



Oregon Public Utility Commission
201 High Street SE, Suite 100
Salem, OR 97301-3398

March 5, 2021

RE: Low-income Recruitment Penalty – revised comments

Dear Chair Decker, Commissioner Tawney and Commissioner Thompson,

The Oregon Solar + Storage Industries Association (OSSIA) and the Project Managers (PMs) it represents appreciates the diligence by staff and the Program Administrators to create a fair penalty if a PM does not meet the 10% low-income subscriber requirement. OSSIA supports staff's recommended penalty.

However, we also need to express concern about the difficulty in signing up low-income customers to Community Solar projects. While the pandemic has certainly contributed to the difficulties in signing up low-income ratepayers, we remain concerned that the current process is not functioning well and we look forward to discussing the issue further with Community Energy Project and the Program Administrators.

In addition, OSSIA appreciates staff's comments regarding the arrears concern. OSSIA offers a potential partial solution; if the utility uses LIHEAP funds to recover costs, they could compensate the PM at an as-available avoided cost rate. This avoids the problem of PMs being unable to directly accept LIHEAP funds and would mitigate the financial harm to both the utility and the PM.

Thank you for the opportunity to comment.

Sincerely,

Angela Crowley-Koch
Executive Director