



**Docket No. UM 1930
Community Solar Program (CSP)**

**Special Public Meeting
Use of Agent Subscription Model**

**September 22, 2022
OPUC Staff**

Staff Presentation

- Agent subscription model definition
- Staff recommendation
- Additional stakeholder feedback

Agent Subscription Model

- Additional agreement that grants limited power of attorney to an agent to do one or more of following:
 - Administer the participant's electric utility account
 - Subscribe the participant to a project
 - Provide the participant with a consolidated bill, paid to the agent instead of the utility
- Commission approval required for use through CSP pre-certification or project modification process
- Decision is necessary in order to facilitate any Program changes required and avoid project delays

Staff Recommendation

Projects using the agent subscription model are not eligible to participate in the Program for the following reasons:

- CSP already provides primary Model benefits through ratepayer investment
- Would create additional risks for participants
- Would create additional risks and complexity for the Program
- Would create specific, additional barriers for low-income participation
- And would result in additional ratepayer costs

Staff Findings On Use of Model in CSP

	Conflicts w/ CSP Decision-Making Principles	Adds Participant Risks/Barriers	Adds Program Risks/Complexities
Model Component	Alternate Consolidated Bill	Impacts consumer protections	Requires use of unregulated bill
	Agent-Administered Utility Account	Impacts consumer protections	Can disrupt utility-participant communications
	Bill Payment Requirements	Undermine equitable opportunity	Add barriers for low-income participants

Stakeholder Feedback

- Staff appreciates comments from the following stakeholders:
 - Common Energy, Arcadia, Oregon Solar + Storage Industries Association (OSSIA), Oregon Shines, Portland General Electric, PacifiCorp, and CUB
- OSSIA, Arcadia, Common Energy, PGE, and CUB submitted comments after Staff's recommendation.
 - OSSIA requested narrowing Staff's recommendation; sought clarity on how recommendation would impact existing projects and on revising CPS contracts
 - Arcadia requested specific Commission order language
 - Common Energy argued Model benefits and disputed Staff's recommendation
 - PGE reiterated its support for Staff's recommendation
 - CUB reiterated its support for Staff's recommendation

Thank You

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