



July 30th, 2021

Oregon Public Utility Commission  
201 High Street SE, Suite 100  
Salem, OR 97301-3398

Dear Chair Decker, Commissioner Tawney, and Commissioner Thompson,

We want to express our gratitude and appreciation for all the work the PUC staff has done to get the program to where it is today.

1. We strongly advocated for the release of the remaining 79MW capacity, along with an increased focus on enabling greater residential participation, so we are happy to see both of those goals included in the staff proposal for tier 2.
2. We applaud the efforts to require a minimum of 50% residential capacity subscription. We feel this will help address the fact that the majority of subscribed capacity currently belongs to commercial subscribers, and not low-income individuals.
3. We support the recommendation to increase the low-income subscription discount to 40 percent, as this would help encourage low-income participation and make their subscription/participation more meaningful and beneficial.
4. We support setting the Tier 2 first-year bill credit rate at: (i) the Tier 1 rate for residential participants, and (ii) 90 percent of the Tier 1 rate for non-residential participants.
5. We support the addition of a 2% escalator to the bill credit rate for all projects, as this will help ensure that all projects, but especially small carveout projects, pencil out financially.
6. We support the retention of the 25 percent capacity carveout for community-driven projects, along with moving the remaining capacity from tier 1 into tier 2. Community-driven projects are crucial to the program's impact, and it's important that there is guaranteed capacity for these projects.

Thank you again for all the work you've put into implementing and improving the program - we are greatly appreciative.

Best,

Raphaela Hsu-Flanders  
Tomas Endicott  
Evan Ramsey

bonneville environmental foundation

1500 southwest 1st ave., ste 885    503.248.1905  
portland, oregon 97201    www.b-e-f.org



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1500 SW 1<sup>st</sup> Ave #885  
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