PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: October 6, 2020

REGULAR _____ **CONSENT** __X__ **EFFECTIVE DATE** _____ **October 12, 2020** _____

DATE: September 28, 2020

TO: Public Utility Commission

FROM: Kacia Brockman

THROUGH: Bryan Conway, JP Batmale, and Sarah Hall **SIGNED**

SUBJECT: <u>PACIFIC POWER</u>:
                (Docket No. ADV 1183/Advice No. 20-010)
                Revises Community Solar Program Interconnection Application.

STAFF RECOMMENDATION:

Approve Pacific Power's (PacifiCorp, PAC, or Company) Advice No. 20-010 to revise its Community Solar Program (CSP) Interconnection Application.

DISCUSSION:

<u>Issue</u>

Whether the Commission should approve PAC's request to revise its CSP Interconnection Application in order to update how eligibility-based minimum daytime load (MDL) is calculated.

<u>Applicable Law</u>

Oregon Revised Statutes (ORS) 757.386(2)(a) directs the Commission to establish a program that provides electric customers with the opportunity to share the costs and benefits of solar generation.

ORS 757.205 requires public utilities file to all rates, rules, and charges with the Commission.

ORS 757.210 establishes a hearing process to address utility filings and requires rates be fair, just, and reasonable.

ORS 757.220 provides that no change shall be made in any schedule, except upon 30 days' notice to the Commission prior to the time the changes are to take effect.

Analysis

Summary
PAC is updating its CSP Interconnection Application to provide clear guidance to applicants on how to correctly calculate the maximum generator size for which they can apply for a CSP interconnection. PAC is not changing the way maximum size eligibility is determined, but rather clarifying the correct use of PAC's publicly posted MDL data in the calculation. This advice filing makes no other revisions.

Background
On October 29, 2019, the Commission adopted a streamlined interconnection process for CSP projects.[1] The streamlined interconnection process includes a dedicated interconnection queue for CSP projects sized such that generation on the utility feeder does not exceed the feeder's minimum daytime load (MDL).

On January 16, 2020, the Commission approved CSP interconnection implementation plans submitted by PAC, Portland General Electric (PGE), and Idaho Power Company (IPC), and directed each electric company to file a tariff formalizing its CSP interconnection process and supporting interconnection documents.[2]

On April 14, 2020, PAC filed, and the Commission accepted, its final CSP tariff and supporting interconnection documents in Advice No. 20-003.[3] The supporting documents included PAC's CSP Interconnection Application, which is used by generators applying to PAC's CSP interconnection queue.

The CSP Interconnection Application contains a formula for the applicant to calculate the maximum CSP generator size allowed based on the feeder's MDL. The applicant obtains the feeder's MDL from a spreadsheet publicly posted and updated by PAC. For feeders with Supervisory Control and Data Acquisition (SCADA), the posted MDL is a measured value that represents load net of any existing generation on the feeder. For feeders without SCADA, the posted MDL is a proxy value equal to 30 percent of summer peak load. The proxy MDL does not account for existing generation on the feeder, so existing generating capacity must be subtracted from the proxy MDL value to determine the remaining feeder capacity that can support new or pending generation.

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[1] *See* Docket No. UM 1930, Order No. 19-392, adopted October 29, 2019, and issued November 8, 2019, at p. 5.
[2] *See* Docket No. UM 1930, Order No. 20-038, adopted January 16, 2020, and issued February 4, 2020.
[3] *See* Docket No. ADV 1093, PAC Advice No. 20-003, filed April 14, 2020.

The current version of PAC's Interconnection Application provides different instructions for calculating maximum eligible generator size depending on whether or not MDL data is available for the feeder. While the current instructions are technically correct, they can be confusing to the applicant because, on PAC's spreadsheet, MDL appears to be available for every feeder, even those with a proxy, rather than measured MDL value.

On September 10, 2020, PAC filed Advice No. 20-010 to update the CSP Interconnection Application. In this advice filing, PAC revises the instructions to depend no longer on whether MDL data is available for the feeder, but instead on whether SCADA is available on the feeder. The availability of SCADA on each feeder is listed in PAC's publicly posted MDL data. For feeders with SCADA, existing generation is already accounted for in the MDL, so the applicant is instructed to subtract only pending generation from the MDL value to determine the remaining feeder capacity available for the applicant's generator. For feeders without SCADA, the applicant is instructed to subtract both existing and pending generation from the MDL value to determine remaining feeder capacity.

Conclusion

Staff finds that PAC's proposed revision to its CSP Interconnection Application will clarify the method to calculate eligible generator size for CSP interconnection applicants, benefitting both PAC and the applicants. Staff confirms that no other changes are included in this advice filing.

PROPOSED COMMISSION MOTION:

Approve PacifiCorp's Advice No. 20-010 to revise its Community Solar Program Interconnection Application.

ADV 1183 PAC CSP Interconnection Application Update