1	BEFORE THE PUBLIC UTILITY COMMISSION		
2	OF OREGON		
3	UM 1746		
4	In the Matter of		
5	PUBLIC UTILITY COMMISSION OF OF OREGON))COMMENTS OF THE OREGON DEPARTMENT OF ENERGY		
6 7	Recommendations for Community Solar) Program Design and Attributes)		
8	The Department agrees with the framework outlined by Commission Staff and appreciates		
9	the thorough discussion of models at the August 11 th meeting. The Department will limit it		
10	comments on the framework to comments around existing state incentive structures and the		
11	possible interaction with a community solar program.		
12	If the Commission recommends expanding existing incentives to apply to community solar		
13	objects in its community solar report to the legislature, the Commission should describe any		
14	statutory changes that would be needed to those programs.		
15	For example, the Residential Energy Tax Credit (RETC), which is administered by the		
16	Oregon Department of Energy, provides a personal income tax credit for the installation of		
17	residential photovoltaic systems. RETC and the Energy Incentives Program are set to expire on		
18	January 1, 2018.		
19	To provide RETC eligibility for residential participants in community solar projects,		
20	several areas of the RETC would need to be amended. Some areas that may need amending are		
21	the RETC requirements in statute that photovoltaic projects must generate electrical energy for a		
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1	dwelling, be constructed on installed in a dwelling, and owned by the dwelling owner. See OAR			
2	4693B.100(16), 469B3115(1), 316.116(1), 316.116(3). Changes in these and other sections of the			
3	statute would be necessary to allow RETC to be used as an incentive program for community solar.			
4	DATED this 1 st day of September, 2015.			
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6			Respectfully submitted,	
7			ELLEN F. ROSENBLUM Attorney General	
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11			Attorneys for the Oregon Department of Energy	
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