



October 15, 2019

Dear OPUC Commissioners and Staff,

Thank you for your efforts to design and launch the Oregon Community Solar Program (authorized in 2016 under ORS 757.386). The signatory organizations urge approval of Staff's proposal to address major implementation policy issues related to interconnection, low-income requirements, transition to ongoing costs, and bill credit rates under the Community Solar Program¹.

Community solar expands access to solar for all, including low-to-moderate income customers, while contributing to a stronger, distributed and more resilient electric grid. It offers important opportunities for shared ownership and development of solar assets in communities who might otherwise be left behind. In a State whose solar penetration rates remain well below 2%, programs and policies that provide incentives for further development of distributed, renewable energy generation in Oregon are urgently needed.

The common-sense proposals recommended by Staff represent important progress towards the finalization of the Community Solar Program rules and the successful launch of the program in 2020. While the staff proposal is not perfect, it is an important step in the right direction and should be approved. Further work will be needed to address outstanding issues related to startup and ongoing administrative and transition costs, capacity allocation, and ongoing interconnection challenges that threaten successful implementation of community solar in Oregon; particularly for community-based and local government-led projects.

¹ Item No. RA1 PUC Staff Report (Docket No. UM 1930) Community Solar Program interconnection, low-income, transition to ongoing costs, and bill credit rate policies.

We look forward to continued engagement with the OPUC and other key stakeholders on the finalization and implementation of the program and to the successful launch of community solar in Oregon.

Thank you for your consideration.

Sincerely,

Bonneville Environmental Foundation
Coalition for Community Solar Access
Community Renewable Energy Association
Environment Oregon
NW Energy Coalition
Onward Oregon
Oregon Solar Energy Industries Association
Renewable Northwest
Spark Northwest
Sustainable Northwest
Verde

*Please note that a number of signatory organizations to this letter are also submitting more detailed comments in their individual capacities and those should be considered as such.