

June 16, 2023

***Via Electronic Filing***

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High Street SE, Suite 100  
Salem, OR 97301-3398

Re: UM 2111 – IREC Revised Rule Language

In advance of the workshop on Tuesday June 20, 2023, the Interstate Renewable Energy Council (IREC) provides revised rule language for the work group's consideration. In addition to the revisions recommended in comments on May 5, 2023, attached to this letter IREC proposes three discrete changes to the June 12, 2023 Staff Proposal.

First, IREC presents a refined interconnection agreement timeline proposal which strikes a reasonable balance between the 5 and 15 day timelines that Staff is considering.

Second, IREC presents an updated line configuration screen. After additional meetings and communications with the Joint Utilities, IREC and the Joint Utilities have largely reached consensus on the language the Commission should use for the line configuration screen. There is one area of disagreement remaining between the Joint Utilities and IREC: whether the Yg-y and Yg-delta configurations should be listed. IREC understands that the Joint Utilities support listing Yg-yg and oppose listing Yg-y and Yg-delta. For the reasons described in IREC's May 5, 2023 comments, IREC supports listing all three configurations.

Regarding mixed three-wire and four-wire systems, IREC agrees to PacifiCorp's proposal to extend the neutral wire at no cost to applicants. The Commission should memorialize the requirement not to charge applicants for this upgrade in its adoption order.

Third, IREC can accept the June 12, 2023 Staff Proposal's Supplemental Review Penetration Screen if the defined term "relevant minimum load" is used.

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IREC looks forward to discussing these issues at the workshop on Tuesday.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

*/s/ Yochanan Zakai*

YZ:YZ

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**860-082-0025(7)(f) Interconnection Agreement.** If the proposed interconnection requires no construction of facilities by the public utility, the public utility must provide the applicant an executed interconnection agreement no later than five business days after providing Tier 2 or Tier 3 screen results, approving the interconnection despite screen failure, the applicant options meeting, providing supplemental review screen results, or completing the last tier 4 study. If the proposed interconnection requires construction of facilities, the public utility must provide the applicant an executed interconnection agreement, along with a non-binding good faith cost estimate and construction schedule for any required upgrades, no later than fifteen 15 business days after the applicant options meeting, approval despite screen failure, providing supplemental review screen results, or completing the last tier 4 study. If the applicant does not return a countersigned interconnection agreement and any required deposit to the public utility, or request negotiation of a non-standard interconnection agreement, within 15 business days of receipt of an executed interconnection agreement, the application is deemed withdrawn.

**860-082-0050(1)(g) Line Configuration Screen.** Using the table below, determine the type of interconnection to a primary distribution line. This screen includes a review of the type of electrical service provided to the project, including line configuration and the transformer connection to limit the potential for creating over-voltages on the interconnecting public utility's electric power system due to a loss of ground during the operating time of any anti-islanding function.

Primary Distribution Line Type	Type of Interconnection to Primary Distribution Line Required to Pass Screen
Three-phase, three-wire	Interface connection transformer high side is phase-to-phase.
Three-phase, four-wire	For single phase generation, the interface connection transformer high side is phase-to-neutral;  For three-phase inverter-based generation, the interface connection transformer is Yg-yg, Yg-y, or Yg-delta; or  For three-phase rotating generation, the small generator facility high side is connected phase-to-neutral and effectively grounded.
Three-phase, mixed three-wire and four-wire	The public utility will extend the neutral wire to the point of interconnection and treat the small generator facility as an interconnection to a three-phase, four-wire system.

**Commented [JRS1]:** Yg-y is not effectively grounded because there is no path for the neutral on the lower side of the transformer. Yg-delta may be acceptable but would require installation of a relay--for example, through supplemental review. Therefore, Yg-delta cannot be a way of passing the screen without further review or upgrades.

**Commented [YZ2]:** The one area of disagreement remaining between the JU and IREC is whether Yg-y and Yg-delta should be listed here. JU supports listing Yg-yg and opposes listing Yg-y and Yg-delta. For the reasons described in IREC's comments, IREC supports listing all three configurations as shown here.

**Commented [JRS3]:** While PacifiCorp will not charge the applicant, it is not appropriate to include cost-allocation language in this screen.

**Commented [YZ4R3]:** IREC can agree to this language as long as PacifiCorp does not charge the applicant for this upgrade. The Commission should memorialize the requirement not to charge customers for this upgrade in its adoption order.  
PacifiCorp provided this note: Please note that the extent of this configuration on PacifiCorp's Oregon system is currently very limited, and PacifiCorp is in the process of converting the rest of its Oregon system. By the end of this year, the only area that will still be mixed three-wire and four-wire is in the Enterprise area, and PacifiCorp expects that area to be fully converted in 2027.

**860-082-0063(2)(a) Supplemental Review Penetration Screen.** "... the aggregate Export Capacity on the feeder or line section is less than 100 percent of the relevant minimum load on the feeder."