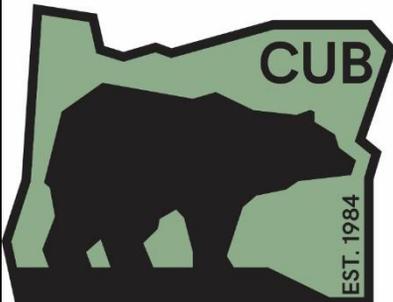


**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1930**

In the Matter of)
)
Oregon Public Utility Commission Staff)
)
Interim Alternative Bill Credit Rate)
Proposals for Community Solar.)
_____)

**COMMENTS OF THE
OREGON CITIZENS' UTILITY BOARD**

April 17, 2018



**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1930**

In the Matter of)	
)	COMMENTS OF THE
Oregon Public Utility Commission Staff)	OREGON CITIZENS' UTILITY
)	BOARD
Interim Alternative Bill Credit Rate Proposals)	
for Community Solar.)	
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The Oregon Citizens' Utility Board ("CUB") appreciates the opportunity to comment on the Oregon Public Utility Commission Staff's ("Staff") interim alternative bill credit rate proposals for community solar. CUB commends Staff for its thorough and careful analysis of an interim rate framework and application.

CUB supports adoption of the simple retail rate as an interim rate, because it appears most likely to satisfy the original basis for determining an interim rate. Senate Bill (SB) 1547 requires community solar projects to be credited at a rate that reflects the resource value of solar (RVOS) or a different rate for good cause. In March, the Commission determined that the initial RVOS values, and the protracted timeline for developing final RVOS values, were a good cause basis for developing an interim rate.

CUB favors the simple retail rate option because its simplicity and accessibility will allow it to be adopted the most expeditiously. Both the adjusted retail rate and adjusted RVOS include adjustment factors that, CUB suspects, will become contentious sources of debate that

further delays implementation of an interim rate. If one of the primary goals of adopting an interim rate is to provide rate certainty by the end of April, then the simple retail rate is likely the best option.

Additionally, CUB believes the simple retail rate appropriately balances the desire to spur project development and minimize rate impacts to non-participating customers. CUB believes the simple retail rate is in the range of values solar developers need to develop projects.¹ While the simple retail rate poses the greatest rate impact of the three options, the increase to rates would still be a modest one.² Moreover, CUB recognizes that, at least initially, all ratepayers will need to contribute towards creating a viable community solar program. In exchange, ratepayers will have access in the future to greater customer choice through the community solar program, and avoid the more costly alternatives that may arise if the community solar legislation fails.³

Finally, CUB agrees with Staff's finding that an initial capacity threshold should be set as a check-in point to reassess the initial interim rate. CUB would suggest setting an initial capacity threshold at half of the available capacity tier.

Respectfully Submitted,

/s/ Elizabeth Jones

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¹ It may be worth highlighting that the Commission needs to adopt an interim rate that spurs project development, but the Commission is under no obligation to adopt a rate that satisfies all potential projects or fits every solar developer's business model.

² CUB notes the exception to this statement is the calculated rate impact to Idaho Power customers. CUB is open to discussing an alternative interim rate unique to Idaho Power to avoid the more severe projected rate impacts.

³ CUB is concerned that, should community solar never become a viable option under the current rules, ballot initiatives or other hallmarks of the 'solar wars' may be used at a greater cost to Oregon ratepayers.

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