



Oregon

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Summary of January 17 Workshop

The workshop held January 17 included a process check in, an update on Joint Utility efforts to address historical DER project data gaps that impact ongoing interconnection analysis, and a discussion of parties' screening policy proposals focused on penetration screening policies. The following are highlights of the [discussion](#) as recorded by Staff, with questions for stakeholders italicized. If you believe anything is missing or in error, please reach out to Ted Drennan.

Following the workshop, the Joint Utilities communicated with Staff and Stakeholders on the process as well as offering suggestions for moving forward. Their suggestions have been incorporated into the schedule and next steps as discussed below.

Process Update

Staff described its understanding of the scope of Phase 1 issues (export controls, screening policies, IEEE-1547 standard updates) and proposed that meaningful discussion of parties proposed rule changes is nearly complete. Staff proposed that redlines covering these policy areas have been circulated and parties have engaged in robust discussion of all but a few remaining policies. Staff believes that following discussion of Joint Utility proposal, fast-track screening, and any incidental issues at the February 15 workshop, we will have sufficient understanding of areas of agreement and parties' positions where there are areas of disagreement to put forth a Staff straw proposal for Phase 1 issue rule language.

Given the current status, Staff is planning on providing a redlined version of Divisions 82 and 29 following the February 15 meeting. Staff will go through this at the March 15 workshop. To allow Staff time to incorporate information from the February 15 workshop, the February 28 workshop is canceled; and the discussion will pick up at the March 15 workshop.

The March 15 workshop will also be used to gauge the potential for reaching consensus on any of the issues with competing proposals; future workshops could be used to work on consensus positions. There will also an opportunity for comments prior to moving to a formal rulemaking. As mentioned, following internal discussions, it is Staff's intent to have a single formal rulemaking to address all phase 1 issues, following the conclusion of this portion of the investigation.

Staff is interested in what parties think of the proposal for moving the docket forward. Do parties believe this is an efficient way to address Phase 1 issues? Please provide and suggestions that would improve the process.

Data Availability Discussion

Previous working group meetings identified a gap in utility data on existing DERs that can impact the ability to implement modern screening (and study) practices. Energy Trust and the Joint Utilities provided an update on their efforts to combine Power Clerk databases to get more precise information on the amount of energy that distributed energy resources (DERs) put on the grid. Energy Trust has been using Power Clerk since 2003, while the utilities adoption is more recent. It appears the information contained within the Energy Trust database could be used to supplement the utilities databases and ensure better data for use in screening, studies, and other analyses such as hosting capacity.

As stated at the workshop, there is a business case for aligning the databases. This will require work, especially for all of the utility systems that make use of the data currently. The timeline for this will likely vary amongst the utilities, one example timeline mentioned was the year given to Illinois utilities to complete a similar task.

There was a suggestion that the UM 2111 docket should not include mandates on updating data, that should be left to the DSP discussion. Staff understands that DSP analyses are designed to identify constraints in a planning and transparency context that are roughly the same as the project-specific analyses associated with interconnection screening (and study) practices. However, Staff believes that data quality issues will affect the ability to implement modern screening policies under discussion in this docket and this is just as appropriate of a venue to make this priority clear to the utilities as DSP.

Staff appreciates the willingness of parties to work together to get data reflective of actual system conditions. Internal discussions will likely help guide Staff's ultimate position on the issue, should there be requirements set forth in the current docket, or in the DSP process.

Staff is interested in how many utility computer systems could be impacted through the modernization of the interconnection process, including the approach of looking at export capacity as opposed to nameplate capacity, as well as the implications on timing for updating these systems. Also of interest are any current plans to update impacted systems; that is, are system modernization plans already in place, and what timing is anticipated for completing the process.

Tier 4 Feasibility Study Requirements

One of the first issues discussed involved timelines for the Tier 4 Interconnection Review, and the potential need to modify the section to deal with utilities using cluster studies. It is not clear

at this point that there is a clear answer to this question, and if it is in scope for the current phase.

Similar questions were raised with an edit to give the interconnection customer the option to unilaterally waive the feasibility study requirements. This seems to be a relatively innocuous change; as well, Staff supports the idea of giving customers more decision-making authority where possible. While saying that, there appeared to be potential issues with the queue processes for applicants waiving the feasibility study, versus those proceeding with the study.

Staff would like to hear more from parties on these issues, is there wording that can be added to reflect cluster studies? Is there a workable solution to address applicants wanting to waive feasibility studies? Do parties believe these discussions are within the scope?

Penetration Screens

The majority of the workshop time was devoted to discussion of differing proposals for revised screening policies. With penetration screens being the main focus among the issues discussed.

Penetration Screen in Supplemental Review

Parties discussed their differing positions on the appropriate penetration screen for supplemental review without reaching a consensus proposal. IREC's initial proposal would allow for interconnection for projects up to 100% of the feeder's minimum load, however, IREC expressed a willingness to compromise with a 90% minimum load penetration screen because they understood from statements made in Docket No. UM 2099 that this was the current utility penetration screen process to identify generation limited feeders.¹ The Joint Utilities explained that they currently use a more conservative 80% penetration screen based on the transformer serving the feeder.

In response to the Joint Utilities, IREC suggested that the penetration screen, if needed at all, should be treated as an overall ceiling for the supplemental review and that subsequent screens are designed to identify the risks that the utilities cited as the reason to use 80% minimum load for the penetration screen. For example, there is a supplemental grounding screen that can be used to address risks of overvoltage during ground faults raised by the Joint Utilities. That is, the penetration screen should not be used as a proxy for grounding, when there is a grounding screen available.

¹ See the following from page 6 of PGE's reply comments dated 9/22/2020:

If sufficient levels of protection are not present at the associated substation level, a limited feeder is defined as having aggregate daytime inverter-based generation (kW) greater than 90% of its minimum daytime consumption load (kW).

The Joint Utilities pointed out that the IEEE 1547.2 draft seems to call for an 80% value for the screen. IREC also noted that states who have addressed use of penetration screens are using 100% of daytime min load for the penetration screen. One other point, it appears the Safety and Reliability screens could be used to address other concerns raised, without relying on the penetration screen as a proxy for safety.

Discussion of penetration screens for Tier 1 seemed to reach consensus that 90% of minimum load on the feeder section would be appropriate. There potentially could be an additional screen relying on 80% in cases of a dedicated substation transformer.

Will the use of a supplemental grounding screen alleviate concerns about setting the penetration screen at 100% (or 90%) of minimum load, please explain. Please also explain the risks of moving from something like an 80% level to higher penetration level screens, such as 100%. Finally, is it possible to rely on the safety and reliability screen, either as written, or edited, to relieve concerns raised at the workshop with the penetration screen?

Tier 3 Needed?

There was a brief discussion on the continuing need for a Tier 3 in the study process for Small Generator Interconnection Procedures. Tier 3 projects are non-exporting behind the meter projects limited in size to 10 MW. There are currently around five – seven projects submitting applications annually for Tier 3 interconnections with PGE. It is not clear at this point if developers would like to continue with this Tier.

Staff is interested in the necessity of this tier, is it needed, or could it be eliminated with the new export controls? What process would non-exporting generators between 2 and 10 MW apply for interconnection? Do stakeholders have concerns with eliminating Tier 3 as an option?

Next Steps

The following table contains the topics for the next set of workshops. This includes the currently scheduled workshops for Phase 1 of the UM 2111 investigation. As mentioned above, Staff is looking to present a red line proposal for consideration at the March 15 workshop. As shown below, both the January 31 and February 28 workshops have been canceled due to lack of SMEs and to provide Staff time to finalize a proposal for discussion at the March 15 workshop.

Combined Workstreams		
Description	Event Date	Workshop Topic
Workshop 11 Canceled	January 31, 2023	Fast track Screen Reports Tier 4— Screen failure and export controls changes Remaining near term issues
Workshop 11	February 15, 2023	Joint Utilities present redlines Fast-track Screen Reports Remaining issues
Workshop 13 Canceled	February 28, 2023	TBD— Staff intends to open a rulemaking in the first/second quarter of 2023. Final approach is not yet determined, but these workshops could be held for that purpose.
Workshop 12	March 15, 2023	Staff proposal presented
Workshop 13	March 28, 2023	TBD – Staff intends to open a rulemaking in the first/second quarter of 2023. Final approach is not yet determined.

Staff appreciates stakeholders taking the time and effort to participate in these discussions. To make these productive as possible, *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.

Please be sure to circulate all discussion, redlines, comments, etc. to the Service List as listed on the [OPUC UM 2111 webpage](#).

For any questions or concerns please contact:

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To receive meeting notices and agendas for this docket, send an email to 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.