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February 28, 2025

Senator Janeen Sollman, Chair
Senate Energy and Environment Committee
900 Court St. NE
Salem, OR 97301

Subject: SB 92, -2 Amendment

Chair Sollman, Vice Chair Brock Smith and members of the committee,

Thank you for the opportunity to provide comments on SB 92 on behalf of Idaho Power Company (Idaho Power). Idaho Power is an integrated utility that generates, transmits, and distributes electricity to customers across Southern Idaho and Eastern Oregon with approximately 20,000 customers in Malheur, Baker, and Harney counties. We are proud to serve these communities and remain committed to providing safe, reliable, and affordable energy.

SB 1547 (2016 session) directed the Public Utility Commission of Oregon (OPUC) to establish a community solar program and laid out the program's statutory framework. The OPUC then undertook an extensive rulemaking process for the program, codifying the rules in Chapter 860, Division 88. Idaho Power fully participated in these processes and has a 2.95 MW community solar project on our system, located in Ontario, OR.

Economic Impacts and Cost Shifting

Idaho Power is committed to providing affordable energy to its customers. However, under the current framework, community solar is more expensive than utility-scale renewable resources. For instance, Idaho Power is currently paying \$84.80 MWh for Community Solar energy, whereas the Company's 2023 IRP estimates the levelized cost of solar PV at just \$31 MWh. The higher costs of the Community Solar Program are passed onto non-participants, which is particularly concerning for Idaho Power, as many of our customers in Eastern Oregon have low to moderate incomes compared to the rest of the state and there are fewer customers to share the financial burden. This results in a disproportionate impact on a community that can least afford rising energy costs.

Although Senate Bill 1547 did not prohibit subsidization, it directed the Commission to "minimize the shifting of costs from the program to ratepayers who do not own or subscribe to a community solar project." Given the economic realities of Idaho Power's Oregon service area, expanding the Community Solar program as proposed in SB 92 would not serve the best interests of our customers.

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Community Integrity and Program Intent

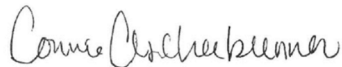
Community solar programs were originally designed to provide localized access to renewable energy, allowing customers to share in the benefits of locally generated power while supporting their local grid and economy. SB 92 undermines this purpose by allowing participation in community solar projects outside of a subscriber's utility service area, while failing to clearly define responsibility for other associated community solar-related costs. This contradicts the fundamental concept of community solar by disconnecting the project from the community it is meant to serve.

Interconnection

SB 92 proposes several changes to the interconnection process, including penalties for delays and the option for third-party contractors to build interconnection upgrades. Many of these issues are already being addressed in the state interconnection modernization docket, UM 2111, at the OPUC. Idaho Power maintains that any changes to interconnection procedures should continue to be handled through the OPUC.

For the reasons stated above, Idaho Power opposes SB 92 and the -2 Amendment.

Sincerely,



Connie Aschenbrenner
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