

Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • tcp@dvclaw.com
1750 SW Harbor Way, Suite 450
Portland, OR 97201

October 14, 2020

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem OR 97301

*Re: October 20, 2020 Public Meeting Agenda Item # RA3 – PGE Advice No. 20-22,
Schedule 136 Oregon Community Solar Program Cost Recovery Mechanism
Methodology of Bill Credits*

Dear Filing Center:

The Alliance of Western Energy Consumers (“AWEC”) appreciates the opportunity to file comments on Portland General Electric’s (“PGE”) revised proposal for allocating above-market community solar costs. PGE’s revisions allocate above-market costs to each customer class on the basis of total revenues, rather than generation revenues as previously proposed, and prices long-term direct access customers at their cost-of-service equivalent rate schedule.

AWEC does not oppose PGE’s revised proposal. As PGE notes, because above-market community solar costs are designed to ensure a successful community solar program, they are properly considered a public policy cost rather than a generation cost. PGE’s allocation reflects how it allocates similar public policy costs such as taxes.

AWEC also does not oppose pricing direct access customers at cost-of-service for purposes of allocating above-market community solar costs based on total revenues. AWEC opposed PGE’s previous allocation proposal because it would have assigned costs to direct access customers based on PGE generation revenues, which AWEC believed was both inconsistent with what these costs represented and potentially violated the direct access law.

Additionally, because this is a new cost (i.e., a cost that did not exist when most of PGE’s direct access customers opted out) that is specifically related to the achievement of public policy goals from which no particular customer class benefits over another, AWEC does not oppose assigning these costs equivalently to direct access and cost-of-service customers. This is to be distinguished from costs that are not solely in furtherance of public policy and benefit certain customer classes over others, as well as costs related to utility property that was in

service when direct access customers opted out of bundled rates. With respect to these other examples, AWEC's position on allocating costs to direct access customers would likely be different.

Sincerely,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

1750 SW Harbor Way, Suite 450

Portland, Oregon 97201

(503) 241-7242 (phone)

(503) 241-8160 (facsimile)

tcp@dvclaw.com

Of Attorneys for the

Alliance of Western Energy Consumers