

To the Oregon Public Utilities' Commission  
March 5, 2018

Docket UM 1930

Dear Public Utility Commissioners -

I am a Portland resident and homeowner and would like to solarize my home in order to do my bit to help make a broader transition to renewable power in the state and country happen. Unfortunately, my home does not have a suitable roof, like so many others. The Community Solar program ought to be a sound and workable solution for renters and people with homes like mine. I am but one of many people in this same boat...

I have read the staff memo prepared for this March 5 meeting, and, appropriately, it does not make recommendations. I do not claim expert knowledge on the many technical issues discussed in the memo, but the sense I get from reading it is that the easy thing for commissioners to do would be to simply avoid the risks of making a determination to set an alternate bill credit rate and be done with it – i.e. just follow the current course. I encourage you not to accept that train of thought.

The problem with “just staying the course” is that key decisions made using a “low-risk” approach to following the legal and logistical parameters add up. Summing them up results in simply preserving the status quo, which is not what legislators had in mind when they passed CSP. It already seems that some earlier decisions made in Oregon – like not including environmental or other externalities in the RVOS formula (as New York and Minnesota do), or not (yet?) establishing “adders” or other incentives to enhance the bill credit rates they use (as several states do) will significantly limit the potential of the CSP when it is finally launched.

Even though the staff memo appears to urge commissioners not to make decisions with an outcome orientation, the cumulative impact of all the decisions you make is obviously going to lead to an outcome that is better or worse for the potential of the CSP to do what it was intended to do, i.e. make solar power accessible for more people in Oregon.

With these considerations in mind, I urge you to determine that setting an alternate bill credit rate is appropriate, as recommended by several of the more-expert advocates for the CSP, and for renewable power in general. These recommendations show it is possible to operate within legal and logistical parameters and still fulfill Oregon's CSP's potential.

Sincerely -

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