE is able to communicate with customers. At this time, CUB requests that the Commission suspend the use of an unregulated billing program for the Community Solar Program.

CUB appreciates the Commissioners' time and attention to this matter.

Respectfully submitted,



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