



November 22, 2022  
Via Electronic Filing

Oregon Public Utility Commission  
201 High St. SE, Suite 100  
Salem, OR 97301-3398

**RE: Comments on PGE's Partial Waiver Application for Level 1 Net Metering Interconnection Review Process**

The Oregon Solar + Storage Industries Association (OSSIA) appreciates the opportunity to provide the below comments to Portland General Electric's (PGE) Application of a Partial Waiver for 860-039-0030(3) in Docket No. UM 1631, General Waiver Requests. Below OSSIA conditionally supports PGE's request for a partial waiver.

**Discussion**

OSSIA is supportive of PGE's creative solution to the limited generation feeders problem. While this partial waiver request will not fully resolve the limited generation feeders issues, it is certainly a step in the right direction. Our concerns with the solution surround PGE's discretion to approve a net metering system that fails to meet the applicable requirements. This discretion appears to be the same type given to utilities in Level 2 and Level 3 Net Metering Interconnection Review. However, the discretion does not provide clarity to distributed generation installers who are trying to determine whether they can install on different feeders throughout PGE's service territory.

To provide additional clarity to developers and net metering applicants seeking solar, OSSIA requests that PGE provide examples of previous Level 1 interconnection applications that were denied with an explanation. This type of information would add some clarity into utilities discretion on what they deem safe, reliable, and power quality. Additionally, PGE should provide notice to net metering applicants who previously applied under Level 1 Net Metering Interconnection Review in limiter generation feeder areas. This notice would be applicable to projects that did not reapply under Level 2 and does not need to go to projects outside of limit generation feeder areas. Lastly, OSSIA believes that by expanding the utilities discretion to Level 1 of interconnection review it may expand the potential for the utility to abuse their discretion. If the utility uses their discretion to continually block projects without providing some explanation it will create significant uncertainty for developers and net metering applicants. As a potential solution for this, we recommend that PGE share this information with PUC Staff. This



oversight should help to avoid abuse of discretion and provide sufficient transparency for stakeholders.

### **Conclusion**

OSSIA commends PGE and the rest of the UM 2111 stakeholders on their efforts to prepare creative solutions to the interconnection process. While the partial waiver of OAR 860-039-0030(3) is a creative solution, OSSIA would like to see some additional transparency in the interconnection review process. We look forward to additional opportunities to participate in resolving the limited generation feeder issue and the other interconnection modernization processes in UM 2111.

Respectfully submitted this 22nd day of November 2022,

Jack Watson  
Director of Policy and Regulatory Affairs  
Oregon Solar + Storage Industries Association