Renewable Northwest Members

3Degrees
American Wind Energy Association
Atkins
Blattner Energy
Bonneville Environmental Foundation
Center for Energy Efficiency & Renewable Technologies
Christenson Electric
Citizens' Utility Board of Oregon
Climate Solutions
Columbia Gorge Community College
Community Renewable Energy Association
DNV GL
Ecofys
EDF Renewable Energy
EDP Renewables
Environment Oregon
Environment Washington
Eurus Energy America
FirstWind
GE Energy
Geothermal Resources Council
Green Mountain Energy
HDR Engineering, Inc.
Iberdrola Renewables
Idaho Conservation League
K&L Gates
Kapla Law PLLC
MAP
Montana Environmental Information Center
MontPIRG
Natural Capital Partners
Natural Resources Defense Council
NextEra Energy Resources
Northwest Environmental Business Council
Northwest SEED
NW Energy Coalition
OneEnergy Renewables
Oregon Solar Energy Industries Association
Orion Renewable Energy Group LLC
OSPIRG
Oregon Tech
Portland Energy Conservation, Inc.
REC Silicon
RES America Developments
Solar Oregon
SolarCity
Stoel Rives, LLP
SWCA Environmental Consultants
Tonkon Torp LLP
Vestas Americas
Warm Springs Power & Water Enterprises
Washington Environmental Council
WashPIRG
Western Resource Advocates

Renewable Northwest

To: **Energy Trust of Oregon**
(via email to hannah.hacker@energytrust.org)
From: **Renewable Northwest**
Attn: Michael O'Brien, Policy Associate (michael@renewablenw.org)
Re: **Comments on Draft 2015–2019 Strategic Plan**
Date: **August 26, 2014**

Renewable Northwest appreciates the opportunity to comment on the Energy Trust of Oregon's (ETO's) Draft 2015–2019 Strategic Plan. Renewable Northwest is a non-profit regional advocacy group composed of renewable energy businesses and environmental, academic and consumer groups working together to facilitate responsibly developed renewable energy resources in the region.

Renewable Northwest staff and members have been engaged with the ETO's renewable energy mission since its inception. Since the passage of SB 11490 and 838, ETO funding for renewable energy has contributed significantly to advancing Oregon's renewable energy market for projects, most recently fro projects less than 20 MW. Renewable Northwest applauds ETO's ability to continue to play a transformative role as policies and market conditions constantly evolve.

Renewable energy is experiencing significant cost declines, but in our region still depends on supportive policies and incentives to make the difference. The renewable energy goals proposed in ETO's Draft Plan recognize both a generalized role in market development and, importantly, an ability to provide incentives directly to new renewable energy projects. We offer brief comments in both areas.

1. Renewable energy installation goal

We recognize the challenge in setting numeric targets for renewable energy additions in a evolving market and policy landscape. Pegging the ETO's long-term vision to the adopted SB 838 goal for small-scale renewable energy projects is sensible, in that it connects ETO's renewable energy mission to an existing state policy framework for the same project size category.

However, we encourage the ETO to consider setting a more ambitious goal for the contributions that ETO incentives can make toward that vision during the period from 2015 to 2019. Solar costs, in particular, are declining such that ETO will be able to stretch its incentive funds farther. For all types of solar systems, using incentives as sparingly as possible during the next five-year period should allow ETO to make a larger than 10 aMW contribution to the long-term vision.

For context, the ETO had a 2010–2014 strategic goal of 23 aMW of renewable energy; however, from 2009 through the end of 2013 the ETO only managed to support small and mid-scale renewable energy project installations generating

15.27 aMW. Installing an additional 15.27 aMW is a welcome achievement, despite not meeting the anticipated 23 aMW. Having an ambitious goal can be a powerful motivator to make the most out of available funds.

2. Market development

Reducing soft costs for renewable energy development is one factor that can help stretch ETO incentives farther during the coming years. Renewable Northwest supports ETO leveraging its valuable project development expertise and relationships to eliminate or reduce market barriers for all types of renewable energy projects, insofar as that activity translates into reduced development costs. We encourage ETO to document its successes with concrete qualitative examples and, where possible, with analysis of how activities have supported lower soft costs.

Thank you for considering these comments on the Draft 2015-2019 Strategic Plan.