

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1505

In the Matter of:)	
)	
PUBLIC UTILITY COMMISSION OF)	COMMENTS OF ENERGY TRUST
OREGON)	OF OREGON
Solar Photovoltaic Program Draft Report)	
Comments and Recommendations)	

Energy Trust of Oregon offers the following comments on the draft of the Commission’s first report to the legislature. All of our comments relate to the **Incentive Rates and Estimated Rate Impact** section of the report.

1. While the Energy Trust incentive is a lump sum upfront payment, the state tax credit is neither issued upfront nor as a payment. To clarify this, we recommend adding the underlined text to the following statement in the report: “By comparison, the existing incentive programs under ETO and state tax credits provide a lump sum upfront payment and 4-5 years of tax credits to the residential or business customer who has installed the system.” Throughout this section, the existing incentive programs may be better characterized as “shorter-term financial incentives” rather than “lump sum upfront payments”. This section does a good job describing the customer’s risks of the two different incentive options.
2. Where the BETC (Business Energy Tax Credit) is referenced, the RETC (Residential Energy Tax Credit) should also be mentioned, since the report covers both residential and commercial sectors.
3. In describing the bidding process for large size projects, the report should quantify the number of bids received rather than stating that a “significant level of participation” was

achieved. Also, we are unclear whether the bid prices shown are *average* bid prices as stated in the text or the *winning* bid prices as implied in the table. In order for the bidding process to succeed in driving down the cost of solar energy systems, the *winning* bid rates should be made public.

4. In the last sentence of this section, we recommend eliminating the term “cost-effective” from the description of the solar pilot program. Cost-effectiveness is a defined term in Oregon law (e.g., ORS 469.010, 469.631, OAR 860-030-0010, Oregon PUC Order 94-590, UM 551) and is not relevant to the pilot.



Kacia Brockman


November 23, 2010

Date

CERTIFICATE OF SERVICE

I, Kacia Brockman, hereby certify that on this day I served a copy of the Comments of Energy Trust of Oregon upon all persons indicated on the attached service list via electronic mail, and also by first-class mail to those who have not waived paper service.

Dated this 23rd day of November, 2010, at Portland, Oregon.

By: 

Kacia Brockman, Sr. Solar Program Manager
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