

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Docket No. UM 2316

In the Matter of

THE PUBLIC UTILITY COMMISSION OF
OREGON,

Application for Waiver of Large and Small
Generator Interconnection Procedures.

Staff Comments

Staff is reviewing Pacific Power's (PacifiCorp or Company) application for waiver of the large and small generator procedures that requests waiving PacifiCorp's 2024 Cluster Study requirements. This request was submitted on February 29, 2024 with a requested effective date of April 1, 2024. The Company requests approval on an expedited basis; Staff anticipates a Special Public Meeting will be held on March 29 to address this filing.

Staff has multiple questions regarding the filing, and the approach. There are also questions as to impacts on Oregon jurisdictional generators, and the Company's ability to meet Oregon requirements, such as those with HB 2021. A non-exhaustive list of questions follows.

1. When did PacifiCorp realize it would likely need to request a waiver of the 2024 Cluster Study? Also, why did the Company wait two weeks after its FERC request to file the request in Oregon?
2. How will the Company ensure that the waiver does not forestall progress in acquiring the resources needed to meet its HB 2021 requirements, including its small-scale resource acquisition requirements? Please be specific about the actions the Company will take in 2024 to mitigate interconnection delays and other negative impacts on Oregon jurisdictional generators, including mitigating impacts on the 2024 SSR RFP.
3. How will the Company prevent further delays opening the next cluster? Please be specific about the actions the Company will take in 2024 to prevent further delays that will impact Oregon jurisdictional generators, including how the Company will work to avoid conducting a transition cluster in 2025 given the number of generators from previous clusters with pending facilities studies and restudies (~50 generators).
4. How will PacifiCorp treat Oregon-jurisdictional generator applications if a waiver is not granted?

5. What specific concerns does the Company have about processing Oregon-jurisdictional interconnections in either a group or serial process in 2024? Staff understands that the Company and other generators may have fairness concerns, so please focus on practical concerns for moving Oregon-jurisdictional interconnections forward absent a FERC 2024 cluster.
6. Has PacifiCorp added any additional staff to help with the current interconnection backlog? Please explain.
7. Has PacifiCorp added any additional staff to deal with new requirements of FERC Order No. 2023? Please explain.

Staff would appreciate responses from the Company to the questions listed on an expedited basis, March 12, or sooner, if possible, to assist in review of the Company's February 29, 2024 filing.

This concludes Staff's comments.

Dated at Salem, Oregon, this 5th day of March, 2024.

Ted Drennan

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