

April 17, 2018

Oregon Public Utility Commission  
Attn: Caroline Moore  
201 High Street SE, St. 100  
Salem, OR 97301

**RE: UM 1930 Community Solar Implementation, Alternative Bill Credit Comments**

Community solar is a critical tool for advancing climate justice in Oregon, and for achieving the carbon reduction and renewable energy commitments made by Multnomah County. We applaud the thoughtful, diligent work that Public Utility Commission (PUC) staff have put into developing a community solar program that works for all Oregonians.

The Multnomah County Office of Sustainability appreciates the opportunity to comment on the alternative bill credit rate under consideration by the PUC. Timely approval of an alternative bill credit rate that encourages the early participation of developers and customers is essential for building long term momentum for the program.

We support the use of a straightforward retail rate for the initial alternative bill credit rate. Given the many questions that remain to be addressed in the development of the community solar program, avoiding a likely contentious process of establishing a more complex initial interim rate will help ensure that the program continues to move forward in a timely manner. In addition, we believe that an interim rate that does is not initially at or near the retail rate will limit participation by customers in the Willamette Valley, including Multnomah County and its residents. Finally, the initial interim bill credit rate must be sufficiently high to allow program customers to pay participation rates that are financially prudent, while ensuring that the program is meeting the ten percent low income participation requirements and allowing for recoupment of administrative startup costs.

Multnomah County and its residents are committed to a just transition to a renewable energy future. We appreciate the opportunity to participate in the development of a community solar program in Oregon, and are eager to see this critical tool in the renewable energy transition to come to fruition.

Sincerely,



Tim Lynch  
Senior Policy Analyst  
Multnomah County Office of Sustainability