June 4, 2021, Workshop Summary

Docket No. UM 1930 – Community Solar Program

On June 4, 2021, from 9:30 am – 12:00 pm, Staff and the Program Administrator conducted a public workshop to receive stakeholder input on the next phase of the Community Solar Program.

Below are links to materials from the workshop.

- Video recording of the Zoom meeting June 4.
- Workshop presentation provided June 4.
- Workshop agenda provided May 28.
- Preparation questions provided May 24.
- Program dashboard provided May 24.

Notes from the workshop's breakout sessions:

- Full group recap summarizing breakout sessions (next page).
- Notes from six separate breakout sessions (attached).

Stakeholder written comments:

- Fleet Development, emailed May 25, 2021 (attached).
- Frank Selker, emailed May 26 (attached).
- Port of Portland, emailed June 1 (attached).
- Electrify Now, emailed June 2 (attached).
- Solarize Rogue (attached).
- PGE, filed June 16.
- NWEC, BEF, Solarize Rogue, Wallowa Resources joint comments, filed June 18.
- OSSIA, filed June 21.

PUC Staff Contacts: Joe Abraham, joseph.abraham@puc.oregon.gov, 503-428-0699 and Kacia Brockman, kacia.brockman@state.or.us, 503-931-9668

Oregon Public Utility Commission

OREGON COMMUNITY SOLAR PROGRAM

FULL GROUP RECAP

Top takeaways from your small group discussions

11:05-11:50

Reflection questions:

What is becoming clearer to you after today's workshop?

What did you hear in your discussion group or this recap that surprised you?

PUC Staff Contacts: Joe Abraham, joseph.abraham@puc.oregon.gov, 503-428-0699 and Kacia Brockman, kacia.brockman@state.or.us, 503-931-9668

OREGON COMMUNITY SOLAR PROGRAM

Oregon Public Utility Commission

Stakeholder Workshop on Tier 2
Team Polar (A)
Breakout Discussion

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TEAM POLAR (A)

2 Introductions
10:05-10:10 (suggested timing)

What's your name?
What organization are you with?
What do you hope to get out of today?

Haley Mountain Community Energy Project	Kacia Brockman OPUC Staff	Lizzie Rubado Energy Trust of Oregon/PA Team	Aric Mulvieston PP	Tess Jordan PGE Renewables program development	Sam Lauer Community Energy Project	Oriana Magnera, Verde
I want to effectively capture everyone's feedback today!	Hear from stakeholders that I haven't had the opportunity to interact with much	Hear from stakeholders on what's working and what isn't	Hear feedback on what can be improved.	Better understand current status, pain points for all stakeholders, reflections on program policy intent	Hear from individuals in this room about their perspectives on positives and opportunities/challenges within program	

Dan Orzech Oregon Clean Power Co-op	Renfis PCEF					
Focus is mostly on carve-out projects.						

Add an icon to your intro that reflects the type of stakeholder you are.

Utility
CBO
Agency
Industry
Muni
PA Team

3 Program Success
10:15-10:25 (suggested timing)

Discussion Questions:
What does program success look like in Tier 2?
In what ways is the Community Solar Program currently successful?
Is there anything else that you feel should be added to our goals?

The program is a good foundation - (unsea)

Reach low-income residents (Joe)

Protecting low-income participants from harm (Joe)

Make sure project subsidies go towards customers who need them most (low-income)

Emphasis on those without access

Limit impact on non-subscribers

protect rate payers that aren't participating in program

Build community capacity - invest in community

see stronger community elements and values within program

see economic benefits for communities on variety of levels

projects that advance workforce equity goals

Providing program access to customers who lack access to other renewable options

community solar projects that support diverse contracting

Facilitators: Group stickies by themes. Use stars to identify top solutions supported by stakeholders. Symbolize for ideas that intrigue people and / for concepts that cause confusion or could use more explanation.

Parking Lot

4 Participation
10:25-10:35 (suggested timing)

Discussion Questions:
What does participation look like in a successful community solar program?
Who is missing, or under-participating? What is needed to increase their participation?
What would improve the customer experience with the program?

Interested in this project as a case-study to learn from

50% LI, w/ 20% disabled, w/ a good target, but sub materializing

Having existing workers on your tail is a barrier to joining

Customers who lost homes to fires are even deeper behind

Having to manage three-party relationship is a hurdle for community partners doing recruitment or outreach, adds to the challenge

Customers on participant list this impacts a lot of the project (CDR)

Low projects with joint community ownership (tribal, nonprofit, community-owned) seem to have preselection at a high level

Sp apply for pre-development funds (design documents, but you can't get investors until you are pre-certified)

Small subscription sizes $$ equates to larger acquisition costs

Promised of outreach and engagement, but remember subscribers is harder to PAs targeting or protecting them

Non-profits and churches or large user tariffs can't participate (except as an anchor tenant)

These entities wanty need to engage at a smaller subscription level than anchor tenant

They don't meet the definition for a small commercial customer

These project models are not a good fit for community ownership

They can't get loan money from members until after pre-cert

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Parking Lot

5 Program Costs and Complexity
10:35-10:45 (suggested timing)

Discussion Questions:
How can the program reduce costs and complexity?

Challenges

Risk of community-based project that are volunteer-struggle to manage higher costs for their project portfolios

Differential rates (subsidized by smaller projects with other benefits) could address these higher costs

Financing entities want to see a track record of success and risk, impacts the cost of financing

Project costs for smaller projects (community-based) make economies of scale more difficult

Partner with unions and workplaces to enroll workers into program

partner with union pension trusts on investments

involving low-interest loan program

Low-cost financing specific to those types of projects (community-based) is not market and don't even assume risks

Grants

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Parking Lot

6 Major Barriers and Solutions
10:45-10:55 (suggested timing)

Discussion Questions:
What do you feel is the most important issue to address in the next program phase?
What solutions could address this issue?

Complicating subscription porcess

Simpler/shorted agreements

Just check a box to sign up!

Averarages for LI participants

Overly complex customer experience with the credits, fees, etc.

Simplify the crediting fee structure

High costs for smaller community-led projects

Bill adder for these projects

Low participation by LI and residential subscribers

Partner with unions

"United way" model of enrollment

Can support consumer protection

Can help people navigate the experience

Interconnection

Referee to help project negotiations with utility on IX costs

Pre-certification process for joint owned projects

Solution

Facilitators: Group stickies by themes. Use stars to identify top solutions supported by stakeholders. Symbolize for ideas that intrigue people and / for concepts that cause confusion or could use more explanation.

Parking Lot

7 Takeaways
10:55-11:05

Identify the top 3-5 takeaways from this discussion to share with the full group in **5 minutes or less**. Takeaways might be big observations, major barriers or needs, or other points or ideas that should be remembered and shared with the whole group. You also need to **select a spokesperson** to share these with the full group.

Add your top 3-5 takeaways here. You can add them as new stickies, or drag them from other parts of the board.

Simplifying the enrollment process for students, including nonlevel, sign up

Averarages and other supports for LI participants

High costs for smaller community-led projects, but credit adders

Interconnection negotiation support

Different approach to pre-certification / modifications for community-based / community joint-owned projects

LIZZIE

Hey spokesperson! Thanks for volunteering. When you share your remarks, please be brief so each group has a chance to share. Plan to spend no more than 5 minutes sharing your takeaways.

OREGON COMMUNITY SOLAR PROGRAM

Oregon Public Utility Commission

Stakeholder Workshop on Tier 2
Team Savanna (B)
Breakout Discussion

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TEAM SAVANNA (B)

2 Introductions
10:05-10:10 (suggested timing)

What's your name?
What organization are you with?
What do you hope to get out of today?

NAME Organization	Rich George - PGE	Charity Fain - CEP	Abby Spegman - ETO	James Valdez - PCEF	Fred Heutte	Carra Sahler - GEI
I want...						

NAME Organization	Erik Anderson - PAC Power	Ivana Osmanovic - Energy Solutions				
I want...						

Add an icon to your intro that reflects the type of stakeholder you are.

Utility
CBO
Agency
Industry
Muni
PA Team

3 Program Success
10:15-10:25 (suggested timing)

Discussion Questions:
What does program success look like in Tier 2?
In what ways is the Community Solar Program currently successful?
Is there anything else that you feel should be added to our goals?

Making it work how there's a path for orgs to develop projects and a market structure for smaller (communities of color, LI)	Reducing program barriers for meaningful participation	Less risk for vulnerable customers	Greater residential participation	Continue to protect non-participating customers (including many low-income)	Simplify participation for low income customers and residential customers
Awareness and understanding of the program in the greater community	Equitable participation	Increasing residential participation	Never replace NEM or solar with more expensive delivery	Drive rec. participation - some method for decentralized communication - community organization - community leaders	Make it easier for customers to participate to allow project developers to participate in the increase LI energy
Awareness of choice/ agency of solar	More carve out	Meaningful participation (a bill savings, CBO participation)	There is a real latent demand for community solar, community solar program isn't solving that demand, what else?	Capacity being built and utilities for arranging bill transaction	Developing how orgs/ organizations come together to work together, PMI
					Optimistic about the hard piece being figured out
					Infrastructure and decision making

Facilitators: Group stickies by themes. Use stars to identify top solutions supported by stakeholders. Spotlight/ve ideas that intrigue people and TW concepts that cause confusion or could use more explanation.

Parking Lot

4 Participation
10:25-10:35 (suggested timing)

Discussion Questions:
What does participation look like in a successful community solar program?
Who is missing, or under-participating? What is needed to increase their participation?
What would improve the customer experience with the program?

Residential and low-income (missing or under-participating)					
Important that the program not do any harm to participants					
providing subsidized subscriptions for LI customers	lack of marketing to residential customers	How to fill the risk of residential customer (LI / non. LI)	use more research studies on what the problem is and solutions	stakeholder process to find a better sense what the customer/potential customer experience has been	difficulty may relate to the impacts of COVID (natural growth path, maybe not necessarily related to COVID - sort as one "all-purpose bucket")
addressing risk to parties	cost savings vs reduced administrative costs	designed as an option for the hard to reach pop. / LI	what are the problems?	"I'm not ready for this"	understanding PMI costs, structure, customer acquisition costs, and other development costs
improving customer experience	lack of customer understanding for participation i.e. 10 yr contract	seeing more as bill savings + REC's, need to get ready to market get the right customer (not customers)	Where is the demand? - do some research on figuring this out	difficult to engage with the program even as a potential customer	baseline of information

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Parking Lot

5 Program Costs and Complexity
10:35-10:45 (suggested timing)

Discussion Questions:
How can the program reduce costs and complexity?

Project manager complexity	lack of assessment between PMs and customers	What does the contract look like? Who is it designed to protect? Why are those protection necessary?	10-year customer contract is a barrier		
We don't have a solid understanding of PMI project cost details	leverage continuing work between stakeholders	not simply throw more $ at things			

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Parking Lot

6 Major Barriers and Solutions
10:45-10:55 (suggested timing)

Discussion Questions:
What do you feel is the most important issue to address in the next program phase?
What solutions could address this issue?

ISSUE / BARRIER	ISSUE / BARRIER	ISSUE / BARRIER	ISSUE / BARRIER
Solution	Solution	Solution	Solution
Solution	Solution	Solution	Solution
Solution	Solution	Solution	Solution

ISSUE / BARRIER

Facilitators: Group stickies by themes. Use stars to identify top solutions supported by stakeholders. Spotlight/ve ideas that intrigue people and TW concepts that cause confusion or could use more explanation.

Parking Lot

7 Takeaways
10:55-11:05

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barriers to LI + RE participation

carve out for community organizations and serving a more solution specific need, Community Solar Grants (CSG) - grow this vision out of the current program

acquisition challenges for residential customers - getting an understanding on what is a challenge or a barrier for residential customers?

accomplishment a lot in the short time - Grants, infrastructure, CBO groups and communication, leverage that

Add your top 3-5 takeaways here. You can add them as new stickies, or drag them from other parts of the board.

James Valdez

Hey spokesperson! Thanks for volunteering. When you share your remarks, please be brief so each group has a chance to share. Plan to spend no more than 5 minutes sharing your takeaways.

OREGON COMMUNITY SOLAR PROGRAM

Oregon Public Utility Commission

Stakeholder Workshop on Tier 2
Team Rainforest (C)
Breakout Discussion

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TEAM RAINBFOREST (C)

2 Introductions
10:05-10:10 (suggested timing)

What's your name?
What organization are you with?
What do you hope to get out of today?

NAME Organization	Ryan Cook	Carly Sellers (Oregon Shines)	Tomas Endicott, BEF	Madeline Gould-Arcadia	Jennifer Angell (PacifiCorp)	Stephen Gates-Neighborhood Power
I want...	To get good feedback!	To hear other perspectives on program successes and issues	Hear perspectives of others in program.	To learn more about the program and hear about others involvement	To learn more about the program and hear about others involvement	I'm here to listen and learn more.

NAME Organization	Natasha Smith-OOJ	Jason Zappe - PGE	Olivia Tym-CEP	Emily Findley	Troy Snyder- Project manager	
I want...	To ensure that the CSP program aligns with legislative goals	Interested in what's working and what can be done to improve the program.	Take notes and capture detailed perspectives of stakeholders	Mural scribe		

Add an icon to your intro that reflects the type of stakeholder you are.

Utility
CBO
Agency
Industry
Muni
PA Team

3 Program Success
10:15-10:25 (suggested timing)

Discussion Questions:
What does program success look like in Tier 2?
In what ways is the Community Solar Program currently successful?
Is there anything else that you feel should be added to our goals?

Customer excitement

Getting firm timing

Set more community based projects (SBDW) into the program

better economics for carveout 1- only projects projects

Missing out the original carve-out capacity, then expanding

Increasing residential participation

Reducing unknowns about the program's future

Addressing unknowns where program is needed - knowing changes sooner rather than later

Ensuring costs are minimized for other ratepayers

Simplifying the program to be more customer friendly

More residential subscription

On-bill bill credits and subscriptions fees is a great selling point as well

Being released, opening up new capacity

Make customer entry points more accessible, like the website

Increase low income subscriptions

Better economics for smaller projects

Quicker program movement would be a win, streamline processes for enrollment and certification

Customers receiving bill credits and future projects in pipeline is A success.

Offering REDs to customers is a high selling point for customers

Verification for low-income subscribers, verbal verification of income makes process less invasive

Facilitators: Group stickies by themes. Use stars to identify top solutions supported by stakeholders. Symbolize for ideas that intrigue people and / For concepts that cause confusion or could use more explanation.

Parking Lot

4 Participation
10:25-10:35 (suggested timing)

Discussion Questions:
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Who is missing, or under-participating? What is needed to increase their participation?
What would improve the customer experience with the program?

Other options to go renewable energy through utility are simpler, don't require a contract

Increasing residential participation would reflect the original intent of the program

Subscriptions are commercial participation have different motivations, this creates a barrier

Need to better educate/sell the benefits of joining residential customers

Long contracts are a deterrent, creates uncertainty

Customers are worried about their future energy costs, creates reluctance to commit to 10 year contract

Contract year length

Customers may use difficulty getting approval through HOA as a barrier

Limited savings, and potential penalties

Ensuring customer understanding of program's benefits, avoid consuming for PAs, but necessary

These barriers create a gender Challenge for L

This process can take up to an hour or more per customer

Scaling unrealistic due to need to give attention to each customer

So rev. are the savings worth the risks / complexity?

Other community solar programs in the country have been doing this as a year

contract page length

Restricting termination fees and credit checks allows more flexibility from program side

Providing PAs more flexibility in how they meet customer requirements allows them to use their own strengths and has been successful elsewhere

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Parking Lot

5 Program Costs and Complexity
10:35-10:45 (suggested timing)

Discussion Questions:
How can the program reduce costs and complexity?

Higher credit would make this factor big for developers, especially for projects that are already higher cost and make it harder to develop projects

Administer costs compared with traditional net-metered, like program fees, property taxes, upfront cost equivalent and ongoing costs

Bulk upload of participants would make the process easier, simpler

Could explore ways around that from regulatory perspective

For property taxes, commercial projects have a lot of property taxes, long-term short: Bigger project could get bigger savings - without property tax

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Parking Lot

6 Major Barriers and Solutions
10:45-10:55 (suggested timing)

Discussion Questions:
What do you feel is the most important issue to address in the next program phase?
What solutions could address this issue?

Bill credit rate	Contracting process	Higher development cost for smaller projects	Unknowns about future of the program
Residential adder	Solution	bill credit rate	Solution
Differentiated rates based on participant type	Solution	program fees	Solution
Allow value of credits to increase over time like with a net metered project	Solution	More data	Solution

Program complexity		Contract length, terms
easy exit of contracts	Simplify customer experiences of different administrators	Solution
More accurate customer sizing		Solution
		Solution

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7 Takeaways
10:55-11:05

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customers like and see value in the program

contracting process has room for improvement

more data needed on participation barriers (cost or complexity?

program is complex for residential participants, and costs to acquisition are high

the current bill credit rate creates uncertainty, restrains some participation and carveout goals

lots of unknowns around the future of the program

Ryan!

complex contract terms (long contract, termination fees) creates risk (not much savings) high acquisition costs

Hey spokesperson! Thanks for volunteering. When you share your top takeaways, be brief so each group has a chance to share. Plan on no more than 5 minutes sharing your takeaways.

OREGON COMMUNITY SOLAR PROGRAM

Oregon Public Utility Commission

Stakeholder Workshop on Tier 2
Team Desert (D)
Breakout Discussion

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TEAM DESERT (D)

2 Introductions
10:05-10:10 (suggested timing)

What's your name?
What organization are you with?
What do you hope to get out of today?

NAME Organization	Joe Abraham OPUC	Angela Crowley-Koch, OSSIA	Anna Kemper Premier Solar NW	Alina Lambert, Energy Trust of Oregon	Conor Grogan, Sulus	Steve Rogers Kevala
I want...	to listen and learn from everyone!	To brainstorm solutions to improve the program	to learn how contractors can support CS	to learn from you!		Learn more about the program and where it is headed

NAME Organization	Santiago Beltran Laborde - PGE	Alisa Gillam, Saturn Power	Hunter Strader, GreenKey Solar			
I want...	To learn from the experiences outside of PGE in making CS succeed					

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3 Program Success
10:15-10:25 (suggested timing)

Discussion Questions:
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- A lot of interest in the program
- Increased LMI participation willower default rates
  - LI verification in the current phase of the program is 'less risky' that other states
  - Allowing customer who would not have access to solar access
  - Less rigorous LI verification process with CSP
- Reduce program complexity
  - Creating a program that customers can understand(i.e. especially LI)
  - Outreach and education so Oregonians have a better understanding of CS
- IRC capacity filled up since interconnection was streamlined
- Capacity filled up so quickly in PGE territory
- Focusing on the types of subscribers that we want to see increased
- Capacity information needs to be clear to CBO's
  - Hosting capacity that's available is valuble to the program
  - Greater visibility into grid capacity at the site level
- Creating a program thats economically viable to Project Managers
- Consolidated billing
- Suggest allowing overgeneration credits to be allocated to your subscribers instead of a penalty for oversubscription
- Rate adders, similar to other states to far low-income and residential subscribers
- Oversubscription is tough to explain to customers
- Good customer experience
  - Improving the customer experiance and reducing risk
  - Resolve overgeneration penalties
- Improve verification process for customers
  - Longer turnaround time when multiple sites during verification process
  - Easier way to pull utility data
  - Some sites have hundreds of meters

Parking Lot
- PMs hindering other PMS via the CUP process

4 Participation
10:25-10:35 (suggested timing)

Discussion Questions:
What does participation look like in a successful community solar program?
Who is missing, or under-participating? What is needed to increase their participation?
What would improve the customer experience with the program?

Facilitators: Group stickies by themes. Use stars to identify top solutions supported by stakeholders. Symbolize for ideas that intrigue people and / for concepts that cause confusion or could use more explanation.

- Carve out projects are needed
  - Need- foundation support
  - Need- clarity of information
  - Need- financing options
  - Need- adders for carve out projects
- Adder for storage
- Improve Interconnection
  - net metering cap in Oregon is 2 MW
  - Interconnection requirements for large or dispers various for metering is a major challenge
- Installation costs for rooftop projects are high
- Economics are tight for rooftop projects
- Usual advantage of rooftop solar is interconnection, not the case in CBCSP
- Production is lower, can't do trackers for rooftop projects
- Helping subscribers on the website- currently overwhelming
- Program needs to be simpler for subscribers
- A lot of parties involved, a standard contract would be beneficial
- Shorter contracts
- Rate adders would allow for a deeper discount to residential and LI subscribers
- Need more residential and LI subscribers
- Missing: younger, shorter-term renters
- Young, short-term renters

Parking Lot
- Do we want larger carve out projects?

5 Program Costs and Complexity
10:35-10:45 (suggested timing)

Discussion Questions:
How can the program reduce costs and complexity?

Facilitators: Group stickies by themes. Use stars to identify top solutions supported by stakeholders. Symbolize for ideas that intrigue people and / for concepts that cause confusion or could use more explanation.

- How can align costs to be aligned with our goals?
  - Reducing contract length, adders, etc
- Making sure the correct people are paid for the program- fairness
- Getting a sense of overall cost has been challenging, due to small amount of current projects
  - More information on the program paying for itself over time is wanted
  - Important to know what the current costs are
- Eliminating oversubscription costs
  - Would reduce data burden
  - Avoiding penalties for oversubscription can reduce complexity
- Instead of adding new capacity a bit at a time, take CO's example and require 1% of IOU annual sales be devoted to CSP. That also creates an incentive for solar developers to expand electricity sales and demand.
  - Increase the size of projects to 5 MW, just as CO did

Parking Lot

6 Major Barriers and Solutions
10:45-10:55 (suggested timing)

Discussion Questions:
What do you feel is the most important issue to address in the next program phase?
What solutions could address this issue?

Facilitators: Group stickies by themes. Use stars to identify top solutions supported by stakeholders. Symbolize for ideas that intrigue people and / for concepts that cause confusion or could use more explanation.

- We want to encourage adders for different rate structures
- Need to address tight project economics. Lack of National interest demonstrabtes that rate is too low
  - escalator
- Capacity certainty
  - CO strategy - 1% of yearly IOU sales, which creates certainty
  - consistency and predictability
  - Solution
- Need to finish the program strong
  - Need to increase low-income subscribers
  - Create Low-income adder
- Nothing in the PIM about PM's hindering other PM's
- Program Complexity
  - Letter of completeness should be adjacent to a project
  - Grid processing timing
  - Accessibility to the public - program seems mystical

Parking Lot

7 Takeaways
10:55-11:05

Identify the top 3-5 takeaways from this discussion to share with the full group in **5 minutes or less**. Takeaways might be big observations, major barriers or needs, or other points or ideas that should be remembered and shared with the whole group. You also need to **select a spokesperson** to share these with the full group.

- Difficult project economics - Increasing the rate for specific participants
- Increasing capacity in the program and increasing certainty of roll-out
- Increasing participation for LI subscribers
- Decrease complexity in order to increase subscriptions

Add your top 3-5 takeaways here. You can add them as new stickies, or drag them from other parts of the board.

Angela Crowley-Koch

Hey spokesperson! Thanks for volunteering. When you share your remarks, please be brief so each group has a chance to share. Plan to spend no more than 5 minutes sharing your takeaways.

OREGON COMMUNITY SOLAR PROGRAM

Oregon Public Utility Commission

Stakeholder Workshop on Tier 2
Team Ocean (E)
Breakout Discussion

HOW TO USE MURAL

1 MOVING AROUND THE BOARD

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TEAM OCEAN (E)

2 Introductions
10:05-10:10 (suggested timing)

What's your name?
What organization are you with?
What do you hope to get out of today?

NAME Organization	Tamara Perry Energy Solutions	Shayna Choulet Energy Solutions	Ryan Sheehy Fleet Development	Heather Moline NW Energy Coalition	Shaun Foster PGE	Raphaela Hsu-Flanders Bonneville Environmental Foundation
I want...	Your ideas!			Transparent/publicly accessible data about utility system capacity, and ice cream		Increased program capacity and no barriers for low-income participants

NAME Organization	Ray Sanchez Solarize Rogue	Joe Basil Wallowa Resources	Evan Ramsey BEF	Kelley Noe
I want...				

Add an icon to your intro that reflects the type of stakeholder you are.

Utility
CBO
Agency
Industry
Muni
PA Team

3 Program Success
10:15-10:25 (suggested timing)

Discussion Questions:
What does program success look like in Tier 2?
In what ways is the Community Solar Program currently successful?
Is there anything else that you feel should be added to our goals?

Facilitators: Group stickies by themes. Use stars to identify top solutions supported by stakeholders. Symbolize for ideas that intrigue people and / for concepts that cause confusion or could use more explanation.

Parking Lot

Simpler participant contracts	Interconnection fees process for solar projects easy to understand and justify	Higher bill credit rate	More residential customers subscribed	More small carveout projects live	Clarity among program industry, credit rate, and rules for the near and medium term	
Success: process, interconnection, etc is easy to understand completely and timely manner	Ease and affordability for public/nonprofits projects especially, but everyone	Larger project size allowed.	Focused incentives for desired participants.	Next tier opened up.	Targeted incentives - from the PUC to ensure diversity of participants and low income benefits	
Much more simplified process for tier 1 and more tier 2 not involved project process.		Link size shift to non-participants, which would include other low income customers.	Solar expansion for affordable housing production (manuel). Perhaps tax credit or credit rate			
Community-owned projects should be promoted and made straight forward.	Better participant diversity - residential and low income	Integrate community solar program with SD 20-24, passage of HB 2475, OSP	Success but at what cost to non-participants?	How do new policy proposals/decisions inform this program	Better data access - where is capacity? Available to all participants	
Guaranteed grant funds. Small projects simply don't pencil in.	Plan and goal transparency for projects/locations					

4 Participation
10:25-10:35 (suggested timing)

Discussion Questions:
What does participation look like in a successful community solar program?
Who is missing, or under-participating? What is needed to increase their participation?
What would improve the customer experience with the program?

Facilitators: Group stickies by themes. Use stars to identify top solutions supported by stakeholders. Symbolize for ideas that intrigue people and / for concepts that cause confusion or could use more explanation.

Parking Lot

Community based projects	Small projects	Project Financing	What have other states/utilities done about billing and hierarchy problems?	NMEC potentially low enough fund for low-income or danger of getting kicked off program	---->	
Small community-based project	Greater percentage of low-income participants per project	Residential and low income participants are not expensive to acquire/serve	Simplification is needed to increase participation, especially with higher bill credit rate	Incentives to drive participation	Customer Experience	
Low income	Projects located in underserved communities	Residential customer subscribers	Adders to bill credit rate for certain customer classes		Long lead times	
Revise customer classes	projects that make economic sense	Residential customer who live in homes unsuitable for solar			Faster to market	
					Retail rate + escalator	
					Also adder to bill credit rate for certain customer classes	
					Transparency on where capacity is	
					Verification for location-based adders	

5 Program Costs and Complexity
10:35-10:45 (suggested timing)

Discussion Questions:
How can the program reduce costs and complexity?

Facilitators: Group stickies by themes. Use stars to identify top solutions supported by stakeholders. Symbolize for ideas that intrigue people and / for concepts that cause confusion or could use more explanation.

Parking Lot

Make small projects follow the net metered project process instead of PM	Eliminate 100% LMI subscriber accounts, part of other projects		More certainty around tier capacity and bill credit rate	What have other states/utilities done about billing and hierarchy problems?	
Inherent interconnection fees are too expensive for a part of process so that an operational endeavor can be made with interconnection consultants	Adders to bill credit rate for certain customer classes	More flexibility			
Small projects are being required to comply with interconnection fees, projects in Lincoln County Electrate that					
Interconnection process and costs for small projects is onerous	Different wait/delay requirements interconnection for upgrades				
Transparent/publicly accessible data about utility system capacity	Fee differences for net metered projects vs. CSP interconnection fees, etc				

6 Major Barriers and Solutions
10:45-10:55 (suggested timing)

Discussion Questions:
What do you feel is the most important issue to address in the next program phase?
What solutions could address this issue?

Facilitators: Group stickies by themes. Use stars to identify top solutions supported by stakeholders. Symbolize for ideas that intrigue people and / for concepts that cause confusion or could use more explanation.

Parking Lot

Interconnection: Both cost to interconnect, and lack of publicly understandable data about locational capacity	Small community projects	Meeting low income subscription requirements	Bill credit	
LMI 27%OSP to address	Guaranteed incentives (grants)	100% low income project	Escalator: locked into rate for 20 years currently- acts as de-escalator	
More data/decision transparency, communication/outreach with other dynamic programs	Fast Track process		Adders for certain customer classes	
Streamline the PM for net metering process towards the Net Metering process	Solution	Solution	Solution	
Treat projects as NEM				
I realize how major this is, but modernizing utility business models				

Recruiting national PMs and subscriber managers	The year 2020-2021	Simplication	Financing	
	Lets be patient and stay positive.	Contracts		
	HB 2475 passed	Clarity around bill credit rates, program capacity, etc.		

Commissioners and utilities have said, especially bit of the disasters of this year, that we need to be ready for things that would raise rates. Also, how much more capacity/creativity would stakeholders and communities have had if the major crises of this year hadn't happened?

7 Takeaways
10:55-11:05

Identify the top 3-5 takeaways from this discussion to share with the full group in **5 minutes or less**. Takeaways might be big observations, major barriers or needs, or other points or ideas that should be remembered and shared with the whole group. You also need to **select a spokesperson** to share these with the full group.

Add your top 3-5 takeaways here. You can add them as new stickies, or drag them from other parts of the board.

Ryan Sheehy

Hey spokesperson! Thanks for volunteering. When you share your remarks, please be brief so each group has a chance to share. Plan to spend no more than 5 minutes sharing your takeaways.

OREGON COMMUNITY SOLAR PROGRAM

Oregon Public Utility Commission

Stakeholder Workshop on Tier 2
Team Forest (F)
Breakout Discussion

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TEAM FOREST (F)

2 Introductions
10:05-10:10 (suggested timing)

What's your name?
What organization are you with?
What do you hope to get out of today?

NAME Organization	Sherrie Villmark Community Energy Project	Brian Stewart Electrify New Electrification education and advocacy	Janet Lorenzen 350Salem	Mary Ratcliff LCSN	Zach Sipper TWENDE Solar	
I want...	To hear your thoughts and ideas!	To make it easier for anyone to learn about and sign up for CS	To support equity & access for low-income POC	Recruit more participants, promote community projects	Learn more! And especially, considerations for LI participants	

NAME Organization					Joshua Reed Energy Trust/PA Team Scribe
I want...					Assist documenting your thoughts and discussion

Add an icon to your intro that reflects the type of stakeholder you are.

Utility
CBO
Agency
Industry
Muni
PA Team

3 Program Success
10:15-10:25 (suggested timing)

Discussion Questions:
What does program success look like in Tier 2?
In what ways is the Community Solar Program currently successful?
Is there anything else that you feel should be added to our goals?

Facilitators: Group stickies by themes. Use stars to identify top solutions supported by stakeholders. Symbolize for ideas that intrigue people and ? for concepts that cause confusion or could use more explanation.

Bills don't have unintended consequences for low income participants	focus on projects other than large commercial projects	support community owned projects where the benefit is not just a business or a rich investor (various between utility & customers)	help build community wealth	Build in community reliance by having local systems	Connection between projects going through construction & when subscribers are actually very clear
Fill up some of that small carveout! (Zach)	Community Solar is generally known about publicly like green energy plans are now	More BIPOC participation	More low-income participation	It is a no-risk commitment to sign up	Keep resources and wealth (benefits of solar) in the community with other models
Have an urban-based community-based project that people can SEE (Zach)	Its really easy to sign up - as easy as bills say an app to buy stuff online	There is a fund (also using external dollars) to support subscribers in arrears	More multi-family residents participation	More BIPOC participation in building the projects - green jobs	Programs the subscribe of low-income folks are key to meeting Oregon's GHG goals
Have a truly COMMUNITY based and driven project developed for users and by users (Zach)	I want to know more! better understand transferability of subscriptions	Make the process least easy for NPU PMs (workshops? step by step navigation of process?)	community-visible solar resources	Clear communication (website) on community solar & plug-n reduced	Metrics for the program include job creation and BIPOC job creation
competition exists in who builds & innovation	clear energy jobs & BIPOC job creation (with metrics that track that)	Bill savings	Metrics around public awareness about community solar		Metrics for green job creation, BIPOC job creation. Need to have a goal
Clarity around bill credits and how they transfer to the subscriber	Incentives are aligned to encourage subscriptions				

Parking Lot

4 Participation
10:25-10:35 (suggested timing)

Discussion Questions:
What does participation look like in a successful community solar program?
Who is missing, or under-participating? What is needed to increase their participation?
What would improve the customer experience with the program?

Facilitators: Group stickies by themes. Use stars to identify top solutions supported by stakeholders. Symbolize for ideas that intrigue people and ? for concepts that cause confusion or could use more explanation.

no penalties, arrears	Education on green electrons, democracy of energy grid??	community expressed wins in easy web terms (e.g. "subscribers saved x $ + x pounds of carbon" instead of kwh/year between utility & customers)	No cancellation fee (other than paying that monthly subscription fee	Ability to cancel any time without penalty	Eliminate penalties for cancellation
Pick low goals for moving from Carbon Tax to Carbon Cap (much is CS part of that)	JOBS (and not just install - marketing, site assessors, etc)	eliminate 10 or 20 year contract	blockchainey data on +accreditedness in addition to kwh/MWh	transparent website would help participants (English & Spanish)	resiliency hubs for disaster preparedness & time-elevated areas
Full community - getting to net-zero energy	New dealer models? Community-owned solar or MBA model (nonprofit) like solar electricians said his capital money	Partnering participation promotion through a larger group (large company) Part of something Bigger!	Ability to sign up for it. No do-up-front purchase (legal stuff is simplified in that case that it is still there)	Don't be the kind of housing the elderly, Preschool, or only subsidizing multifamily housing	continuing theme of community visibility of projects
Fund to assist with late payments					Subscribers signed up to large scale CS with an address, and it is not clear if they are subscribed to a specific community, resulting in confusion and frustration
		one theme I've seen is pairing the LI benefit!			
(see post-it notes above on a successful program)					

Parking Lot

5 Program Costs and Complexity
10:35-10:45 (suggested timing)

Discussion Questions:
How can the program reduce costs and complexity?

Facilitators: Group stickies by themes. Use stars to identify top solutions supported by stakeholders. Symbolize for ideas that intrigue people and ? for concepts that cause confusion or could use more explanation.

Complete rebuid of the OCSP website to make consumer friendly and transaction oriented	loss reserve fund	Bill credit sale-leaseback and excelsior, with adders for certain customers (such as low income)	need more certainty about how much is in each capacity tier, much sooner	Eliminating consultation fee/charge and make and make enrollment easier similar to other services	Streamline enrollment process. Large variance amongst developers
Green energy utility programs (carveout to provide more certainty and stability/security for project developers)	INTERCONNECTION and Net Metering process (these cause 90% project proposerts. Can we use ITS process for stickies in our?)	utilities cover the costs of an in arrears program, so that a subscriber is able to pay	transparency & predictability (project developers can require and treatme of a sitting subscriber/customer when other stuffs that can't or	project managers need more long term certainty and so does the finance community	Program can help facilitate soft cost reduction, like the enrollment process
		how is the Commission going to meet ratepayer needs? (Low income, equity, PV-DPR, CSF, another community solar)			

Parking Lot

6 Major Barriers and Solutions
10:45-10:55 (suggested timing)

Discussion Questions:
What do you feel is the most important issue to address in the next program phase?
What solutions could address this issue?

Facilitators: Group stickies by themes. Use stars to identify top solutions supported by stakeholders. Symbolize for ideas that intrigue people and ? for concepts that cause confusion or could use more explanation.

ISSUE / BARRIER	ISSUE / BARRIER	ISSUE / BARRIER	ISSUE / BARRIER
Solution	Solution	Solution	Solution
Solution	Solution	Solution	Solution
Solution	Solution	Solution	Solution

ISSUE / BARRIER

Parking Lot

7 Takeaways
10:55-11:05

Identify the top 3-5 takeaways from this discussion to share with the full group in **5 minutes or less**. Takeaways might be big observations, major barriers or needs, or other points or ideas that should be remembered and shared with the whole group. You also need to **select a spokesperson** to share these with the full group.

Add your top 3-5 takeaways here. You can add them as new stickies, or drag them from other parts of the board.

Awareness - more communication and transparency about the program to the public and CBO's	Change billing & be transparent about problem & solution	Metrics - report out Carbon savings job creation BIPOC job creation	wealth building, community/grid resilience, reduce risk to participate	ACCESS (BIPOC, low-income), nonprofits/CBO, public entities, Reduce complexity, streamline processes to make signup easier

Sherrie Villmark, Spokesperson

Hey spokesperson! Thanks for volunteering. When you share your remarks, please be brief so each group has a chance to share. Plan to spend no more than 5 minutes sharing your takeaways.

BROCKMAN Kacia * PUC

From: Ryan Sheehy <ryan.sheehy@fleetdevelopment.org>
Sent: Tuesday, May 25, 2021 12:08 PM
To: BROCKMAN Kacia * PUC
Subject: Answers to questions posed for June 3rd CSP workshop

Please consider the answers to the posed workshop questions. Our answers are based on our experience with two CSPs, one in Idaho Power Territory and one in PAC territory. Thanks for the opportunity to comment.

1. What is your priority group for the next program phase and why?
  a. Low-income residents
  b. Residential and small commercial tenants
  c. Community-based projects
  d. Large commercial/public entities
  e. Other
  e. Other. We are focused on the 10% LMI subscribers, and the other 90% will go to small commercial + public entities. This is because we cannot afford the cost of subscription management incurred by residential customers.

2. What program changes would be needed to increase participation by your priority participant group?
  a. Bill credit rate
  b. Eligibility criteria
  c. PIM requirements
  d. Project capacity designations by participant type
  e. New program support services (tech assistance, language translation, educational materials)
  f. Other
  f. Other. I really think that in a free market, water finds its level. This means that the project managers, short of other incentives, will always go for the lowest cost participant group. Increasing the bill credit rate generically will not incentivise more residential, LMI or community based projects. It will just make more projects possible. If the program wants to incentivize more expensive participants, bill credit kickers, incentives and grants will need to be focused on the desired participants at a level that moves the needle financially.

3. The primary challenge with recruitment of low-income residents is the risk of indebtedness to the Project Manager if the customer falls into arrears on their utility payments. The root cause of the problem is the existing bill hierarchy where on-bill subscription fees are reimbursed after utility charges are paid in full. If the program is not able to change the payment hierarchy, which alternative solution(s) do you recommend to achieve the Program's low-income goals?
  a. Enroll low-income multifamily housing providers instead of individuals
  b. Increase participant income eligibility threshold
  c. Establish a loss reserve fund to cover arrearages owed to Project Managers
  d. Subsidize subscription fees for low-income participants
  e. Other
  e. Other. We already know option A is possible and our projects are pursuing that strategy exclusively. But even this method has issues, as it largely only works effectively on multifamily housing where the utilities are paid by the property landlord. There are not many of this type of project around. Option B is somewhat

counterproductive to LMI inclusion as the LMI threshold is already generous. Option C would be very helpful, but require some strategy to determine how much and when it can be activated. Option D may not work well. It isn't really the cost of the subscription causing arrearages, it is the ability to pay at all when money is tight. I think one of the best things the program could do is take the complexity and costliness off of the individual project managers and move LMI subscribers to subsidized and proactively managed projects that are 100% LMI. This will solve many of the problems associated with the other options and reduce the complexity for every project manager.

4. How can the program reduce complexity for participants?
a. Embed program and utility administration fees into the bill credit rate, rather than charging as separate line items on the participant's bill
b. Simplify participant contracts
c. Restrict custom off-bill transactions between Project Managers and participants
d. Other
d. I agree with all above. I also think the program could sponsor and subsidize 100% LMI projects to reduce overall program complexity. Project manager could donate what they would have offered in 20% LMI discounts for their percentage of LMI participants to the 100% LMI projects.

5. How can the program achieve greater administrative efficiency to shorten timelines, reduce Project Managers' costs, and improve participants' experience?
a. Delegate certain authorities from the Commission to the Program Administrator
b. Standardize schedule for Program Implementation Manual updates
c. Other, I don't believe I have really experienced any timeline delays from the program, once it finally got up and running.

6. How can the program help reduce project development costs borne by the Project Managers, considering that the Commission has opened Docket No. UM 2111 to investigate interconnection processes and procedures?
a. Increase Project Manager capacity limits to allow for larger project portfolios
b. Adjust project capacity requirements by participant type
c. Revise eligibility requirements for projects or Project Managers
d. Other
a. Option A, seems like the most likely way to reduce costs after UM 2111. UM 2111 docket opens with a pretty solid explanation of the problems developers are facing with interconnection that drive up the costs.

7. What do you consider the most important issue that the Oregon Community Solar Program should address in the next program phase?
I believe that a bill credit escalator would be more fair. The utility is most likely to raise its rates over the next 20-years because costs will inflate. Why would that be any different than what a CSP project faces?

--
Ryan Sheehy
Fleet Development
200 E. Main St
Enterprise, OR 97828

Email: ryan.sheehy@fleetdevelopment.org
PH: 541-263-7684
FX: 541-426-5978
www.fleetdevelopment.org

BROCKMAN Kacia * PUC

From: fselker@gmail.com
Sent: Wednesday, May 26, 2021 7:26 AM
To: BROCKMAN Kacia * PUC
Subject: Community Solar Input

Written comment on Community Solar:

As a business owner who has entered into many legal agreements, I find the legal agreement that is currently in use to be unnecessarily – I would even say absurdly - long and complex. Once digested you realize that there is little there except the need to pay a modest sum if you don't provide 30 days' notice that you are leaving.

The stakes are very low, and contrast this with the contractual simplicity of signing up for utility power or gas. It almost appears that the contract is an intentional impediment to the program because it is so absurdly out of proportion to the stakes involved.

I believe the agreement should be reduced to one page with an addendum with information.

Sincerely,
Frank Selker
Portland OR

June 1, 2021

Kacia Brockman
Sarah Hall
Oregon Public Utility Commission
Email: Kacia.Brockman@puc.oregon.gov
(503) 931-9668
Email: Sarah.L.Hall@puc.oregon.gov
(971) 273-9512

Subject: Port of Portland Comments Regarding Oregon Public Utility Commission Community Solar Program

Dear Kacia and Sarah,

Climate change is one of the most important challenges of our time. According to the Intergovernmental Panel on Climate Change (IPCC), unprecedented reductions in greenhouse gases are needed to avoid catastrophic climate impacts, requiring rapid and far reaching transitions in energy, transportation and industry.

The Port plays a leadership role in regional transportation, which by nature is resource intensive traditionally due to its reliance on fossil fuel combustion which produces greenhouse gases (GHGs) and other air pollutants. While many sources of fossil fuel combustion are transitioning to electric, it's essential to increase sources of renewable power in chorus to meet the increasing electrical demand and truly reduce carbon emissions. Today, the carbon emissions associated with utility-provided electricity serving much of Oregon, including Port facilities, is significant. Because of this, we are working diligently on strategies for continued investment in energy efficiency, planned electrification, and sourcing renewable electricity both on and off-site to lower carbon

emissions at Portland International Airport (PDX) by 80% below 1990 levels by 2040. Even with these long-term goals in mind, we understand there is greater impact in action taken today rather than in the future in mitigating the devastating effects of climate change.

The Port commends the PUC's Community Solar Program in successfully breaking down barriers to greater development and access of renewable energy in our state. The program has been thoughtfully designed to offer multiple areas of value to our communities and environment. The Port has a community solar project underway in partnership with Bonneville Environmental Foundation on PDX property, referred to as the Goodling Annex. The Port is looking forward to the fruition of this project to help provide clean energy to PDX and surrounding neighborhood residents and businesses.

In addition to the Goodling Annex, the Port was made aware of the opportunity to support additional community solar projects through subscription with Oregon Shines. Unfortunately, although on the waitlist, we missed the opportunity to subscribe to available community solar projects serving PacifiCorp territory in the first tier. However, we greatly look forward to supporting future projects.

To this end, we would like to voice our strong support of the continuation of the Community Solar Program, helping to rapidly increase access to renewable energy within our state.

As we move to mitigate climate change as quickly as we can, we need all available strategies to support moving away from fossil fuels with accessible, carbon-free electricity, and we see the PUC's Community Solar Program as especially impactful. We look forward to hearing about the future of community solar in Oregon from you soon.

Sincerely
Port of Portland

David J Breen

David Breen
Manager, Environmental Air Quality, Energy, and Aviation Noise

c. Ivo Trummer, Port of Portland
Jenn Bies, Port of Portland

7200 NE Airport Way Portland OR 97218
PO Box 3529 Portland OR 97208
(503) 415-6000

BROCKMAN Kacia * PUC

From: Brian Stewart <brianstewart@electrifynow.net>
Sent: Wednesday, June 2, 2021 3:07 PM
To: BROCKMAN Kacia * PUC
Subject: Input to OPUC Workshop on Community Solar

Kacia - I am not sure I will be able to attend the workshop on Friday, but wanted to send in some of my thoughts on concerns I have or ideas about how to make sure the Community Solar program is effective and successful.

I have been recommending subscribing to all that I interact with as part of our work with Electrify Now. I believe it is a fantastic solution that is almost too good to be true, but it is a bit awkward for subscribers as it stands today.

Here is my wish list for how to make the program stronger.

1. Make it easier to find projects to enroll in

- The current ORCSP website is not effective at quickly matching potential subscribers to available projects to consider signing up for.
- Once someone has gone that far, we should get them to a transaction point quickly and seamlessly.
- FYI - I never send anyone to the ORCSP website - I know that we will lose them if I send someone there. Instead, I send them to the Acquisition companies who have good websites - Oregon Shines or Common Energy - where they can sign up quickly - no return emails or other cumbersome steps that keep someone from taking action.

2. Make it easier to enroll

- The current agreement is off-putting to many potential subscribers - why should it be harder to enroll in CS than to sign up for a credit card?
- Once someone is at the point of making the decision to enroll, we do not want to scare them off with lots of paperwork or legal wording if possible. Most software companies and others have figured out how to make the legal stuff not get in the way.

3. Reduce the issues that give people pause

- The truth is that signing up for CS is a very low risk proposition, but it does not feel that way when going through the process. It should feel risk free.
- There should not be any cancellation fees of any kind other than perhaps some short notice period to avoid that months charge.

4. Elevate awareness about Community Solar

- Most people know about the green energy plans from PGE and Pacific Power, but they do not know about CS which is a much better deal.
- I think we should require PGE and Pacific Power to advertise the programs to their ratepayers.

Thank you.

Brian

Brian Stewart
C: 503 803 5020

Workshop Preparation Questions

Docket No. UM 1930 – Community Solar Program

On June 4, 2021, from 9:30 am – 12:00 pm, Staff and the Program Administrator are conducting a public workshop to receive stakeholder input on the next phase of the Community Solar Program.

To prepare for the workshop, we ask stakeholders to consider the following questions and come prepared to share your insights and opinions. If you are unable to attend the workshop, we invite you to email your responses to kacia.brockman@puc.oregon.gov by June 3, 2021.

The prompts listed below each question suggest various program design ideas for consideration, but we encourage stakeholders to suggest other ideas that may not be listed.

1. What is your priority group for the next program phase and why?
    a. Low-income residents – *The current costs of PV systems and associated recurring fees severely limits our ability to focus on these type of residents as the primary source for funding without massive outside financing (e.g. grants or altruistic investors)*
    b. Residential and small commercial tenants – *See c below*
    c. Community-based projects – *This remains our top priority as it represents the only truly Community Solar type of project where a group of community members can pool their resources to build a shared PV system that they can use to power their homes/businesses, as stated in SB 1547. This opens clean, renewable energy options to folks who do not have a suitable roof for a PV system or are renters, either in mobile, single or multi-family dwellings. The currently popular "subscription" model is in our opinion no different technically than the utility (or in this case a developer) building a solar farm and selling the energy to residents (subscribers) through a program like PAC's Blue Sky – the ownership of the PV system does not reside with the communities.*
    d. Large commercial/public entities
    e. Other

2. What program changes would be needed to increase participation by your priority participant group?
    a. Bill credit rate – *Yes! Current participants are disappointed that PAC gets to pay less for the energy our PV system generates than what PAC sells their energy for, even though our energy is local, cheaper and the installation is paid for by the community. Further insult is that participants get to pay extra fees to PAC every month for the privilege of providing them with cheap energy. Net-metering and a small transmission fee would be fairer.*
    b. Eligibility criteria – *See 3b below*
    c. PIM requirements – *PROCESS: The Pre-Certification process requires that exact*

drawings and specifications be submitted with the application. In order to comply with this requirement, community-owned projects MUST have the ability to advertise and procure participants PRIOR to applying for Pre-Certification. Without a solid participation roster it is impossible to define the PV system specifications (e.g. size) with any reasonable accuracy. A large developer can "build it and they will come." A small community organization can only build what it has willing participants for.

Furthermore, the current Pre-Certification process for a not-for-profit small project requires community members to spend money upfront in preparing system engineering designs and application fees without knowing whether their system will be pre-certified and interconnected at a cost that makes financial sense. Only after pre-certification is complete and the utility issues their interconnection approval (which requires pre-certification) are participants informed of the full cost of their project. If the resulting interconnection costs specified by the utility make the project financially unfeasible and the participants decide to terminate the project, they would be out a significant amount of money and would get nothing in return. Why would anyone be interested in participating in a program where there is a significant potential for loss? This obviously does not apply to larger, developer-driven projects because the developers are assuming all the risk when choosing to build a for-profit project. We recommend that small projects should be processed in a simpler manner, perhaps similarly to current "behind-the-meter" projects where upfront costs (including interconnection) are defined beforehand given a simple PV system size specification and location. This would allow participants to evaluate their level of interest before spending a significant amount of time and money in engineering drawings, etc. only to find out that their project is unfeasible cost-wise later on due to high interconnection fees.

d. Project capacity designations by participant type
e. New program support services (tech assistance, language translation, educational materials) – *INTERCONNECTION TECHNICAL SUPPORT: Dealing with the utility is probably the most challenging and daunting task for a small, community organization and can easily discourage many organizations from ever trying to build a small, community-driven project. Particularly for these projects, it is critically important that technical support is made easily available at nominal or no cost to help them navigate through highly technically complex utility interconnection requirements. Small, community organizations do not have the technical expertise, consulting funds or legal representation to challenge utility demands for interconnection, which could make small projects not pencil in and thus be terminated early (see 2c above). For example, our particular project has been stalled for months now because of PAC's request for unnecessary and expensive equipment that is not required for similarly sized, behind-the-meter projects. There is no precedent for this request and even the PAC-recommended parts manufacturer engineers question the utility of such a requirement.*
f. Other – *COST: The financials for a small, community driven project are extremely tight when including all the upfront application fees and the ongoing recurring fees. Best case scenario is a 12+ year payback period <u>after</u> the 26%*

FITC. The payback period improves slightly if grants are made available and the application process is not too cumbersome. USDA grants are available but require a lengthy application that includes business plans and is not available to non-profits, so they are not a typical option. Any add-on costs (e.g. a high interconnection cost) essentially kills any small project. We recommend that small non-profit projects should automatically receive a 10-30% grant in order to stimulate these truly community-driven projects.

The fact that any potential investor interested in taking advantage of the FITC must have passive income further limits funding sources. The FITC should be made available to ANY type of investor, not just landlords or Real Estate companies.

3. The primary challenge with recruitment of low-income residents is the risk of indebtedness to the Project Manager if the customer falls into arrears on their utility payments. The root cause of the problem is the existing bill hierarchy where on-bill subscription fees are reimbursed after utility charges are paid in full. If the program is not able to change the payment hierarchy, which alternative solution(s) do you recommend to achieve the Program's low-income goals?
   a. Enroll low-income multifamily housing providers instead of individuals
   b. Increase participant income eligibility threshold
   c. Establish a loss reserve fund to cover arrearages owed to Project Managers
   d. Subsidize subscription fees for low-income participants
   e. Other – *The current PIM <u>requires</u> that CS projects, even participant-owned projects, allocate a minimum of 10% of their energy output to LI families and sells the energy at a minimum 20% discount. The requirement that participant families be not in arrears with the utility company in order to participate created an unintended limitation to the type of LI families who can be enrolled. The typical LI family meeting this requirement will need to have a steady job and a reasonable income in order to afford rent, food and energy costs. This inevitably reduces the pool of LI families available to participate in CS projects and the families who need financial assistance the most are left out with the current format. We see this as a potential missed opportunity by limiting assistance to the most financially successful of the LI families and leaving out the rest.*

   In order to circumvent this process limitation we are evaluating a few options presented here for your consideration:
   - *Provide the LI families with further discounted or free energy from our PV system either permanently or for a defined period of time (e.g. 12-24 months) to allow them to catch up with their utility bills, then revert to the 20% discounted energy*
   - *Provide for charitable donation or subsidy options to cover the cost of bringing these LI families' energy bills up to date*
   - *Work with the Community Solar Coordinator to provide the project with*

annual re-verification of status of LI participants to ensure that the LI participants continue to qualify

- *Limit the LI participation requirements to only having a steady income to ensure that future bills can be paid instead of being up to date on their energy bills with the utility*
- *Provide the LI energy allotment to the utility for free with the condition that they provide it to our LI families for free as well*

We do believe that a suitable option must be found because it poses a heavier burden on the PV system owners for finding qualifying families and because it is imperative that we address the current clean energy inequality that limits the ability of truly LI participants to take part in these efforts.

4. How can the program reduce complexity for participants?
    a. Embed program and utility administration fees into the bill credit rate, rather than charging as separate line items on the participant's bill
    b. Simplify participant contracts
    c. Restrict custom off-bill transactions between Project Managers and participants
    d. Other

5. How can the program achieve greater administrative efficiency to shorten timelines, reduce Project Managers' costs, and improve participants' experience?
    a. Delegate certain authorities from the Commission to the Program Administrator
    b. Standardize schedule for Program Implementation Manual updates
    c. Other – *Today, project delays and conflicts are most likely due to interconnection issues with the utility company more than anything else. Utilities are in the driver's seat and have total control of the process, the requirements and the timeline. The OPUC or the Program Administrator must be given the authority to override the utility for the benefit of the project, help expedite technical disagreements and reduce barriers to accelerate the timeline.*

6. How can the program help reduce project development costs borne by the Project Managers, considering that the Commission has opened Docket No. UM 2111 to investigate interconnection processes and procedures?
    a. Increase Project Manager capacity limits to allow for larger project portfolios
    b. Adjust project capacity requirements by participant type
    c. Revise eligibility requirements for projects or Project Managers
    d. Other – *See 5c above*

7. What do you consider the most important issue that the Oregon Community Solar Program should address in the next program phase?
    Interconnection – This is the biggest single hurdle for CS projects. As stated above, utility

companies are holding the projects hostage because they control every aspect of the interconnection. Rather than piecemealing each project's interconnection, the program would greatly benefit from a standardized process where interconnection fees are defined by project size and distance from a substation. This would allow developers and small organizations to know upfront the cost of interconnecting their project to the grid (this addresses item 2c above). Required equipment should also be standardized to avoid overbuilding by the utility. A small project example: nobody at PAC has been able to explain to us why our 141.18 kW system requires a recloser and recloser controller or alternatively an SEL switch to connect to the PAC grid when similarly sized behind-the-meter systems do not require anything beyond commercial-grade inverters. In fact, nobody makes parts for such small projects and every engineer or parts manufacturer we've spoken to dismisses PAC's requirement as wasteful and unnecessary. This adds costs that can make small projects financially challenging, delays the timeline, generates mistrust in the process and creates a precedent for the following projects. We'd be happy to discuss this further.