

To the Oregon Public Utilities' Commission

April 17, 2018

Docket UM 1930 – Comments in Response to PUC Staff Memo of April 10, 2018

Dear Public Utility Commissioners -

The undersigned members of Portland-based Climate Jobs Pdx, 350PDX, and Oregon Clean Power Cooperative hereby present our joint public comments in preparation for the UM 1930 Commission Meeting on April 24th, 2018. We recognize the significance of your decision to establish an interim rate for the Community Solar Program (CSP) – the subject of the April 24th meeting - and appreciate your willingness to take this important step. All of us are Portland-area residents with a strong desire to see a workable CSP established in Oregon, and fully support your efforts to create an interim bill credit rate that will make that possible.

We have read the April 10 staff memo and offer you our recommendation for consideration:

Of the three proposed options interim rate options (“Retail Rate,” “Adjusted Retail Rate,” and “Adjusted RVOS”), we urge the Commission to pick the **Retail Rate**, which would put rates for renters and non-suitable-roof-homeowners on a par with the rates earned by other homeowners and would also more likely be at a high-enough level to ensure a workable community solar program during the interim/start-up period.

In addition, because the CSP’s goal of incentivizing low-income participation in CSP projects is a fundamental aspect of the program, we support the proposal made by other stakeholders for **adjustments (or “adders”) to the Retail Rate** to be established for all subscribers in **CS projects with a majority of low-income subscribers**. The point of proposing the adjustment for all subscribers’ rates instead of just those of low-income subscribers, is to create an incentive for low-income participation at the project level, not just at the individual subscriber level. Such a retail rate adjustment would also work in conjunction with a **separate adder for small-scale projects**, to improve the feasibility of small-scale projects and increase the chances of achieving important disaster recovery benefits within communities.

With these considerations in mind, we urge acceptance of the “Retail Rate” option, with adjustments in rates for majority low-income subscriber projects, and for small-scale projects.

Sincerely, Members of Climate Jobs Pdx, 350PDX, and the Oregon Clean Power Cooperative -

Dave King, Co-Chair CJ-Pdx, 8728 N. Edison Ave, Portland, OR 97203

Laurie King, Member CJ-Pdx, 8728 N. Edison Ave, Portland, OR 97203

Linda Craig, Member OCPC and 350PDX

Mark Darienzo, Co-Chair CJ-Pdx, 6923 NE Morris Ave, Portland, OR 97213

Rich Peppers, Member 350PDX and CJ-Pdx, 821 NE 70th Ave, Portland, OR 97213

Sandy Polishuk, Board Member 350PDX, 1610 NE Tillamook Ave #3, Portland, 97212