

**PUBLIC UTILITY COMMISSION OF OREGON  
STAFF REPORT  
PUBLIC MEETING DATE: October 6, 2015**

REGULAR \_\_\_\_\_ CONSENT X EFFECTIVE DATE \_\_\_\_\_ N/A \_\_\_\_\_

DATE: September 30, 2015

TO: Public Utility Commission

FROM: Cindy Dolezel *CSD*

THROUGH: *J* Jason Eisdorfer and Aster Adams *J for AA*

**SUBJECT: OREGON PUBLIC UTILITY COMMISSION STAFF:**

Status update on the discussions of the Portfolio Options Committee held on September 15, 2015, about the educational and marketing materials to be provided to customers about Portland General Electric's Renewable Solar Option, Advice No. 15-10, docketed as ADV 23.

**STAFF RECOMMENDATION:**

Staff recommends the Commission acknowledge this status report outlining the Portfolio Options Committee's (POC) review and suggestions for improvements to Portland General Electric (PGE)'s marketing and educational materials for the Renewable Solar Option, under Advice No. 15-10, docketed as ADV 23. Staff recommends that PGE provide a final version of the marketing materials to the POC at the regularly scheduled POC meeting on December 1, 2015.

**DISCUSSION:**

**Issue and Commission Requirements:**

On July 29, 2015, through Order No. 15-225, the Commission directed PGE to present its marketing and educational materials for its new Renewable Solar Option (Solar Option) to the POC at its meeting scheduled for September 15, 2015. The Commission further directed Staff to report on the discussions of the POC about PGE's presentation after the September 15<sup>th</sup> meeting. These directives arose in part because of concerns by Staff, the Oregon Department of Energy, and Renewable Northwest about how PGE was using the terms and concepts of "community solar," "bundled" renewable energy credits (RECs), "energy," and "power" to describe its proposed Solar Option to its customers. PGE intends to begin the Solar Option marketing campaign to its customers on October 1, 2015, and was made aware by Staff that this memo would not go to the

Commission until October 6, 2015. Staff has requested copies of the final marketing materials upon completion.

**POC Comments to PGE:**

As directed by the Commission, on September 15, 2015, PGE presented its draft marketing and educational materials to POC members for review and discussion. As confidentiality was a concern for PGE, the materials were distributed at the meeting and were collected by PGE at the end of the meeting. The POC reviewed and accepted the materials with five comments and suggested changes in marketing concepts and language. PGE received both review and input on the marketing materials, and agreed to make the recommended changes for clarity before final distribution to customers. The POC's suggested changes are as follows:

1. One section of PGE's marketing materials had proposed language that compared the cost of enrolling in the Solar Option to ownership of a rooftop solar system. The POC was not comfortable drawing parallels between owning a project and enrolling in the program and asked for this language to be altered. The POC discussion centered on this comparison not being an equitable comparison because with the Solar Option there was no representation of the economic benefit that was received by customers who own their own solar photovoltaic array and then enroll in net-metering.
2. The POC discussed how customers that already have solar on their homes are mostly net-metering customers, those enrolled in the volumetric incentive rates, and those who receive an Energy Trust of Oregon (ETO) incentive. Most of these customers do not receive renewable energy certifications (RECs) for at least a portion of their system's life as they go to third parties or the ETO. The POC suggested that additional marketing could be directed to these customers that want to cover this gap by using the Solar Option.
3. In the draft materials provided by PGE, there was language indicating that renewables were more expensive than conventional energy sources. POC members stated that this should be altered and that there should be special attention paid to any blanket language that discusses the expense of renewables versus conventional energy sources
4. POC members indicated that language in the brochure should reflect the price and size of the share relevant to the Solar Option. As presented, the language indicated the price relevant to kilowatt hours, however, program enrollment occurs in kilowatt blocks (\$5 per kW) rather than kilowatt hours.

5. Some POC members stated that PGE should not market the program as “community solar”. These members stated that PGE’s Solar Program is likely to be different than the community solar program to be designed by the legislature during the 2016 session, which is being explored through docket UM1746. In its draft materials presented to the POC, PGE had removed all references to the program being ‘community solar’ and the use of the term community. There were references to “local” since the project is in PGE’s service territory.

PGE emphasized in its draft marketing materials that this is the first Oregon project in its service territory contributing RECs to its customers and the Company took great pride in it.

Staff also acknowledges that most POC members find this option to be a positive step forward and supports the POC’s expressed desires to develop local (in Oregon) renewable energy projects.

## **CONCLUSION**

Staff recommends the Commission acknowledge this status report outlining the POC’s review and suggestions for improvements to PGE’s marketing and educational materials for the Solar Option, under Advice No. 15-10, docketed as ADV 23. Staff recommends that PGE provide a final version of the marketing materials to the POC at the regularly scheduled meeting on December 1, 2015.

## **PROPOSED COMMISSION MOTION:**

Staff’s status update on the discussions of the Portfolio Options Committee held on September 15, 2015, about the educational and marketing materials to be provided to customers about Portland General Electric’s Renewable Solar Option, Advice No. 15-10, docketed as ADV 23 is acknowledged.