

Oregon Solar + Storage Rebate Program

Frequently Asked Questions

Thank you for your interest in the Oregon Solar Rebate Program. This document contains questions and answers to a variety of questions received by the program staff.

Project Eligibility

Q: Are projects involving third-Party ownership allowed to participate in the Oregon Solar + Storage Rebate Program?

A: The program's enabling legislation, HB2618 (2019), and our administrative rules are clear that rebates may only benefit residential customers and nonresidential customers that are low-income service providers. In order to be considered the recipient of the rebate benefit, a customer must confirm, per program rule OAR 330-240-0140, that they have received the full value of the rebate as a reduction in the net cost of the purchase, construction, or installation of the system, and that the rebate was clearly reflected on an invoice provided to the customer. A customer that is not obligated to pay the charges reflected on an invoice is not considered to have received the value of the rebate.

A customer is free to contract with a third-party, for example to capture additional costs savings by leveraging capture of depreciation and the Federal Investment Tax Credit, as long as the rebate is for the benefit of a residential customer or a low-income service provider and the customer is in compliance with OAR 330-240-0140.

Q: What requirements does ODOE have for contracts that are submitted during the funding reservation process in ODOE PowerClerk?

A: The Program Rules describe relevant requirements in both 330-240-0030 Project Eligibility and 330-240-0120 Reservation Process. Many of the details required in 330-240-0120(2) are captured in the ODOE PowerClerk system. Most of these project details are expected to be declared in both the PowerClerk reservation and in the contract submitted with that reservation. The program is required to determine if the project includes any ineligible project costs that are to be excluded from the eligible project costs that are allowed for determining the rebate. To satisfy (2)(j) and (2)(k), the contract must include financial accounting that provides line-item details of the hardware the customer is receiving and the services to be performed. Furthermore, to verify the utility incentive (where applicable), it should be included in both PowerClerk and on the contract/invoice. In the scope of service providers, any grant from PacifiCorp BlueSky should be included with any ETO incentive, as a bundled amount in "Utility Incentive" in PowerClerk. As well, the program also needs to be able to verify that the warranty periods listed in PowerClerk have also been declared to the customer. The department must be able to confirm that the project as described in ODOE PowerClerk matches the project as described to the customer in contract and invoice.



Q: Are rental residences eligible to participate in the Oregon Solar + Storage Rebate Program?

A: Only low-income service providers are eligible to receive a rebate on a residential property operated as a commercial application. Residential customer rebates will only be issued for projects installed on owner-occupied residential property.

Q: If commercial businesses are excluded, why does part (j) of 330-240-0030, Project Eligibility, specify “for use in a dwelling or commercial application?”

A: First, please see the prior question on third-party ownership, wherein we state that the Bill and Rules are clear on the allowed customer types. Second, the interpretation of (j) must be considered in context with part (h), which states “The solar electric system or paired solar and storage system must benefit a residential customer or a low-income service provider as defined in these rules.” Part (j) reads “In the case of a solar electric system, the system must contain all components necessary to convert and deliver solar energy into electrical energy for use in a dwelling or commercial application.” The association to be made is that residential customers are in dwellings and low-income service providers are typically in a commercial application, such as offices and warehouses that are in commercial or light industrial zones, or multi-family housing that receives funding under OHCS affordable housing programs.

Q: What does administrative rule OAR 330-240-0030 (h) mean? “*The solar electric system or paired solar and storage system must benefit a residential customer or a low-income service provider as defined in these rules.*”

A: It is our policy that we interpret “benefit a residential customer” to mean the eligible system must be installed on residential property, be owned and occupied by the residential customer, and upon whose behalf the rebate is being issued to the installer contractor. Conversely, individuals or entities that hold an ownership interest in a residential property but do not reside at the property and lease the property to another person or entity are considered commercial customers and therefore ineligible for a rebate under the enabling legislation.

It is our policy that we interpret “benefit a low-income service provider” to mean the eligible system must be installed on property owned by the low-income service provider upon whose behalf the rebate is being issued to the installer contractor, or installed on property subject to an agreement with a community land trust, if the community land trust is the low-income service provider for whose benefit the rebate has been issued. We interpret low-income service provider to include community land trusts where the purpose or mission of the trust is to benefit low- or moderate-income persons or households through the provision or availability of affordable housing, and where the trust has published eligible-income guidelines that are at or below the 100 percent Oregon State Median Income Guideline for the current year.

Low- or Moderate-Income Residential Customer Eligibility

Q: How can a residential customer qualify for the low- or moderate-income residential rebate rate of the program?

A: The Department offers residential customers three options to qualify for the LMI Residential rate by providing proof of eligibility as required under OAR 330-240-0060.

Option 1

A homeowner is eligible for the LMI Residential solar incentive if the homeowner is determined eligible for one of the following Oregon Housing and Community Services programs:

- A) Low Income Home Energy Assistance Program (LIHEAP)
- B) Oregon Energy Assistance Program (OEAP)
- C) Low Income Weatherization Assistance Program (LIWAP)

The Department must be able to verify with Oregon Housing and Community Services the eligibility of an applicant under this option.

Option 2

A homeowner is eligible for the LMI Residential solar incentive if the homeowner is determined eligible for one of the following Oregon Department of Human Services or Oregon Health Authority programs:

- A) Supplemental Nutrition Assistance Program (SNAP)
- B) Oregon Health Plan (OHP) (Medicaid)
- C) Children's Health Insurance Program (CHIP)

An Eligibility Notice for one of the identified programs above that your household has received in the past seven months will be required under this option.

Option 3

A homeowner is eligible for the LMI Residential solar incentive if the homeowner can prove qualifying household income. The homeowner must provide the Department an Oregon Department of Revenue tax transcript for each tax filer residing at the household physical address. Transcript(s) for tax year 2019 are preferred but tax year 2018 is/are also acceptable.

To qualify as a household with low- or moderate-income, the sum of all incomes in the household must be at or below the gross income amounts listed below, by household size. Tax transcripts must be provided to the Department for all income recipients residing at the place of residence, including all family members and roommates who are not related and not part of a separate lease agreement.

100% Oregon State Median Income Guideline for 2020

Household Unit Size	Annual Gross Income*	Monthly Gross Income*
1	\$43,305.00	\$3,608.75
2	\$56,630.00	\$4,719.17
3	\$69,955.00	\$5,829.58
4	\$83,278.33	\$6,939.87
5	\$96,603.33	\$8,050.28
6	\$109,928.33	\$9,160.70
7	\$112,426.67	\$9,368.88
8	\$114,925.00	\$9,577.08
9	\$117,423.33	\$9,785.28
10	\$119,921.67	\$9,993.47
11	\$122,420.00	\$10,201.67
12	\$124,918.33	\$10,243.20
Each Additional Member	\$2,498.33	\$208.20

* **Gross Income means all household income before any deductions**

Solar Electric System Rebate Rates; Calculation Method

Q: If a residential customer project is unable to qualify for a utility incentive from Energy Trust of Oregon or from the local utility, can the project qualify for the higher incentive rate for residential projects without utility incentives?

A: Yes, the Department does provide the higher rate to projects that are unable to receive a utility incentive, so long as the project is otherwise eligible under the OS+SRP rules.

The known scenarios, to date, for utility incentives to be unavailable are as follows:

- Customers who have received incentives from Energy Trust in the last five years are limited in their incentive eligibility to the amount of the (Current Incentive Cap) minus (Incentive previously received). ETO allows partial incentives, up to the current cap, but in most cases, the current cap is lower than the previously received incentive, so the project is disqualified until five years have passed.
- Customers not eligible for a utility incentive because their utility has requirements that exceed the OSSRP requirements (shading/TSRF is one such example).

The following program policies apply:

- It is program policy that all applicants are encouraged and expected to apply for all available incentives.
- It is program policy that if a site or project is unable to collect a utility incentive, then the Department will do an administrative override of the incentive rate from \$0.20/watt to \$0.50/watt, subject to



availability of unreserved funds for the non-income restricted residential rates. (This occurs after the contractor has submitted a reservation at the \$0.20/watt rate.)

- It is program policy that the Department independently verifies with Energy Trust of Oregon or the electric utility that funds are not available for the site.
- It is program policy to request the shading assessment data when shading qualification looks marginal. In the event the utility incentive is unavailable because of shading, the contractor is strongly encouraged to include the shading report with the contract at the time of the funds reservation request in ODOE PowerClerk, to be most efficient and avoid delays.

