



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

July 1, 2022

Re: UM 1930, Agent subscription models

Commissioners Decker, Tawney and Thompson:

Oregon Solar + Storage Industries Association (OSSIA) appreciates the work of PUC and PA staff to explore agent subscription models in the Oregon Community Solar Program (CSP) to ensure maximum benefits to program participants. However, OSSIA is concerned that the draft recommendations are not flexible enough to recognize the benefits that agent subscription models can bring to customers. OSSIA recommends that agency subscription models be allowed in Oregon's CSP and that staff's recommendation take a more nuanced approach in order to recognize the benefits different models can bring.

OSSIA finds the definition of "agent subscription model" in the draft recommendation confusing. After talking with staff, we understand the definition to mean a model that contains all three elements: administering a customer's utility account, subscribing the customer to a project, and using a third party consolidating bill, paid to the agent instead of the utility. However, the language in the draft recommendation is not clear, it appears that all types of subscription model are recommended to be banned. Because subscription models can vary and subscription managers can also make changes in how they operate, OSSIA suggests that staff rework their recommendations to allow agent subscription models, but set clear parameters for what is allowed and/or required under any agent subscription model.

Agency subscription agreements (separate from third party consolidated billing) are a critical component of how PMs will be able to meet the new 50% residential subscriber requirement for Tier 2 projects. Agency agreements can provide a simpler and more streamlined process for subscribers by allowing the subscription manager (SM) to adjust ratepayer subscription size to avoid penalties and to move customers to different projects that might be better suited to their subscription needs. Without that capability, subscribers will have to sign new contracts: a confusing process that will most likely result in dropped subscriptions.

Lastly, the recommendations mention concerns about the impact of agency subscription models but do not mention any potential benefits. Some agency subscription models may be a net benefit for low-income subscribers. Every agency subscription model currently contemplated for use in Oregon is different and should be evaluated as such.



OSSIA strongly recommends that agency subscription models be allowed in Oregon's CSP. The Commission can put parameters around the subscription models to ensure low-income customers are fully protected and that the full benefits of the program are achieved by all customers.

Thank you for your attention to these comments.

Sincerely,

A handwritten signature in black ink that reads "Angela Crowley-Koch". The signature is fluid and cursive, with the first name "Angela" being the most prominent.

Angela Crowley-Koch