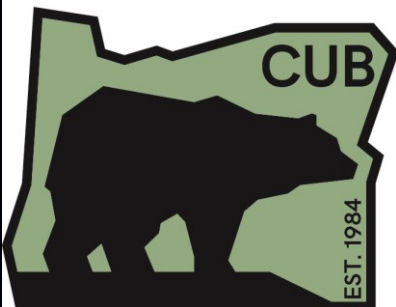


**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1857**

In the Matter of)
)
PACIFICORP, dba PACIFIC POWER,)
)
Draft Storage Potential Evaluation.)
_____)

COMMENTS OF THE
OREGON CITIZENS' UTILITY BOARD

March 8th, 2018



BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1857

In the Matter of)	COMMENTS OF THE
)	OREGON CITIZENS' UTILITY
PACIFICORP, dba PACIFIC POWER,)	BOARD
)	
Draft Storage Potential Evaluation.)	
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I. INTRODUCTION

Oregon Citizen’s Utility Board (“CUB”) files these Comments for PacifiCorp’s Draft Storage Potential Evaluation (“storage proposal”). CUB appreciates the opportunity to comment on PacifiCorp’s Storage Proposal. These comments address PacifiCorp’s Storage Proposal, which PacifiCorp is completing to fulfill its statutory obligation under Oregon House Bill 2193. House Bill 2193 directs PacifiCorp to identify and evaluate energy storage technologies and to install at least 5 MWh of capacity by January 1st, 2020.¹

This Storage Proposal is PacifiCorp’s initial proposal to the Oregon Public Utilities Commission. PacifiCorp is proposing two projects to fulfill the guidelines set by HB 2193: the Utility Owned Distribution Storage Pilot, and the Community Resiliency Pilot Project.

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1 <https://olis.leg.state.or.us/liz/2015R1/Downloads/MeasureDocument/HB2193/Enrolled>

II. COMMENTS

CUB broadly supports the Company's Storage Proposal. In particular, CUB supports the Company selecting only two projects as pilot projects. The Oregon Legislature placed a cap of 1% of PacifiCorp's 2014 system peak load (25 MW) on energy storage projects installed under HB 2193. PacifiCorp's proposed projects are well below the 2014 system peak load cap. PacifiCorp has selected two projects to help advance general knowledge in preparation of the future wide scale deployment of energy storage, and both projects are economical for customers. CUB appreciates the inclusion of both utility owned and customer owned energy storage projects in this proposal.

PacifiCorp's first proposed project is a utility owned distribution pilot (Project One). PacifiCorp has selected an advantageous location to install energy storage technology. The location has had system reliability issues in the past. This utility owned storage is not being installed merely as a pilot, but rather it is being used to solve a need. Without revealing the location of the proposed project, there are many synergies associated with this pilot project. The utility is able to test the proposed energy system against commercial, residential, and non-standard loads.

Project One's design enables PacifiCorp to learn more about managing energy storage systems. Additionally, all three phases of the project have clear objectives. The energy storage system is not built all at once. The design grows in an incremental fashion. The first phase involves the installation of a single energy storage device. Once that phase is complete, the

second phase involves building an energy storage device that will participate in EIM. The third phase involves the installation of several energy storage devices.

CUB would like clarification and additional information related to the capital expenses of Phase I and II of Project One. Based on the application, it appears as if the Company assumes at least 1MWh of energy storage will be installed. The capital spending of Phase II does not appear to scale with the size of the project.

Capital Spending for Project One		
Phase	Size	Expected Capital Spending
Phase I	2MW x 3 HR	\$4,000,000
Phase II	MWh \geq 1	\$2,000,000

CUB would like to be able to review the integration and control costs associated with the Company’s energy storage programs. The Company has indicated it intends on integrating its energy storage projects with SCADA monitoring, outage management and dispatch systems. CUB would like to see initial cost estimates for these programs in the Company’s Final Proposals.

PacifiCorp’s second proposed project is the Community Resiliency Pilot Project (Project Two). Project Two establishes a state wide grant program to help build small scale energy storage projects for communities in PacifiCorp’s service territory. In this project, PacifiCorp is proposing hiring a consultant to help communities build energy storage projects. Additionally,

PacifiCorp is helping to fund several community energy storage projects. At this time, CUB does not have sufficient information to discuss the specific merits of Project Two.

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III. CONCLUSION

CUB appreciates the opportunity to submit these comments, and we look forward to continuing to participate in this docket.

Signed this 8th of March, 2018.

A handwritten signature in black ink, appearing to read "William Gehrke".

William Gehrke, Economist
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