

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

November 30, 2023

RE: ADV 1539

Commissioners Decker and Tawney,

As members of the Oregon Solar + Storage Industries Association, we are extremely concerned with Idaho Power's proposal to cut net metering rates for their Oregon customers. If adopted, the proposal would be unfair to our customers and could have negative impacts on other net metering programs in Oregon. We urge you to take adequate time to review the proposal and either decline their proposal or make significant improvements.

Our customers make a personal investment in solar energy to save on their utility bills, have energy independence, and contribute to fighting climate change. Their good will and financial contributions to society should be encouraged, not made harder by cuts to net metering.

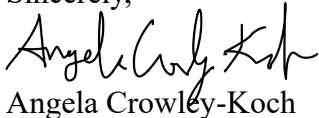
The ability to go solar is still out of reach for some of our moderate- and low-income customers. We are fortunate to have Oregon programs that help offset the costs, but the majority of our customers will struggle with any changes that result in a longer payback time for their investment. We are concerned that these changes will make it difficult for the Oregon Department of Energy to implement plans they have to help low-income Oregonians go solar with their Solar for All Federal grant application. With funding finally being made available to help working families go solar, it is exactly the wrong time to cut net metering rates.

We also strongly oppose Idaho Power's request to make these changes retroactive for new solar customers, invalidating contracts for solar purchased after 2019. Utility customers should have certainty that signed contracts will be upheld. This provision would negatively impact the reputation of the solar industry and all utility clean energy programs. We urge you to ensure that consumers are protected - utilities should not be able to go back on the deal they made with customers.

Lastly, three months is not adequate time for our customers to weigh in on the future of such an important program, especially when other net metering programs in the state will be different. Any changes in investor-owned net metering programs in Oregon should be considered together and with a process that gives ample time for customer input and participation.

Idaho Power's proposal will make rooftop solar harder to reach for working families. We urge you to modify or decline Idaho Power's proposal.

Sincerely,



Angela Crowley-Koch

Executive Director, Oregon Solar + Storage Industries Association, on behalf of the following OSSIA member companies:

/s/Power Northwest

/s/Elemental Energy

/s/Obsidian Renewables

/s/Earthlight Technologies

/s/Blue Raven Solar

/s/SunPower

/s/True South Solar

/s/Solar Oregon