

Advocates for the West
Affiliated Tribes of Northwest Indians
AirWorks, Inc.
Alaska Housing Finance Corporation
Alliance to Save Energy
Alternative Energy Resources Organization
American Rivers
A World Institute for a Sustainable Humanity
BlueGreen Alliance
Bonneville Environmental Foundation
Centerstone
Citizens' Utility Board of Oregon
City of Ashland
City of Seattle Office of Sustainability & Environment
Clackamas County Weatherization
Clean Energy Works Oregon
Climate Solutions
Community Action Center
Community Action Partnership Assoc. of Idaho
Community Action Partnership of Oregon
David Suzuki Foundation
Earth and Spirit Council
Earth Ministry
Ecova
eFormative Options
Emerald People's Utility District
EnergySavvy
Energy Trust of Oregon
Environment Oregon
Environment Washington
HEAT Oregon
Home Performance Guild of Oregon
Home Performance Washington
Housing and Comm. Services Agency of Lane Co.
Human Resources Council, District XI
Idaho Clean Energy Association
Idaho Conservation League
Idaho Rivers United
Interfaith Network for Earth Concerns
League of Women Voters Idaho
League of Women Voters Oregon
League of Women Voters Washington
Montana Audubon
Montana Environmental Information Center
Montana Renewable Energy Association
Montana River Action
National Center for Appropriate Technology
Natural Resources Defense Council
New Buildings Institute
Northern Plains Resource Council
Northwest Energy Efficiency Council
NW Natural
NW SEED
OneEnergy Renewables
One PacificCoast Bank
Opower
Opportunities Industrialization Center of WA
Opportunity Council
Oregon Energy Coordinators Association
Oregon Environmental Council
Oregonians for Renewable Energy Policy
Pacific Energy Innovation Association
Pacific NW Regional Council of Carpenters
Portland Energy Conservation Inc.
Portland General Electric
Puget Sound Advocates for Retired Action
Puget Sound Cooperative Credit Union
Puget Sound Energy
Renewable Northwest Project
Save Our wild Salmon
Sea Breeze Power Corp.
Seattle Audubon Society
Seattle City Light
Seinergy
Shoreline Community College
Sierra Club
Sierra Club, Idaho Chapter
Sierra Club, Montana Chapter
Sierra Club, Washington Chapter
Smart Grid Northwest
Snake River Alliance
Solar Installers of Washington
Solar Oregon
Solar Washington
South Central Community Action Partnership
Southeast Idaho Community Action Partners
Spokane Neighborhood Action Partners
Student Advocates for Valuing the Environment
Sustainable Connections
The Climate Trust
The Energy Project
The Policy Institute
Trout Unlimited
Union Of Concerned Scientists
United Steelworkers of America, District 12
US Green Building Council, Idaho Chapter
Washington Environmental Council
Washington Local Energy Alliance
Washington State Department of Commerce
Washington State University Energy Program
YMCA Earth Service Corps



May 12, 2020

Public Utility Commission of Oregon
Attn: Natascha Smith
201 High St SE, Suite 100
Salem, Oregon 97301

Re: Docket No. ADV-1112, Portland General Electric Company, Advice No. 20-09,
Schedule 136 Oregon Community Solar Program Cost

Dear Ms. Smith:

The NW Energy Coalition (NVEC) appreciates the opportunity to submit this comment concerning the above referenced Advice filing by Portland General Electric Company (PGE), as initially submitted on April 23, 2020, and amended on May 4, 2020. We support PGE's proposed tariff update and agree with the reasoning by both the Company and the Citizens' Utility Board of Oregon letter of May 11, 2020.

First, both PGE and CUB note that the community solar program is legislatively mandated and supports this state's policy of climate action and decarbonization, as further underscored by Gov. Brown's March 10, 2020 executive order which states, "all agencies with jurisdiction over sources of GHG emissions will need to continue to develop and implement programs that reduce emissions to reach the state's GHG goals." Executive Order 20-04 at 3.

Second, NVEC strongly supports the view that all customers, including long term and new load direct access customers, benefit from the community solar program and should pay for its appropriate costs, in line with legislative mandate and long established ratemaking principles of the Commission.

Third, we agree that it is appropriate to incorporate the proposed change to perfect the structure of Schedule 136 so as to explicitly include all customer classes in the recovery of costs for the community solar program, and to do so in a timely manner. Not to do so would result in a rate that is not fair, just and reasonable.

Thank you for your consideration of this comment.

Sincerely,

Wendy Gerlitz
Policy Director
NW Energy Coalition
wendy@nwenergy.org