

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2111

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation Into Interconnection
Process and Policies

JOINT COMMENTS ON BEHALF
OF THE COMMUNITY
RENEWABLE ENERGY
ASSOCIATION, RENEWABLE
ENERGY COALITION, AND
NORTHWEST & INTERMOUNTAIN
POWER PRODUCERS COALITION

I. INTRODUCTION

The Community Renewable Energy Association (“CREA”), the Renewable Energy Coalition (the “Coalition”), and the Northwest & Intermountain Power Producers Coalition (“NIPPC”) (collectively the “Interconnection Trade Associations”) respectfully submit these comments in response to Staff’s February 10, 2022 Scoping Announcement.¹ The Interconnection Trade Associations appreciate the Oregon Public Utility Commission’s (the “Commission’s”) commitment to investigating how to improve the interconnection process for generators in Oregon. However, the Interconnection Trade Associations propose some modest revisions regarding the prioritization of issues and seek clarification on the timing of the proposed groupings.

¹ Staff’s Scoping Announcement at 2.

II. COMMENTS

The Interconnection Trade Associations appreciate the Commission moving forward with UM 2111. Interconnection is an important step in developing energy projects. Without a fair, transparent, and functional process for interconnecting to a utility, interconnection customers are unable to progress in the development process. Thus, interconnection can also be a major impediment to developing energy projects.

In Oregon, there have been numerous issues with interconnection, including but not limited to major delays in the interconnection process, excessive interconnection costs, errors in interconnection studies, and lack of ability to vet utility decisions regarding interconnection. All of these issues have caused significant issues between interconnection customers and the utilities. Improvements to the interconnection process will increase the certainty and predictability of project development in Oregon, as well as ease concerns about utility obstruction and lessen the tensions between utilities and interconnection customers. Thus, the Interconnection Trade Associations appreciate Staff's and the Commission's commitment to addressing various interconnection issues and restarting the docket.

A. The Timeline to Address Each Grouping Should Be Clarified

The Interconnection Trade Associations seek clarification on the proposed timeline for the different groups in Staff's proposal. It is unclear how long Staff expects each grouping to last. For example, if it will take a year or more to address one group of issues compared to something shorter like six months, then that may influence the

Interconnection Trade Associations’ recommended priority of grouping issues. Thus, the Interconnection Trade Associations request clarification on Staff’s proposed timeline for the various groupings specifically how long it would take to address each grouping.

B. The Grouping Should Address the Highest Priority, Most Useful, and Easiest Issues for Commission to Resolve in 2022

Staff proposes to “focus on underlying methodologies and ensuring readiness for the types of projects being promoted by state policy (community, resiliency, flexible decarb)” for Group 1.² Specifically, Staff proposes

- Ensuring rules, policies, and practices for identification of upgrades account for modern technologies and industry best practices including, but not limited to:
 - Modernizing the screening and interconnection study practices
 - Incorporating updated standards such as IEEE 1547-2018
 - Incorporating advanced inverters, storage, islanding, and other modern configurations
 - Modernizing and right-sizing the upgrade options considered when an upgrade is needed[.]³

The Interconnection Trade Associations believe Staff’s Group 1 issues are important but are not the highest priority nor do they address the most useful and impactful issues out of all the issues Staff has identified. The Interconnection Trade Associations are not opposed to the inclusion of Staff’s proposed issues in Group 1 but recommend that additional issues be addressed early in the investigation.

² Staff’s Scoping Announcement at 3.

³ Staff’s Scoping Announcement at 3 (internal footnotes omitted).

The Interconnection Trade Associations recently submitted comments and recommendations reiterating their list of the seven most important and impactful issues to address that are not currently being addressed in other dockets. None of these seven issues are listed in Staff’s Group 1. To narrow and further prioritize, the Interconnection Trade Associations identify the three critical issues to be addressed and resolved in 2022:⁴ 1) an interconnection customer’s option to build (or hire third parties to build) interconnection facilities and network upgrades;⁵ 2) an interconnection customer’s opportunities to hire third parties to perform interconnection studies;⁶ and 3) a process

⁴ These issues were included in the Interconnection Trade Associations lists of issues to be addressed in UM 2000. *See in re Commission Investigation into Public Utility Regulatory Policies Act Implementation*, Docket No. UM 2000, NIPPC, the Coalition, & CREA Responses to Staff Questions (Mar. 29, 2019); see also Docket No. UM 2000, NIPPC, Coalition, and CREA’s Supplemental Answers to Staff’s Questions (Apr. 26, 2019). Interconnection Trade Associations first requested that these three issues be prioritized as the most important interconnection issues to be addressed in 2020. *See in re Commission Investigation into the Treatment of Network Upgrade Costs for Qualifying Facilities*, Docket No. UM 2032, NIPPC, Coalition, and CREA Comments on Staff’s Draft Issues List at 7-8 (Apr. 9, 2020).

⁵ This issue has been raised in various complaints at the Commission. *See, e.g., Sandy River Solar, LLC v. PGE*, Docket No. UM 1967; *Waconda Solar, LLC v. PGE*, Docket No. UM 1971.

⁶ This issue has been raised in various complaints at the Commission. *See, e.g., Pac. Nw. Solar, LLC (Amity Project) v. PGE*, Docket No. UM 1902; *Butler Solar, LLC v. PGE*, Docket No. UM 1903; *Pac. Nw. Solar, LLC (Duus Project) v. PGE*, Docket No. UM 1904; *Pac. Nw. Solar, LLC (Firwood Project) v. PGE*, Docket No. UM 1905; *Pac. Nw. Solar, LLC (Starlight Project) v. PGE*, Docket No. UM 1906; *Pac. Nw. Solar, LLC (Stringtown Project) v. PGE*, Docket No. UM 1907; *Dunn Rd. Solar v. PGE*, Docket No. UM 1963; *Sandy River Solar, LLC v. PGE*, Docket No. UM 1967; *Waconda Solar, LLC v. PGE*, Docket No. UM 1971; *Zena Solar, LLC v. PGE*, Docket No. UM 2074.

through which an interconnection customer may challenge utility cost estimates and propose alternatives.⁷ The fact that these are heavily litigated issues demonstrates their importance to interconnection customers and that their resolution will improve the interconnection process and help eliminate disputes.

Currently, these issues are not set to be addressed until Group 3 in Staff's proposal.⁸ These three issues are all related to each other and are primarily concerned with the interconnection customer's ability to check the utility's work and possibly reduce the cost of the interconnection. The Interconnection Trade Associations believe addressing these important issues first will increase certainty and predictability of project development in Oregon, ensure interconnection customers can effectively challenge utility costs estimates, and reduce Commission workload and utility complaints.

The Commission should reorder the priority of issues from Staff's proposal to ensure that the top issues to be addressed by the end of 2022: 1) an interconnection customer's option to build (or hire third parties to build) interconnection facilities and

⁷ This issue has been raised in various complaints at the Commission. *See, e.g., Sunthurst Energy LLC v. PacifiCorp*, Docket No. UM 2118; *in re Sunthurst Notice of Intent to File Complaint for Enforcement-PacifiCorp*, Docket No. UM 2177; *in re Carnes Creek Solar, LLC*, Docket No. UM 1631, Petition for Waiver of OAR 860-082-0025(b) & (c), Small Generator Interconnection (Apr. 23, 2020); *in re Marquam Creek Solar, LLC*, Docket No. UM 1631, Petition for Waiver of OAR 860-082-0025(1)(c), Applications to Interconnect a Small Generator Facility (Jan. 25, 2021); *Dunn Rd. Solar v. PGE*, Docket No. UM 1963; *Madras PVI, LLC v. PGE*, Docket No. UM 2009; *Zena Solar, LLC v. PGE*, Docket No. UM 2074; *Zena Solar, LLC v. PGE*, Docket No. UM 2164.

⁸ Staff's Scoping Announcement, Attachment B at 2.

network upgrades; 2) an interconnection customer's opportunities to hire third parties to perform interconnection studies; and 3) a process through which an interconnection customer may challenge utility cost estimates and propose alternatives. If Staff plans to resolve the issues in Group 1 in the next six months, then these three issues can be addressed in Group 2. However, if Staff does not plan to resolve the Group 1 issues until the end of 2022, then these three issues should be included in Group 1.

III. CONCLUSION

The Interconnection Trade Associations recommend reorganizing the issues in Group 1 to address higher-priority issues for interconnection customers. Additionally, the Interconnection Trade Associations request clarification on the proposed timelines to address each grouping in Staff's proposal.

Dated this 24th day of February 2022.

Respectfully submitted,


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