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