



August 22, 2020,

Public Utility Commission of Oregon
Filing Center
201 High Street SE, Suite 100
P.O. Box 1088
Salem, Oregon 97301

RE: Community Solar Program Utility and Program Administration Fees in Idaho Power Service Territory

Fleet Development (Fleet), to our knowledge, is the singular project manager/developer with an active community solar project (CSP) in Idaho Power service territory. Because of the limited CSP programmatic capacity assigned to Idaho Power (3.28 MW), the size of our CSP project (2.95 MW), and the financial implausibility of even the largest CSP projects in Idaho Power service territory – our project is likely to be the only project in the near term.

We greatly appreciate the reasonable concessions made by Idaho Power in previous filings, as well as the effective waivers to several CSP rules granted by the PUC that have enabled this project to continue development. We believe that everyone wants a community solar project to succeed in SE Oregon. We also appreciate Idaho Power's recent CSP tariff filing on August 10th, 2020 which further lowered the Utility Admin fee.

In previous comments filed by Fleet regarding the Utility Admin fee, we suggested that the cost of administration incurred by the utility to manage this program should not be borne by a single community solar project. In this service territory, the lowest programmatic bill credit rate (\$.0848/kWh) coupled with the highest Utility Admin fee (now \$.048/kW/month) combine to create an unintentional, yet prohibitive, CSP project environment. Furthermore, projects in Idaho Power Service territory neither benefit from shared costs with other developer's projects nor receive any of the Energy Trust of Oregon incentives available in other utility service territories. **The community solar program is less equitable for project developers in Idaho Power service territory through no fault of Idaho Power or the program itself.**

While Fleet does not have insight to the component costs that drive the Utility Admin fee, we believe a significant portion of it may come from the utility's requirement to develop solutions and processes for the unique CSP billing requirements and the account management associated with a subscription. This is likely true for the Administrator's Program Admin fee as well. Both institutions can spread these costs across many ratepayers. Our project has synonymous costs and requirements at the project manager level. To put the burden of the programmatic fees (Utility and Program) on this single project in perspective, each of these fees exceed the total

amount we can allocate for annual project management. Yet the project management fee must pay for billing services and subscriber management and all the operational project management associated with a 2.95 MW solar project.

We believe that several options may exist for reducing the utility administration costs. One option may be to remove fee billing requirements from the utility completely and make them 'back of the house' transactions handled by the Program Administrator. Another option may be found in a unique off-bill subscription collection methodology agreed to by all parties.

A final option may be to exempt certain fees. Because Idaho Power's proposed Utility Admin fee is 239% higher than other utilities and the programmatic project capacity limit does not allow for the cost to be shared across a large number of developers, we recommend the Community Solar Program waive the Program Admin fee (\$.85/KW/Month), to support a successful program in Idaho Power territory. In the future, if the programmatic allocation assigned to Idaho Power were to increase and if more projects are likely there, the methodology could be revisited in future program filings. We look forward to any other creative suggestions and dialog with the utility, program administrator and Staff.

Sincerely,

Ryan Sheehy

Ryan Sheehy

President, Fleet Development