



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

Re: Comments on UM 2000

July 9, 2019

Oregon Public Utility Commissioners and staff,

The Oregon Solar Energy Industries Association (OSEIA) respectfully submits the following comments to UM 2000. OSEIA is a trade association founded in 1981 to promote clean, renewable, solar technologies. OSEIA members include businesses, non-profit groups, and other solar industry stakeholders. We provide a unified voice of the solar industry and focus exclusively on the solar value chain; from workforce development to permitting, advocacy, policy, and regulation for manufacturing, residential, commercial, community, and utility scale solar projects on the local, state and regional level.

OSEIA supports the extensive comments submitted by The Northwest and Intermountain Power Producers Coalition ("NIPPC"), the Renewable Energy Coalition ("REC"), and the Community Renewable Energy Association ("CREA") (jointly, "QF Trade Associations") on UM 2000. In particular, OSEIA strongly supports the request to continue action on UM 2000 in rulemaking, as opposed to a contested case. Contested cases are more resource intensive, often so much so that participation is prohibitively expensive for OSEIA members, leaving critical voices out of the conversation.

OSEIA strongly agrees with the QF Trade Associations that interconnection issues should be prioritized in the rulemaking. Making headway toward fixing current interconnection delays will have far ranging benefits for ratepayers and the industry alike and could resolve many outstanding disputes. While this rulemaking is focused on QFs, net metered projects also face interconnection problems and community solar projects will soon run into the same barriers. Focusing on interconnection first and thoroughly in this rulemaking could benefit other projects as well.

OSEIA appreciates the work of PUC staff and the attention of the commissioners to the critical issues to be addressed in UM 2000.

Sincerely,

A handwritten signature in black ink that reads "Angela Crowley-Koch".

Angela Crowley-Koch
Executive Director
Oregon Solar Energy Industries Association