



- Community Solar -
Overview of Staff Proposal &
Opportunity for Comment
October 2019

Webinar Outline

- Brief overview of program
- Brief overview of remaining implementation process
 - Policy elements (this is the focus of the webinar)
 - Program Implementation Manual, Program launch
- Deep dive into Staff proposal on policy elements
 - Credit rate / capacity allocation
 - Administrative costs
 - Low-income requirements and options
 - Interconnection

Program Design - Big Picture

- Legislation passed in 2016 (SB 1547)
- Rules adopted June 2017 (860-088-00100)
- 160+ MW in “initial capacity tier”
 - PGE – 93MW; PAC – 63MW; IDP – 3MW
- Projects limited to 25 kW - 3 MW in size
- Project Manager eligibility
 - Third-party developers and utilities



Customer Participation

- **All customer types eligible, but:**
 - At least 50% of project capacity reserved for residential and/or small commercial
 - At least 10% of program capacity reserved for low-income customers
- **Participation options:**
 - Direct ownership
 - Subscription (minimum 10 years)



- **Individual limits:**
 - Cannot exceed avg. annual usage, and $\leq 40\%$ of project capacity
 - 2 MW max. for one customer; and up to 4 MW for “affiliated”



Program Implementation: Remaining Timeline for Addressing Policy Elements (led by Staff)

- October 4 - Staff shares Memo proposing key policy design elements:
 - Credit rate; low-income requirements; administrative costs; and interconnection
 - See PUC Oregon Docket # UM 1930
- October 15 - Deadline for stakeholder comments
- October 22 - Public Meeting at which Staff presents their proposal and stakeholders have an opportunity to provide public comment
- October 29 - PUC special meeting to deliberate and decide policy issues

Program Implementation: Remaining Timeline for Program Implementation Manual (PIM)

- October 4 - A draft of the final chapter, "Balance of PIM" is released.
 - Go to: <https://orcspaunch.wordpress.com/> ("Resources" tab)
- October 18 - Comments on draft Balance of PIM chapter are due
- November 18 - A final draft of the PIM is posted (on docket) for public comment and PUC review
- December 3 – Staff present PIM to PUC (opportunity for stakeholder comment)

Program Launch Timeline (targets)

- September 30 – Project Manager registration is available
 - Go to: <https://www.oregoncsp.org/>
- December 4 - Program opens the pre-certification application website
- December 16 - Project Managers may start submitting pre-certification applications

Credit Rate and Capacity Allocation Proposal

Utility	75% of Tier (MW)	General (MW)	Small (\leq 360 kW), or Non-profit, Gov't (MW)	Rate (\$/kWh)	20-yr Levelized (2.18% esc.)
PGE	69.86	52.40	17.47	\$ 0.11234	\$ 0.13895
PAC	48.45	36.34	12.11	\$ 0.09770	\$ 0.12084
IPC	2.45	1.84	0.61	\$ 0.08480	\$ 0.10489

- Credit rate established as residential retail rate
 - Not literally “floating”, but with 2.18% annual escalator
- Non-profit = any mutual benefit, public benefit, religious, or municipal corporation, or Tribe

Administrative Cost Recovery Proposal

Fee Type/Duration	Fee
Application Fee (\$/kW-DC)	\$ 5.00
Ongoing Participant Fee (\$/kW-DC/month)	\$ 1.50

- These values are based on a 50% (80 MW) capacity “transition” level
 - Once 80 MW is both “subscribed and billing”, new applicants could be charged a \$75/kW pre-certification application fee, in addition to the ongoing fee
 - Note – it’s feasible that 120 MW applies (at \$5/kW) prior to 80 MW operating
- The ongoing administrative fee is only applied to non-low-income customers

Proposed Low-Income Requirements & Options

- Each project is required to have at least 10% of capacity for low-income customers
- Low-income customers must receive at least a 20% discount
 - Low-income Facilitator will “prioritize” projects offering at least 50% discount
 - Special “Low-Income Designation” given to projects offering 50%+ discount
- Low-income customer definition includes the following:
 - Qualifying residential customer (as defined in PIM)
 - Including customers that have a utility allowance or other rent assistance
 - Affordable housing provider that pays electricity costs for qualifying low-income tenants
 - 75% of financial savings must be shared with low-income tenants

Other Staff Recommendations

- Simplified crediting mechanism (requires change to program Rules)
 - Credits are monetary and applied against full bill (electricity costs + subscription)
 - Carried forward monthly, with annual true-up that forfeits remainder
- Utilities provide at least 1 communication a year to inform customers of CSP opportunity, and direct customers to 1) list of available projects (on PA website) and 2) PA contact info

Interconnection Proposal

- **Recommendation #1:** Adopt the Joint Utilities' proposal – with modifications - for a streamlined CSP interconnection process
 - Creates a unique interconnection queue for eligible community solar projects that avoids potentially costly deliverability studies and associated costs
 - Eligibility based on being at or below 100% of minimum daytime load (or 30% of summer peak load)
- **Recommendation #2:** Recommends initial steps toward developing models for cost-sharing between generators
 - Near term - Utilities to study CSP generators jointly, upon request
 - Long term – Staff to continue stakeholder engagement around pre-emptive cost sharing and CEZ zones

Interconnection Proposal

- **Recommendation #3:** Staff recommends that the Commission adopt the Joint Utility proposal to allow CSP generators 360 kW or less to meter on the low side of the transformer
- **Recommendation #4:** PUC to issue a Request for Information (RFI) for third-party expert interconnection study review services (upon request)
- **Recommendation #5:** Enhanced pre-application report for non-profit and public Project Managers
 - Can request 5 sites in single request, at no cost
- **Recommendation #6:** PacifiCorp to provide additional information on the process to address the backlog of interconnection applications (i.e., outside Recommendation #1)

How to stay involved

- Send comments in response to Staff proposal to: puc.filingcenter@state.or.us
- Review Draft PIM Chapters and provide comments via the Program Administrator's Stakeholder Engagement Website - <https://orcsplaunch.wordpress.com>
- Register to become a Project Manager and learn more about program requirements via the Program website - <https://www.oregoncsp.org>
- Join OSEIA! We have weekly member updates and a Community Solar Committee that meets bi-monthly. <https://www.oseia.org/join> We have government and non-profit rates.



Oregon Solar Energy Industries Association

www.OSEIA.org

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