

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1505

In the Matter of)	
)	COMMENTS OF
PUBLIC UTILITY COMMISSION)	SOLAR ENERGY SOLUTIONS,
OF OREGON)	INC.
)	
Solar Photovoltaic Program)	

Solar Energy Solutions, Inc. appreciates the opportunity to contribute comments and recommendations on the Solar Photovoltaic Pilot Programs. These comments regard allocation, data collection and the ‘first come first serve’ policy.

ORDER 10-198: On the matter of allocation, way back when this whole thing started, the pilot program was intended to primarily serve residential solar installations. The residential solar industry has repeatedly compromised on this issue and made more room for other segments of the solar market place. This has been done in the spirit of truly developing a sense of what effect the pilot program would have on more than one segment of the industry. However, to take any greater proportion away from solar residential installations would be completely contrary to and move us further away from legislative intent. We believe this intent primarily to be getting as many ratepayers as possible involved in a healthy program to test its success. We believe it is also to test the industry for installation prowess and technological dexterity.

There is enormous demand for allocation in the <10 kW category. Lots of people are discouraged from applying for this program, as opposed to the tax credit/ETO incentive program, because there is a perception that it's nearly impossible to get allocation. Worse still, even

though we have been active participants and strong advocates for the pilot program, Solar Energy Solutions has been more than hesitant to actively sell the program to prospects due to the uncertainty of getting into the program. It is a huge risk for a company whose livelihood is based upon the sales it makes to gamble on such uncertainty. Sadly we are not alone in this and many other solar firms are actually selling against the pilot program because of this uncertainty.

As a result, the comparison of the two programs is skewed, because the tax credit/ETO system is a sure thing, unlike the Pilot Program.

OAR 860-084-0230: On the matter of data collection we need the utilities to spend more time and effort on this in a number of ways. We can only imagine what the demand for a good FIT would be in Oregon at this point as no data has been collected on this subject. All we know is that it sells out in 10 minutes.

We need the utilities to figure out a way to count how many folks and businesses are desirous of the pilot program during all enrollment periods. Without this key information, too many important questions remain unanswered.

We would also like the utilities to be more aggressive in collecting and sharing other important data. For example, data / chart showing interest level by county, data / chart showing distribution of allocations, data / chart showing sizes of systems, data / charts showing time of application reception, etc. With the current system, it is impossible to make policy decisions that are based on objective data. By not collecting this data we are missing a marvelous opportunity... to know.

We also strongly support keeping the enrollment period open for a full 24 hours. This would accomplish a couple of things. It would help with the public perception that the process is unfair or worse still. It would also allow a greater amount of folks the opportunity sign up. Lastly, it would better help us to understand the enthusiasm behind this program.

OAR 860-084-0195: Finally, we would like to touch upon the ‘first come first serve’ basis of the allocations for the 0 to 10kW systems. This is an issue I have discussed with others in the industry as much as anything trying to figure out whether we should advocate for a change or keeping things the same. At the end of the day, we agree that the first come first serve allocations is not a good way to distribute the allocations for two reasons. The first reason is because of public perception that the process is rigged or unfair. Whether this perception is right or wrong is immaterial. It is predominant. Public support is of monumental importance.

Secondly, the solar industry is comprised of a wide variety of businesses. It consists of huge interstate and statewide companies right down to homegrown mom and pop local solar companies. Right now we feel the existing policy unfairly favors larger, better equipped and better staffed solar companies over the smaller companies. We think in order for a healthy solar industry to exist, one able to serve the Oregon population over the long haul, all kinds of solar companies need to have a better shot at the pilot program. Unfortunately, we are unsure as to what the answer is to this issue. Perhaps some kind of project or kilowatt cap per company, perhaps some kind of lottery system. We look forward to being part of this conversation.

Below is a list of supporters of these comments:

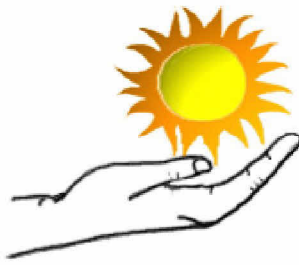
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Respectfully submitted,
DATED this 28 day of February 2011.
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SOLAR ENERGY SOLUTIONS

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CERTIFICATE OF SERVICE

I certify that I have caused to be served the foregoing COMMENTS OF SOLAR ENERGY SOLUTIONS, INC., PUC Docket No. UM 1505, by electronic mail to the persons listed on the attached Service List on February 28, 2011, and by US mail to the parties listed below who have not waived paper service.

Dated this 28 day of February, 2011.

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