



Oregon Citizens' Utility Board

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7/1/2022

Public Utility Commission
Attn: Filing Center
P.O. Box 1088
Salem, OR 97308-1088

RE: UM 1930 – Community Solar Programs – CUB’s Comments on Staff’s Draft Recommendation on the use of an agent subscription model

Oregon Citizens’ Utility Board (CUB) appreciates the opportunity to comment on Staff’s draft recommendation on the use of an agent subscription model for the Community Solar Program. CUB represents the interest of Oregon’s residential utility customers before the Oregon Public Utilities Commission.

CUB supports Staff’s draft recommendation. Based on CUB’s participation in public workshops on this issue and review of Staff’s recommendation, CUB recommends that the Commission not allow the use of an agent subscription in the Community Solar Program. Staff provided four reasons to not use an agent subscription model for the Community Solar Program.

- I. The Agent Subscription Model does not provide significant additional benefits to participants.
- II. The Agent Subscription Model creates risk for participants and the program.
- III. The Agent Subscription Model creates specific, additional barriers for low-income participation.
- IV. The Agent Subscription Model would require additional ratepayer funds to implement.

CUB would like to highlight three concerns with the agent subscription model.

CUB’s first concern about this program is its impact on residential customer participants, especially low-income participants. In order to participate in the Community Solar Program, customers are required to enroll in the auto-pay program. If Pacific Power, Idaho Power, or Portland General Electric were seeking to require residential customers to enroll in autopay as a condition of electricity service, CUB would oppose such a filing, because it forces customers to pay their full bills on time every month. Residential customers do not always have the funds to timely pay their utility bill and may have to decide around which bill to pay each month. Residential customers would also lose the ability to make partial payment on their utility bill. CUB is also concerned that bill agents may unenroll participants from equal pay programs. CUB

is supportive of equal pay program because it enables customers to experience smoother bills throughout the year and to budget for an essential service.

The second concern is that subscribing customers may experience reduced ability to receive utility communications. Under the agent subscription model, a third party oversees communication between the utility and the customer, which adds an additional layer of complication on utility to customer communication. It is important that the electric utility is able to communicate with customers. CUB is concerned about delivery of important program communications such as low-income discount programs, additional demand response programs such as peak time rebates, arrearage management programs, public power safety shutoff notices and medical certificate programs. While Arcadia has stated that it passes all messages to the subscribing customer, CUB is concerned about complicating customer and utility communication pathways.

The third concern is that this program will require additional ratepayer funds to operate. Staff's recommendation noted at least \$200,000 in additional ratepayer's funds would be needed to enable harmony between Arcadia's and Common Energy's payment procedures and utility systems. Staff's recommendation also notes that additional administrative fee revenue may be required to continue with this model. The Community Solar Program already has a consolidated bill program which can track credits and surcharges due to the Community Solar Program. CUB does not see a ratepayer benefit to have a third-party agent subscription model, and does not recommend spending additional funds to pursue the agent subscription model for the community solar program.

CUB supports Staff's recommendation, and recommends that the Commission not allow the use of an agent subscription in the Community Solar Program.

Respectfully submitted,

/s/ William Gehrke

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