



UM2011 Staff and Service List

August 14, 2020

RE: Potential objection, proposed clarification to Staff's proposed issues list

PUC UM2001 Staff and Service List,

It is OSEIA's understanding that staff proposes this investigation will not address locational capacity value, and that transmission and distribution (T&D) components of capacity value will be addressed in a future docket. OSEIA supports the proposal to hold off on the determination of the T&D component of generation capacity value, so long as T&D grid value and any non-wires solution value aspects of locational value are certain to be addressed in a future docket. Given the slate of dockets currently open and the transcendent nature of many aspects of integrating both the findings of SB 978 and EO 20 04, we suggest that staff prepare a Gantt chart, or other means of communicating to stakeholders, the intended schedule and vehicle for addressing the various critical strands of PUC policy that, like locational value, will greatly inform distribution and transmission level planning as well as procurement valuation.

Furthermore, OSEIA would like to clarify its understanding that this docket will address how much generation capacity specific renewables in specific locations can provide. Thus, OSEIA would like to raise the potential objection that, in deferring the issue of locational capacity value to a future docket, staff should not also defer the issue of how much capacity is provided by various types of resources in different locations. Given that derivation of capacity contribution of renewables is on the proposed issue list, we do not expect that locational variations in those renewable capacity contributions would be an issue to defer, but we raise this concern out of an abundance of caution as the production from photovoltaic generators varies greatly within Oregon (from 1.03 kWh/watt DC per year in Astoria to 1.47 kWh/watt DC in Klamath Falls) depending on the solar resource at the array location. It is OSEIA's hope that this proceeding will result in methodology for determining the system generation capacity value of specific projects, excluding the locational component. OSEIA appreciates your consideration of this concern.

In service,  
Shannon Souza, PE  
Board Director, Policy Chair

*Shannon Souza*