

Affiliated Tribes of Northwest Indians
AirWorks, Inc.
Alaska Housing Finance Corporation
Alliance to Save Energy
Allumia
Alternative Energy Resources Organization
Ameresco
American Rivers
Backbone Campaign
Beneficial State Bank
BlueGreen Alliance
Bonneville Environmental Foundation
Byrd Barr Place
City of Ashland
City of Seattle Office of Sustainability & Environment
CleanTech Alliance
Climate Smart Missoula
Climate Solutions
Community Action Center of Whitman County
Community Action Partnership Assoc. of Idaho
Community Action Partnership of Oregon
Community Energy Project
Earth Ministry
Ecumenical Ministries of Oregon
eFormative Options
Elevate Energy
Energy350
EnergySavvy
Energy Trust of Oregon
Environment Oregon
Environment Washington
Forth
Global Ocean Health
Green Energy Institute at Lewis & Clark Law School
Grid Forward
Homes for Good
Home Performance Guild of Oregon
Human Resources Council, District XI
Idaho Clean Energy Association
Idaho Conservation League
Idaho Rivers United
League of Women Voters Idaho
League of Women Voters Oregon
League of Women Voters Washington
Montana Audubon
Montana Environmental Information Center
Montana Renewable Energy Association
Multnomah County Office of Sustainability
National Center for Appropriate Technology
National Grid
Natural Resources Defense Council
New Buildings Institute
Northern Plains Resource Council
Northwest EcoBuilding Guild
Northwest Energy Efficiency Council
NW Natural
OneEnergy Renewables
Opportunities Industrialization Center of WA
Opportunity Council
Oracle
Oregon Citizens' Utility Board
Oregon Energy Fund
Oregon Environmental Council
Oregon Physicians for Social Responsibility
Oregon Solar Energy Industries Association
Pacific Energy Innovation Association
Pacific NW Regional Council of Carpenters
Portland Energy Conservation, Inc.
Portland General Electric
Puget Sound Advocates for Retirement Action
Puget Sound Cooperative Credit Union
Renewable Northwest
Save Our *wild* Salmon
Seattle City Light
Sierra Club
Sierra Club, Idaho Chapter
Sierra Club, Montana Chapter
Sierra Club, Washington Chapter
Small Business Utility Advocates
Snake River Alliance
Snohomish County PUD
Solar Installers of Washington
Solar Oregon
Solar Washington
South Central Community Action Partnership
Southeastern Idaho Community Action Agency
Spark Northwest
Spokane Neighborhood Action Partners
Sustainable Connections
The Climate Trust
The Energy Project
Transition Missoula
UCONS, LLC
Union of Concerned Scientists
United Steelworkers of America, District 12
Washington Environmental Council
Washington Physicians for Social Responsibility
Washington State Community Action Partnership
Washington State Department of Commerce
Washington State University Energy Program
YMCA Earth Service Corps
Zero Waste Vashon



NW Energy Coalition
for a clean and affordable energy future

October 15, 2018

Oregon Public Utility Commission

Attn: Caroline Moore

Via email: caroline.f.moore@state.or.us

RE: UM 1930 Community Solar Interconnection Staff Proposal

The NW Energy Coalition is grateful for the opportunity to comment on Staff's community solar implementation proposal. We and many other advocates have been more than impressed with Staff's coordination, facilitation, and listening with regard to the complexities of this docket.

Support

We are generally supportive of the proposal and grateful for the progress toward the overarching objective of establishing "an equitable opportunity for consumers that have not been able to access customer generation opportunities and incentives" in solar in the past. In particular, we believe Staff has successfully reduced uncertainty and barriers to entry for community-owned projects by:

- Using the simple retail rate with a 2.18% annual escalator as the interim bill credit rate,
- Reducing administrative costs for low-income (LI) participants, including by simplifying bill credit to net total bill costs over annual energy consumption,
- Requiring 20% bill savings for LI participants, and
- Defining low-income as 80% of the state median level.

We also appreciate Staff's work to recommend a modification to the joint utility proposal to use 30% of summer peak load as a minimum daytime load when a measure of MDL is unavailable.

Concerns

While we stress our overall support and gratitude for the current proposal, we are concerned that the administrative costs may still be a barrier to entry for projects with the most equitable outcomes. One concern is the jump from a \$5/KW pre-certification application fee before the 80 MW transition capacity level, to a \$75/KW application fee after reaching 80 MW; another is the \$1.50/KW/month administrative fee. To address these concerns, we would recommend considering the following:

- Expanding the bill credit rate to 100%, rather than 75%, of the capacity tier, though 75% is a great improvement upon previous proposals.

- A line-item report from Staff delineating what costs this ongoing administrative fee is intended to recover, or some other method of greater transparency around this cost,
- Reducing the general participant administrative fee from \$1.50 to \$0.80/KW/mo., which Staff noted would suffice for a 160 MW program,
 - Or, at a minimum, consider lowering the general participant administrative fee for projects that surpass the 10% LI participation requirement, or for projects that surpass 20% bill savings for LI customers.

Moreover, we are concerned that the interconnection process alone, with its high costs and uncertainty, may dissuade otherwise promising projects. While we appreciate the inclusion of an RFI for a third-party reviewer of interconnection studies, this proposal places no time, cost, or decision-making limitations on utilities. We would encourage greater transparency or deadline requirements to ensure utilities' forward momentum in interconnection.

In summary, we appreciate the hard work behind crafting this much-improved proposal, and will continue to engage to ensure community solar is accessible to communities for whom the project was created.

Sincerely,



Heather Moline
Energy & Environmental Justice Policy Associate
NW Energy Coalition