



Oregon

Kate Brown, Governor

Public Utility Commission

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September 14, 2020

UM 1930 Stakeholders,



Staff understands that COVID has presented a substantial challenge for customer acquisition, particularly for project managers recruiting their own low-income subscribers.

Staff has received a request for a waiver of the Program Implementation manual (PIM) requirement that “at least 10% of the generating capacity of each project must be subscribed by low-income residential customers at the time of Certification and throughout the Commercial operations of the project.” After investigation, Staff has determined that granting this request would entail an additional waiver of OAR 860-088-0050(c), requiring “[c]ompliance with applicable low-income capacity requirements” in order for a project to receive certification. Recognizing that all projects are facing similar COVID impacts, Staff intends to recommend a waiver of OAR 860-088-0050(c) for a period of twelve months, ensuring that all Community Solar Projects have the opportunity to seek reprieve from low-income enrollment requirements prior to certification.

The Program Administrator believes this waiver would benefit low-income customers since the requirement to reserve capacity for low-income customers would remain in place, and low-income customers that have already enrolled in a project would be able to experience more immediate benefits by the project coming online. Allowing the project to become operational earlier could also support low-income recruitment efforts, as projects could offer an immediate start date after enrollment and point to the experience of an existing project.

Staff anticipates drafting a public meeting memorandum with its recommendations on waiving the administrative requirement that low-income customers subscribe 10% of the project prior to Certification, by October 9, 2020 for the October 20, 2020 public meeting. This will allow time for stakeholders to file comments regarding Staff’s recommendation. In the meantime, Staff invites stakeholders to submit comments to Staff to inform our recommendations. We ask that objections or comments be filed by September 23, 2020.

Please feel free to contact me if you have any questions and thank you for your engagement in this process.

Best,

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