

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 2000**

In the Matter of

PUBLIC UTILITY COMMISSION OF OREGON

Investigation into PURPA Implementation.

OSSIA'S COMMENTS ON STAFF'S
STRAW PROPOSAL

The Oregon Solar + Storage Industries Association (“OSSIA”) respectfully submits these timely comments to the Oregon Public Utility Commission (the “Commission”) for consideration. Overall, OSSIA is supportive of the direction Staff recommends for Phase 1, however there are some issues that we feel should be included in the scope of this docket. In these comments, OSSIA highlights some of the issues that have been raised in various dockets over the years but were left unsettled for resolution in this docket.

I. Issues that should be included in Phase 1 scope.

While Staff generally includes many of the issues raised over the years in the scoping process, OSSIA recommends several issues that should also be addressed in this docket. At the outset of UM 2000, in July 2019 Staff recommended that all miscellaneous PURPA issues raised by parties be included in the UM 2000 process.¹ The original proposal also recommended inclusion of the lack of progress in interconnection queues. There have been some changes to interconnection through UM 2111, but it is worth discussing at the next workshop to see if there are any other interconnection issues for QFs that should be resolved in UM 2000.

¹ UM 2000 Staff Report at 4, (July 22, 2019) <https://edocs.puc.state.or.us/efdocs/HAU/um2000hau17555.pdf>

There has been a lot of progress made since the outset of this docket in 2019, but there have also been some new issues raised through UM 2032, AR 631, and AR 630. Accordingly, we recommend the inclusion of the following issues for resolution in UM 2000.

First, the standardized templates for standard avoided cost inputs and outputs, while this issue was slotted in AR 630, as we examine an appropriate methodology for avoided costs, we should also consider how to make improvements to the templates to increase stakeholders ability to understand the avoided costs calculations for all three utilities.

Second, UM 2000's scope should include potential modifications necessary to implement the Commission decisions in UM 2032. Order No. 23-005 included clarification that avoided costs include avoided interconnection costs.² To some extent that is covered within the scope that Staff put forward, but it is not explicitly called out in the proposal so some clarity would be appreciated.

Third, UM 2000 should include consideration of the timing and requirements for avoided cost updates. There should be some discussion of whether the process for a post-IRP acknowledgement plus an annual update is still the best course of action for updating, and if it is not then there should be a discussion about another timeline and process for avoided cost updates.

Fourth, the scoping should include a discussion of Renewable Energy Certificate ownership for Qualifying facilities that elect the renewable rate in the contract period following the fixed-price period. This issue was raised in AR 631, but was determined more applicable to UM 2000, as the question of REC ownership and their treatment were better examined in

² Order No. 23-005, In the Matter of Public Utility Commission of Oregon, Staff Investigation into treatment of Network Upgrade Costs for QFs, Docket No. UM 2032, pg. 9 (Jan. 20, 2023).

discussion of avoided cost pricing. Accordingly, OSSIA recommends this issue be addressed in UM 2000's scoping.

Lastly, UM 2000 should allow for potential revisions to the Oregon Administrative Rules for Division 29, as rule changes will likely be necessary to implement proposals adopted in UM 2000.

II. Conclusion

OSSIA appreciates the efforts of Staff in developing the straw proposal. Although OSSIA does not list its position on the aspects laid out in the proposal, we look forward to discussing those issues more in depth as this docket moves forward. Additionally, OSSIA is supportive of the recommendations of the QF Trade Associations to incorporate a local resiliency rate policy so that QFs can elect to provide local resiliency benefits, and the recommendation to require a fixed-price power-sale term of at least 20 years.

Dated this 15th day of May 2024.

Respectfully submitted,

s/ Jack Watson

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