



## Sunthurst Energy, LLC

August 17, 2016

Oregon Public Utility Commission  
Public Utility Commission of Oregon  
201 High St SE, Suite 100  
Salem, Oregon 97301

RE: PUC Solar Report Comments  
Docket No. UM 1758

We wish to comment on the aforementioned draft report and due to an extremely brief comment period allowed, hope some or all of this letter may be inclusive in the final report. Sunthurst Energy, LLC is EPC and small development company concentrated on the commercial and DG solar. We operate statewide in Oregon and California. My origin is from Umatilla County and spent 35 of my 44 years as an Oregonian. For several tangible reasons, we find the disposition and conclusions of the draft report irreprehensible in any reference to reducing current levels of rebates, tax credits, or taxation policy in the near future. Here's why.

First and foremost, the greatest loss to weakened policies are Oregon homeowner's, business owners, public entities that are or will consider solar self-generation. They derive the greatest return in long-term energy savings with allows them to stay in their homes, keep businesses open or reinvesting in new projects and spending that positively and directly impacts our economy statewide. Generally, we find by comparison across all sectors, Oregon a much softer marked than CA, and if not for geographic diversification could not maintain operation should we solely rely on the few jobs in Oregon we do serve each year. Of those Oregon client (about 10), not 1 would have implemented solar if not for every combination of incentives available. Whether, due to liquidity, generally, or other factors, if one variable changed, these owner would pass on solar.

Second, PUC and utilities frankly fail to fully value the cost benefit of dispersed solar generation to the grid. There are two type of approaches to the valuation proposition. All too often, groups like your concentrate at cost per kwh vs. other sources, or utility rate impacts. This more complete assessment accounts for other tangible benefits by solar such as- extended life and expansion of transmission infrastructure, extended life and expansion of base load generators, or peak demand shaving and grid balancing (basically, solar generation best matches demand load profiles). When Nevada Energy squashed solar, much like this PUC appears to desire, reputable E3 Consulting, Inc. produced a comprehensive report that described these benefits. The CPUC has made IOU utilities impute respective pricing of these factors in many of their latest RFP, because they are valid.

Third, this report runs counter to overwhelming local, state, national, and global support for more renewable energy as important part to mitigating global warming impacts. This past month, July, was cemented as the hottest month in the US in the 150-plus years statistics were kept. In past 5 year's this country has seen unusually high number of catastrophic weather events. The Western States, similarly, have had huge fires each season causing tens of millions in lost timber, property damage, and firefighting resources. A carbon cap and SREC programs, and recent 50% RPS policies give from recognition to these overarching global impacts. If the PUC report was kept as is, however, it would effectively wipe out a decade of slow growth solar has made and fly in the face of the public policies, from the White House Global Initiative, to the pro-renewable laws just passed by Oregon state-government spurred by the will of the voters and industry stake holders.



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Last, but not complete, we know firsthand property tax remains a major importance. Outside the exclusions that are key to residential and net metering system owner. Our company has a 2mW DG project we've advocated for over 18months. When the OR Senate altered HB3496's language that County 'shall' adopt the In Lieu Property Tax rate stated to 'may' adopt, our project remains unable to retain financing as a result. To date, three counties have agreed to this and because of completion in the financial market, those counties who refuse this rate structure will have the unintended consequence of pushing facilities to those concentrated counties. State Legislature, PUC, and Oregon Dept of Revenue need to correct ORS 301.175 language back to 'shall' so all stakeholders have level playing field and project benefits, like grid and economic spending can be shared throughout all of Oregon.

Please scrap the anti-solar sentiment and conclusions in the draft report to maintain sustainable a viable solar industry. System owners, employers, and all of Oregon whether directly or indirectly benefit from keeping this market strong well into the future.

Respectfully,

A handwritten signature in blue ink, appearing to read 'D Hale', is written over a light blue rectangular background.

Daniel Hale, Owner