

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

Docket No. AR 659

In the Matter of

THE PUBLIC UTILITY COMMISSION OF  
OREGON,

Update Division 82 Small Generator  
Interconnection Rules, and Division 39 Net  
Metering Rules.

Staff's Comments

In comments filed on November 7, 2023, Staff recommended a date of February 1, 2023, as appropriate for requiring updated IEEE Standards.<sup>1</sup> After filing comments, other parties raised concerns about the timing of the IEEE standards that were not addressed in comments submitted in the docket. Staff's proposed date also did not allow time for parties to raise questions related to utility filings. As such, Staff appreciates the opportunity to provide additional comments, and is revising its proposal only as it relates to the advanced inverter requirement date.

As part of updating the interconnection rules, utilities will need to update their interconnection handbooks. Staff addressed this process in the Public Meeting Memo presented at the August 22, 2023, public meeting. Staff proposed the Commission direct the Joint Utilities (JU) to follow the following process:

1. Identify areas where the interconnection requirements are contained, be it tariff, handbook or some other document, collectively referred to as "handbooks."
2. Ensure handbook information is posted online.
3. Follow the process listed in OAR 860-082-0030(1)(b)-(c).
4. Provide proposed revisions to UM 2111 parties that will align handbooks with rules changes following the conclusion of the formal rulemaking process.
5. Present proposed revisions at a workshop for UM 2111 and any other interested parties.

Parties would have an opportunity to raise concerns with the filings; this would be 30 days following the JU proposed changes. The JU would then have 30 days to respond to any concerns raised. This is consistent with the process proposed in OAR 860-082-0030(1)(b)-(c). If

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<sup>1</sup> See page 2.

no objections are raised, the handbook changes would be implemented; if objections raised are not addressed by the JU, parties could raise objection to the Commission.

Staff envisions the following timeline to address the adoption of revised standards by the JU, note, this assumes a Commission decision on the proposed rules at the December 28, 2023, Public Meeting.

Event	Date
Commission decision on proposed rules	December 28, 2023
Utility filings updating handbooks	Presented by end of January 2024
Workshop to discuss Utility updates	Early/mid-February 2024
Stakeholder comments on revisions	End of February/ beginning of March
Response from Company to stakeholder issues	End of March/beginning of April
Requirements effective	May 1, 2024

The above schedule assumes that any issues raised by stakeholders will be resolved without going to the Commission with any objections. Should that premise be flawed, the Commission could direct the utility, or utilities to delay IEEE requirements until any outstanding issues are resolved.

Staff's revised proposal recommends using May 1, 2024, as the date to require new applicants to use IEEE 1547-2018 certified equipment. OAR 860-082-0030(1) would read:

(1) IEEE 1547. An interconnection customer or applicant must construct, operate, and maintain a small generator facility and its associated interconnection equipment in compliance with IEEE 1547 and 1547.1. New interconnection applicants will be required to use IEEE 1547-2018 compliant equipment ~~no earlier than January~~ **starting May 1, 2024**. For purposes of OAR 860-082-0030, capitalized terms not otherwise defined in Division 082 have the meaning set forth in IEEE 1547.

Staff believes the approach outlined above will be a more seamless process to update the requirements and limit confusion amongst stakeholders and developers.

This concludes Staff's comments.

Dated at Salem, Oregon, this 29<sup>th</sup> day of November, 2023.

*Ted Drennan*

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