

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1505

In the Matter of)
)
PUBLIC UTILITY COMMISSION OF)
OREGON Solar Photovoltaic Program)
Draft Report Comments and)
Recommendations.)

COMMENTS ON STAFF'S FINAL DRAFT
OF THE
CITIZENS' UTILITY BOARD OF OREGON

December 14, 2010



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OF OREGON
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)	COMMENTS ON STAFF’S FINAL
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OREGON Solar Photovoltaic Program)	UTILITY BOARD OF OREGON
Draft Report Comments and)	
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CUB appreciates the opportunity to submit reply comments on the Final Draft Report created by the PUC Staff to submit to the State Legislature. CUB declined to file comments in the opening round of this docket because Staff’s First Draft Report was satisfactory as-is, in CUB’s opinion. Furthermore, CUB had no firm disagreements with or further comments regarding any of the issues raised by other parties in the opening round of comments.

CUB is now compelled to address a statement made by ICNU in its Comments On Staff’s Final Draft. ICNU claims that “Staff’s initial position is that industrial customers should pay greater than an equal percentage” of pilot program costs.¹ This statement is based on speculation, as the program’s cost amortization schedule has not yet been set. ORS 757.365(10) provides that “all prudently incurred costs” associated with the pilot programs are recoverable in rates by the utilities, but makes no reference as to how the costs will be allocated between rate classes. CUB simply wishes to note to the Commission that this statement is unsubstantiated.

Respectfully Submitted,
December 14, 2010



Gordon Feighner
Utility Analyst
Citizens’ Utility Board of Oregon

¹ ICNU, Comments on Second Draft Report, Dec 13, 2010, page 3.

UM 1505 – CERTIFICATE OF SERVICE

I hereby certify that, on this 14th day of December, 2010, I served the foregoing **REPLY COMMENTS OF THE CITIZENS' UTILITY BOARD OF OREGON** in docket UM 1505 upon each party listed in the UM 1505 OPUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending one original and one copy by U.S. mail, postage prepaid, to the Commission's Salem offices.

(W denotes waiver of paper service)

(C denotes service of Confidential material authorized)

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