

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

February 24, 2020

Dear Chair Decker, Commissioner Tawney and Commissioner Thompson,

We respectfully submit these comments in regard to the draft Power Purchase Agreement (PPA) contracts for community solar attached to Staff's February 7, 2020 filing in Docket UM 1930. While most of the signed groups are not project managers, we have concerns with the draft PPAs and what they could mean for the entire community solar program.

The draft PPAs include new concepts and requirements that appear to be more burdensome than standard PPAs for qualifying facilities (QFs). Additionally, these new concepts are quite complex and have had only very limited opportunity for vetting by stakeholders, the industry or the Commission; contrast the careful, deliberate, and lengthy process that generally takes place to determine standard QF PPAs.

We feel that this is not the appropriate time – after the program has launched and while projects are under review for pre-certification – to introduce new and possibly contentious elements that have not been discussed with all stakeholders. Further, some elements being introduced appear to be not only unnecessary but also potentially harmful to project participation. Instead, we believe it would be more appropriate to alter the standard QF PPA to accommodate appropriate elements of the community solar program.

The groups signing onto this letter also appreciate the more technical comments submitted by the Renewable Energy Coalition (REC). We call out a few obvious elements of the proposed PPAs that stand out as problematic, but primarily lean on the expertise provided by the lawyers and experienced Oregon QF developers for highlighting all the technical issues that could create project risk and undermine a Project Manager's and/or its investors' confidence toward participating in the community solar program.

Thank you for your consideration.

Respectfully,

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