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VIA E-MAIL TO

Public Utility Commission of Oregon
Filing Center
201 High Street SE, Suite 100
Salem, Oregon 97301-3398

**Re: Docket AR 659- In the Matter of Rulemaking to Update Division 82 Small
Generator Interconnection Rules and Division 39 Net Metering Rules.**

Attached for filing in the above-referenced case, please find the Joint Utilities' Comments Regarding Rule Implementation Timeline.

Please contact this office with any questions.

Sincerely,

A handwritten signature in blue ink that reads "Cole Albee".

Cole Albee
Paralegal
McDowell Rackner Gibson PC

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

AR 659

In the Matter of Rulemaking to Update
Division 82 Small Generator
Interconnection Rules and Division 39 Net
Metering Rules.

**JOINT UTILITIES' COMMENTS
REGARDING RULE
IMPLEMENTATION TIMELINE**

1 Pursuant to the Administrative Law Judge's November 20 Ruling, Portland General
2 Electric Company (PGE), PacifiCorp dba Pacific Power (PacifiCorp), and Idaho Power Company
3 (Idaho Power) (together, the Joint Utilities) offer these comments regarding the timeline for
4 implementing the final, approved rules (Final Rules), including the date for IEEE 1547-2018
5 compliance and the review process for updates to utility handbooks.¹ The Joint Utilities appreciate
6 the opportunity to provide brief comments addressing the rule implementation process and
7 timelines to ensure the rules can be implemented smoothly. To allow sufficient time to update
8 their handbooks and internal processes following the Public Utility Commission of Oregon's
9 (Commission) order adopting the Final Rules, the Joint Utilities recommend that the Final Rules—
10 including the rule requiring new interconnection applicants to comply with IEEE 1547-2018—
11 take effect no earlier than May 1, 2024. As discussed below, the Joint Utilities' support for a
12 May 1, 2024 effective date is contingent on the Commission adopting the Final Rules at its
13 December 28, 2023 Public Meeting.

¹ Ruling Extending Comment Deadline (Nov. 20, 2023).

I. BACKGROUND

1 The Joint Utilities understand that the Commission will likely adopt the Final Rules at its
2 December 28, 2023 Public Meeting. Each utility will then need to update its interconnection
3 requirements handbook (or analogous document) and applicable internal processes to reflect one
4 or more aspects of the revised rules. Because the Joint Utilities are differently situated with respect
5 to the content and structure of their handbooks, each utility's updates will vary somewhat.

6 First, each utility must publish its preferred default settings for small generator facilities
7 complying with IEEE 1547-2018.² Second, some of the utilities will need to update other portions
8 of their handbooks to reflect technical changes adopted in the Final Rules. For example, the rules
9 include a new section regarding Export Controls, and certain aspects of the handbooks addressing
10 technical interconnection requirements may need to include revisions to implement this new
11 approach. Because one aspect of the Export Controls rules is disputed and requires Commission
12 resolution, these updates cannot be completed until after the Final Rules are adopted. The process
13 of reviewing and implementing technical updates will be particularly complex for PacifiCorp,
14 whose interconnection requirements document currently applies to six states. PacifiCorp will need
15 to review the changes required in Oregon to determine whether to apply them across all states or
16 whether to specifically carve out Oregon in its policies. Third, PGE's handbook provides
17 information regarding the interconnection process and will need to be updated to reflect changes
18 to the interconnection process and timelines adopted in the Final Rules. Several of these process
19 and timeline changes will not be known until the Commission resolves all disputed issues and
20 adopts the Final Rules.

² Proposed OAR 860-082-0030(c).

1 All handbook revisions will require review by various subject matter experts within each
2 utility before they are finalized. The Joint Utilities expect that they can finalize all handbook
3 updates by March 1, 2024. After each utility finalizes its handbook revisions, then Staff proposes
4 that the revisions be posted and circulated to docket UM 2111 participants for a 60-day review
5 process involving: (1) 30 days for interested parties to provide comments regarding the changes;
6 (2) a workshop during the comment period to discuss the changes; and (3) 30 days for the utilities
7 to respond to any comments.³

8 Finally, the Joint Utilities will also need to update their internal systems, processes, and
9 documents, as applicable, to implement the Final Rules. For example, PGE and PacifiCorp use
10 PowerClerk to manage their interconnection processes. Updating PowerClerk involves designing,
11 implementing, and testing changes to the software regarding process flow, timelines, engineering
12 screens, the new supplemental review process, and mandated changes to outputs.

II. DISCUSSION

13 Assuming the Final Rules are adopted by the Commission at its December 28, 2023 Public
14 Meeting, the Joint Utilities anticipate that a May 1, 2024 effective date for all of the revised rules
15 will allow adequate time for the utilities to make all of the necessary updates and for the handbook-
16 update review process recommended by Staff and supported by the Joint Utilities to be completed.
17 Even if some of the necessary changes could be completed sooner, making all of the Final Rules
18 effective at the same time will be the simplest and most efficient approach and will avoid
19 confusion.

³ Docket AR 659, Order No. 23-319, App. A at 11 (Aug. 30, 2023); Docket AR 659, Staff’s Opening Comments at 5-6 (Nov. 7, 2023).

1 Specifically, the Joint Utilities anticipate and recommend the following implementation
2 timeline:

- 3 • **December 28, 2023:** Final Rules adopted.
- 4 • **March 1, 2024:** Utilities’ updates to handbooks circulated for review and comment.
- 5 • **Early- or Mid-March 2024:** Workshop to discuss handbook updates.
- 6 • **March 30, 2024:** Deadline for comments regarding handbook updates.
- 7 • **April 30, 2024:** Deadline for utilities to respond to comments regarding handbook
8 updates.
- 9 • **January-April 2024:** Utilities implement necessary updates to PowerClerk and
10 any other systems, documents, or processes that must be changed to account for the
11 Final Rules.
- 12 • **May 1, 2024:** Date on which Final Rules take effect, including the requirement that
13 new interconnection applicants comply with IEEE 1547-2018 pursuant to
14 OAR 860-082-0030(1).

15 However, if either: (1) the Commission does not adopt the Final Rules at its December 28, 2023
16 Public Meeting, or (2) there are irreconcilable disputes regarding handbook updates that require
17 Commission resolution, then the May 1, 2024 effective date may need to be revisited. The Joint
18 Utilities also would not oppose the Commission establishing a later effective date from the outset
19 to build extra time into the process.

III. CONCLUSION

1 The Joint Utilities respectfully request that the Commission order that the Final Rules take
2 effect no earlier than May 1, 2024.

DATED: November 29, 2023

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