



## **Docket No. UM 1930 - Community Solar Implementation**

April 13, 2026

### **Request for Public Comment – Proposed Modifications to Program Implementation Manual and Standard Participant Contract Template**

Staff requests public comments on proposed modifications to the Community Solar Program Implementation Manual (PIM) and general market standard participant contract template. Written comments should be submitted to Docket No. UM 1930 by **April 27, 2026**. Comments will inform Staff’s final recommended PIM modifications for Commission consideration at an upcoming public meeting. Stakeholders can refer to the procedural schedule published to UM 1930.

Staff explains proposed modifications on the following pages. In addition, Staff has posted redlines to the PIM and to the general market standard participant contract template.

**Please email comments on Staff’s proposed modifications to:**  
**[puc.filingcenter@puc.oregon.gov](mailto:puc.filingcenter@puc.oregon.gov)**



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This document summarizes a set of draft modifications to the Community Solar PIM and the general market standard participant contract template. With the Community Solar Program Administrator (PA), Staff has worked to ensure the proposed PIM modifications are consistent with recent Commission Orders and reflect needed and required changes in Program implementation.

Staff proposes 19 total modifications to the PIM. Of these, nine are clarifying, three update timeframes, and seven fall under administrative revisions as listed below:

Total Modifications	
<b>Clarifying Modifications</b>	1, 2, 3, 7, 8, 16, 17, 18, 19
<b>Updating timeframe</b>	5, 9, 11,
<b>Administrative Revisions</b>	4, 6, 10, 12, 13, 14, 15

**1. Update the carve-out eligibility criteria and capacity to reflect the Commission Order 25-392 in UM 1930 (Section 1.4).**

*Change:*

Modify Section 1.4 to add the following language to the Project Manager (PM) attribute carve-out eligibility criteria: “At the time of Pre-certification, a Renewable Energy Cooperative participating under this eligibility requirement must demonstrate an established track record of developing or financing community-led or controlled Projects.” Additionally, update table 1 in Section 1.4 to reflect the additional capacity added to the second offering (Tier 2).

*Rationale:*

On October 2, 2025, in Order No. 25-392, the Commission approved an additional 50 MW of carve-out capacity as an expansion of the second offering.<sup>1</sup> Order 25-392 also revised carve-out eligibility criteria. Accordingly, table 1 must be updated under the second

<sup>1</sup> See Docket No. UM 1930, Order No. 25-392, Oct 02, 2025. [UM 1930 PM Order encrypted .pdf](#)

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offering (MW-AC) for both total capacity by utility and carve-out capacity by utility. The revised totals are:

- Total capacity (second offering):
  - Portland General Electric: 66.57 MW-AC
  - Pacific Power: 62.3 MW-AC
- Carve-out capacity (second offering):
  - Portland General Electric: 31.645 MW-AC
  - Pacific Power: 38.075 MW-AC

These updates reflect the changes directed in Commission Order 25-392.

#### **2. Update the Program capacity tables to reflect actual capacity limits in each offering (Section 1.4, 1.5.1, and 1.5.2).**

##### *Change:*

Modify table 1 (Section 1.4), table 2 (Section 1.5.1) and table 3 (Section 1.5.2) to reflect the additional capacity added to the second offering (Tier 2). Also, the unallocated Tier 1 capacity shift into Tier 2 capacity upon release.

##### *Rationale:*

On October 2, 2025, the Commission approved the addition of 50 MW of Carve-Out capacity to the second offering (Tier 2) through Commission Order 25-392. To address this, table 1 in Section 1.4 must be updated to reflect the increase. Additionally, the table should show that unallocated interim offering capacity was incorporated into the second offering when it was originally released in early 2022.

To promote PM diversity, enhance market competition, and provide more options for customers, the PIM sets limits on how much capacity a single PM or Subscription Manager (SM) can reserve in each offering. Specifically, no entity may reserve more than 50 percent of the capacity available in the second offering.



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Table 2 (Section 1.5.1) and table 3 (Section 1.5.2) must be updated to reflect the interim offering capacity that was transferred to the second offering in 2022. In addition, table 3 should include an additional 50 MW of Carve-Out capacity approved under Commission Order 25-392.

#### 3. **Specify that maintaining PM registration is required over the life of the Project (Section 2.3).**

*Change:*

Modify Section 2.3 to clarify that PMs must maintain current record of their contact information, IRS W-9 form, and certificate of insurance throughout the lifetime of the Project.

*Rationale:*

The Program requires PM registration, proof of insurance, and IRS Form W-9 to be maintained for the entire lifetime of a Project; however, this requirement is not clearly stated in the PIM. The PA has observed that these documents can become outdated, particularly when operational Projects are transferred to new PMs.

To address this, PMs must ensure all required documentation remain current throughout the life of the Project. Incoming PMs must also be made aware of their responsibility to maintain and update these records after assuming ownership of an operational Project. In addition, PM contact information must be kept up to date so the PA can clearly identify the party responsible for the Project.

#### 4. **Require PMs to provide documentation of sale or merger to the PA when a Project and/or a PM is sold to a new organization (Section 2.3.1).**

*Change:*

Modify Section 2.3.1 to specify that PMs must provide proof of sale or merger within ten business days after execution of a contract for the sale or merger of a Project or PM entity.

*Rationale:*

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After a sale or merger, the PA needs adequate documentation that the sale between the parties is complete and the entity responsible for the PM role is clear in the event of a dispute.

- 5. Require PMs and/or SMs to respond to customer complaints to resolve complaints within five business days, provide an alternative timeline for resolution or escalate to the PA as appropriate (Section 2.4).**

*Change:*

Modify Section 2.4 to clarify that a PM must resolve a participant complaint, in writing, within five business days of being notified of the complaint. If additional time is required, the PM must propose an alternative timeline for approval by the PA and communicate the approved timeline to the complainant.

*Rationale:*

The Program requires PMs to respond to customer complaints forwarded by the PA, but the PIM does not currently define a required response timeframe. As a result, participants may experience delays, leading to dissatisfaction and poorer overall Program experience. These delays also drive participants to contact the PA call center for updates, shifting admirative burden away from PMs and onto the PA.

Establishing a clear response timeline ensures that PMs address complaints promptly, improves participant experience, and maintains appropriate responsibility for complaint resolution.

- 6. Require PMs and/or SMs to inform the PA at least two weeks in advance of canvassing, including the date, number of people, duration, and area (Section 2.6.3).**

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#### *Change:*

Modify Section 2.6.3 to require PMs and their agents to inform the PA of any canvassing efforts that are intended to enroll participants in the Program. The PMs or agents should share canvassing details including the date(s), number of door-to-door representatives, and geographic area(s) that will be canvassed.

#### *Rationale:*

When PMs or their agents conduct canvassing activities, the Program call center, the Low-Income Facilitator (LIF), and utility call centers often experience a surge in inquiries from potential participants seeking to verify whether canvassers are legitimately affiliated with the Program. Without advance notice, these stakeholders may be unprepared to handle the increased call volume or provide timely verification.

Requiring PMs or their agents to notify the PA at least two weeks in advance allows the PA call center and LIF to prepare for higher demand and enables coordination with utility call centers. This improves responsiveness, reduces participant confusion, and helps protect consumers from potential fraud. Advance notification also benefits canvassing organizations, as it ensures that stakeholders can confirm their legitimacy as registered Program participants when inquiries arise.

#### **7. Specify that the PA may withhold subscription fee payment to the Signatory to the Power Purchase Agreement in the event that disciplinary penalties are enacted due to disciplinary probation (Section 2.7.1).**

#### *Change:*

Modify Section 2.7.1 to specify that subscription fee payments may be withheld from either a PM or the respective Signatory to the Power Purchase Agreement (PPA).

#### *Rationale:*

The Program allows the PA to remit subscription fee payments to the Signatory to the PPA when that entity differs from the registered PM for a given Project. However, in cases of Program violations, disciplinary actions—such as probation—apply to the registered PM, and the PA may withhold subscription fee payments as a penalty.



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Under the current PIM language, if payments are directed to the PPA Signatory rather than the registered PM, the PA’s ability to enforce this penalty is limited. Updating the language ensures the PA can withhold payments from either the registered PM or the PPA Signatory, as appropriate. This change strengthens enforcement mechanisms and helps ensure compliance with Program rules and requirements.

**8. Update the language in Section 3.2.b regarding the characteristics of a Single Development to reflect the Commission Order No. 26-014 in UM 1930.**

*Change:*

Modify Section 3.2.b to reflect Commission Order No. 26-014.<sup>2</sup>

*Rationale:*

On January 21, 2026, the Commission approved clarifying Project siting requirements in OAR 860-088-0070 for the Community Solar Program (CSP).<sup>3</sup> The Commission Order 26-014 approved three clarifying siting requirements. Firstly, OAR 860-088-0070(2) does not apply to certified CSP Projects. Secondly, a determination of whether two or more Projects exhibit characteristics of a single development, which do not otherwise meet the co-location exemption requirements, should be based on a totality of the circumstances. Thirdly, individual characteristics of a single development listed in OAR 860-088-0070 rule are not independently sufficient to support a finding of Project co-location. To comply with the Commission Order, Section 3.2.b will need to be updated to include the clarifying language.

**9. Require Projects to be registered in Western Renewable Energy Generation Information System (WREGIS) within one (1) month of achieving operation. (Projects that have a WREGIS waiver do not apply.) (Sections 3.8 and 5.4.3).**

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<sup>2</sup> See Docket No. UM 1930, Order No. 26-014. [UM 1930 PM Order CA7 encrypted .pdf](#)

<sup>3</sup> OAR 860-088-0070 establishes Project siting and requirements for Projects to participate in the CSP. [OAR 860-088-0070 – Project Siting and Requirements](#)



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#### *Change:*

Modify Sections 3.8 and 5.4.3 to specify a timeline for when PMs must register their Projects with Renewable Energy Credits (REC). Currently, the PIM does not specify when this should occur.

#### *Rationale:*

Projects that do not have a waiver of the WREGIS registration are required to register within WREGIS after they become operational to retire RECs on behalf of the participants. Currently, there is no requirement stated in the PIM for when PMs must complete enrollment of generating units. WREGIS will only accept generation data for registered generation units, three months before the WREGIS generation approval date. If a Project registers with WREGIS three months after it achieves commercial operation, the PA will have to submit a request to WREGIS (and possibly attend a meeting) on behalf of the Project to accept generation data before the three-month timeframe.

To align the PIM with WREGIS's enrollment policy, Staff recommends adding a requirement for the PM to register the Project as a generating unit with WREGIS within thirty days of achieving commercial operation. This requirement will provide the PA and the PM with sufficient time to ensure accurate enrollment with WREGIS and prevent delays with annual REC retirement and reporting.

#### **10. Restrict cancellation fees, transfer fees, late fees, and subscription size change fees for residential participants (Sections 3.13.1 and 6.4).**

#### *Change:*

Modify Sections 3.13.1 and 6.4 to bar PMs from charging residential customers with cancellation fees, late fees, or fees reducing the size of subscription for contracts signed after May 2026.

#### *Rationale*

The PIM currently protects low-income participants from being charged fees beyond standard subscription charges, including sign-up, cancellation, subscription size change, and late fees. However, these protections do not extend to the broader residential



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customer base. The PA proposes aligning protections across all residential participants by prohibiting such fees in these circumstances.

This change is not expected to materially impact PMs' finances, as they have indicated that these fees are not typically charged in practice. However, allowing such fees could be harmful to participants in the CSP, particularly in situations where customers relocate or adjust subscriptions to avoid oversubscription.

To implement this update, the required contract template will need to be revised for agreements executed after the change takes effect. Proposed revisions have been redlined in the attached contract template for stakeholder review. This change is prospective only and will not apply retroactively to existing contracts.

#### **11. Specify the timeframe in which PMs and their agents should notify participants of an outage (Section 3.13.1.l).**

*Change:*

Modify Section 3.12.1.l to add language that PMs and their agents must notify participants within five business days after receiving a notification of an unplanned outage.

*Rationale:*

The PIM currently requires PMs and their agents to notify participants of Project outages "promptly," but it does not define a specific period. This lack of clarity creates ambiguity around when notifications must be sent.

When participants are not informed before receiving a utility bill reflecting reduced bill credits, it can lead to confusion and a negative customer experience. Establishing a defined timeframe ensures timely communication, improves transparency, and helps participants better understand changes to their bill credits.

#### **12. Require that PMs provide participants with a completed copy of their contract within one day of signing (Section 3.13.1).**



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#### *Change:*

Modify Section 3.13.1 to include language to ensure that PMs and their agents provide participants with a completed and signed copy of their Community Solar contract within one day of signing.

#### *Rationale:*

The PIM currently requires PMs and their agents to provide contract copies to low-income participants (Section 3.15.3) but does not extend this requirement to general residential customers. This gap has led to confusion among participants regarding their enrollment and the terms of their subscription.

When participants do not receive a copy of their contract, they may not recall key details of what they agreed to, resulting in misunderstandings and increased customer complaints. Requiring PMs and their agents to provide a completed and signed contract promptly ensures participants have clear documentation of their enrollment and can reference it as needed, improving transparency and overall customer experience.

### **13. Change the process of transferring a Project to a new PM into a minor revision instead of a major revision, which would not require a Project amendment (Section 4.7.2).**

#### *Change:*

Modify Section 4.7.2 to state that updating the PM of a Project is a minor revision.

#### *Rationale:*

Controlling entities frequently transfer and sell Projects and PM entities' Projects at different stages of Project development and financing. Reclassifying a PM transfer as a minor revision would reduce administrative burden for both the PA and OPUC staff. PM transfers have historically been routine, non-controversial, and have not had any meaningful impact on the community.

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#### 14. Remove the requirement to retire station service RECs (*Section 5.4.3*).

*Change:*

Modify Section 5.4.3 to no longer include the true-up process, which currently requires PMs to retire station service RECs in addition to amount of generation reported to WREGIS by the Qualified Reporting Entity.

*Rationale:*

Differences between utility Program metering practices and WREGIS procedures typically result in a small discrepancy between the generation used to calculate Program bill credits and the generation reported to WREGIS for REC creation. This discrepancy is primarily due to how station service (on-site consumption) is treated.

Under the current PIM, the PA must coordinate with PMs and WREGIS to perform an annual true-up by calculating this difference and requiring PMs to retire the corresponding station service RECs on behalf of participants. However, the PA has found that these discrepancies are minimal—generally ranging from 0.5 percent to 5 percent and that the true-up process creates unnecessary administrative burden for both the PA and PMs.

Given the negligible impact of these differences, and the fact that WREGIS does not require similar true-up processes in other Programs, removing this requirement will streamline operations without materially affecting Program integrity. PMs will still be required to retire RECs associated with participant generation, ensuring that participant benefits are preserved.

#### 15. Change the calculation of oversubscription fees in the Annual Bill Credit Reconciliation calculation to reflect the subscription fees paid by participants (*Section 6.3.6*).

*Change:*

Modify the language in Section 6.3.6 describing the calculation used by the PA to determine oversubscription fees. Currently, fees are based on the value of the bill credits received for the oversubscribed kWh. Staff instead recommends determining fees based on the difference between the subscription fees paid and the bill credits received for the



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oversubscribed kWh. Specifically, multiply the oversubscribed kWh by the difference between the Bill Credit Rate and the subscription fee rate during the annual billing cycle in review.

Similarly modify the language in Section 6.3.6 describing the calculation to determine oversubscription fees if the participant was billed within both Tier 1 and Tier 2 Projects. Specifically, fees will be equal to the oversubscribed kWh multiplied by the difference between the average Bill Credit Rate and the average subscription fee rate during the annual billing cycle in review.

Similarly, modify the two examples in Section 6.3.6 that show application of the calculation where participants are billed in Tier 1 or Tier 2 only, and where participants are billed in both Tier 1 and Tier 2.

#### *Rationale:*

In Q1 2026, the PA alerted Staff of its forecast that almost 1,000 participants, including over 690 residential participants and 160 low-income participants, would likely be over subscribed for the annual billing period ending April 30, 2026. This represents a disproportionately large percentage of total CSP participants compared to prior annual reconciliations.

However, Staff determined the need to timely address the magnitude of oversubscription fees a sub-set of current participants are expected to have added to their electricity bills starting in June 2026. Staff is concerned that the fees could result in cancellation of subscriptions because the current calculation of oversubscription fees does not account for the subscription fees paid by participants for the bill credits received. This would result in a subset of participants paying far more in oversubscription fees than the savings they received.

As an example, if a residential participant is oversubscribed by 1,000 kWh in a billing year, and receives a \$0.10 bill credit rate and a \$0.095 subscription fee rate, they would have gained \$5 in that billing year from being oversubscribed ( $1,000 \text{ kWh} * \$0.10/\text{kWh}$ ) - ( $1,000\text{kWh} * \$0.095/\text{kWh}$ ) = \$5). However, the current reconciliation calculation would have the participant paying \$100 in oversubscription fees to the utility ( $1,000 \text{ kWh} * \$0.10/\text{kWh} = \$100$ ).

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While the Program must continue to annually identify oversubscribed participants, the proposed modification reduces the fees owed to correspond with the actual financial benefit received by the participant over the prior 12 months. Staff intends this change to prevent inappropriate oversubscription fees.

The PA has analyzed drivers of participant oversubscription and Staff intends to engage stakeholders on these issues and options to mitigate the issue later in 2026.

#### **16. Remove language regarding donating a customer’s excess bill credits to their Utility’s low-income Program upon early cancellation of contract and update the language around who pays for the unsubscribed energy payments (Section 6.4).**

*Change:*

Remove the following language from Section 6.4:

“If a customer closes its subscription before its contract has expired, the customer’s excess bill credits will be donated to the low-income Program. Any over-generation from previously cancelled Participants will also be donated to low-income Programs.”

Also, update the language to explain that the PA will be paying the Signatory to the PPA. The entity listed in the PPA can be the registered PM in the Program, or an affiliated entity that attests to be associated with the Project.

*Rationale:*

The existing language does not accurately reflect current Program operations. When a participant cancels their subscription before the contract term ends, excess bill credits are not generated. Instead, the PM or SM either enrolls a new participant to replace the departing customer, or treats the capacity as unsubscribed. In the latter case, the PM receives compensation at the as-available avoided cost rate for unsubscribed energy.

Additionally, Program payments—whether for subscribed or unsubscribed energy—are made by the PA to the Signatory to the PPA, not necessarily to the registered PM. The PPA Signatory may be the PM or an affiliated entity associated with the Project.

Updating this language ensures alignment with actual Program operations and clarifies payment responsibilities.



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#### **17. Update the language that specifies who is impacted if the participant fails to pay the full utility bill (Section 6.5).**

##### **Change (reworded):**

###### *Change:*

Modify Section 6.5 to clarify that any impacts from partial or non-payment apply to the Signatory to the PPA, rather than the PM.

###### *Rationale:*

The PA issues all payments—whether for subscribed or unsubscribed energy—to the Signatory to the PPA. Therefore, any impacts from partial or non-payment apply to the PPA Signatory, not necessarily the PM. This revision ensures the language accurately reflects Program payment practices.

#### **18. Update the language to clarify that the avoided cost rate is the Commission – approved as-available avoided cost rate, and the PA will pass the unsubscribed payments to the Signatory to the Power Purchase Agreement (Section 6.6).**

##### *Change:*

Modify Section 6.6 to clarify that the as-available avoided cost rate is the Commission-approved rate. Also clarify that the PA must remit payments for unsubscribed energy to the Signatory to the PPA.

##### *Rationale:*

This update clarifies that the as-available avoided cost rate is approved by the Commission and ensures consistency in payment responsibilities. The PA is required to remit all unsubscribed energy payments to the Signatory to the PPA, and this revision makes that requirement explicit.

#### **19. Add a new section to the PIM that clarifies the PA’s role in processing unbillable power (Section 6.7).**



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#### *Change:*

Add Section 6.7 to the PIM that outlines the PA’s process for determining what happens if power is not attributed to a billing record and is never resolved, or if the Participant is no longer actively enrolled in the Program.

#### *Rationale:*

The PIM currently addresses participant billing and unsubscribed Project capacity but does not fully account for unbillable Project capacity. In 2025, the PA introduced two new data transfer files to manage this scenario. Adding this section improves transparency by clearly describing the PA’s role in calculating and processing data and funds associated with unbillable Project capacity, providing greater clarity for market participants.