
From: Angela Crowley-Koch <angela@oseia.org>
Sent: Thursday, July 16, 2020 5:14 PM
To: Energyweb Incoming * ODOE
Cc: SPLITT Christy * ODOE; Niki Terzieff
Subject: OSEIA budget comments

Dear ODOE,

Thank you for the budget presentation today. Below you'll find OSEIA's comments regarding the Solar+Storage Rebate program.

First, OSEIA greatly appreciates the work that ODOE staff have put into the solar+storage rebate program. A brand new program was started in a short amount of time, with very few hiccups. Every concern raised by participants of the program was met with a prompt response from staff, including adjustments to rules so that the program could function better. As staff noted in the presentation, the program was in high demand and was depleted within the first four months of the program.

We appreciate that ODOE sees the value of this program and has put forward a POP to continue to the program. While we want ODOE to be fully staffed in order to run the program, we also would like to see the maximum amount of dollars go directly to projects in this time of recession. Times are tough for the solar industry - even a drop in several projects a month can mean layoffs for these small businesses.

With that in mind, OSEIA respectfully requests the following for the program and POP:

1. In order to be cost efficient, we request the ODOE limit its project inspections to those that it performs jointly with Energy Trust of Oregon. It is not necessary to inspect every system, especially since the dollar amounts of each rebate is under \$5K. This should reduce administrative and staff costs.
2. Please re-examine the need for 2.5 FTE for this program. We propose reducing the staff costs and instead requesting a higher amount for the actual rebates. Solar companies will gladly wait longer to get approved if it means additional projects will receive funding.

Thank you again for your commitment to this important program, which reduces carbon emissions, retains jobs at small businesses during this difficult economic time, and reduces energy bills for customers.

Sincerely,
Angela

Angela Crowley-Koch
Executive Director
Oregon Solar Energy Industries Association (OSEIA)
Oregon Solar Energy Education Fund
503-867-3378



July 23, 2020

Ms. Janine Benner, Director
Oregon Department of Energy
550 Capitol Street NE, 1st Floor
Salem, Oregon 97301

SENT VIA E-MAIL to AskEnergy@oregon.gov

Dear Director Benner:

Thank you for the opportunity to submit further comment on ODOE's 2021-23 budget proposal. We reiterate our message that the COVID-19 recession is hitting our customers and our utilities hard. Significant revenue shortfalls are not just a concern for General Fund agencies. We are seeing shuttered businesses and customers with difficulty paying utility bills. We are not-for-profit, community utilities. The Energy Supplier Assessment (ESA), which makes up the bulk of ODOE's funding, must be passed on to our customers, many of whom are out of work and struggling.

As you know, in our correspondence of June 3rd, we implored ODOE to forgo new policy initiatives and to *reduce* ESA expenditures. So, we were shocked to learn that ODOE plans to submit an agency request budget that relies on an **11.9% increase** in ESA. This is incomprehensible to us.

We understand that as part of your budget submittal to the Department of Administrative Services (DAS), you will be submitting a 10% agency cut. In the absence of a statewide cut in personal services (e.g. – furloughs, suspending COLAs, etc.) which you indicate is driving the large ESA increase, the 10% cut must be an essential component of ODOE's 2021-23 budget going forward. Since we have not seen that cut list yet, to the extent that it does not achieve the necessary ESA reductions to avoid the 11.9% proposed increase we stand ready to help you make the hard choices that COUs have had to make in the last four months.

Additionally, without corresponding agency cuts elsewhere, we cannot support any of the agency-proposed Policy Option Packages (POPS). If they are key priorities, ODOE should make cuts to fund them within existing resources. To the extent that safety net services are not being provided, now is the time to take a hard look at current expenditures—just as businesses and local governments have been forced to. During your recent budget presentation, one of the presenters noted that one of the POPs had been put forward because it was a “popular program.” That rationale may have made sense in a pre-COVID world, but not in this current economic environment.

Given utility impacts and our response on behalf of customers during this pandemic, ODOE's proposed budget is a disservice to ESA payers. COUs know it is not a time for a business as usual approach. Based on your proposal, we don't get the sense that ODOE appreciates that.

Sincerely,

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