



**PROFESSIONAL ENGINEERS OF OREGON**

*A Chapter of the National Society of Professional Engineers*





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**L<sup>3</sup>+ Learning Licensure Leadership**

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July 8, 2019

Chair Megan Decker  
 Commissioner Steve Bloom  
 Commissioner Letha Tawney  
 Oregon Public Utility Commission  
 201 High Street SE, Ste. 100  
 Salem, OR 97301

RE: Interconnection Data Transparency (Interim Measure #2) Docket Nos. UM 2000/2001

Dear PUC Commissioners and Staff,

Thank you for considering ways to improve market efficiency in Oregon and ensure existing policies are implemented in a reasonable, transparent manner that is protective of public safety.

The Professional Engineers of Oregon (PEO) is Oregon's professional association providing leadership in all engineering disciplines. We promote the professional engineer as a recognized voice in society through legislative advocacy, public education and adherence to engineering principles and standards.

On behalf of the Professional Engineers of Oregon, I am submitting these comments to document our understanding that Oregon's rules for the practice of engineering given in ORS Chapter 672 and OAR Chapter 820 are relevant and applicable to all activities associated with the interconnection, operation and transmission of qualifying facilities. As such, we encourage the PUC to require that Interconnection studies, applicant reviews, determination of interconnection requirements and issuance of related standards be conducted by a registered engineer with appropriate qualifications as determined by Oregon State Board of Examiners for Engineering and Land Surveying.

We urge the PUC to abide by Oregon's engineering rules which present a simple mechanism to ensure the interconnection process is fairly administered and safely implemented and that all engineering studies, evaluations, and work is completed in a manner that minimizes costs to ratepayers and is in the best interest of the public welfare.

David Y. Etchart, PEO President  
 On behalf of the PEO Board or Directors