

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: September 7, 2021**

REGULAR CONSENT EFFECTIVE DATE September 8, 2021

DATE: August 30, 2021

TO: Public Utility Commission

FROM: Joe Abraham

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

SUBJECT: OREGON PUBLIC UTILITY COMMISSION STAFF:
(Docket Nos. UM 1930 and ADV 1298/Advice No. 21-017)
Corrects omission in Community Solar Program Interconnection Agreement.

STAFF RECOMMENDATION:

Approve Pacific Power's (PAC) Advice No. 21-017 correcting an omission in their CSP Interconnection Agreement.

DISCUSSION:

Issue

Whether the Commission should approve PAC Advice No. 21-017 correcting an omission in their CSP Interconnection Agreement.

Applicable Rule or Law

ORS 757.386(2)(a) directs the Commission to establish a program that provides electricity customers the opportunity to share the costs and benefits of electricity generated by a community solar energy system.

ORS 757.205(1) provides that "[e]very public utility shall file with the Public Utility Commission, within a time to be fixed by the commission, schedules which shall be open to public inspection, showing all rates, tolls and charges which it has established and which are in force at the time for any service performed by it within the state, or for

any service in connection therewith or performed by any public utility controlled or operated by it.”

OAR 860-088-0140, utilities must enter into contracts for the procurement and purchase of energy from CSP projects.

OAR 860-088-0120(4) requires electric companies to obtain Commission approval of any applicable tariffs required by the CSP rules.

Commission Order No. 21-192 directed PAC to file a re-file portions of their PPA's that incorporate modifications recommended by Staff.

Analysis

Background

In April 2020, PAC and Portland General Electric made compliance filings that established the contractual terms for the CSP Power Purchase Agreement.¹

On August 5, 2021, PAC submitted Advice No. 21-017² to correct an omission in Section 6.3 of its CSP Interconnection Agreement, which begins as follows:

All insurance required by this Article 6 shall name the Public, its parent, associated and Affiliate companies and their respective directors, officers, agents, servants and employees ("Other Party Group") as additional insured.

PacifiCorp proposes to correct that omission, causing Section 6.3 to read:

All insurance required by this Article 6 shall name the Public **Utility**, its parent, associated and Affiliate companies and their respective directors, officers, agents, servants and employees ("Other Party Group") as additional insured.
[Addition in bold.]

¹ Order No. 20-122 in UM 1930 established the terms of the utility CSP Interconnection Agreements and PPAs. PGE filed Compliance Filing of Advice No. 20-04 on April 17, 2020, effective April 20, 2020, docketed in ADV 1095; PAC filed Supplemental Compliance Filing of Advice No. 20-003 on April 14, 2020, effective April 14, 2020, docketed in ADV 1093; IPC filed Supplement to Advice No. 20-01 on April 13, 2020, effective April 7, 2020, docketed in ADV 1094.

² <https://edocs.puc.state.or.us/efdocs/HAD/um1930had14221.pdf>.

Docket Nos. UM 1930 and ADV 1298
August 30, 2021
Page 3

Conclusion

Staff recognizes the omission as inadvertent and support the Commission approving the proposed correction.

PROPOSED COMMISSION MOTION:

Approve Pacific Power's Advice No. 21-017 correcting an omission in their CSP Interconnection Agreement.