

Affiliated Tribes of Northwest Indians
 AirWorks, Inc.
 Alaska Housing Finance Corporation
 Alliance to Save Energy
 Allumia
 Alternative Energy Resources Organization
 Ameresco
 American Rivers
 Backbone Campaign
 Beneficial State Bank
 BlueGreen Alliance
 Bonneville Environmental Foundation
 Byrd Barr Place
 City of Ashland
 City of Seattle Office of Sustainability & Environment
 CleanTech Alliance
 Climate Smart Missoula
 Climate Solutions
 Community Action Center of Whitman County
 Community Action Partnership Assoc. of Idaho
 Community Action Partnership of Oregon
 Community Energy Project
 Earth Ministry
 Ecumenical Ministries of Oregon
 eFormative Options
 Elevate Energy
 Energy350
 EnergySavvy
 Energy Trust of Oregon
 Environment Oregon
 Environment Washington
 Forth
 Global Ocean Health
 Green Energy Institute at Lewis & Clark Law School
 Grid Forward
 Homes for Good
 Home Performance Guild of Oregon
 Human Resources Council, District XI
 Idaho Clean Energy Association
 Idaho Conservation League
 Idaho Rivers United
 League of Women Voters Idaho
 League of Women Voters Oregon
 League of Women Voters Washington
 Montana Audubon
 Montana Environmental Information Center
 Montana Renewable Energy Association
 Multnomah County Office of Sustainability
 National Center for Appropriate Technology
 National Grid
 Natural Resources Defense Council
 New Buildings Institute
 Northern Plains Resource Council
 Northwest EcoBuilding Guild
 Northwest Energy Efficiency Council
 NW Natural
 OneEnergy Renewables
 Opportunities Industrialization Center of WA
 Opportunity Council
 Oracle
 Oregon Citizens' Utility Board
 Oregon Energy Fund
 Oregon Environmental Council
 Oregon Physicians for Social Responsibility
 Oregon Solar Energy Industries Association
 Pacific Energy Innovation Association
 Pacific NW Regional Council of Carpenters
 Portland Energy Conservation, Inc.
 Portland General Electric
 Puget Sound Advocates for Retirement Action
 Puget Sound Cooperative Credit Union
 Renewable Northwest
 Save Our *wild* Salmon
 Seattle City Light
 Sierra Club
 Sierra Club, Idaho Chapter
 Sierra Club, Montana Chapter
 Sierra Club, Washington Chapter
 Small Business Utility Advocates
 Snake River Alliance
 Snohomish County PUD
 Solar Installers of Washington
 Solar Oregon
 Solar Washington
 South Central Community Action Partnership
 Southeastern Idaho Community Action Agency
 Spark Northwest
 Spokane Neighborhood Action Partners
 Sustainable Connections
 The Climate Trust
 The Energy Project
 Transition Missoula
 UCONS, LLC
 Union of Concerned Scientists
 United Steelworkers of America, District 12
 Washington Environmental Council
 Washington Physicians for Social Responsibility
 Washington State Community Action Partnership
 Washington State Department of Commerce
 Washington State University Energy Program
 YMCA Earth Service Corps
 Zero Waste Vashon



NW Energy Coalition
for a clean and affordable energy future

October 15, 2018

Oregon Public Utility Commission

Attn: Caroline Moore

Via email: caroline.f.moore@state.or.us

RE: UM 1930 Community Solar Interconnection Staff Proposal

The NW Energy Coalition is grateful for the opportunity to comment on Staff's community solar implementation proposal. We and many other advocates have been more than impressed with Staff's coordination, facilitation, and listening with regard to the complexities of this docket.

Support

We are generally supportive of the proposal and grateful for the progress toward the overarching objective of establishing "an equitable opportunity for consumers that have not been able to access customer generation opportunities and incentives" in solar in the past. In particular, we believe Staff has successfully reduced uncertainty and barriers to entry for community-owned projects by:

- Using the simple retail rate with a 2.18% annual escalator as the interim bill credit rate,
- Reducing administrative costs for low-income (LI) participants, including by simplifying bill credit to net total bill costs over annual energy consumption,
- Requiring 20% bill savings for LI participants, and
- Defining low-income as 80% of the state median level.

We also appreciate Staff's work to recommend a modification to the joint utility proposal to use 30% of summer peak load as a minimum daytime load when a measure of MDL is unavailable.

Concerns

While we stress our overall support and gratitude for the current proposal, we are concerned that the administrative costs may still be a barrier to entry for projects with the most equitable outcomes. One concern is the jump from a \$5/KW pre-certification application fee before the 80 MW transition capacity level, to a \$75/KW application fee after reaching 80 MW; another is the \$1.50/KW/month administrative fee. To address these concerns, we would recommend considering the following:

- Expanding the bill credit rate to 100%, rather than 75%, of the capacity tier, though 75% is a great improvement upon previous proposals.

- A line-item report from Staff delineating what costs this ongoing administrative fee is intended to recover, or some other method of greater transparency around this cost,
- Reducing the general participant administrative fee from \$1.50 to \$0.80/KW/mo., which Staff noted would suffice for a 160 MW program,
 - Or, at a minimum, consider lowering the general participant administrative fee for projects that surpass the 10% LI participation requirement, or for projects that surpass 20% bill savings for LI customers.

Moreover, we are concerned that the interconnection process alone, with its high costs and uncertainty, may dissuade otherwise promising projects. While we appreciate the inclusion of an RFI for a third-party reviewer of interconnection studies, this proposal places no time, cost, or decision-making limitations on utilities. We would encourage greater transparency or deadline requirements to ensure utilities' forward momentum in interconnection.

In summary, we appreciate the hard work behind crafting this much-improved proposal, and will continue to engage to ensure community solar is accessible to communities for whom the project was created.

Sincerely,



Heather Moline
Energy & Environmental Justice Policy Associate
NW Energy Coalition