

**From:** [Jennifer Dombek](#)  
**To:** [PUC.FilingCenter](#)  
**Subject:** Draft Solar Report  
**Date:** Wednesday, August 10, 2016 1:22:46 PM  
**Attachments:** [image001.png](#)

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Dear Honorable Commissioners,

I am writing to urge you to please change the content and tone of the draft solar report to the Legislature. I am concerned that the current draft will not be helpful to the Legislature. Unfortunately, the report's recommendations regarding net metering and Energy Trust incentives are not supported by an analysis of the value of solar or what the above-market costs might be. I am also concerned about the report's depiction of net metering as an incentive. Net metering in itself is not an incentive. Rather, net metering simply ensures the customer has the right to generate electricity to serve on-site load (just as customer has a right to save energy via energy efficiency), and provide net excess generation back to the grid.

There are several pending proceedings related to solar at the Commission - analysis regarding the value of solar, establishment of a new community solar program, and implementation of the new 50% RPS. There is also regular Commission oversight of Energy Trust of Oregon programs and incentives. I encourage the Commission to revise the solar report to inform the Legislature of the current status of pending Commission proceedings and avoid any specific recommendations regarding changes to incentives or solar programs at this time.

Thank you kindly.  
Jennifer

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**Jennifer Dombek** | Instructional Designer  
Portland | office 510.260.8558 | [Jennifer.Dombek@sunpower.com](mailto:Jennifer.Dombek@sunpower.com)

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