

**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.

COMMENTS OF THE OREGON  
SOLAR + STORAGE INDUSTRIES  
ASSOCIATION

**I. INTRODUCTION**

The Oregon Solar + Storage Industries Association (“OSSIA”) respectfully submits these comments to the formal rulemaking in Docket No. AR 659 that the Oregon Public Utility Commission (“Commission”) opened in Order No. 23-319. OSSIA was previously involved in Docket No. UM 2111 and participated in the work group process to address issues related to modernizing the screening and interconnection study practices and incorporating IEEE-1547-2018 standards. At the conclusion of the working group process, Staff identified nine areas where Commission decisions are needed, and these comments will respond to those issues that remain outstanding at this point. Additionally, OSSIA’s comments on the Division 39 rule changes from UM 2111 are attached to these comments below.

**II. COMMENTS**

**A. Size Threshold for Net Metering Tier 1 Screen**

The Commission should utilize the size threshold for tier 1 net metering screen that it uses for other tier 1 interconnections. The working groups came up with the nameplate capacity threshold of 50 kw with an export capacity of 25 kw and those figures are reflected in the rules. The same thresholds should apply to commercial and residential tier 1 installations. This is not

an attempt to raise the net metering cap, but rather future proofing and avoiding the need to do future rulemaking on these areas of the Division 39 rules.

**B. Timing of IEEE 1547-2018 Compliance Requirements.**

At the rulemaking hearing, OSSIA stated that the compliance dates of January 1st or February 1st, 2024, presented by the Interstate Renewable Energy Council sounded reasonable. Upon further conversations with our members, we recommend that the IEEE 1547-2018 Compliance Requirement be set on February 1st, 2024, rather than in January. This will give Oregon installers confidence in their ability to meet the compliance requirements and give the market sufficient time to mature.

**C. Legacy Data Update Requirements.**

During the UM 2111 work group process, it was revealed that the utilities are still utilizing direct current nameplate instead of the more accurate alternating current nameplate ratings. The utilities are therefore potentially overestimating the impact to their distribution systems, which is a significant issue that should require an immediate remedy. The Staff proposal from UM 2111 seems to be a fair process for resolving the legacy data issues, as there is a process for updating areas of the system that are above a certain threshold and sets a date certain by which all legacy data should be revised. As this rulemaking seeks to modernize the interconnection processes for net metering and small generators, it makes sense for the utilities to use the alternating current nameplate capacity to evaluate system impacts to the grid since the distributed energy resources on the grid are using inverters to convert the power the inverter sends to the grid from direct current to alternating current. This has implications that go beyond interconnection, as the utilities are planning for their distribution systems through their distribution system plans.

### III. CONCLUSION

OSSIA recommend that the Commission incorporate the above recommendations into the formal rulemaking.

Dated this 7<sup>th</sup> day of November 2023.

Respectfully submitted,



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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 2111**

In the Matter of  
  
PUBLIC UTILITY COMMISSION OF  
OREGON,  
  
Investigation Into Interconnection Process  
and Policies

COMMENTS OF THE OREGON  
SOLAR + STORAGE INDUSTRIES  
ASSOCIATION

**I. INTRODUCTION**

In accordance with the Public Utility Commission of Oregon (“Commission” or “OPUC”) Staff’s Workshop and Schedule Update dated April 18, 2023, the Oregon Solar + Storage Industries Association (“OSSIA”) respectfully submit these comments on Staff’s draft proposal for updates to the Commission’s Division 39 rules as circulated on March 27, 2023 (hereafter “Staff’s Proposed Rules”).

OSSIA has participated in the series of workshops that has led to consensus on many of the areas in the proposed rules and has found the process to be informative. OSSIA appreciates the Commission’s commitment to investigating how to improve the interconnection process for net energy metering (“NEM”) projects in Oregon. OSSIA is supportive of many of Staff’s proposed edits and feel Staff’s proposal appropriately update the rules with respect to the issues identified for this phase of the proceeding. OSSIA submits comments on some important remaining issues and signal support for the supplemental review process.

## II. COMMENTS

1. **General Support for Staff's Proposed Rules:** at the outset of this docket, OSSIA indicated that we would not support changes to the NEM interconnection process that would slow down or make NEM interconnection process more expensive. Staff's Proposed Rules include a supplemental review process, which while potentially adding costs to projects that undergo supplemental review, will better enable NEM projects to interconnect in areas that are already constrained. Accordingly, OSSIA is supportive of the inclusion of the supplemental review process in Staff's Proposed Rules. OSSIA is also supportive of changing the terminology in Division 39 to match the Division 82 rules, this step will make it easier to potentially combine the two divisions into a single division of rules in a later phase. OSSIA is also supportive of the options meeting, as this will provide additional transparency to customers in a process that it almost entirely in the utilities control.

However, OSSIA is concerned with the timeline for an application to be deemed withdrawn in OAR 860-039-0025 (2). A customer or installer may not have sufficient time to obtain the necessary information to ensure an application is complete in 10 business days. We would recommend this timeframe be longer to better accommodate busy schedules and obviate the need to resubmit an entirely new application. OSSIA recommends the timeframe be 20 business days following written notice from the public utility that the application is incomplete.

2. **Process Changes:** OSSIA is supportive of IREC's recommendations to update the Division 39 rules to reflect the process and increase synchronization with the timelines in the Division 82 rules. While these process changes are intended to be

addressed in Phase 2, much of the work to discuss these process changes occurred in the Phase 1 workstreams. The relatively limited changes to the Division 39 rules present an opportunity to address the process changes to the NEM interconnection rules and avoid a duplicative rulemaking in Phase 2. For example, IREC recommended standardizing the timeline for project approval at 7 business days, as it is now in the SGIP. Currently, the NEM approval timeline is within 10 business days. Additionally, IREC recommended considering providing written information on any screen failure to projects. These types of improvements provide transparency to customers and rooftop installers and better enables those customers to determine whether to continue pursuing the project. To the extent possible, this rulemaking should resolve as many changes as possible to avoid the need to do another rulemaking in Phase 2.

3. **Data Conversion to Export Capacity:** OSSIA would like to echo the comments of the Interconnection Trade Associations on data conversion from the Division 82 rules as it relates to the Division 39 rules. By logging the capacity of facilities into interconnection software based on the direct current (“DC”) rating of the component parts even when the facility’s AC export capacity from inverters is far lower. Accordingly, interconnection studies have been overestimating the amount AC capacity being injected into the AC grid, and this error has likely resulted in significant overstatements of the upgrades needed to interconnect new generators. This data error needs to be remedied to allow for DERs to utilize existing capacity available on the system and better enable Oregon utilities to meet their annual goals from HB 2021. While OSSIA understands that utilities have been working with the Energy Trust of Oregon to remedy this information, going forwards the rules should require the utilities to

immediately correct this data error for prospective interconnections and projects currently in the queue. Additionally, the Commission should set a date certain by which utilities must include in their databases the AC nameplate rating and export capacity of all existing interconnected facilities. Without a set date for completion stakeholders will not know when this data error has been remedied.

Any identified additional capacity on feeders would be extremely valuable considering existing constraints on the system. While utilities may respond that this capacity would require considerable work, this work could have been avoided if the data was inserted properly. Additionally, this mistake may have been indicating that expensive network upgrades were required when the actual result was the opposite. Correcting this error will provide insight into availability on utilities systems which will be informative for all parties.

### III. CONCLUSION

OSSIA recommend that the edits proposed above be incorporated in the draft proposed rules.

Dated this 5th day of May 2023.

Respectfully submitted,



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