

October 13, 2020

*VIA EMAIL*

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

Attn: [kacia.brockman@state.or.us](mailto:kacia.brockman@state.or.us)  
[administrator@oregoncsp.org](mailto:administrator@oregoncsp.org)

**Re: UM 1930 - Feedback on proposed revisions to the Program Implementation Manual**

PacifiCorp, d/b/a Pacific Power respectfully provides these brief comments in response to Public Utility Commission of Oregon Staff's request for feedback to the proposed revisions of the Community Solar Program (CSP) Program Implementation Manual (PIM).

The proposed PIM revisions include the following new marketing disclaimer language for inclusion by all Project Managers in all sales, advertising and marketing materials.

This organization is operating under the Oregon Community Solar Program. The Oregon Community Solar Program is a state-enabled initiative overseen by the Oregon Public Utility Commission and implemented by Energy Solutions, The Energy Trust of Oregon, and Community Energy Project. The Program provides resources and certification for its Project Managers (PMs) but does not promote any individual PM or PM affiliated organization. For more information about the program, call 1-800-481-0510 or email [info@oregoncsp.org](mailto:info@oregoncsp.org).<sup>1</sup>

We are concerned that this language has the potential to cause confusion among CSP-participating customers, specifically regarding their ongoing customer relationship with their electric utility. For this reason, PacifiCorp recommends that the marketing disclaimer include, as one of the implementing organizations, a reference to the specific utility in whose service territory a project is being sold, advertised and marketed. PacifiCorp proposes to add the following amendment to the marketing disclaimer language (changes are shown in ~~strikeout~~ and *italics*): "The Oregon Community Solar Program is a state-enabled initiative overseen by the Oregon Public Utility Commission and implemented by Energy Solutions, The Energy Trust of Oregon, ~~and~~ Community Energy Project, *and [Portland General Electric/Pacific Power/Idaho Power].*"

PacifiCorp has no other concerns about the proposed PIM revisions. We appreciate the opportunity to provide these comments and look forward to helping bring this program to fruition.

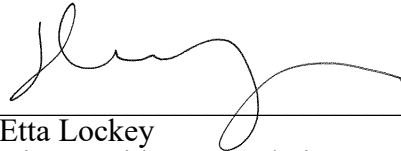
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<sup>1</sup> This language appears twice in the proposed revisions to the PIM, in sections 2.6.3(b) and 3.10(a).

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Informal inquiries may be directed to Cathie Allen, Regulatory Affairs Manager at (503) 813-5934 or Nate Larsen, Project Manager at (503) 813-7294.

Respectfully submitted this 13<sup>th</sup> day of October, 2020.

A handwritten signature in black ink, appearing to read 'Etta Lockey', written over a horizontal line.

Etta Lockey  
Vice President, Regulation