December 8, 2021

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, OR 97301-3398

RE: UM 1930—Request for Public Comments on Proposed Modifications to CSP Program Implementation Manual

PacifiCorp submits these comments in response to Public Utility Commission of Oregon Staff's (Staff's) *Request for Public Comments on Proposed Modifications to CSP Program Implementation Manual* (PIM), published in the Community Solar Program (CSP) docket, UM 1930, on November 23, 2021.

PacifiCorp has concerns about Staff's proposed revisions to the PIM, which include a proposal to roll unallocated Interim Offering capacity and capacity freed up as a result of project termination into the Second Offering capacity. The specific language at issue occurs on page 3 of the PIM:

> Any capacity remaining in the Interim Offering is rolled over to the Second Offering upon release of that additional Program capacity. If a Project that is Pre-certified under the Interim Offering withdraws or is cancelled from the Program, the re-released capacity will be rolled into the Second Offering as well. A Project that is Pre-certified under the Interim Offering and withdraws or is cancelled will not be eligible for Pre-certification under the Second Offering. A future Project that is located at the same site as that withdrawn or canceled Project and that shares a Project Manager, interconnection application, or permit with the original Project also will not be eligible for Pre-certification under the Second Offering.

PacifiCorp's concern is that developers with multiple queue positions in the CSP interconnection queue could benefit by withdrawing, or allowing to be canceled, one or all of their projects in the Interim Offering in favor of later-queued projects that would be pre-certified at Second Offering rates. This potential expansion of the program capacity compensated at Second Offering rates underscores PacifiCorp's longstanding concerns about shifting CSP costs onto nonparticipating customers.

Staff has proposed language that would prohibit a *project* from eligibility for Second Offering rates if it has been withdrawn or cancelled; PacifiCorp requests that the Commission consider adopting a restriction on a *project manager* whose project has been withdrawn or cancelled from later eligibility for Second Offering rates for that program capacity. To that end, PacifiCorp proposes the inclusion of additional language in the PIM as follows [PacifiCorp's proposed language in **bold**]:

If a Project that is Pre-certified under the Interim Offering withdraws or is cancelled from the Program, the re-released capacity will be rolled into the Second Offering as well. A Project that is Pre-certified under the Interim Offering and withdraws or is cancelled will not be eligible for Pre-certification under the Second Offering. A future Project that is located at the same site as that withdrawn or canceled Project and that shares a Project Manager, interconnection application, or permit with the original Project also will not be eligible for Pre-certification under the Second Offering. **A Project Manager affiliated with a withdrawn or cancelled project that requests Pre-certification of one or more additional Projects is not eligible to receive Pre-certification under the Second Offering and will be Pre-certified under the Interim Offering until such time as its subsequently Pre-Certified Projects have met or exceeded the withdrawn or cancelled Project capacity. The entire Project that exceeds the capacity of the withdrawn or cancelled Project for a Project Manager will receive the Interim Offering.**

PacifiCorp believes that the inclusion of a restriction of this nature would meaningfully reduce the risk of further cost-shifting to non-participating customers. PacifiCorp appreciates Staff's attention to this issue.

Please direct any informal correspondence and questions regarding this filing to Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934.

Sincerely,

Shelley McCoy
Director, Regulation