



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

July 30, 2021

Dear Chair Decker, Commissioner Tawney, and Commissioner Thompson,

Solar Oregon is a 501(c)3 nonprofit that has educated solar consumers across the state and advocated for increased access to solar energy for over four decades. Community solar represents an unparalleled opportunity to make the benefits of clean energy available to the greatest number of Oregonians, and we appreciate your stewardship of the Oregon Community Solar Program (CSP). Solar Oregon strongly supports the Public Utility Commission (PUC) staff's recommended adjustments for Tier 2 of the program.

Oregon's CSP must serve residential customers--especially low income households--if it is to truly be *community* solar. Although Tier 1 has succeeded in many ways, it does not create viable project economics for small carve-out systems that represent "community scale" energy. It has also resulted in only a small percentage of subscribers being residential, and in lackluster acquisition of low-income subscribers. Staff's proposed changes address these challenges, and should be adopted in full.

Solar Oregon strongly supports increasing the energy savings for low-income subscribers to 40%, and for a resolution to the utility payment hierarchy that currently puts low-income subscribers at increased financial risk. By creating a stronger incentive and eliminating the risk associated with the payment hierarchy, the CSP will vastly increase the benefit that it delivers to low-income Oregonians.

Solar Oregon also strongly supports the 2% escalator to the bill credit rate. This change is absolutely necessary to a) compensate for the increased energy savings for low-income subscribers proposed by staff, and b) make small carve-out projects economically viable. Tier 1 saw very low utilization of the carve-out capacity for small projects due to inadequate bill credit rate, and without staff's proposed increase Tier 2 will see a similarly lackluster usage of the carve-out.

Thank you for your attention to our testimony.

Sincerely,

A handwritten signature in black ink that reads "Zach Snyder". The signature is written in a cursive, flowing style.

Zach Snyder
Solar Oregon