

**PUBLIC UTILITY COMMISSION OF OREGON  
STAFF REPORT  
PUBLIC MEETING DATE: September 20, 2022**

**REGULAR**  **CONSENT**  **EFFECTIVE DATE** September 21, 2022

**DATE:** September 12, 2022

**TO:** Public Utility Commission

**FROM:** Joe Abraham

**THROUGH:** Bryan Conway, JP Batmale, and Sarah Hall **SIGNED**

**SUBJECT:** OREGON PUBLIC UTILITY COMMISSION STAFF:  
(Docket No. UM 1930)  
Extension of Community Solar Program renewable energy credit reporting  
deadline for 2021-2022 Program year.

**STAFF RECOMMENDATION:**

Extend the Community Solar Program renewable energy credit reporting deadline for the 2021-2022 Program year.

**DISCUSSION:**

Issue

Whether the Commission should extend the Community Solar Program (CSP) renewable energy credit (REC) reporting deadline for the 2021-2022 Program year.

Applicable Rule or Law

ORS 757.386(2)(a) directs the Commission to establish a program that provides electricity customers the opportunity to share the costs and benefits of electricity generated by a community solar energy system.

On June 29, 2017, in Order No. 17-232, the Commission adopted formal rules for the CSP under OAR Division 88 of Chapter 860.

## Analysis

### *Background*

In Order No. 19-438, the Commission adopted Staff's proposal for the CSP Program Implementation Manual (PIM).<sup>1</sup> PIM Section 3.8 requires projects larger than 360 kW-AC in aggregate size to register with the Western Renewable Energy Generation Information System (WREGIS) and retire RECs owned by participants annually in WREGIS. PIM Section 5.4.3 also requires Project Managers (PM) to compile and submit a report to the CSP Program Administrator (PA) by September 30 each year. The report must show, as of the end of March of that year, the total number of RECs retired on behalf of participants and the total number of RECs generated and sold as a result of a contract for the unsubscribed portion of the project's generation.

Utilities report CSP project generation levels to WREGIS, and WREGIS operating rules require utilities to exclude any on-site station usage. CSP bill credits, however, are based on gross project generation. As a result, the generation reported by CSP projects to WREGIS through March 2022 is about one percent different than the generation reported by utilities. Because of this discrepancy CSP projects are unable to retire all RECs owned by participants.

Working with utilities and WREGIS, Staff and the PA have identified a solution to this issue. On an annual basis the PA will request that WREGIS true-up REC generation to Program generation. In doing so, WREGIS will generate additional RECs and identify them as associated with station usage. The additional RECs must be retired by PMs on behalf of participants and may not be sold. This solution does not impact how projects retire RECs in the Program nor does it impact any other REC-related program. However, the solution requires approximately three months for the PA and WREGIS staff to implement this process with WREGIS. As a result, the solution cannot be implemented in a timeframe that would allow CSP projects to retire RECs in WREGIS before the 2021-2022 Program deadline of September 30, 2022.

### *Stakeholder Feedback*

The PA engaged stakeholders in development of the proposed solution detailed above. To this end, Oregon Shines, a Subscription Manager in the Program, initially shared with the PA the discrepancy in RECs and utility-reported generation. Upon learning this, the PA discussed the issue with utilities multiple times, with Portland General Electric (PGE) putting forth the proposed solution. The PA notified utilities of the need to extend the 2021-2022 Program year deadline for REC reporting while the new process with WREGIS is adopted. The utilities reported no concerns to the PA.

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<sup>1</sup> Order No. 19-438. <https://apps.puc.state.or.us/orders/2019ords/19-438.pdf>.

*Staff's Proposal*

Based on the collaborative work described above, Staff recommends the Commission extend the 2021-2022 Program year deadline for REC report submission to December 31, 2022. This would allow PMs to remain in compliance with the PIM and provides the PA and WREGIS with an adequate amount of time to implement the proposed solution.

Conclusion

Staff appreciates the collaboration between the PA, stakeholders and WREGIS to identify and develop the proposed solution. Staff's recommendation provides a one-time extension to the current deadline for PMs to submit a report and provides sufficient time to implement the proposed solution. Staff recommends the Commission extend the 2021-2022 Program year deadline for PMs to submit a REC report to the CSP PA to December 31, 2022.

**PROPOSED COMMISSION MOTION:**

Extend the Community Solar Program renewable energy credit reporting deadline for the 2021-2022 Program year.