



November 28, 2022

Via Electronic Mail

Oregon Public Utility Commission
201 High Street SE, Suite 100
Salem, OR 97308-1088
puc.filingcenter@puc.oregon.gov

RE: UM 1158 Comments on Equity Metrics for the Energy Trust of Oregon

The Oregon Solar + Storage Industries Association (“OSSIA”) respectfully provides the following comments regarding Equity Metrics for the Energy Trust of Oregon (“ETO”). OSSIA appreciates the effort that the Oregon Public Utility Commission (“PUC”) Staff and Stakeholders put into these equity metrics, especially the in-person outreach to communities. We look forward to the implementation of HB 3141 as these equity metrics to ensure that the Energy Trust’s programs are more accessible to all eligible utility customers.

Overall, these proposed equity metrics are promising. OSSIA is supportive of three of the four proposed metrics and hopes to see modification of one in order to better serve customers. OSSIA strongly desires to see increased access to solar for underserved communities. Additionally, OSSIA would like to remind stakeholders and the PUC that the funding dedicated to solar incentives through the public purpose charge is .51% of utility revenues. This funding is for all solar incentive programs that the ETO facilitates. There was no increase in funding associated with HB 3141 and new focuses or programs will need to be met with existing funds. However, current ETO programs are not able to meet current demand.

Discussion

OSSIA is fully supportive of three of the equity metrics. We support increased funding to support community ambassador outreach to environmental justice communities. OSSIA also supports the second metric, new and expanded low-cost and no-cost offers to reduce energy burden created and launched. Lastly, OSSIA supports the fourth metric, increased support for nonprofits with a mission that supports environmental justice communities through incentives, training, and funding for energy efficiency upgrades or solar with storage projects. Each of these three metrics works to increase access to communities that have been underserved to date.



OSSIA has concerns with the third proposed metric, installation of solar with storage systems for low- and moderate-income residents supported in areas with limited infrastructure. The goal is laudable and communities with limited infrastructure should be served better. However, having reliable power is the responsibility of the utilities, not of the ETO. Utilities are responsible for creating reliable power for their customers, the ETO does not participate in the procurement of network resources or make decisions regarding infrastructure investments. In the utilities distribution system plans, each utility laid out areas in their territories that need increased infrastructure and options for plans to increase that reliability. These plans included options with non-wire solutions, like solar with storage systems. The utilities are taking the lead in solving those reliability concerns and are already working with the ETO as a partner, which is the correct procedure for resolving these reliability issues.

The PUC should work with utilities in the DSP process to ensure that the utilities are adequately investing in communities that have frequent outages. Oregon ratepayers have invested in a solar program at the ETO and the way the proposed metric is drafted is not in line with the current program as it has been built out, unlike the other new equity metrics. Within HB 3141, the public purpose charge allocated to the ETO for renewables is intended to fund, “the above-market costs of new renewable energy resources and customer investments in distribution system-connected technologies that support reliability, resilience, and the integration of renewable energy resources with the distribution system.” This language denotes that the ETO is responsible for using the public purchase charge funds to offset above market costs in support of reliability and resilience. The public purchase charge is not meant for the ETO to augment infrastructure in areas where the utilities have not provided sufficient investment.

For areas prone to utility outages it may be an indication of the need for further investment in utility infrastructure to ensure more reliable power. This may be a case where there is higher locational value for solar+storage and potentially an opportunity to explore a community energy resilience focused non-wires solution. OSSIA requests examination of a potential pathway for incorporating information from ETO’s engagement with vulnerable communities as part of this metric into the distribution system planning or clean energy planning process. This would rightfully put utilities in the driver’s seat on reliability and create the opportunity to explore additional funding that may be available for the solar+storage projects for communities with frequent outages.

Conclusion

In conclusion, OSSIA would like to reiterate our appreciation for PUC Staff and other stakeholders’ efforts to create these equity metrics for the ETO. OSSIA respectfully requests that the third metric be reworked to ensure that the utilities and the ETO are collaborating in their appropriate roles and that appropriate funding is identified and used for communities



experiencing frequent outages. We look forward to seeing the ETO implement their mission with an increased eye towards environmental justice through these metrics.

Respectfully submitted this 28th day of November 2022,

Jack Watson
Director of Policy and Regulatory Affairs
Oregon Solar + Storage Industries Association