



October 6, 2022
Via Electronic Mail

Oregon Public Utility Commission
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Salem, OR 97308-1088
puc.filingcenter@puc.oregon.gov

**Re: UM 2225 Letter on Roadmap Acknowledgement and Community Lens Staff Memorandum and 10/4/22 Special Public Meeting Discussion
October 6, 2022, Special Public Meeting – Agenda Item 1**

Dear Commissioners:

The Oregon Solar + Storage Industries Association (“OSSIA”) hereby submits these written comments for the Public Utility Commission of Oregon’s (“Commission”) consideration as the Commission prepares to deliberate on the roadmap acknowledgment and community lens straw proposals. OSSIA would like to highlight some of the recommendations that we feel are necessary to ensure the first CEP is meaningful and capable of meeting the utilities statutory obligations.

OSSIA has argued in comments in this docket that the HB 2021 emission reduction targets are mandatory and binding. We recommend that the Commission recognize that the statutory obligations are binding.

Additionally, OSSIA believes that the first CEP needs to account for contingencies, failure rates, and factor in possible delays and challenges to ensure that the utilities are prepared to meet their compliance obligations.

OSSIA further recommends that the utility CEPs should be both economically and technically feasible. Permitting timelines and transmission constraints will require new transmission lines to bring electricity to load. New transmission projects have long permitting timelines and may not be ready in time for utilities compliance with the emission reduction targets. Accordingly, these should be considered in CEP Proposals and should be considered when CEPs are acknowledged.

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Furthermore, continual progress should contemplate a linear glide path towards compliance as the yard-stick for acceptable scale and timing of actions. While the IRP and RFP process result in a stair step emission reduction over time, utilities must pursue all options that contribute to meeting the continual progress requirement.

Lastly, OSSIA recommends that the Commission clarify that the resiliency projects and Community Based Renewable Energy standards should not be limited to small scale projects. These projects should be meaningfully evaluated as in-state and on-system projects.

In conclusion, OSSIA recommends that the Commission adopt the recommendations as laid out above. We greatly appreciate the efforts of staff to bring this docket to this point and we look forward to further engagement in this docket.

Respectfully submitted this 6th day of October 2022,

Jack Watson
Director of Policy and Regulatory Affairs