

From: [MENZA Candice * PUC](#)
To: [MENZA Candice * PUC](#)
Subject: FW: UM 1930 COMMUNITY SOLAR IMPLEMENTATION
Date: Thursday, September 15, 2022 12:54:06 PM
Attachments: [image001.png](#)

UM 1930 Stakeholders,

On August 23, 2022 OPUC Staff posted in UM 1930 its recommendation to the Commission regarding the eligibility of projects using the agent subscription model (Model) in the Community Solar Program (CSP). Staff defines the Model as an agreement that grants limited power of attorney to a Project Manager, Subscription Manager, or other partner to serve as an ORCSP participant's agent by doing at least one of the following:

1. Administering the participant's electric utility account;
2. Subscribing the participant to a CSP project; or
3. Providing the participant with a consolidated bill, paid to the agent instead of the utility.

Staff is aware that several projects have signed subscription agreements with customers that provide the Project Managers or Subscription Managers the flexibility to set and re-size a customer's subscription or to re-assign a participant to a project other than the one that a customer originally signed up with. Staff hopes to clarify here that it does not consider these activities to be included in the definition of the Agent Subscription Model above, as they do not relate to any of the three specific activities noted. It is Staff's understanding that projects are not using these agreements to originally subscribe a participant to a CSP project, but instead to provide flexibility in managing the participant's subscription over time. Staff considers this to be a separate activity that is not part of the Agent Subscription Model as defined.

Staff appreciates the opportunity to share this clarification and looks forward to engaging with stakeholders and the Commission at the special public meeting on September 22nd.

Joe Abraham, Ph.D. *(he/him)*
Utility Analyst ♦ Energy Resources and Planning
Oregon Public Utility Commission
201 High Street SE ♦ Salem, OR 97301
C: (503) 428-0699
[*joseph.abraham@puc.oregon.gov*](mailto:joseph.abraham@puc.oregon.gov)

