



February 7, 2022

VIA ELECTRONIC FILING

Chair Megan Decker
Commissioner Letha Tawney
Commissioner Mark Thompson
Public Utility Commission of Oregon
201 High Street, Suite 100
Salem, Oregon 97301

Re: Docket UM 2111 – PGE’s Response to Trade Associations’ January 4, 2022 Letter.

Dear Commissioners:

Portland General Electric Company (“PGE”) respectfully submits this response to the January 4, 2022, letter submitted in this docket by the Renewable Energy Coalition, the Community Renewable Energy Association, Oregon Solar + Storage Industries Association, and the Northwest & Intermountain Power Producers Coalition (collectively, “Trade Associations”). PGE shares the Trade Associations’ view regarding the importance of interconnection issues, and PGE also looks forward to constructive engagement with the Commission and all stakeholders as this proceeding moves forward.

PGE hopes this docket will proceed in a manner that allows all interested stakeholders to engage in forward-looking solutions that will benefit the public interest by establishing interconnection policies and rules that: (1) are clear and transparent; (2) do not require utility customers to bear an unreasonable share of costs associated with qualifying facility interconnections; and (3) do not have detrimental impacts to utility system reliability. If we can achieve this balance, it should reduce the level of future litigation over interconnection issues, which is certainly a goal PGE shares with the Trade Associations.

It is PGE’s hope that all participants will come into these discussions with an open mind, and PGE is committed to doing so. On this point, PGE believes it is counterproductive to rehash past interconnection complaints filed by interconnection customers, as rearguing past disputes is unlikely to encourage creative solutions. Moreover, the mere fact that a number of complaints have been filed sheds no light on who is actually at fault, let alone how the parties’ differences can be resolved.

Regarding the list of issues the Trade Associations suggest prioritizing in this docket, PGE believes

it would be more efficient for the Commission to delay consideration of such a list until all participants have had an opportunity to provide input on the issues to be considered and prioritized in this docket.

Finally, to clarify the process used to develop PGE's Independent System Impact Study ("iSIS") business practice discussed in the Commission's November 30, 2021, Public Meeting, this particular business practice was not developed in a formal stakeholder process. However, PGE adopted it in an attempt to address the concerns of developers and with the hope that it would provide clarity on PGE's iSIS process that would benefit both the development community and PGE.

PGE is open to stakeholder input on similar practices in the future; this would be consistent with the Open Access Transmission Tariff ("OATT") business practice process established by the Federal Energy Regulatory Commission, which provides a mechanism for utilities to post business practices detailing OATT implementation practices and requires utilities to gather stakeholder input on such practices. PGE believes the business practice approach is one of many ways in which utilities can provide specific guidance to developers in areas where the Commission's rules lack specificity or clarity.

PGE looks forward to working with the Trade Associations, Commission Staff, and other UM 2111 participants to tackle interconnection issues in the near future.

Sincerely,



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