



Portland General Electric Company

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Via Electronic Filing

Public Utility Commission of Oregon
P.O. Box 1088
Salem, OR 97308-1088

Re: Staff's Draft Modifications to CSP PIM, UM 1930

Portland General Electric Company (PGE) appreciates Staff's work in revising the Community Solar Program (CSP) Program Implementation Manual (PIM). Staff's recommendations clarify the program's expectations of Project Managers (PMs) and their agents, and support customer protections. PGE agrees with Staff's modifications that clarify when customers must be notified of contract modifications, and which modifications do not warrant notification. The contracting practices that Staff outlines should support a positive customer experience with the program.

PGE remains concerned that the recommended PIM modifications allow registered PMs to establish waitlists without representing a pre-certified or certified project. There is a risk that these PMs will never contract with a project, and the waitlisted customers will never become program participants. Being on a waitlist will discourage customers from seeking an immediately available subscription opportunity. The program needs to ensure transparent communications and accountability for these waitlists. PGE recommends:

- Customers be informed whether they are on a waitlist for a project that is full but may have availability in the future vs. on a waitlist that is not associated with a project.
- For customers on a waitlist that is not backed by a project, customers be updated every three months, as is the standard for customer contracts signed for projects that are not yet operational.
- Customers on waitlists not backed by projects be released after a reasonable time period (12-18 months).
- PMs with waitlists not backed by a project report to program administration on a quarterly basis and provide copies of customer communications.

PGE appreciates Staff's continued attention to the positive evolution of this program.

Sincerely,

\s\ Robert Macfarlane

Robert Macfarlane
Manager, Pricing & Tariffs