



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

August 3, 2022

Re: UM 1930, Agent subscription models, additional comments

Commissioners Decker, Tawney and Thompson:

Oregon Solar + Storage Industries Association (OSSIA) appreciates the work of the Public Utility Commission (PUC) Staff and the Program Administrator (PA) to explore agent subscription models in the Oregon Community Solar Program (CSP) to ensure maximum benefits to program participants. After further reflection on the topic and a close reading of other stakeholder comments, OSSIA would like to offer additional comments and a proposal.

OSSIA would like to reiterate our original comments that issues surrounding third party consolidated billing should be separated from issues regarding an agency subscription service administering a customer's utility account and subscribing a customer to a project. Agency subscription services provide benefits to customers that are completely separate from whether or not third party consolidated billing is used. If these issues are separated, the concerns regarding low-income subscribers and third party consolidated billing can be addressed separately.

OSSIA members recognize the concerns raised regarding third party consolidated billing and low-income subscribers and are willing to propose to Commission Staff that they consider restricting third party consolidated billing to non-low-income participants. The proposal would allow subscribers who are not low-income to take advantage of the benefits of third party consolidated billing – such as autopay – but would use the existing utility billing model for low-income subscribers. For low-income customers, this would allow for partial payments or skipped payments, and would not require auto-pay or paperless billing. Despite the fact that third party consolidated billing works well for all customers in other states, OSSIA members are willing to adjust their preferred business models and not offer third party consolidated billing to Oregon CSP low-income subscribers.

However, since agency subscription agreements (separate from third party consolidated billing) are a critical component of how Project Managers and Subscription Managers will be able to meet the new 50% residential subscriber requirement for Tier 2 projects, OSSIA continues to strongly recommend that they be allowed. Subscribers receive benefits from having Project Managers and Subscription Managers handle many of the details of the program for them, without new contracts needing to be signed.

Thank you for your attention to these comments.

Sincerely,



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