

Carel deWinkel - AR 521

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From: Carel deWinkel  
 To: Durrenberger, Ed  
 Date: 6/9/2008 9:36 AM  
 Subject: AR 521  
 CC: anderson, sven; Broad, Diane; Cowan, Alan; peter@richardsonandoleary.com; Woodin, Paul

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Dear Ed:

I apologize for not being able to send you our comments by last Friday. I was out of town most of the week. Here are our comments.

The Oregon Department of Energy appreciates the opportunity to comment on the latest draft Rules on Small Generator Facility Interconnection.

The number of distributed generation projects in our state continues to increase rapidly, primarily because of the increase in the business energy tax credit, the increased payments by the Energy Trust of Oregon and the growing awareness among the state's citizens and business owners that high energy costs are here to stay. The latest draft is a significant improvement over the previous draft, but ODOE continues to be concerned about the time it might take to complete the interconnection process. While all stakeholders have paid a lot of attention to the time lines, none of us is able to accurately predict how well the rules will work in the real world.

ODOE suggests the following improvements.

OAR...0055

The proposed rules have specific time lines, but they do not specify the time allowed for the studies in OAR ....0055, Tier 4. Because of the increase in distributed generation projects, the workload for the utilities' staff will increase significantly. In order to make sure that the time it takes to complete the studies is reasonable, we believe that language should be added that makes it clear that the utilities provide adequate staff resources or are expected to contract third-party consultants. Such language could be included in section OAR....0055-8-f "to complete the studies (feasibility, impact, and facilities), as well as interconnection facilities and system upgrades..."

OAR ...0045-3-a, 0050-3-a, 0055-5

Replace the words "must schedule" a scoping meeting with the words " must hold", as was stated in the version 10-1 Revision.

OAR...0060 Record keeping and Reporting Requirements.

Annual reporting of the completed interconnections with sufficient details will be the only way to find out whether the rules are working as intended. Therefore, we suggest to add the following to section ..0060-3:

(e) ADD: the estimated and actual cost of the telemetry

(f) (A) and (B) in both cases, ADD the actual costs of the interconnection facilities and upgrades. We recognize that the project owner will pay the actual cost of the interconnection facilities. Thus, the project owner will have to agree up-front (add text in the agreement) that (s)he will share those cost data with the utility for reporting purposes.

(g) NEW: we need to add information on the time lines, otherwise it will be impossible to monitor whether the rules are meeting the state's needs. ADD: For each Tier 3 and Tier 4 small generator interconnection approval, the number of business days it takes:

(A) between the day that the utility receives an application and the date of the certificate of completion; (B) to complete each study, (C) to complete the facility installation and (D) to complete system upgrade, where applicable.

We believe that the above stated suggestions will make the proposed rules more effective to help promote the

rapid increase of distributed generation.

Thank you very much for your cooperation.

Carel

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