



Portland General Electric Company
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portlandgeneral.com

December 10, 2021

Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
P.O. Box 1088
Salem, OR 97308-1088

Re: UM 1930 Community Solar Implementation

Dear Filing Center:

PGE offers these comments regarding the Community Solar Program (CSP) Implementation Manual changes being proposed, and particularly in response to Common Energy's December 8 comments regarding the Major Plan Amendment process for project certification.

PGE appreciates and supports the Proposed Change that would require Project Managers to cease enrolling new customers while the request for a Project Amendment is pending.¹ A Project Plan Amendment could raise significant policy issues that require Commission consideration and decision, and enrollments should halt to prevent potential subscriber harm and provide the Commission the "space" to review and deliberate.

PGE has become aware of at least one CSP entity that is enrolling customers into a CSP model that involves consolidated non-regulated billing in which the customers no longer receive their PGE bill and instead receive a re-packaged bill from the CSP entity. PGE understands that the Program Administrator and PUC Staff have advised, under these circumstances, that the project must seek a Plan Amendment to use this practice. PGE believes that this practice raises a significant policy issue for the Commission. Should the Commission disallow the consolidated non-regulated billing approach, subscribers would be impacted. Continuing to subscribe customers while seeking the Plan Amendment will magnify the impact, and it is more difficult to deny a fully subscribed project. Instead, subscriptions should halt while the Commission weighs its decision.

PGE appreciates the consideration of these comments in support of the PIM provision halting subscriptions pending a Plan Amendment.

Sincerely,

/s/ Karla Wenzel

Karla Wenzel, Manager
Regulatory Policy and Strategy

¹ See Section 4.7.1 Major Revisions Requiring Amendments, Page 66. The text reads: "If the Program Administrator determines that a Project Manager must request a Project Amendment and that not doing so may impact Participants, the Program Administrator will request that the Project Manager cease enrolling new customers while the request is pending."