



March 4, 2018

Oregon Public Utility Commission
Attn: Caroline Moore
201 High Street SE, St. 100
Salem, OR 97301

RE: UM 1930 Stakeholder Feedback

To the Oregon Public Utility Commission staff and Commissioners:

The Environmental Center appreciates the opportunity to comment on the implementation of the Community Solar Program. We have deep roots in the Central Oregon community and are engaging in this process because bringing community solar to our community is essential to achieving our mission: to embed sustainability into daily life in Central Oregon.

Thirty years ago, we started with a handful of people and a building in the center of Bend. Since 1988, we've brought people, businesses, and government together to nurture lasting change. In 2013, our community lacked a grassroots campaign focused on energy use--so The Environmental Center set out to create one. Our Energy Challenge of Central Oregon program is leading our community to a low-carbon, clean energy future through efficiency, conservation, and renewables by bridging the gap between awareness, resources, and action.

We are concerned with the initial RVOS findings that range from \$0.01/kWh to \$0.04/kWh. **As is, the initial RVOS values will not support a robust community solar program. The initial RVOS value is not adequately rigorous, excluding key elements such environmental externalities, and calculates only today's value of solar with no regard for impending RPS requirement deadlines that could pass during a 20-year PPA.** Despite the RVOS docket decision to exclude the value of social and environmental benefits, future climate reduction goals could significantly impact the elements that are included in, and ultimately, the rate that is calculated for the RVOS.

In line with our mission, community solar presents a unique opportunity to provide renewable energy to a much larger portion of our state's population than is possible with today's limited premium product options. **In order for community solar to become a robust program accessible to all Oregonians, and not just another premium product, a bill credit rate that offers an equitable opportunity for customers who have not been able to participate in net-metering is necessary. All the other states that have effectively launched community solar programs have used bill-credit rates indexed to retail. Oregon should do the same.**

Lastly, in order to meet the program launch goal of Q4 2018, the alternative bill credit rate must be established by spring 2018. This is the only timeline that will allow a project to be completed by the end of 2019 which is critical because of step-down of the federal ITC that will begin for projects completed after this date. As was noted in the staff report, it is still unclear whether the step-down to a 26% ITC will impact a to the point of making it financially infeasible,



however each time the profit is lowered for project developers, we risk diminishing the financial incentive for our local project participants.

We thank the Public Utility Commission staff and Commissioners for your thoughtful engagement of stakeholder groups in the Community Solar Program implementation process. We look forward to engaging further in this process to develop a community solar program that gets to the heart of the goal of SB 1547: an inclusive and equitable program that transitions Oregon away from energy generated by coal and moves us toward a renewable energy future.

Respectfully,



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