



NewSun Energy LLC  
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April 25, 2023

**Via Electronic Filing**

Oregon Public Utility Commission  
Attention: Filing Center  
201 High Street, Suite 100  
Post Office Box 1088  
Salem, OR 97308-1088

**Re: UM 2000 – Comments on Staff’s April 6, 2023 S+S Straw Proposal**

Dear Staff, Stakeholders and Commissioners:

NewSun Energy LLC (NewSun) provides the following comments on Staff’s April 6, 2023 Straw Proposal for the Phase 0 Interim Solar Plus Storage Rate. NewSun applauds the Commission and Commission Staff for identifying a key issue affecting qualifying facilities (QFs) and working towards a practical solution that will help encourage the development of solar QFs co-located with storage. Staff’s proposal goes a long way towards addressing the systemic barriers faced by QFs in Oregon and helps to open the door for independent power generators to offer innovative solutions to addressing the climate crisis and helping Oregon meet its clean energy goals. NewSun supports staff’s proposal with one change and a few clarifications requested by the trade associations. Given the clarifications requested, NewSun believes that a workshop would be useful in talking through the submitted comments and further refining Staff’s proposal.

NewSun does not believe that a 50 MW cap is necessary. First, the framework proposed by Staff is aimed at addressing a key issue facing the utilities (the hours of greatest capacity need) and only compensates solar plus storage QFs for capacity when they generate in those hours of greatest need. The proposal also requires that utilities update the rate annually during the pendency of UM 2000, so the hours of greatest need will be adjusted to appropriately incentivize the QFs to address and contribute to meeting the utilities’ most essential capacity needs. Given the huge lift required to meet Oregon’s clean energy goals and the looming capacity needs, there is no reason to disincentivize QFs from helping to meet those needs during the pendency of UM 2000 with a 50 MW cap.

Second, the Commission will have ample opportunity to suspend, discontinue, or adopt a different solar plus storage compensation framework in the broader, ongoing UM 2000 docket. Staff’s proposal is by its own terms an *interim* measure to be in effect only during the pendency of UM 2000. The remainder of the docket will review the avoided cost methodology, including capacity contribution, valuation, and payment structures. The Commission will therefore have ample opportunity in that broader, comprehensive process to glean learnings from this interim rate and choose to take a different approach if it is not working as imagined. Therefore, NewSun sees no reason to impose a 50 MW cap at this time.

In conclusion, NewSun greatly appreciates Staff’s attention to this important issue and their

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diligence in working towards a practical and streamlined interim solar plus storage compensation framework. It shows that Staff is really listening to industry concerns, understands the importance of the issues, and values the benefits that QFs provide to utilities and to ratepayers. Thank you for your attention to this matter. NewSun looks forward to continued discussions.

Sincerely,

*s/ Marie P. Barlow*

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