

September 14th, 2015

Community Solar Program Design Recommendations to OPUC UM1746

To: Chair Ackerman, Commissioner Bloom, Commissioner Savage and OPUC Staff:

As Chief Sponsor of HB 2941, I would like to comment on legislative intent and some aspects of the UM 1746 docket. HB 2941 was introduced as an Act relating to solar energy and to provide retail customers access to participation in community solar gardens. In the initial draft of this measure, retail customers could subscribe to an interest in electricity generated by the solar facility. The electricity would be purchased by the utility and the subscriber would receive a credit on their' retail customer account based on that generation, minus some costs and other potential adjustments. A community solar gardens program would provide retail customers an alternative to a private on site solar installation program or purchasing utility scale solar energy. In stakeholder discussion there was not sufficient agreement on this community solar concept to move forward as drafted. Section 3 of the Enrolled HB 2941 was intended to continue that community solar discussion resulting in an examination and recommendation of a community solar program design, or a set of attributes of community solar programs that allow customers to share in the cost and benefits of solar facilities. Attributes of a community solar program include: eligibility, access or contracts (Purchase Power Agreement), pricing and subscriber account bill credits. I think it was recognized that it may be difficult to recommend a specific community solar program with some of the costs and values of solar identified in Section 2 of the bill or the value of solar not yet established; however some attributes of successful community solar program designs could be identified and recommended.

Concurrent with the HB 2941 discussion on community solar gardens, Portland General Electric proposed what became Section 1 of the bill. It directs the utility to provide residential electric customers a rate option to purchase specific renewable resource that includes solar photovoltaic under certain circumstances. Section 1 does codify the potential for customer access to purchase energy associated with renewable energy, including solar; but does not include other attributes identified in the community solar garden discussion or the attributes identified in Section 3. As such, I did not consider Section 1 to be a replacement for the community solar program that Section 3 directs the PUC to examine or recommend. I do agree that Sections 1, 2, and 3 all relate to solar energy, and Section 3 is specific to community solar programs as discussed in the introduced version.

I hope my comments are informative to the PUC discussion of UM 1746 docket.

Respectfully,

Paul Holvey

Oregon State Representative District 8