

From: [Dan Orzech](#)
To: [PUC.PUC.FilingCenter * PUC](#)
Subject: UM 1930 – Community Solar Program comments
Date: Friday, July 30, 2021 5:36:18 PM

To the Commissioners and staff:

We appreciate staff's hard work in trying to make the Oregon Community Solar Program a success.

Our experience with the program to date is that it is effectively impossible for community-based carve-out (360 kW) projects to succeed. These projects cost on the order of one-quarter to one-third more per Watt to build than larger projects. They also do not have the same access to tax equity investment as larger projects.

The proposed changes to the program do not level this playing field. The proposed escalator is helpful, but its effects are essentially negated by the other proposed changes.

We work with many Oregon nonprofits, educational organizations and Tribes which would like to be able to host community solar projects. We suggest that Commissioners consider revising the program structure for carve-out projects with nonprofit project managers, to allow better access to community solar by these community organizations.

We also suggest Commissioners re-examine taking an approach similar to Massachusetts' SMART program, which incentivizes community solar projects which provide various social benefits, including brownfield locations and agrivoltaics.

Respectfully yours,

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