

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

April 11, 2024

RE: ADV 1600

Commissioners Decker, Tawney, and Perkins,

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. The proposal goes against the original intention of net metering in Oregon and we urge you to deny their proposal.

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 lower credit rates, confusing new rate structures, and increased difficulties to fully offsetting their own energy use.

We are concerned that Idaho Power did not consider the impacts of their proposal on low- and moderate-income customers. Idaho Power low- and moderate-income customers who are unable to take the federal investment tax credit currently have zero solar incentives available, since the Oregon Department of Energy rebate funds for low- and moderate-income customers have run out and Idaho Power does not offer incentives. While Idaho Power low-income customers in Oregon could benefit from federal Solar for All funds, we are concerned that the proposed changes will make it difficult to take full advantage of those funds. With funding finally being made available to help working families go solar, it is exactly the wrong time to cut net metering rates.

In addition, we are concerned that the Idaho process undervalued benefits to solar. Solar's cost saving benefits for customers, the environmental benefits for the customer, utility and the state, and grid resiliency should be fully included when evaluating any program changes. We are gravely concerned about the impact a different state's process could have on our own programs in Oregon.

Lastly, if changes must be made to Idaho Power's net metering program, existing customers must be treated fairly. New rules should only apply to new customers after the date an order is adopted. In addition, legacy customers should not be penalized if they have trouble getting an offline system fixed and back online. Given supply chain constraints and the challenges of supporting rural customers, all customers should have the ability to repair their system and remain a legacy customer. If customers seek to add solar in order to offset new load, like an electric vehicle, they should be allowed to add capacity at their legacy rates.

Idaho Power's proposal will make rooftop solar harder to reach for working families. We urge you to 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/Blue Raven Solar

/s/SunPower

/s/Earthlight Technologies

/s/True South Solar

/s/Solar Oregon

/s/Advanced Energy Systems

/s/Fleet Development

/s/ Abundant Solar

/s/Cascade Solar

/s/Sunlight Solar

/s/A&R Solar

/s/Purelight Power

/s/Neil Kelly

/s/Green Ridge Solar