



Senator Janeen Sollman, Chair  
Senator David Brock Smith, Vice Chair  
Members of the Senate Energy and Environment Committee

The Association of Oregon Counties is in support of the Community Solar program. Community Solar is solar energy generated from a central location and shared by multiple subscribers. It is a program that is available to customers of Portland General Electric, Pacific Power or Idaho Power. Community solar is a distributed solar energy deployment model that allows customers to buy or lease part of a larger, off-site, shared solar photovoltaic system and receive benefits for their participation. However, even though AOC is in support of Community Solar and the clean, renewable energy that the program offers for the utility grid and subscribers, **AOC is opposed to SB 92 and the -2 amendment for two reasons.**

First, SB 92 expands an agreement counties made with developers during both the 2022 and the 2023 sessions. In 2022, the legislature created an ad valorem property tax exemption for residential community solar projects; however at that time, commercial community solar projects were excluded from the exemption. That was rectified in 2023 through SB 54. **The agreement for Community Solar projects in 2022 and 2023 was a maximum of 3 megawatts (mw) of energy generated.** 3mw can be thought of as anywhere from 18 acres to 30 acres of land – roughly 6-10 acres for a single megawatt generated (depending on the source used). SB 92 as drafted lifts the 3mw cap and takes it to 15mw, the -2 amendment brings the program up to 20mw. The amendment also allows for battery energy storage (BES) to be developed in conjunction with Community Solar. It is unclear whether the BES would be sited and developed on the 20mw acres, or if this would be additional land needed; however, Community Solar has an ad valorem property tax exemption.

Second, Counties have concerns about the provisions in the base bill and the -2 amendment that allows a community solar project to be “located within an electric company’s service territory that is different from the electric company’s service territory within which subscribers of a community solar project are located.” (Section 1(3)(d) of the -2 amendment).

Currently, projects are required to be located in the same service territory as the subscribers of the program. This allows Pacific Power, as an example, to locate a project in Umatilla County while letting the citizens of Coos County have access to the energy. Although counties agree with the goals of Community Solar, this change would allow the project to be built anywhere in the three IOUs territory without having the power be made available to their own ratepayers. For example, Umatilla county would be losing the property tax revenue from the project and its citizens would lose out on the energy entirely as the subscribers of the program would be in PGE or even Idaho Power’s territory

The Association of Oregon Counties respectfully requests these two issues be addressed in a subsequent amendment before the bill is scheduled for a work session.