

Request for Public Comment

March 10, 2022

Community Solar Program - Docket No. UM 1930 Staff recommendation for the low-income subscription requirement.

Background

In Order No. 20-387¹ the Commission approved a twelve-month waiver of the low-income subscription requirement for Community Solar Program (CSP or Program) projects to subscribe at least ten percent of project capacity prior to Certification. Order No. 20-387 also required Project Managers (PM) to meet that same subscription requirement within twelve months after Certification, or be subject to a penalty. In Order 21-347² the Commission approved extending the waiver for an additional six months, and approved Staff seeking stakeholder input on the future of the waiver before the waiver would expire on April 20, 2022.

The COVID-19 pandemic has created unforeseen challenges to low-income recruitment in the Program. When the Commission approved the twelve-month waiver, none of the 22 pre-certified projects had been successful in meeting its low-income subscription requirement. In-person and online education and outreach to low-income residents was not feasible or viable, and low-income verification was difficult.

Approximately five months after approving the twelve-month waiver, the CSP Program Administrator (PA) and utilities identified an additional barrier to low-income recruitment related to the utilities' billing hierarchy. In Order No. 21-082,³ Staff described how, under the then-billing hierarchy, a partial or missed payment would cause a customer to fall into arrears with the PM as well as the utility. As a result, the Low-Income Facilitator (LIF) and community-based groups were hesitant to recommend low-income customers participate in the Program until this was resolved.

Staff Recommendation and Rationale

Staff is recommending allowing the waiver to expire on April 20, 2022, which is the end of the six-month extension approved in Order No. 21-347. In that Order, Staff reported a number of positive updates regarding low-income recruitment in the Program. The utility billing hierarchy issued had been resolved, and the LIF and community-based groups had resumed low-income recruitment activities. LIF has also

¹ Order No. 20-387. <https://apps.puc.state.or.us/orders/2020ords/20-387.pdf>

² Order No. 21-347. <https://apps.puc.state.or.us/orders/2021ords/21-347.pdf>

³ Order No. 21-082. <https://apps.puc.state.or.us/orders/2021ords/21-082.pdf>



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developed low-income customer waitlists, and the LIF was optimistic all currently pre-certified projects would meet their low-income recruitment goals without delaying project Certification. With the lifting of COVID-19 restrictions Staff is optimistic the impacts of the pandemic on low-income recruitment will continue to diminish. Staff appreciates public comment on its recommendation to allow the waiver to expire on April 20, 2022.

Staff appreciates the significant efforts of the PA, LIF, PMs, utilities, and community-based groups over the past sixteen months to identify and implement solutions to overcome challenges to low-income recruitment in the Program. Staff's recommendation reflects this important work, the LIF's positive outlook for remaining pre-certified projects to meet the low-income subscription requirement at Certification, the continued decline in COVID-19 cases, and the scheduled lifting of COVID-19 restrictions.

Please email comments on Staff's recommendation to allow the waiver to expire on April 20, 2022 to puc.filingcenter@puc.oregon.gov by March 25, 2022.