



Bureau of Planning and Sustainability

August 22, 2025

Via Electronic Filing

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

RE: UM1930 Proposal to Expand Carve-out Capacity in the Community Solar Program

Dear Chair Tawney, Commissioner Perkins, Commissioner Power:

The City of Portland Bureau of Planning & Sustainability (BPS) supports the proposal to increase the carve-out capacity for the Oregon Community Solar Program (OCSP) and the “intent to focus on serving energy burdened utility customers or include community control or leadership”¹. This is a needed and urgent step towards a longer-term, continued expansion of the Oregon Community Solar Program.

The City of Portland has adopted goals and commitments toward decarbonization and climate action, including the current Climate Emergency Workplan² and Portland Clean Energy Community Benefits Fund (PCEF) Climate Investment Plan³. Community solar plays a role in helping Portlanders meet our climate goals, including our citywide goal to have 100% of electricity come from renewable energy by 2030, with community ownership of renewable energy escalating from 2% in 2030 to 10% by 2050.

The PCEF community grant proposals demonstrate significant demand from nonprofit organizations wanting to construct, host, and connect their community members to the benefits of community solar. PCEF has awarded grants to organizations like Verde and Bonneville Environmental Foundation, which successfully built the 1MW Goodling Annex project in 2024 in partnership with Port of Portland. This project is providing significant cost reduction for low-income households. Our existing PCEF grantees have seven active projects in development totaling approximately 11MW, and interest in community solar continues to increase locally as organizations recognize the benefits of bill savings that these projects can deliver for low-income customers. While we have a direct interest in a robust program locally, it is also important that the OCSP succeed in other communities around Oregon.

The Oregon Community Solar Program, as passed by the Legislature in 2016 through SB 1547, did not denote a specific capacity limit for the program, and a 160MW “Initial Capacity” allocation was created by OPUC rulemaking. On August 12, 2025 OPUC Staff issued an “advisory notice to stakeholders regarding the limited unallocated Tier 2 carve-out capacity remaining...” with anticipation that incoming

¹ <https://edocs.puc.state.or.us/efdocs/HAH/um1930hah336919026.pdf>

² <https://www.portland.gov/bps/climate-action/climate-emergency/documents/climate-emergency-workplan-2022-2025/download>

³ <https://efiles.portlandoregon.gov/record/17318486>



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applications are “likely to exceed remaining unallocated Tier 2, carve-out capacity.”⁴ At a time when development of non-emitting resources is paramount to meeting state and local energy goals, the OPUC should continue to expand opportunities for community solar as part of a diverse and decarbonized generation portfolio. The OCSP brings new non-emitting resources to the system, while also providing direct community benefit and household energy bill reductions. This model is particularly effective for renters, residents in multi-family housing, and low-income households.

BPS supports the OPUC Staff recommendation to add 30 MW of additional carve-out capacity in PAC and 20 MW in PGE service territories for a total 50 MW. While BPS staff have some concerns about the OCSP financial model, the direct community benefits of this added capacity will exceed the estimated monthly cost on residential bills (\$0.07 for PGE customers and \$0.13 for PAC customers)⁵, and the incremental cost of this program is significantly lower in magnitude than most other regulatory charges incurred on energy bills.

While this allocation of 50MW represents an urgent and necessary next step, there is also need for a comprehensive and continued expansion of the broader OCSP capacity, as well as efforts to bring certainty to the project development timelines. Community solar can and should be a core long-term strategy for meeting both utility obligations for small-scale renewable energy acquisition, as well as the interest of customers to participate in the clean energy economy. The thriving community solar ecosystem that we envision requires both a clear path forward for development of additional projects, as well as removal of burdensome interconnection barriers and streamlining of administrative issues. We look forward to future discussions to ensure the continued health of the OCSP.

We appreciate the OPUC Staff for their thoughtful stakeholder engagement and support the direction to provide Oregonians with the certainty that they can invest in, participate, and benefit from community solar. Thank you for the opportunity to provide public comment.

Respectfully,

A handwritten signature in blue ink, appearing to read "Eric Engstrom".

Eric Engstrom, Director
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he/him/his

⁴ <https://edocs.puc.state.or.us/efdocs/HAH/um1930hah339023027.pdf>

⁵ <https://edocs.puc.state.or.us/efdocs/HAH/um1930hah338774035.pdf>