



Office of Sustainability

May 12, 2020

Public Utility Commission of Oregon

Attn: Natascha Smith

201 High St. SE, Suite 100

Salem, Oregon 97301-3398

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

Dear Ms. Smith,

The Multnomah County Office of Sustainability appreciates this opportunity to Comment on the amended Advice No. 20-09 that Portland General Electric (“PGE”) filed with the Oregon Public Utility Commission (“OPUC”) on May 4, 2020. We support PGE’s request in Advice No. 20-09 to update its Schedule 136 so that all customers contribute to the costs associated with Oregon’s Community Solar Program.

The Office of Sustainability strongly supports Oregon’s Community Solar Program. This legislatively created program is an important tool to advance the goals of the State of Oregon.¹ We also view this program as a key tool to help realize the goals of Multnomah County to meet our community-wide electricity and energy needs with renewable energy while prioritizing community-based development of renewable energy infrastructure and advancing environmental justice and a just energy transition.²

As highlighted in comments by the Citizens Utility Board of Oregon, the NW Energy Coalition, and Portland General Electric, as well as in the May 11, 2020 report that you prepared on behalf

¹ As Executive Order 20-04 highlights, those goals include GHG emission reductions.

² In Multnomah County Board of Commissioners Resolution No. 2017-046, the Board established a goal to meet 100% of community-wide energy needs in Multnomah County with renewable energy by 2050, and a goal to meet 100% of community-wide electricity needs in Multnomah County with renewable energy by 2035. The resolution also prioritizes community-based development of renewable energy infrastructure and lays out principles for a just transition for Multnomah County.

of OPUC Staff, the community solar program benefits all customers. Therefore, we believe it is appropriate that all customers, including long-term direct access and new-load direct access customers, contribute to covering the costs associated with the program.

Thank you for your attention to these comments.

Sincerely,

/s/ John Wasiutynski

John Wasiutynski

Director

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Multnomah County

/s/ Silvia Tanner

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