

June 2, 2021

VIA ELECTRONIC MAIL (Matthew.Loftus@PacifiCorp.com)

Mr. Matt Loftus
Senior Transmission Counsel
825 NE Multnomah St, Suite 1600
Portland, OR 97232

Subject: **Sunthurst Energy, LLC
Notice of Intent to File Complaint for Enforcement,
Questions re System Impact Study (SIS) Reports for OCS 062 and OCS 063,
and Questions re Facilities Study (FS) Report for OCS 024**

Dear Mr. Loftus:

Sunthurst Energy, LLC asked me to contact you to see if you might help with its current good faith negotiations of the Oregon Community Solar interconnections of Sunthurst's 2.4 MW Nye Solar Project (OCS 062), its 2.99 MW Reith Solar Project (OCS 063), and its 1.56 MW Tutuilla Solar Project (OCS 024). Specifically, Sunthurst requests extension of deadlines PacifiCorp has imposed upon Sunthurst, until PacifiCorp has meaningfully addressed Sunthurst's concerns with the interconnection studies. Sunthurst further requests PacifiCorp explain why 3 of 3 Sunthurst interconnection requests have been reconfigured by PacifiCorp during the study process, and state whether PacifiCorp will assist Sunthurst in mitigating resulting cost impacts.

OCS 062 and OCS 063 technical issues

Background. Sunthurst requested interconnection for Nye and Reith Community Solar projects on December 17, 2020. PacifiCorp published the SIS Reports for both projects on May 3, 2021.

Sunthurst e-mailed questions about the SIS Reports to Mr. Ty Engle. A distillation of those questions, which were sent in several e-mails, is attached for your information. Sunthurst requested PacifiCorp postpone any conference call reviewing the SIS Report pending PacifiCorp's response to Sunthurst's questions, and toll Sunthurst's time to execute Facilities Study agreements until a reasonable time after. Notwithstanding Sunthurst's request, on May 25, 2021, Sunthurst received an e-mail from Mr. Engle declaring OCS 062 and OCS 063 in default and threatening to terminate their queue position on June 16, 2021. But Sunthurst has not received specific responses to any of its questions, attached.

Sunthurst has reasonable grounds for an extension. Sunthurst's request to postpone the deadline for executing Study Agreements for OCS 062 and OCS 063 makes sense in light of incomplete and seemingly incorrect information provided in both studies.

For OCS 062, Sunthurst is waiting to receive load flow and voltage drop analyses. PacifiCorp is required by OAR 860-082-0060(7)g to perform these studies. Such information allows Sunthurst to review PacifiCorp's conclusions, including whether re-conductoring part of the OCS 062 feeder is necessary. Sunthurst also questioned several SIS assumptions, including the existence of a line recloser and a sectionalizer included in the studies (see further explanation in page 5, below).

For OCS 063, Sunthurst is waiting to receive load flow studies quantifying the reactive support PacifiCorp requires OCS 063 to provide. And Sunthurst has asked PacifiCorp to confirm its input assumptions which Sunthurst believes to be inaccurate, including: (a) the need for new transmission poles, (b) the existence (or non-existence) of 69kV Voltage Transformers at Buckaroo Substation; and (c) whether (senior queue position) Project 0586 has achieved commercial operation (see further explanation in page 6, below).

In the case of each Project, Sunthurst is waiting for PacifiCorp to provide information required by the OARs and has sought to clarify potentially material inaccuracies in the study assumptions. Forcing Sunthurst to sign the Facilities Study Agreements on threat of default is unreasonable, and also increases the likelihood that preventable errors will be perpetuated in the Facilities Study agreement. This can be remedied by tolling Sunthurst's timeline until PacifiCorp has responded substantively to Sunthurst's questions.

OCS 024 technical issues

On or about February 25, 2021 Sunthurst provided detailed comments/requested modifications on the OCS 024 Facilities Study. The proposed modifications would reduce cost of interconnection equipment and interconnection facilities without affecting safety or performance. A summary of the comments is attached on page 7, below.¹ Notwithstanding Sunthurst's request, on May 21, 2021, Sunthurst received an e-mail from Mr. Bremer declaring OCS 024 in default and threatening to terminate its queue position on June 14, 2021. But Sunthurst has not received specific responses to many of its questions. Sunthurst requests that PacifiCorp either incorporate the proposed changes into the OCS 024 interconnection or else explain why they cannot be allowed. Until PacifiCorp has responded, Sunthurst's deadline to execute the OCS 024 interconnection agreement should be tolled.

OCS 024, 062, and 063 programmatic issues

In all three of Sunthurst's OCS interconnection requests, PacifiCorp studied system conditions that do not currently exist and were not announced prior to Sunthurst's interconnection requests. PacifiCorp apparently studied the distribution system as it believes it will be at some future, unspecified, date. The studied system conditions are materially adverse compared to the system conditions published by PacifiCorp, and upon which OCS Project Stakeholders were encouraged to rely upon when siting projects. PacifiCorp's assumed system conditions in OCS 024: (1) caused Sunthurst to reduce its Project OCS 024 size from 2.45 to 1.56 MW; and (2) caused PacifiCorp to require direct transfer trip. PacifiCorp's assumed system conditions in OCS 062 caused PacifiCorp to require direct transfer trip on that project.² PacifiCorp's assumed system conditions in OCS 063 (which differ from its published UM2000 Feeder data) caused PacifiCorp to require direct transfer trip on that project as well.³

PacifiCorp's unilateral re-designation of requested interconnection points, and planned reconfiguration of feeders, financially harms Sunthurst and could constitute unfair restraint of trade.

¹ Sunthurst provided a similar summary of OCS 024 modifications requested, with additional details, in an e-mail from Daniel Hale on June 1, 2021.

² Sunthurst requested OCS 062 interconnect to 5W203 with a UM2000 published MDL of 2.4 MW. PacifiCorp changed the interconnection point to circuit 5W856, which does not currently exist, and which has an estimated MDL of < 2.4 MW.

³ PacifiCorp's assumed reconfiguration of circuit 5W202 caused PacifiCorp to assume an MDL <2.99 MW.

PacifiCorp's system assumptions used in its studies for OCS 024, 062, and 063 necessitate direct transfer trip (DTT) at each project that otherwise would not be necessary, and have caused Sunthurst to reduce the size of OCS 024 by 0.89 MW. Other increases to cost may also result. Together, PacifiCorp's changes will cost Sunthurst approximately \$1 Million more than Sunthurst would pay to interconnect to PacifiCorp's existing system, as described in its UM 2000 published data at the time Sunthurst submitted its SIS requests.

While PacifiCorp's technical team is responding to Sunthurst's technical questions about the current SIS Report results, Sunthurst asks PacifiCorp to please explain how it determined to unilaterally change (in the case of OCS 024 and OCS 062) Sunthurst's requested interconnection point, and what steps, if any, PacifiCorp considered to mitigate the adverse impacts to Sunthurst. Does PacifiCorp have a codified policy to ensure comparable treatment of all small generator interconnections with respect to assumed base case system conditions, or was its decision purely discretionary? Sunthurst requests, further, that it be allowed to review the distribution system drawings in the vicinity of its three projects to look for alternative, more economical options for interconnection. (Sunthurst would agree to an NDA in order to review such information). If Sunthurst identifies such alternatives, it asks that they be considered.

Suggested Steps forward.

Clearly the parties need time to meaningfully address the issues described above. Sunthurst therefore renews its request for PacifiCorp to answer the attached questions, and to toll Sunthurst's deadlines for OCS024, OCS 062 and OCS 063. Unless PacifiCorp is willing to do so, Sunthurst may be forced into filing Complaint(s) before the Commission seeking injunctive relief.

With respect to PacifiCorp changing its distribution system after Sunthurst has relied upon published system data, Sunthurst is hopeful that there is an opportunity to mitigate the cost-related impacts to Sunthurst through discussion, which would be a preferred outcome to litigation from Sunthurst's perspective.

With this letter, Sunthurst satisfies the 10-Day notice prior to filing a complaint requirement in OAR 860-082-0085, although Sunthurst will hold off filing such Complaint so long as PacifiCorp agrees to toll Sunthurst's pending default deadlines while its concerns are addressed. In order to avoid a potential Complaint, will you please contact me as soon as possible, and no later than June 7, with PacifiCorp's response? Thank you for your consideration.

Sincerely,



Ken Kaufmann
Attorney for Sunthurst Energy, LLC

Enclosures

Technical Questions regarding Nye Solar (OCS 062) SIS Report
Technical Questions regarding Reith Solar (OCS 063) SIS Report
Suggested Modifications to Tutuilla Solar (OCS 024) FSR

Mr. Matt Loftus

June 2, 2021

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Copy:

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PacifiCorp c/o CT Corporation
780 Commercial St. SE
Suite 100
Salem OR 97301

Technical Questions from Sunthurst re OCS 062 (Nye Solar) System Impact Report (SIR):

1. Overview of Study Changes
 - a. Pac moved POI from Buckaroo 5W203 to McKay 5W856
 - b. About 14000ft (crow flies) to McKay (20k line ft)
 - i. One line Recloser and one line Sectionalizer existing
 - ii. Replace Sectionalizer with Recloser
 - c. About 18000ft (crow flies) to Buckaroo
2. SIR 6.1
 - a. Volt-VAR mode required but no voltage drop analysis to give any indication of how much VAR support is required.
 - b. **Request to PacifiCorp: Please provide all load flow and voltage drop analyses performed that were used by PacifiCorp to determine that Volt-VAR support mode is required. Provide the operating parameters to be implemented including voltage droop and maximum reactive power flow requirements.**
3. SIR 6.3
 - a. Need DTT with 4 terminals
 - i. Substation breaker
 - ii. Line Recloser 5W676
 - iii. New Line Recloser FR UMDXXX
 - iv. OCS062 project recloser
 - b. Questions/requests for PacifiCorp:
 - i. **Request to PacifiCorp: Please provide load flow results used to determine need for 0.7 mile reconductoring, and please explain whether the requirement is based upon the Volt-VAR performance or whether this is a drop of generation due to fault.**
 - ii. **Question for PacifiCorp: Could Volt-VAR capability provide the required voltage regulation without reconductoring?**
 - iii. **Please confirm that the recloser and sectionalizer in the study are really there.**(Google Earth street view with 2019 image dates does not show either the line recloser or sectionalizer shown on Figure 2 of page 6, but does show a recloser on the main line but NORTH of the tap toward OCS062.)
4. SIR 6.4
 - a. SIS says that OCS062 AND OCS024 both contribute to need for 69kV VTs.
 - i. **Please explain why PacifiCorp allocated 100% of 69kV VTs on OCS062, and whether this cost may be shared between OCS062 and OCS024.**
5. SIR 6.5
 - a. Calls for "voltage instrument transformers" to be installed at OCS062
 - i. **Question: Will PacifiCorp accept resistive voltage sensors in lieu of voltage instrument transformers? Please explain.**
6. SIR 6.7
 - a. It looks like some of the power line from McKay north is underground.
 - i. **Question: Why not install radio (like OCS063) rather than 9000ft of ADSS? If line-of-sight is poor, can a repeater solve the problem?**

Technical Questions from Sunthurst re OCS 063 (Reith Solar) System Impact Report (SIR):

1. Overview of Study Changes
 - a. 5W202 out of Buckaroo Sub
 - b. About 1.5 line-miles out of Buckaroo
2. SIR 6.1
 - a. SIS requires operation under constant PF mode (100%), but requires Project have capacity to operate in other modes and no information about what level of VAR support may be required in the future.
 - b. Question for PacifiCorp: Based on load flow studies performed by PacifiCorp, what is the largest required reactive support in any possible operating mode? Under what mode of operation and operating conditions is this flow required?**
3. SIR 6.3
 - a. Per SIS Report, three transmission poles to be replaced
 - b. Question for PacifiCorp: were these three poles replaced in the last 6 months? If so, does the SIS Report conclusion take this fact into account? (do they really need re-replacing?)**
4. SIR 6.5
 - a. SIS Report specified transmission line fault detection required, necessitating installation of 69kV VTs and relaying. But Q0586 Facilities Study Report shows the installation of 69kV VTs and Q0586 is in service
 - b. Question for PacifiCorp: Were 69kV VTs installed as part of Q0586, If not, why not?**
5. SIR 6.5
 - a. SIS Report specified POI recloser with voltage instrument transformers
 - b. Question for PacifiCorp: Are voltage sensors an acceptable alternative?**
6. SIR 10.1
 - a. Question for PacifiCorp: Why is Q0586 included as a pending higher priority request, when OASIS says that Q0586 is in commercial operation? Will PacifiCorp remove from 10.1 and, if not now, when?**

Suggested Modifications to Tutuilla Solar (OCS 024) FSR:

As part of the ongoing design review and development of the detailed design, Sunthurst has identified several desirable and cost-effective changes that they propose to make to the OCS 024 (Tutuilla) solar project. None of these changes affect the fundamental functionality or safety of the system. In summary:

1. The total connected inverter capacity will remain the same, 26 @ 60kWac each for 1560 kW total.
2. The main power transformer will be 2000kVA⁴, 5.75%IZ, 12.47kV wye-grounded to 480V wye-grounded. (12.47Y/7.2kV-480Y/277V YGyg)
3. The grounding transformer will be 200kVA, 5.75%IZ, as indicated in the PacifiCorp Facilities Study Report except that the voltages will be 480Y/277V-240/120V wye-grounded to delta and it will be connected to the 480V switchgear through a 600A 480V circuit breaker.
4. The grounding transformer circuit breaker will be intertied with the main breaker preventing plant operation if the grounding transformer is out of service.
5. The 240/120V 3-phase grounding transformer secondary will feed a small 120/240V single phase load center to provide station service power to communication and relaying equipment.
6. The 3000A 480V switchgear will include a EUSERC 324 current transformer section to provide 480V metering capability. It is assumed PacifiCorp will mount a EUSERC 339 meter socket on the outside of the switchgear. No 12kV metering equipment will be installed.
7. The protective relaying equipment will remain identical in function except that the 480V main breaker will be the tripped device. No 12kV recloser or breaker will be provided.
8. Voltage sensing for the over/under voltage and frequency functions will be at the 480V level. No 12kV voltage sensing devices are being used.
9. The radio communication will remain the same, a pole mounted radio with serial communication to the protective relay to effect direct transfer trip.
10. The PacifiCorp owned and operated overhead 3-phase group-operated switch remains the same.
11. The project will provide a riser pole with single-phase hook-operated disconnects to provide the visual-break and isolation point. Change of ownership will be at this pole.

⁴ As indicated in the SIS Report.

CERTIFICATE OF SERVICE

In accordance with ORCP 9, I hereby certify that on June 2, 2021, I caused to be served a full and exact copy of the foregoing **Notice of Intent to file Complaint for Enforcement** via:

- First Class Mail with postage prepaid, deposited in the US mail at Tigard, Oregon
- hand delivery
- facsimile transmission
- overnight delivery
- e-mail
- OPUC EFILING SYSTEM, if registered at the party's e-mail address as recorded on the date of service in the eFiling system, pursuant to UTCR 21.100 addressed to the following parties at the address(es) listed below:

Matthew Loftus Senior Transmission Counsel PacifiCorp 825 NE Multnomah St, Suite 1600 Portland, OR 97232 Matthew.Loftus@PacifiCorp.com (electronic mail)	Filing Center Public Utility Commission of Oregon PO Box 1088 Salem, OR 97308-1088 puc.filingcenter@puc.oregon.gov (electronic mail)
PacifiCorp c/o CT Corporation 780 Commercial St. SE, Suite 100 Salem OR 97301 (US First Class Mail)	

Dated: June 2, 2021
s/ Kenneth E Kaufmann
Kenneth E Kaufmann
Attorney for Sunthurst Energy, LLC
OSB# 982672

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