

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1758

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| In the Matter of |) | |
| |) | COMMENTS ON REVISED DRAFT |
| PUBLIC UTILITY COMMISSION OF |) | REPORT BY TASC |
| OREGON |) | |
| |) | |
| Report to the Legislature on Incentives for |) | |
| Development and use of Photovoltaic |) | |
| Energy Systems |) | |
| _____ |) | |

On behalf of The Alliance for Solar Choice (TASC), we thank the Commission for the opportunity to inform this process, and we have the following comments and suggestions regarding the revised draft report.

(1) General

The revised draft is improved upon in discussing the landscape of Oregon’s solar market and former and existing incentive programs. However, the revised draft does not adequately recognize that the lion share of Oregon’s existing, and projected use of renewable energy comes from utility scale projects driven by the RPS policy. As raised in our prior comments, behind the meter solar projects have not increased significantly on average over the past five years. PacifiCorp’s net metered projects were less in 2015 than they were in 2011 (599 to 609 respectively). While PGE’s net metered projects increased from 780 to 1885 over those five years, as the revised draft acknowledges, that amount is still barely over 1 percent of PGE’s load. If the RETC tax credit sunsets for residential projects, this amount may plummet back to 2011 levels or below for PGE service territory. We continue to recommend that the final report acknowledge these significant limitations and put Oregon’s solar net metering program into context with national leaders. Such an analysis would show that Oregon’s solar net metering program is not in need of major programmatic changes.

(2) Net Energy Metering Proposed Changes

The revised draft report again acknowledges that there is crucial information regarding Oregon’s solar energy sector that is not yet available for consideration in assessing the Net Energy Metering (NEM) program. Specifically, the value of solar methodology has not yet been established under its separate docket, UM 1716, and the ongoing availability of the

renewable energy tax credit (RETC) program is uncertain given its upcoming sunset date and ongoing deliberations by the legislative committee assessing the future of the Oregon Department of Energy and its programs. Given these uncertainties, we continue to recommend that the final report not rush to judgment on whether to eliminate the NEM program in favor of a value of solar methodology. Instead, the final report should note that once the value of solar docket is completed, and it is known whether the RETC program or some successor state incentive program remains available, the PUC will be in a better position to assess whether changes to the NEM program are warranted. There may be no need to consider major changes to the NEM program. In fact, such a change could further adversely impact solar behind the meter project development in Oregon.

Given the gaps in information and ongoing timeline, TASC believes that it is premature to make recommendations on the future of the NEM program. Instead, TASC respectfully urges the PUC to postpone making any recommendations on the future of NEM until those information gaps are filled.

For the reasons stated above, TASC supports retaining the simple and well understood existing NEM program and methodology for the time being, consistent with the vast majority of state NEM programs rather than shifting to a radical new methodology that has no existing precedent and that may create significant new barriers. At the least, TASC asserts that any recommendations to alter the existing NEM program should await conclusion of the Value of Solar docket, UM 1716.

We appreciate the Commission's consideration of our comments and look forward to participating in future discussions.

Dated this 30th day of September, 2016.

Respectfully submitted,

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