

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1667**

In the Matter of)
)
PACIFICORP, dba PACIFIC POWER,)
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Annual Smart Grid Report)
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COMMENTS OF THE
CITIZENS' UTILITY BOARD OF OREGON

September 18, 2015



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1 The Citizens' Utility Board of Oregon (CUB) appreciates the opportunity to submit
2 comments on PacifiCorp's (the Company) Annual Smart Grid Report. In general, CUB is
3 disappointed with the direction the Company has taken this year. Below, CUB details its
4 concerns and offers areas where the Company can improve its report.

5 CUB is frustrated to note that the Company's 2015 report is largely a copy of the 2014
6 report. While there were some areas that the Company did expound upon, such as the Time-
7 based Pricing and the workshop that allowed a number of participants to enroll in that program,
8 CUB noticed that the vast majority of the Company's report is a repeat of the previous year.
9 CUB recognizes that to some degree, if new projects are not being implemented, there is not
10 much new to say. However, there were some areas where CUB felt repetition was unacceptable.
11 In addition, there were projects in which the Company promised to have updates but did not
12 deliver. There were several areas where CUB felt the Company could have provided a more
13 useful picture of where it is in its smart grid endeavors:

1 • The West-of-Populus dynamic line rating project. In the 2014 report, the Company stated
2 that the West-of-Populus dynamic line rating project would be completed by 2015.¹
3 However, in the 2015 report, the Company moved the due date of the project forward one
4 year, to 2016, with no explanation as to why the project is being postponed and without
5 providing any updates of the project's current status.² If the Company did not execute its
6 plans, it should say this. CUB feels that there should at least be an explanation as to the
7 Company's rationale for not providing details about the project's postponement. This is
8 especially in light of the general lack of new content in the report.

9 • The Transmission Synchrophasor Demonstration Project. That project began in 2013, but
10 the Company stated that it will not be able to provide an update of the system model
11 evaluation until 2016. If this project began in 2013, then theoretically, the Company
12 should have at least two years of data on this project on which to report. CUB
13 understands this project is in collaboration with the Western Electricity Coordinating
14 Council (WECC), but after two years of participation, CUB expects the Company to
15 provide more substance in the report than a restatement of previous smart grid reports.

16 • The Communicating Faulted Circuit Indicators. About this project, in its 2014 report, the
17 Company stated:

18 Validation of sensor performance is on-going; a cost-benefit analysis should
19 be complete by spring of 2015. Given positive results this technology will be
20 considered for similar circuits elsewhere. An update on this project will be
21 included in subsequent smart grid reports.³
22

23 There was no cost-benefit analysis provided in the 2015 report, despite this project
24 having had expectations of completion earlier this year. Neither does the Company

¹ Docket No. UM 1667. PacifiCorp 2014 Smart Grid Report, p. 8.

² Docket No. UM 1667. PacifiCorp 2015 Smart Grid Report, p. 9.

³ Docket No. UM 1667. PacifiCorp 2014 Smart Grid Report, p. 16.

1 provide any justification for why this analysis was not completed. CUB is disappointed at
2 the lack of revision on this project. At the very least, the Company should have remarked
3 why the cost-benefit analysis was not provided.

4 • Conservation Voltage Reduction Demonstration. For this project, the Company explains
5 that lowering voltage has minimal impacts on energy savings, and that this has been
6 described in previous smart grid reports. However, the Company goes on to say that it is
7 transitioning to a “new, more powerful circuit analysis application called Cyme.”⁴ The
8 Company does not provide much detail as to what Cyme is or how Cyme applies to low-
9 voltage technology since it appears to be an analysis application.

10 • Time-based pricing. Apart from a summary of results of an irrigation workshop that led
11 to the enrollment of a number of customers in a pricing program, the Company did not
12 provide updates on upgrades it promised in the 2014 report. Last year, the Company
13 stated:

14 For the 2014 summer season, PacifiCorp upgraded the existing Cool Keeper
15 system to improve the remote devices and enable measurement and verification
16 of savings during events. This upgrade is expected to further increase the
17 overall efficiency of the direct load control system.⁵

18 In the 2015 report, the Company again stated that the upgrade “is expected to further
19 increase the overall efficiency of the direct load control system...”⁶ CUB reiterates that
20 after a year of executing the project, at least some update of the Company’s project
21 should be provided, or at least a reason why the Company ignored its previous statement
22 about providing updates.

⁴Docket No. UM 1667. PacifiCorp 2015 Smart Grid Report, p. 20.

⁵ Docket No. UM 1667. PacifiCorp 2014 Smart Grid Report, p. 31.

⁶ Docket No. UM 1667. PacifiCorp 2015 Smart Grid Report, p. 28.

1 In previous years, CUB has urged the Company to explore more reasonable possibilities
2 with smart grid projects. CUB has pointed to direct load control programs, to which the
3 Company has twice stated that energy efficiency is a lower-cost option than demand response.^{7,8}
4 Last year, the Company responded to CUB's 2013 comments and provided a more robust update
5 of projects, but this year the Company has continued its previous trend and has gone so far as to
6 ignore analysis and several revisions it promised in previous years. CUB understands that the
7 Company is obligated to least-cost/least-risk planning and investments, but CUB is disappointed
8 with the repetition, the omission, and general lack of advancement in the report. In the future,
9 CUB hopes that the Company will make a more genuine attempt at providing more substantive
10 content.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nadine Hanhan', with a horizontal line drawn through the middle of the signature.

Nadine Hanhan

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⁷ Docket No. UM 1667. PacifiCorp 2014 Smart Grid Report, p. 28.

⁸ Docket No. UM 1667. PacifiCorp 2015 Smart Grid Report, pp. 24 & 25.