



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

February 8, 2021

Dear Chair Decker, Commissioner Tawney and Commissioner Thompson,

Oregon Solar Energy Industries Association (OSEIA) respectfully submits these comments in regards to the updated compliance filings for UM 1910, UM 1911 and UM 1912, the Resource Value of Solar (RVOS).

OSEIA appreciates working with staff, PGE, and IDP to correct several pieces of previous RVOS filings. We still have some concerns with the recent filing and staff's decisions regarding that filing. They are as follows:

1. It is concerning that PGE, IDP and PacifiCorp included a negative value for the Market Price Response. If solar results in a lower market price, that is a benefit to the utility and its customers.
2. While PGE's 12x24 tables were corrected and thus improved, the table is not actually used for the generation capacity value. OSEIA disagrees that older ELCC values should be used instead of the LOLP value, which is more accurate and quite different than the ELCC value used in PGE's filing.

Since the RVOS docket created a 12x24 model, it is strange that the model and its updated values are not used in the filing. PacifiCorp did not use an ELCC value to over-ride the 12x24 tables and it is unclear why PGE did. Until this issue is resolved in UM 2011, it is not appropriate for the RVOS model to be using an ELCC adjustment factor that essentially replaces the solar capacity contribution indicated in the RVOS model by the LOLPs and solar profile that it uses.

Should the commission decide to request updated RVOS filings in the future, OSEIA respectfully requests that these issues be revisited and that any new information from UM 2011 also be discussed before new filings are made.

In addition, it is worth reminding the Commission that OSEIA still has serious concerns with the RVOS methodology overall and do not feel it accurately represents the full value of solar and the



benefits it provides to Oregonians. We agree with the revision to staff's recommendation and appreciate that the RVOS framework will not be considered for other proceedings.

OSEIA appreciates the new staff recommendation that PGE, Pacificorp and Idaho Power post sub-station level information with respect to annual load, which will bring additional clarity and transparency to valuation and capacity conversations.

Thank you for your attention to these issues.

Sincerely,

A handwritten signature in black ink that reads "Angela Crowley-Koch". The signature is written in a cursive, flowing style.

Angela Crowley-Koch

Executive Director