



Portland General Electric
121 SW Salmon Street · Portland, Ore. 97204

December 16, 2019

Via Electronic Filing
puc.filingcenter@state.or.us

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street, Ste. 100
P.O. Box 1088
Salem, OR 97308-1088

**Re: UM 1930 – PGE Comments on the Oregon Community Solar Program
Implementation Manual Final Draft**

Portland General Electric Company (PGE) submits for filing with the Public Utility Commission of Oregon comments in response to the proposed Oregon Community Solar Program Implementation Manual final draft submitted in Docket No. UM 1930 on December 9, 2019.

Informal questions concerning this filing may be directed to Stefan Cristea at (503) 464-8033. Please direct all formal correspondence, questions, or requests to the following e-mail address: pge.opuc.filings@pgn.com.

Sincerely,

A handwritten signature in blue ink that reads "Karla Wenzel" followed by a small flourish.

Karla Wenzel,
Manager, Regulatory Policy and Strategy

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1930

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Community Solar Program Implementation
Manual

COMMENTS OF PORTLAND
GENERAL ELECTRIC

Portland General Electric (PGE) submits these comments in response to the proposed Oregon Community Solar Program Implementation Manual (PIM), posted on December 9, 2019 in Docket No. UM 1930. PGE appreciates the Program Administrator’s (PA) and OPUC Staff’s commitment and efforts to compile a comprehensive PIM to govern the program implementation while engaging utilities and other stakeholders through a collaborative process.

PGE is generally supportive of the PIM, and we have several suggested edits and clarification comments we address below:

1. Chapter 1 - Program Overview

- a. Page 4 – Program Implementation Manual: It is not accurate to state that the PIM contains “all the rules, requirements and procedures that make up the Oregon Community Solar Program.” There are other statutes, administrative rules, and OPUC Orders that govern the program. In addition, utilities will have various tariffs that will be applicable. PGE suggests that the PIM state it “contains program procedures and requirements for the Oregon Community Solar Program.”
- b. Page 6 – Program Design, last paragraph in the section, sentence “Project Managers will be given two weeks to consider the impacts...”: PGE finds the sentence unclear and recommends more explanation as to what “impacts” are contemplated in the paragraph.

- c. Page 7 – Program Definitions: PGE suggests that the Avoided Cost Rate definition be consistent with the PURPA definition which is: “Avoided costs means the incremental costs to an electric utility of electric energy or capacity or both which, but for the purchase from the qualifying facility or qualifying facilities, such utility would generate itself or purchase from another source.”
- d. Page 8 – Program Definitions: PGE suggests rewriting the definition for Non-Profit to read as follows: “Any mutual benefit corporation, public benefit corporation, religious corporation, municipal corporation as defined by Oregon Law, or federally recognized Indian Tribe.” PGE consulted with several tribes and they felt more comfortable with this definition.
- e. Page 9 – Program Definitions: PGE recommends a change in the RECs definition as it is not accurate. RECs are creatures of state jurisdiction and not federal jurisdiction. PGE suggests that the definition read: “are substantiated in state renewable energy markets.” The same change should be made on page 35.

2. Chapter 3 (Requirements)

- a. Interconnection, part (b) at pages 34-35: PGE requests that the PIM make clear that changing the Project capacity may cause the need for the Project to reapply for interconnection. Oregon Administrative Rule 860-082-0025(c) provides that “An applicant with a pending completed application to interconnect a small generator facility must submit a new application if the applicant proposes to make any change to the small generator facility other than a minor equipment modification. This includes changes affecting the nameplate capacity of the proposed small generator facility.”
- b. Page 36 - Number and Type of Participants, part (a): PGE recommends further clarification as to whether the 50 percent subscription requirement includes the 10 percent low-income subscription requirement. As written, the requirement could be

read that the 10 percent low-income subscription requirement is in addition to the 50 percent such that Project Managers have to subscribe 60 percent of the Project generation to be pre-certified.

- c. Page 43 - Participant Contract requirements / Mandatory contract provisions, part (f), last bullet point: PGE suggests that the PA clarify whether a bill credit balance on a Participant's account at the time of early termination will be forfeited and donated to the utility's low-income programs immediately after termination or as part of the annual true-up.
- d. Page 45 – Participant Contract requirements / Mandatory contract provisions, part (k), second bullet point: PGE requests that the PIM clarify that utilities will remit subscription payments and fees collected from participants to the PA for distribution to Project Managers and not directly to Project Managers.

3. Chapter 4 – Project Pre-certification

- a. Page 65 – Submitting Progress Updates: PGE requests that utilities have access to Project Manager six-months progress reports and Project timelines through the Community Solar Program platform, and that this be noted in the PIM.
- b. Page 69 – Project Cancellation: PGE requests that the PA notify utilities when Project Managers confirm that a Project will be cancelled, and that this be noted in the PIM.

4. Chapter 5 – Project Certification

- a. Page 74 – Requirements After Certification / Commercial Operation section: PGE requests that the utility also be notified whenever a Project submits a request for an extension to their commercial operation date, and that this be noted in the PIM.

5. Chapter 6 – Project Participation and Billing

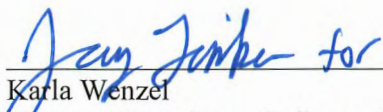
- a. Page 79 – Participant Utility Bill / Bill Display, part (a): PGE suggests adding a clarification that the monthly energy production (kWh) displayed on the utility bill is associated with the Participant’s share of energy production from the Project.
- b. Page 79 – Participant Utility Bill / Bill Display part (c), third bullet point and part (d), second bullet point: PGE does not agree with the assertions that Program Fess “are listed in \$/kW-AC” and subscription fees in “\$/kWh or \$/kW-AC”. PGE seeks to clarify that PGE is expecting to display the monthly totals associated with the program fees and subscription fees, rather than a rate per kWh or per kW-AC.
- c. Page 80 – Participant Utility Bill / Bill Crediting Rules: PGE suggests rewording the section last paragraph: “If the value of the monthly bill credit exceeds...account balance would be from the utility” so that it reads: “If the value of the monthly bill credit, minus any other on-bill repayment expenses, is greater than the total amount due on the monthly utility bill, an excess credit may appear. This excess credit may not be cashed out but will carry forward to subsequent months. If this excess credit is not consumed by monthly energy usage and charges by the end of the annual period, then the value will be issued to low income programs.”
- d. Page 81 – Participant Utility Bill / Bill Credit Timing: PGE suggests removing the unit of measure “kW” related to the subscription size from line 4 of the section first paragraph because subscriptions can be in either kWh or kW, depending on the subscription model.
- e. Page 81-82 – Participant Utility Bill / Annual Bill Credit Reconciliation: PGE finds the second and third paragraphs in this section confusing and suggests rewording as follows: “Every April a reconciliation will be performed. A comparison of the actual kWh credited from the subscription will be made against actual kWh electricity used at the site, prorated as necessary, based on when subscription starts.

The value of excess kWh credited, should there be any, will be donated at the as-available-avoided-cost rate for use in low income programs of the electric company serving the Participant. This reconciliation policy is intended to prevent Participants from over-sizing their subscription. If the subscription has generated more kWh than what is consumed annually, an adjustment shall be included on the Participant's utility bill indicating the amount due (for donation).”

f. Page 82 – Participant Utility Bill / Annual Bill Credit Reconciliation, fourth paragraph in the section – PGE does not agree with the calculation provided for the net balance of the bill credit that exceeds the Participant’s consumption. PGE recommends that the net balance simply be the “kWh overage*Bill Credit Rate” and not subtract any Subscription fees.

6. Not Included in the PIM: PGE notes that no protocol was proposed for a periodic reassessment of low-income subscribers to determine if they maintain this status over the life of their subscription. Although there is no administrative rule requiring this, PGE believes a reassessment should be contemplated to address the instance when a subscriber is no longer qualifying for the low-income designation at some point in their subscription life.

Dated this 16th day of December, 2019



Karla Wenzel
Manager, Regulatory Policy and Strategy
Portland General Electric
121 SW Salmon Street, 1WTC0306
Portland, OR 97204
503.464.8718