



UM 2111

Screens, Study Methods, and Modern Configurations Workshop

8-9-2022



Agenda



Item	Schedule	Time
Welcome		
Approach/Process	2:00	15 min
Discussion Questions	2:15	15 min
PGE Presentation – Net Metering Solution	2:30	15 min
IREC Presentations <ul style="list-style-type: none">• Supplemental Review• Export Controls	2:45	115 min
Next Steps	4:50	10 min
Adjourn	5:00	

Approach



- Phase 1 Topics (adopted by Commission)
 - Modernizing the screening and interconnection study practices;
 - Incorporating advanced inverters, storage, islanding, and other modern configurations;
 - Incorporating updated standards, such as IEEE 1547-2018; and
- Expectations – move process forward, everyone expected to work towards solutions
 - Goal to have actionable items at six-month and twelve-month marks

Initial prioritization strategy



1. New, quick win policies
2. Incorporation of storage
3. IREC model rules
4. Other quick wins from parties

Consider adopting supplemental review

- Includes some exploration of MDL and other methodologies

Use incorporation of storage as the driver for prioritizing sections of the OARs to examine (Oregon SGIP [OAR 860-082](#); Oregon NEM [OAR 860-039](#))

- Take care of export controls threshold decision
- Then, definitions
- Then, incorporation of storage into level/tier 1 and level/tier 2 screening criteria/eligibility
- Then, consider next steps

While working through sections of the OARs for storage, identify differences between current OARs and IREC model rules for consideration

Consider additional quick win proposals from parties

Process



- First workshop discussing specific topic
 - Introduce topic, discuss goals and general concepts, identify parties interested in drafting a proposal for rule language and encourage collaboration amongst aligned parties to avoid multiple competing drafts
- Interested stakeholders collaborate on proposal following workshop
- Proposal circulated among service list one week (or more) prior to second workshop
- Second workshop – discuss proposal and provide feedback
- Opportunity for counter-proposal, or further refinement of initial proposal following second workshop (circulate both one week prior to next meeting)
- If consensus not achieved by third workshop:
 - Continue refining proposal if consensus possible, or
 - Stakeholders to submit competing proposals with written justification
- Develop Final Report
 - Document consensus or competing rule language proposals
 - Include supporting justification for consensus and/or competing proposals
 - Final Report should include sufficient record for Commission decision

Presentations



- PGE – Erik Anderson
 - Potential solution for net metering facilities that fail Level 1 screens
- IREC – Yochi Zakai
 - New Section: Supplemental Review
 - New Section: [Export Controls](#)
- Links to utility manuals
 - [PGE](#)
 - [PacifiCorp](#)
 - [Idaho Power](#)

Net Metering: Small Project Approval Flexibility

August 2022



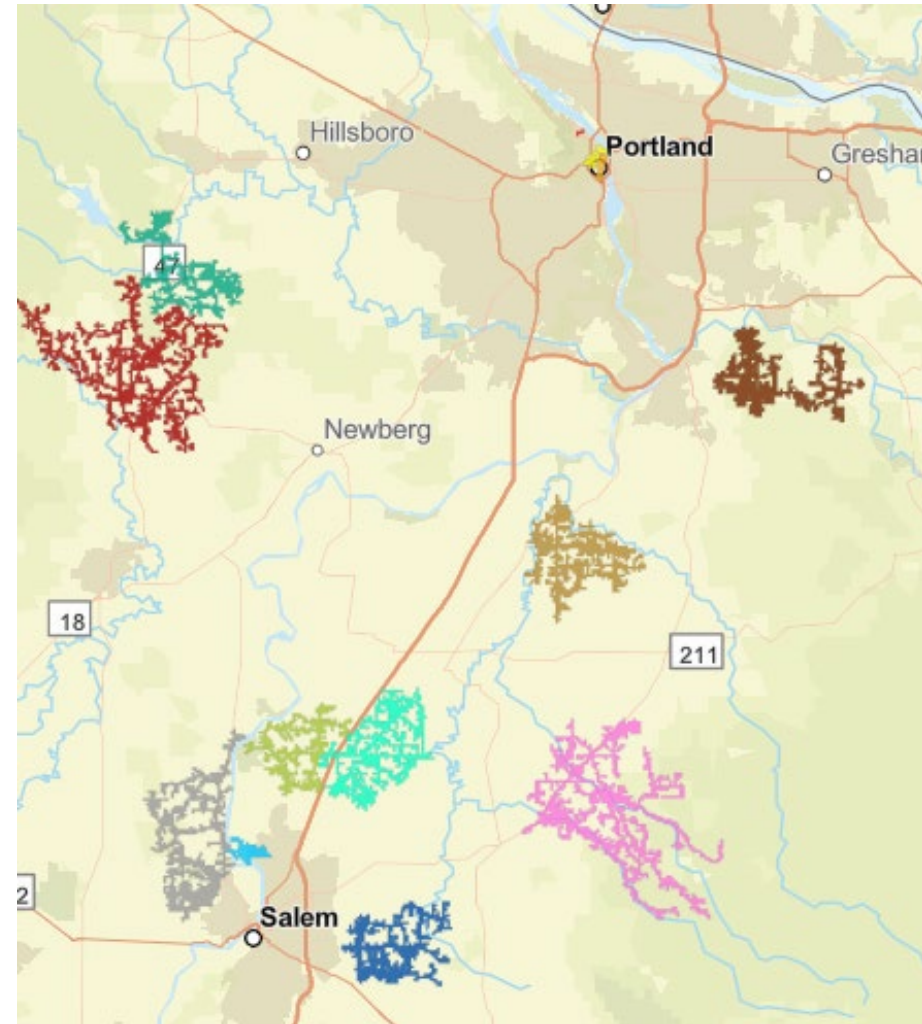
PGE

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Background:

- As currently adopted, the Net Metering Interconnection rules prohibit the utility from approving a Level 1 project that fails a screen.
- Research conducted in conjunction with the UM 2099 docket, the Two Meter Curtailment pilot, suggests that the 15% of peak load screen embedded within Level 1 rules, does not accurately gauge the impacts of small net metering projects on system safety and reliability.
- This leads to unnecessary application costs, time, and administrative burden for customers as they reapply under Level 2.
- While also requiring additional processes and review at the utility that provide little if any additional safety or reliability to the system.
- As net metering project volumes continue to increase, and additional feeders are identified as "Limited Generation Feeders" the burden of this problem is growing.
- PGE seeks regulatory flexibility to approve projects that it deems "consistent with safety, reliability and power quality."

Limited Generation Feeders



Existing Rules- OAR 860-039-0030: Level 1 Net Metering Interconnection Review

SCREENS

(2) The public utility must approve interconnection under the Level 1 interconnection review procedure if:

(a) The aggregate generation capacity on the distribution circuit to which the net metering facility will interconnect, including the capacity of the net metering facility, will not contribute more than 10 percent to the distribution circuit's maximum fault current at the point on the high voltage (primary) level that is nearest the proposed point of common coupling.

(b) A net metering facility's point of common coupling will not be on a transmission line, a spot network, or an area network.

(c) If a net metering facility is to be connected to a radial distribution circuit, the aggregate generation capacity connected to the circuit, including that of the net metering facility, will not exceed **10 percent (15 percent for solar electric generation)** of the circuit's total annual peak load, as most recently measured at the substation.

(d) If a net metering facility is to be connected to a single-phase shared secondary, the aggregate generation capacity connected to the shared secondary, including the net metering facility, will not exceed 20 kilovolt-amperes.

(e) If a single-phase net metering facility is to be connected to a transformer center tap neutral of a 240 volt service, the addition of the net metering facility will not create a current imbalance between the two sides of the 240 volt service of more than 20 percent of nameplate rating of the service transformer.

OPTIONS

(3) Within 10 business days after the public utility notifies a Level 1 applicant that the application is complete, the public utility must notify the applicant that:

(a) The net metering facility meets all applicable criteria and the interconnection will be approved upon installation of any required meter upgrade, completion of any required inspection of the facility, and execution of an interconnection agreement; or

(b) The net metering facility has **failed to meet one or more** of the applicable criteria and the interconnection **application is denied**.

(8) If an application for Level 1 interconnection review is denied because it does not meet one or more of the applicable requirements in this section, **an applicant may resubmit the application under the Level 2** or Level 3 interconnection review procedure, as appropriate.



Potential Language

860-039-0035 Level 2 Net Metering Interconnection Review

(3)(b) The net metering facility failed to meet one or more of the applicable requirements, but the public utility determined that the net metering facility may be interconnected consistent with safety, reliability, and power quality. In this case, the public utility will notify the applicant that the interconnection will be approved following any required inspection of the facility and fully executed interconnection agreement. Within five business days after this notice, the public utility will provide the applicant with an executable interconnection agreement;

IREC Model Rules Section III: Interconnection Review

(A)(4): Screens failure: Despite the failure of one or more screens, the Utility, at its sole option, may approve the interconnection provided such approval is consistent with safety and reliability. If the Utility cannot determine that the Generating Facility may nevertheless be interconnected consistent with safety, reliability, and power quality standards, the Utility shall provide the Applicant with specific information on the reason(s) for failure in writing. In addition, the Utility shall allow the Applicant to select one of the following, at the Applicant's option:

- a. Undergo Supplemental Review in accordance with Section III.D; or
- b. Continue evaluating the Application under Level 4, Section III.F.

The Applicant must notify the Utility of its selection within ten (10) Business Days or the Application will be deemed withdrawn.



Solutions

Long Term

- **Include permissive language that allows utility to approve projects consistent with safety and reliability, even if screens are not passed.**

Near Term

PGE proposal

- **Seek waiver of 860-039-0030(3)(b) until such time as UM 2111 designed rules have been adopted.**

Other potential options:

- **Develop narrow set of preliminary issues to address in initial stages of rule adoption proceedings.**
 - **Even at an expedited pace not likely to effect projects in the near term.**
- **?**



Questions or Thoughts?



Supplemental Review



Challenge

Projects that fail Level 1 & 2 should have the opportunity to interconnect without the time and expense of a System Impact Study.



Solution: Add a Supplemental Review Process

- allow the utility additional time to perform a more detailed analysis than is allowed by the short timeline in Fast Track,
- take significantly less time than the full study process,
- use standard screens, and
- use a fixed fee.

Conversation starters



- Supplemental Review
- Export Controls

Next Steps



- Interested Stakeholders collaborate on proposal
 - Via email or,
 - Virtually
- Circulate proposal(s) to service list by September 7
- Next workshop in this workstream on September 14 9am-noon
 - Discussion of proposal(s) received
 - Potential discussion of other topics
 - Definitions
 - Screens – Level 1 and 2.
- Further refinement of initial proposal(s), and
- Development of proposal(s) for new topics
- Continuation cycle of proposals-workshops-refinements as needed
- Develop Final Report

Save the Date(s)



Workshop 2: Screens, Study Methods, and Modern Configurations

- Date: September 14
- Time: 9:00 AM – 12:00 PM
- Location: Zoom
 - [Link to Meeting](#)
 - Dial-in: 1-971-247-1195
 - Meeting ID: 815 1290 4309
 - Passcode: 5464541110

Workshop 1: Incorporating Updated Standards

- Date: August 31
- Time: 9:00 AM – 12:00 PM
- Location: Zoom
 - [Link to Meeting](#)
 - Dial-in: 1-971-247-1195
 - Meeting ID: 891 0594 8172
 - Passcode: 5189217272