

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 1452

In the Matter of) **RENEWABLE NORTHWEST PROJECT'S**
) **AND CITIZENS' UTILITY BOARD OF**
PUBLIC UTILITY COMMISSION OF) **OREGON'S MOTION FOR ORDER**
OREGON) **ALLOWING SUPPLEMENTAL**
) **COMMENTS ON SOLAR COST DATA**
Investigation into Pilot Programs to) **AND SUBMISSION BY STAFF OF**
demonstrate the use and effectiveness of) **REVISED RATE TABLE**
Volumetric Incentive Rates for Solar)
Photovoltaic Energy Systems.) **EXPEDITED HEARING REQUESTED**

Renewable Northwest Project (“RNP”) and Citizens’ Utility Board of Oregon (“CUB”) move the Commission for an order requesting that (1) the parties in this docket submit supplemental comments on recent solar installed-cost data, and (2) PUC Staff submit a rate table (Appendix B of Staff's final comments) that incorporates a revised range of installed costs. This motion is unopposed by Staff, the Energy Trust of Oregon (“ETO”), the Oregon Solar Energy Industries Association, SunEdison, Tanner Creek Energy, SolarCity, Portland General Electric, and Idaho Power.

To ensure that the timeline for filing additional comments will not significantly delay the Commission’s decision-making process, RNP also requests that the Commission set an expedited schedule for the supplemental comments and limit the comments only to issues related directly to the Volumetric Incentive Rate (VIR). The proposed timeline for submitting opening supplemental comments is April 9, 2010, with closing comments due April 16, 2010. The proposed PUC order on the VIRs is May 7, 2010.

RNP respectfully requests that the Commission continue its current timeline to issue an order on all of the other issues in the docket to ensure that the key program implementation

components are developed to make the programs available to customers no later than July 1, 2010 (HB 3690 § 3).

RNP, along with several other parties including Staff and CUB, is concerned that the installed-cost data used to develop Staff's proposed VIRs may not reflect the current market trends in Oregon. Staff's proposed VIRs are based on an analysis that incorporated ETO data from 2008 and the first three quarters of 2009. Recent conversations with ETO and a sampling of residential and commercial solar developers has lead RNP to believe there has been a significant decline in installed costs in the last quarter of 2009 and the first quarter of 2010.

To ensure the program's initial VIR reflects the most up-to-date range of installed costs, Staff needs a clear process by which it can receive updated installed-cost data and then provide that data to the Commission. RNP believes that the best process is for the Commission to ask the parties to provide supplemental comments on recent solar installed-cost data, and for Staff to revise its rate table to reflect a wider range of installed costs.

For the foregoing reasons, the motion should be allowed.

DATED this 19th day of March, 2010.

ESLER, STEPHENS & BUCKLEY

By: /s/ John W. Stephens
John W. Stephens
Of Attorneys for Renewable Northwest
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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **RENEWABLE NORTHWEST PROJECT'S AND CITIZENS' UTILITY BOARD OF OREGON'S MOTION FOR ORDER ALLOWING SUPPLEMENTAL COMMENTS ON SOLAR COST DATA AND SUBMISSION BY STAFF OF REVISED RATE TABLE** on the following persons on March 19, 2010, by hand-delivering, faxing, e-mailing, or mailing (as indicated below) to each a copy thereof, and if mailed, contained in a sealed envelope, with postage paid, addressed to said attorneys at the last known address of each shown below and deposited in the post office on said day at Portland, Oregon:

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DATED this 19th day of March, 2010.

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