



August 5, 2022

Via Email

Oregon Public Utility Commission
201 High Street SE, Suite 100
Salem, OR 97301-3398

RE: Use of Agent Subscription Model
Docket No. UM 1930

**Common Energy Additional Comments on Draft Staff Recommendation
Prohibiting Agency Agreements**

Dear Staff:

Common Energy, LLC (“Common Energy”) respectfully submits these Comments in support of the proposal filed yesterday by the Oregon Solar + Storage Industries Association (“OSSIA”).¹ OSSIA proposes that Staff at the Oregon Public Utility Commission (“OPUC”) not restrict third party consolidated billing for all subscribers as Staff proposed² but instead only require “use [of] the existing utility billing model for low-income subscribers.”³ Unlike Staff’s recommendation, OSSIA’s proposal would “allow subscribers who are not low-income to take advantage of the benefits of the third party consolidated billing –such as autopay,”⁴ as is the standard practice in other states. Common Energy appreciates OSSIA’s efforts to reach a compromise that allows both agency agreements and consolidated billing to bring benefits to the Oregon Community Solar Program (the “CSP”).

Common Energy’s preference would be to let subscribers decide for themselves whether to request consolidated billing, which is how Common Energy operates in other states. However, Common Energy acknowledges the unique characteristics of the Oregon CSP, and the concerns from OPUC Staff, the Program Administrator and Low-Income Facilitator. While Common Energy disagrees with those concerns, Common Energy is willing to modify its preferred business model to not allow low-income customers to use consolidated billing at this time. Assuming OPUC adopts this model, Common Energy recommends OPUC also require utilities to provide data about the frequency of partial payments by low-income subscribers to inform future decisions about the program.

Common Energy also agrees with OSSIA that agency subscription services and

¹ OSSIA Additional Comments (Aug. 3, 2022).

² Staff Draft Recommendation on Use of Agent Subscription Model at 3 (June 14, 2022).

³ OSSIA Additional Comments at 1.

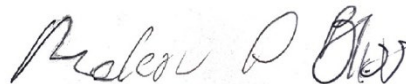
⁴ OSSIA Additional Comments at 1.

consolidated billing should be evaluated separately.⁵ Consolidated billing is one of several options that an agency agreement can provide. Agents can, for example, manage Subscribers' subscription levels or resolve issues with project unavailability without necessarily offering consolidated billing. Common Energy strongly believes both types of offerings can provide valuable benefits to subscribers with little to no cost to the CSP.⁶ To the extent Staff wishes to assess these benefits, Staff should do so separately for agency subscription services without consolidated billing and those with consolidated billing.

Common Energy remains committed to supporting the CSP and the adoption of strong consumer protections. Common Energy looks forward to reviewing Staff's revised Recommendation and engaging further in this matter.

Dated this 5th day of August 2022.

Respectfully submitted,



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⁵ OSSIA Additional Comments at 1; *see also* Common Energy Comments on Staff's Draft Agent Subscription Model at 13-14 (June 24, 2022) (discussing this separation further).

⁶ Common Energy recognizes Staff's concern that consolidated billing could trigger significant costs (\$200,000). Staff Draft Recommendation on Use of Agent Subscription Model at 5. Common Energy remains surprised by this assertion and would appreciate further explanation from Staff as Common Energy assumed that these costs would be minimal. *See* Common Energy Comments on Staff's Draft Agent Subscription Model at 19.