

January 29, 2018
Oregon Public Utility Commission
Attn: Caroline Moore
201 High St. SE #100
Salem, OR 97301



Dear Caroline,

The Bonneville Environmental Foundation (BEF) wishes to express its gratitude and admiration for how the Oregon Public Utility Commission (OPUC) and its staff have approached the implementation and stakeholder engagement of the community solar program. Given the substantial amount of work the OPUC has it is understandable how the implementation of community solar has taken several years. The effort to convene stakeholders to work on consensus and discuss program details is both a prudent and commendable effort led by the OPUC.

However, BEF believes that the most critical element of community solar (the bill credit rate), could follow a similar path to the other sub-group activities. Our reasoning is as follows:

- The OPUC and its Staff have expressed the desire to roll out a successful program out in 2018 and continue to work in parallel on program details as the RFP, 3rd party administrator procurement, utility implementation, and RVOS proceedings are carried out.
- SB 1547 states that the PUC shall “incentivize consumers of electricity” to participate in the community solar program while “minimizing the cost shifting” to non-participants.
- The OPUC and Staff have found it premature to evaluate alternative rates to the RVOS as UM 1716 has not concluded, but this approach risks further delay to community solar implementation.
- When UM 1716 concludes there will still persist the question: “Is the final RVOS rate suitable to create a viable community solar program?”
- This is why we urge the OPUC to conduct an evaluation in parallel to UM 1930 and UM 1716 to answer the question, “What bill credit rate is necessary and sufficient to incentivize community solar participation?”

BEF remains optimistic that a robust and successful program will enable a diverse, equitable, and cost effective solar program. We are appreciative of the OPUC’s commitment to stakeholder input into this program, but we wish to reaffirm that this is a customer focused program and should be developed from the lens of what will work for the customers.

Sincerely,

A handwritten signature in black ink, appearing to read 'Evan Ramsey', is written over a large, faint, dotted circular graphic that spans the lower half of the page.

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