



September 7, 2021

Oregon Public Utility Commission
201 High St SE #100
Salem, OR 97301

Re: Oregon Community Solar Program Tier 2 Recommendations

Dear Chair Decker, Commissioner Tawney, Commissioner Thompson,

Since it was founded in 2015, the member-owned Oregon Clean Power Cooperative has developed and financed more than 20 community-based net-metered solar projects in Oregon. We are a registered Community Solar Project Manager, and are committed to developing community-based Community Solar projects. We have a number of carve-out projects in development, with several nearly ready for pre-certification.

We appreciate the hard work PUC staff have done on the Community Solar program, and would like to offer the following suggestions to the proposed changes to the carve-out eligibility criteria in Item 7, which we believe will increase the likelihood of carve-out projects succeeding:

- 1) In b) and c), add Oregon Cooperative Corporations to the categories of project managers. While the Program Manager has included cooperatives in the “non-profit” Project Manager category, it would be good to remove any potential confusion on this matter.
- 2) Remove Items b) iii and c) iv. The additional paperwork will hinder, rather than assist, small community-based organizations with limited resources in developing projects that meet the program’s goals.
- 3) Add carve-out eligibility to projects with community-based Project Managers that are:
 - sited on brownfields;
 - include dual-use agricultural / solar (without requiring the county to adopt rules for dual-use, which could extend development timelines significantly); or
 - are floating solar projects.

We would also like to offer one suggestion to the participant requirements:

Exclude nonprofit organizations which are on large commercial tariffs but use less than 150,000 kwh/year from the restriction that no "more than 50% of a Project's capacity be owned or leased by commercial, industrial or irrigation Participants."

We work with many relatively small nonprofits and faith-based organizations which are on large commercial tariffs. Many of them would like to subscribe to Community Solar, but are not large enough for a project to use them as the 40% "anchor" subscriber, effectively excluding them from participation in the program.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Dan Orzech" with a stylized flourish at the end.

Dan Orzech
General Manager
Oregon Clean Power Cooperative