



# Oregon

Kate Brown, Governor

## Public Utility Commission

201 High St SE Suite 100

Salem, OR 97301-3398

**Mailing Address:** PO Box 1088

Salem, OR 97308-1088

503-373-7394

9/16/2022

## Summary of September 14 Meeting



At the second workshop in the Screens, Study Methods, and Modern Configurations workstream, the first two items addressed were redlined versions of documents for Export Controls and Supplemental Reviews. These two documents were initially introduced at the August 9, 2022 workshop. There was also a brief introduction to Level 1 screens as part of the workshop. The following are highlights of the discussion.

### Export Controls

For the section on Export Controls on a non-exporting DER, the discussion focused on mainly on the maximum time allowable for protective relays to prevent “inadvertent export”. The initial proposal called for protective relays have “a maximum of 2.0 second time delay to limit Inadvertent Export.” Proposed redlines submitted by the utilities would allow utilities to require a maximum delay of less than 2.0 seconds if a project is on a circuit using high-speed closing. *This issue was not resolved, but parties will look to focus on potential revisions for mutual agreement.*

There was additional discussion related to section 4.1.3: Relative Distributed Energy Resource Rating which allows for no additional protective functions when the resource is small in comparison to the host’s minimum load. There the DER nameplate rating would be no more than 50% of the host’s minimum load over the past 12 months. Comments called for this option to be at the sole discretion of the utility due to the ability of behind the meter DERs for existing load to still cause minimum daytime load thresholds to be reached (utilities may correct Staff’s understanding). *In comments parties should address the reasonableness of giving the utility sole discretion rather than establishing a transparent, predictable policy. Also, parties may propose a more reasonable, but predictable policy such as a different percentage of resource to minimum load that would be acceptable, instead of 50%.*

### Supplemental Review

The Supplemental Review discussion had more areas of discussion amongst the parties. These ranged from the issues with the process, screening thresholds, and timing.

For the process, the utility redlines looked to parallel the process currently in the OARs. Applicants need to request a Supplemental Review once they are notified they have failed the

Level 1 and 2 screens, within ten business days. If a Supplemental Review is not requested the application will be deemed withdrawn. *Parties did not seem far apart in these discussions; future work should focus on refining the approach to something mutually agreeable.*

An additional issues was raised, with one party suggested the Utility should be the one who decides if an applicant is eligible for a Supplemental Review, or if they will need to have a Level 4 review process. This was stated as being in line with FERC SGIP procedures. *Parties should address comments on the amount of discretion utilities should have in performing Supplemental Reviews, i.e. is it the utility or the applicant who makes the decision.*

For the Penetration Screens one issue raised was if 'line section' or "feeder or line section" should be used in screening calculations. *Comments here should focus on revised language that captures the correct level of flexibility and predictability and why.*

The IREC proposal had language where if the Export Capacity on the line section is less than 100% of the gross minimum load the applicant would pass the screen. Redlines from the utilities lowered the value to 90%. *In comments parties should address the appropriate level here, is it 100% of minimum load, 90%, or something else. Parties should focus comments on explaining rationale for why 90% threshold is or is not the appropriate threshold, what the risks are between 90% and 100%, and why those risks are or are not reasonably mitigated by other factors or tools. Please provide references to support positions where possible. Is the percentage proposed universal or only for situations when other protective equipment isn't in place on segment, feeder, substation.*

A further redline lowers the minimum load from 100% to 80% when a feeder is served by a dedicated substation. *Parties should focus on comments explaining rationale for why 80% threshold is or is not appropriate in this case, what the risks are between 80% and 100%, and why those risks are or are not reasonably mitigated by other factors or tools. As with above, please provide references to support positions where possible. Is the percentage proposed universal or only for situations when other protective equipment isn't in place on segment, feeder, substation.*

Also discussed was the appropriate set of hours to use in calculating the daytime minimum load (DML) calculations. Here IREC differentiated between fixed and tracking solar photovoltaic resources, with 10:00a.m. to 4:00 p.m. and 8:00 a.m. to 6:00 p.m. respectively. Utility redlines simplified this 9:00a.m. to 5:00 p.m. for all solar PV. At the workshop it was unclear what the current practices are, utilities should be prepared to provide those. Further discussion could be warranted, depending on current practices. It is Staff's belief the following table captures current utility practices related to the hours included for DML calculations for solar PV. *Staff encourages utilities to follow up with confirmation of their current methods for capturing DML.*

Hours to Calculate DML <sup>1</sup>		
Utility	Tracking	Fixed Panel
Portland General Electric	9:00 am - 5:00 pm	9:00 am - 5:00 pm
PacifiCorp	9:00 am - 6:00 pm	9:00 am - 6:00 pm
Idaho Power	8:00 am - 6:00 pm	10:00 am - 4:00 pm

Another redline allows the utility to take into account the impacts of non-export or export-limited projects in the daytime minimum load calculations. *Parties should focus comments on the rationale for utilities having discretion to consider these systems in calculating DML. Another question is if this for existing generation or Applicant or both?*

One other item discussed was the length of time used in calculating the minimum load on the feeder. The Renewable Energy Coalition suggested allowing for more than twelve months in the calculation when there are anomalies; parties agreed that this was reasonable.

### **PGE NEM Proposal**

At the August 9 workshop, Portland General Electric (PGE) presented a proposal for a waiver that would allow them to approve net energy metering (NEM) applications where safe, where the generator had failed Level 1 or 2 screens. There was additional discussion at this workshop on the proposal. The request is in line with the direction that the workgroup is going with the IREC model rules and the Supplemental Review process Parties appeared to express support at the workshop for moving this proposal forward as an interim measure while UM 2111 continues, and notably the other utilities stated that they do not face the same issue and do not need to rush to seek a temporary waiver of the current rules. Staff requests that the waiver request describe how the utility will determine if there is minimal risk to pass projects through without further study. Staff also encourages PGE to bring insights and learning to the work group where available, if the Commission approves the interim waiver request.

### **Screens**

Finally, due to time constraints, IREC made a brief presentation on Level 1 screens. This was a comparison of current screens in the Oregon Administrative Rules, both SGIP and NEM, in comparison to IREC's model rules. These will be the subject of the next workshop, as well as the Level 2 screens. The material is also contained at the end of the presentation posted to the docket for reference.

---

<sup>1</sup> PGE and PacifiCorp values submitted via email, Idaho Power values from FERC Open Access Transmission Tariff, [https://docs.idahopower.com/pdfs/BusinessToBusiness/smallGen\\_InterconnectionProcedures.pdf](https://docs.idahopower.com/pdfs/BusinessToBusiness/smallGen_InterconnectionProcedures.pdf) Section 2.4.4.1.1

## Next Steps

Based on discussion at the close of the meeting, we have identified the following next steps at the near-term workshops. Staff has identified the key areas where redline counter proposals or written justification of positions will be useful, but, as always, invited comment beyond these areas.

Description	Event Date	Workshop Topic	Pre-meeting deliverable
Workshop 3	October 6, 2022	Review screens comparison document	Initial redline of screens comparison by 9/29
Workshop 4	November 8, 2022	Follow-up discussion of non-export and supplemental review issues	Comments on key points of discussion (see above) by 10/25
Workshop 5	December 7, 2022	Follow up discussion of screens	Comments on key points of discussion by 11/23 (can discuss holiday timing considerations at next workshop)
Workshop 6	January 17, 2023	TBD – will be updated in future meeting notes.	
Workshop 7	February 15, 2023		
Workshop 8	March 15, 2023		

Staff appreciates stakeholders taking the time to participate in these discussions. To make these productive as possible, as discussed at the meeting, *Staff would like to know, as early as practicable, if utility technical experts are unavailable to attend future workshops.* If necessary we will look to reschedule such meetings.

There were also concerns raised by stakeholders who were not in the volunteer workgroup established at the prior workshop. These parties did not see the relines circulating within the workgroup. Going forward, Staff will request the workgroup circulate all redlines, comments, etc. to the Service List as listed on the [OPUC UM 2111 webpage](#).

For any questions or concerns please contact:

Ted Drennan

503-580-6380

[ted.drennan@puc.oregon.gov](mailto:ted.drennan@puc.oregon.gov)

To receive meeting notices and agendas for this docket, send an email to [puc.hearings@puc.oregon.gov](mailto:puc.hearings@puc.oregon.gov), and ask to be added to the service list for Docket No. UM 2111. You will then receive emails with workshop details, when new documents have been added to the docket, or there is a change to the schedule.