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December 5, 2012

*Via Electronic and U.S. Mail*

Public Utility Commission  
Attn: Filing Center  
550 Capitol St. NE #215  
P.O. Box 2148  
Salem OR 97308-2148

Re: In the Matter of PUBLIC UTILITY COMMISSION OF OREGON Solar  
Photovoltaic Program 2013 Draft Report  
**Docket No. UM 1505**

Dear Filing Center:

Enclosed please find the original and five (5) copies of the Comments on behalf of the Industrial Customers of Northwest Utilities in the above-referenced docket.

Thank you for your attention to this matter.

Sincerely yours,

/s/ Sarah A. Kohler  
Sarah A. Kohler  
Paralegal

Enclosures  
cc: Service List

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Comments on behalf of the Industrial Customers of Northwest Utilities upon the parties, on the service list, by causing the same to be deposited in the U.S. Mail, postage-prepaid, and via electronic mail where paper service has been waived.

Dated at Portland, Oregon, this 5th day of December, 2012.

/s/ Sarah A. Kohler  
Sarah A. Kohler

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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1505**

In the Matter of	)	
	)	
PUBLIC UTILITY COMMISSION OF	)	COMMENTS OF INDUSTRIAL
OREGON	)	CUSTOMERS OF NORTHWEST UTILITIES
	)	
Solar Photovoltaic Program Draft Report	)	
Comments and Recommendations.	)	
_____	)	

**I. INTRODUCTION**

The Industrial Customers of Northwest Utilities (“ICNU”) submits these comments to the Public Utility Commission of Oregon (“OPUC” or the “Commission”) regarding Commission Staff’s (“Staff”) Solar Photovoltaic Program Draft Report in Docket No. UM 1505 (“Draft Report”), released on November 21, 2012. The solar photovoltaic pilot program (“Pilot Program”) was established pursuant to House Bill (“HB”) 3039, and modified in 2010 by HB 3690. Under to ORS § 757.365(13), the Commission is required to submit a report to the legislature regarding the costs and effectiveness of the pilot program every two years. The Commission must file its next report no later than January 1, 2013.

**II. COMMENTS**

ICNU recommends that Staff revise the Draft Report to include a more substantive discussion of the retail rate impacts of the program. Pursuant to ORS § 757.365(13), the Draft Report must “evaluate the estimated cost of the program to retail electricity consumers.” As written, the Draft Report devotes less than a page to discussion of “Program

Costs and Estimated Rate Impacts.” Draft Report at 14–15. For more detailed information, Staff references the utilities’ Rate Impact Reports contained in Attachment A. Id.

ICNU is concerned that this may be insufficient to satisfy the statutory reporting requirement in to Oregon Revised Statute section 757.365(13). Without taking a position on the technical sufficiency of the data contained in Attachment A, ICNU recommends that Staff summarize the relevant information into an analysis for the body of the report. At a minimum, ICNU requests that Staff should provide a breakdown of the table presented on page 15 of the Draft Report and present the estimated costs to retail consumers in a fashion that will be more readily useful to the legislature. The Report should also detail how the Pilot Program expenses are allocated between the costs of incentive payments and administrative costs. Id. at 14. This would allow the legislature to better understand how incentive dollars are spent under the program. ICNU believes that it would also be appropriate to identify, by rate schedule, where both the costs and the benefits of the program fall, in order to provide transparency for all interested parties and the legislature.

While these discussions need not be extensive, further evaluation by Staff will strengthen the interpretive value of the Draft Report for the Legislature.

### **III. CONCLUSION**

ICNU appreciates the opportunity to submit these comments and recommends that additional analysis be provided to ensure that the report conforms with the intent of the legislature and provides more helpful and comprehensive information.

Dated this 5th day of December, 2012.

Respectfully submitted,

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