

June 18, 2021

Re: UM 1930 Community Solar Program, Comments on Tier Two Design Following June 4 Workshop

Dear Commissioners,

We are very grateful for a well-facilitated and productive community solar workshop on June 4. Our understanding is that the Commission is currently crafting a proposal for tier two of the program that would crystalize stakeholder input from June 4. Community solar is a key component of an inclusive and thriving energy economy. However, unlike in some other states, Oregon's community solar program does not currently achieve the full promise of its name. These comments represent the hopes of some of the very few non-developer, non-utility voices who've had the capacity to engage in community solar conversations so far, who, along with the Commission, utilities, and developers, would like the program to meet its legislative intent to expand access to solar¹. We hope that these comments, reinforcing a creative and full workshop, help the Commission craft and deliberate on its next steps.

- **We need a simplified program.**

- We are supportive of the alternative solutions staff noted in their workshop questions to simplify the program for participants², and believe these and other changes, such as the following, could greatly improve the program: addressing when project managers can begin to recruit participants for their projects; reducing or eliminating hurdles by making interconnection requirements, costs and approvals available to projects before pre-certification; and treating smaller projects like net metered projects.
- Consider breaking the program implementation manual into two distinct chapters, one each for small and large projects, that guide developers through the appropriate processes required to build projects in Oregon to add clarity to the program. The current PIM handicaps small projects by trying to fit megawatt or gigawatt power-plant procedures and requirements to the development of small (less than 360 kilowatt) systems, making them financially difficult to impossible.
- Greater certainty of a higher and more feasible bill credit rate, available capacity per tier, and availability from an interconnection and distribution system perspective, will also simplify the program. We are hopeful that, even outside this program and docket, utilities can move toward more transparent displays of their systems that are understandable to wider audiences.
- We seek greater support for community-owned, not-for-profit projects that reflect the main intent of SB 1547 in allowing community members to pool their

¹ Oregon Citizens Utility Board; Opening Comments in UM 1930.
<https://edocs.puc.state.or.us/efdocs/HAC/um1930hac16558.pdf>, p. 2.

² <https://edocs.puc.state.or.us/efdocs/HAH/um1930hah135823.pdf>, p. 2.

resources to build PV systems for their own benefit.

- **We need greater bill savings.**
 - As at the start of the program, we continue to support using a simple retail rate with an escalator as the bill credit rate, as staff initially proposed³. This rate best reflects the true value of solar to ratepayers and participants. We would also support an adder or escalator specifically for projects with significant community-owned non-profit, residential or low-income participation.
 - We support continued public conversations about attempts to address the “root problem” of affordable subscriptions that is the billing hierarchy, including potentially adopting a “non-root” solution, such as establishing a separate fund to support subscribers in arrears.
- **We believe in the potential of this program to provide benefits beyond what any other currently existing program can offer.**
 - Some of these benefits might include:
 - Access to community-visible solar resources beyond the household level, which facilitates education and information-sharing that have the potential to address, at the root, many of the clean energy inequities in our state, and create potential for greater community resilience.
 - Promoting competition, customer choice and innovation in who builds and receives the benefits of generation.
 - Community-wealth-building, local economic development, job training and job exposure.
 - Bill savings and bill *resilience*--the ability to pay a bill consistently over the long term and plan to spend savings elsewhere, without jumping through the hoops of energy assistance, which is intended solely as a crisis response.
 - Decarbonization.
 - Allowing renters and residents without suitable roofs to own a source of clean, renewable energy in their community.
 - Providing a guaranteed way for renters and low-income Oregonians to subscribe and participate, and non-private-entities to gain access to the market and these resources.
 - In general, we believe we should not *solely* evaluate the program based on its ability to mitigate energy burden and expand access to renewables.
- **We encourage utilities and the Commission to consider the rate impacts of this program in line with the benefits it is providing and has the potential to provide in the future, which are arguably unavailable anywhere else.**
 - We understand concerns about minimizing the cost of the program to nonparticipants, especially after a catastrophic year for Oregonians and

³ Staff Policy Proposal, [https://edocs.puc.state.or.us/efdocs/HAH/um1930hah145221.pdf](https://edocs.puc.state.or.us/efddocs/HAH/um1930hah145221.pdf), p. 29.

during/after a global pandemic. We believe that we need more specific knowledge about potential rate impacts of the program within its potential to provide the benefits listed.

- With the passage of HB 2475 and the Commission's resulting authority to create a low-income ratepayer class, we believe that low-income ratepayers not participating in the program can be protected from cost-shifting.

We are appreciative of the technical expertise around data and framing questions afforded in PGE's submission, posted yesterday to the docket page⁴. We feel some of the questions posed there have been at least partially addressed. We have some sense of initial participant demographics from the Program Snapshot that featured relevant data through May 1, and from the statistics presented at the June 4 public meeting⁵. Others of these questions will be helpful to program administrators in collecting and crafting meaningful metrics going forward. We do not believe, however, that further data are needed in order to make some meaningful changes to the program that align with program goals and deliver benefits. It seems clear to us from collective stakeholder feedback on June 4 that some of the changes we have outlined here will ease access and remove barriers for certain projects and subscriber types. In addition, we strongly encourage the Commission not to delay decisions on tier two past the current target of late August. Delays increase cost and uncertainty, which is especially difficult for small community-led projects.

Lastly, we encourage the Commission and all partners to remain hopeful. The last year and a half of crisis and response are not a predictor of the future of this program. Moreover, any program is shaky and unknown during its first steps. We encourage the Commissioners' deliberation on these steps to create a stronger program that will be ready for greater community involvement.

Sincerely,

/s/ Ray Sanchez-Pescador, Solarize Rogue

/s/ Joe Basile, Wallowa Resources Community Solutions, Inc.

/s/ Heather Moline, NW Energy Coalition

/s/ Raphaela Hsu-Flanders, Bonneville Environmental Foundation

⁴ <https://edocs.puc.state.or.us/efdocs/HAC/um1930hac16340.pdf>.

⁵ <https://edocs.puc.state.or.us/efdocs/HAH/um1930hah9220.pdf>.