



Oregon

Kate Brown, Governor

Public Utility Commission

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October 6, 2020



BY EMAIL

PacifiCorp, dba Pacific Power

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RE: Advice No. 20-010

At the public meeting on October 6, 2020, the Commission adopted Staff's recommendation in this matter docketed as ADV 1183. The Staff Report and a receipted copy of the sheets in your advice filing are attached.

Nolan Moser

Chief Administrative Law Judge

Public Utility Commission of Oregon

(503) 378-3098

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

REGULAR **CONSENT** **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: PACIFIC POWER:
(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:

Issue

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.

Applicable Law

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.

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.



Community Solar Project Interconnection Application

Application for Interconnection of Community Solar Project(s)
(Tier 2 or Tier 4 Interconnection)

Applicant Contact Information:

Name:
Mailing Address:
Physical Address:
City: State: Zip Code:
Telephone (Daytime): (Evening):
Facsimile Number: E-Mail Address:

*Does the applicant request to be jointly studied with other Community Solar Projects, if applicable?
Yes: No:

Location of Where the Community Solar Project will be Interconnected (if different from above):

Please provide a valid street address or specific Latitude/Longitude as follows:
Street Address:
City: State: Zip Code:
Or
Latitude: Longitude:
Proposed Substation/circuit:

*If the applicant requests to be jointly studied with other Community Solar Projects, please provide a valid street address or specific Lat/Long of the other Community Solar Projects as follows (add more if necessary):

1. Street Address:
City: State: Zip Code:
Or
Latitude: Longitude:
Proposed Substation/circuit:

1 When used in this application, with initial capitalization, the terms specified shall have the meanings given in the Public Utility's Community Solar Project Interconnection Procedures ("CSP Interconnection Procedures").

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Community Solar Project Interconnection Application

(cont.)

System Installer/Consulting Engineer:

Name: _____

Mailing Address: _____

City: _____ State: _____ Zip Code: _____

Telephone (Daytime): _____ (Evening): _____

Facsimile Number: _____ E-Mail Address: _____

Requested Procedure Under Which to Evaluate Interconnection Request:

Please indicate below which review procedure applies to the interconnection request.

- Tier 2** - Certified interconnection equipment with an aggregate Electric Nameplate Capacity of 2 MW or less. Indicate type of certification below. The application processing fee amount is \$500.
 - Lab Tested - tested to IEEE 1547.1 and other specified standards by a nationally recognized testing laboratory and is appropriately labeled.
 - Field Tested – an identical small generator facility has been approved by the public utility under a Tier 4 study review process within the prior 36 months of the date of this interconnection request.
- Tier 4** – Electric Nameplate Capacity rating is 3 MW or smaller and the Community Solar Project does not qualify for a Tier 2-review or has been reviewed but not approved under a Tier 2 review. Application processing fee amount is \$1000.

Field Tested Equipment:

If the field tested equipment box is checked above, please include with the completed application the following information which will be required for review of Tier 2 field tested small generator facilities:

- A copy of the Certificate of Completion, signed by the public utility that has approved an identical small generator facility for parallel operation.
- A copy of all documentation submitted to the public utility that approved the small generator facility for parallel operation under a Tier 4 study process.
- A written statement by the Applicant indicating that the small generator facility being proposed is identical, except for Minor Equipment Modification, to the one previously approved by the public utility for parallel operation.
- If a Tier 2 Application, utilizing Field Tested equipment, is proposed the remainder of the application will not be required to be completed.

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Community Solar Project Interconnection Application

(cont.)

Community Solar Project Information:

List interconnection components/system(s) to be used in the Community Solar Project that is lab certified (required for Lab Tested, Tier 2 Interconnection requests only).

Component/System	NRTL Providing Label & Listing
1. _____	_____
2. _____	_____
3. _____	_____
4. _____	_____
5. _____	_____

Please provide copies of manufacturer brochures or technical specifications

Electric Service Information for Applicant’s Facility Where Community Solar Project Will Be Interconnected:

Capacity: _____(Amps) Voltage: _____(Volts)

Type of Service: Single Phase Three Phase

Will a transformer be used between the generator and the point of common coupling? ___Yes ___No

Transformer Data (If Applicable, for Interconnection Customer-Owned Transformer):

Is the transformer: ___single phase ___three phase? Size: _____kVA

Transformer Impedance: _____% on _____kVA Base

If Three Phase:

Transformer Primary: _____ Volts _____ Delta _____ Wye _____ Wye Grounded

Transformer Secondary: _____ Volts _____ Delta _____ Wye _____ Wye Grounded

Transformer Tertiary: _____ Volts _____ Delta _____ Wye _____ Wye Grounded

Energy Production Equipment/Inverter Information:

Total Community Solar Project Electric Nameplate Rating: _____ kW _____ kVA

Rated Voltage: _____ Volts

Rated Current: _____ Amps

Manufacturer: _____ Model: _____

Type: Forced Commutated Line Commutated

Customer-Site Load: _____ (kW) (if none, so state)



Community Solar Project Interconnection Application

(cont.)

CSP interconnection requests will be eligible if the proposed generator, together with all other interconnected and requested generation in the local area, is less than 100 percent of minimum daytime load (MDL)

If Supervisory Control and Data Acquisition (SCADA) is available then:

Interconnection Line Information

- (1) MDL: _____ kW
(2) Pending generation = _____ kW
(3) Maximum available generation = (1) - (2) = _____ kW
(4) Maximum Physical Export Capability Requested (cannot exceed (3)): _____ kW

If SCADA is not available then:

Interconnection Line Information

- (1) MDL: _____ kW
(2) Existing generation = _____ kW
(3) Proposed generation = _____ kW
(4) Maximum available generation = (1) - (2) - (3) = _____ kW
(5) Maximum Physical Export Capability Requested (cannot exceed (4)): _____ kW

Number of Inverters: _____

Per Inverter Electric Nameplate

Capacity Rated Output: _____ Amps _____ Volts _____ kVA _____ kW

Efficiency: _____% Power Factor: _____%

System Type Tested (Total System): [] Yes [] No (product literature required to be attached)

Individual Generator Rated Power Factor

Leading: _____ Lagging: _____

Additional Information For the Community Solar Project:

DC Source / Prime Mover:

Open Circuit Voltage (If applicable): _____ Volts

Rated Current: _____ Amps

Short Circuit Current (If applicable): _____ Amps

Other Community Solar Project Information:

One Line Diagram attached: [] Yes [] No

Plot Plan attached: [] Yes [] No



Community Solar Project Interconnection Application

(cont.)

Installation Test Plan attached: Yes No

Estimated Commissioning Date (if known): _____

The following are required with the application:

- Enclose copy of site electrical one-line diagram showing the configuration of all Community Solar Project equipment, current and potential circuits, and protection and control schemes.
- Enclose copy of any site documentation that indicates the precise physical location of the proposed Community Solar Project (e.g., USGS topographic map, distance from public utility facility number, other diagram or documentation).
- Enclose copy of any documents that provide proof of site control.

Applicant Signature:

I hereby certify that all of the information provided in this application request form is correct.

I hereby certify that facility is a Community Solar Project as the term is defined in ORS 757.386(1)(a) and meets the certification and eligibility requirements of OPUC Rule OAR 860, Division 088.

I understand if the small generator facility described in this application does not qualify or fails to maintain qualification as a Community Solar Program Project then the project will lose its queue position, and will be deemed withdrawn.

I understand if I withdraw this application, the Community Solar Program Project will lose its queue position.

***If the applicant requests to be jointly studied with other Community Solar Projects,** I understand that if a Community Solar Project that has been jointly studied with my request for CSP Interconnection withdraws, the Company will reassess the System Upgrades needed to complete the interconnection(s) and reallocate the System Upgrade costs to the remaining Community Solar Project(s).

Applicant Signature: _____

Title: _____ Date: _____



Community Solar Project Interconnection Application

(cont.)

Public Utility Acknowledgement:

I hereby acknowledge the receipt of an Interconnection Request for a Community Solar Project.

Approval for a Tier 2 or Tier 4 Community Solar Project interconnection is contingent upon the Applicant's Community Solar Project passing the screens (if applicable) and completing the review process and is not granted by the Public Utility's signature on this Application Form.

Public Utility Signature: _____ Date: _____

Printed Name: _____ Title: _____

Note: The Public Utility shall retain a copy of this completed and signed form and return the original and any attachments to the Applicant.