



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

November 16, 2020

Dear Chair Decker, Commissioner Tawney and Commissioner Thompson,

Oregon Solar Energy Industries Association (OSEIA) submits these comments regarding the use of the Resource Value of Solar (RVOS) in ADV 1148, Advice No 20-009.

We were alarmed to learn that RVOS had been used for calculating the marginal cost per customer for line extensions for transportation electrification. It was our understanding that the Commission had decided *against* using RVOS for any additional proceedings. As we stated during testimony last February, OSEIA has real concerns with RVOS methodology being used for other resources and other proceedings.

In this particular proceeding, it is very concerning that there was not a thorough stakeholder process regarding how RVOS would apply for electric vehicles, charging stations, and line extensions. As was noted during OSEIA's February testimony, the current RVOS methodology does not include things like environmental benefits or carbon reduction. Electric vehicles have high environmental benefits and there is great potential for future grid benefits for load balancing; neither of these things are reflected in the current RVOS methodology. Transportation electrification experts should have had the chance to thoroughly discuss how RVOS may or may not be appropriate for this use.

While OSEIA has strong concerns with the use of RVOS in this proceeding, we acknowledge that timely transportation electrification is beneficial to Oregonians and do not wish to delay immediate progress that can be made. While we are not asking the Commission to deny approval of PacifiCorp's request in this singular instance, we are asking the Commission and staff to refrain from using it in other proceedings until a more thorough stakeholder process is held to determine if RVOS is appropriate.

OSEIA is grateful to PUC staff for recognizing in their staff memo that a stakeholder process is needed and for their commitment to work with stakeholders to establish the marginal cost of service when the rule is next updated. We also appreciate the written confirmation in the staff report that the use of RVOS in this case is *not* precedential.

Sincerely,

A handwritten signature in black ink that reads "Angela Crowley-Koch". The signature is written in a cursive, flowing style.

Angela Crowley-Koch
Executive Director