



200 E Main St  
Enterprise, OR 97828

26 August, 2021

Oregon Public Utility Commission  
201 High St SE #100  
Salem, OR 97301

UM 1930 Docket

Subj: UM 1930 Docket-Comments Regarding Staff-Recommended Modifications of the CSP Program Implementation Manual

PUC Commissioners and Staff,

As a long-time stakeholder in the development of the Community Solar Program I deeply appreciate the amount of matching involvement and effort put in by the Commissioners and Staff to launch this program and to continue to improve it. This work is continued in Staff's Aug. 24<sup>th</sup> 2021, recommendations for changes to the **Program Implementation Manual**. We support the majority of the recommendations as positive refinements to create a better program with one exception:

**Item 12. Define and Limit Participation of Affordable Housing Providers as Low-Income Participants**

This item seeks to constrict sourcing of low-income affordable housing subscribers to no more than half of a project's 10% minimum low-income subscriber requirement. As a developer of a 95% low-income subscriber project and a low-income subscriber access advocate, we reject this recommendation as unintentional fratricide on the entire program, specifically on efforts to recruit more LMI participation.

The Oregon CSP program is innovative and one of the first, if not only, programs nation-wide that creates a path for affordable housing apartment complexes to join the clean energy transition. Conversely, our program has a comparatively steep low-income subscriber mandated requirement at 10% and many projects will struggle to meet this. The last update we received from the program in April, stated that the LIF had only met portions of the actively recruiting projects' low-income subscriber needs: 42% in PGE and 88% in PAC. This situation will get worse as more projects achieve Certification. To underscore the need for MORE low-income subscribers and in recognition of the difficulty in recruiting low-income subscribers the Commission approved a year-long waiver of low-income subscriber requirements.

Considering current, and likely continuing struggles, with low-income subscriber recruitment and retention and the sheer numbers needed to certify all planned projects, why would we make any

changes to the program that limit the pool of potential low-income subscribers? Furthermore, why would we want to exclude affordable housing low-income subscribers?

Under the Affordable Housing mechanism, subscribers from affordable housing complexes receive the same discounts on energy as individual residential LMI subscribers. The method for accomplishing this looks a little different but has the same value to the subscriber. There is no evidence that individual residential LMI subscribers are being turned away because of the stock of affordable housing subscribers. An additional consideration is that there is a significant issue with residential LMI subscriptions because of the potential for arrearages. Affordable housing subscribers do not have the same issue because the property manager is either compelled to take over utility payments through landlord accounts or the property pays the bill in the first place for the whole complex.

Item 12 is an unnecessary tweak to the program that is neither requested by project managers or subscription managers, nor does it improve the program. If affordable housing subscriber restrictions were placed on the program it would have significant consequences for the Low-Income Facilitator who is charged with recruiting LMI subscribers for the entire program. We believe this recommendation is damaging to the whole program and should not be implemented.

Sincerely,

Ryan Sheehy  
Fleet Development