



PO Box 65491
Washington, DC 20035
202-888-6252
info@communitysolaraccess.org
communitysolaraccess.org

**Solar Parties Comments in response to:
PUC Staff Report: Community Solar Program Interconnection Update
1-15-2020**

The following comments are submitted by the Oregon Solar Energy Industries Association (OSEIA) and the Coalition for Community Solar Access (CCSA), hereby referred to as the “Solar Parties”. We appreciate the effort by Staff, Portland General Electric (PGE), PacifiCorp (PAC), and Idaho Power Company in developing the summary and individual proposals for the Community Solar Program Interconnection Update (1-13-2020).

The Solar Parties provide the following brief comments for consideration by the Public Utility Commission (PUC) and all stakeholders.

Duration and Durability of Interconnection Proposals

It’s unclear if the interconnection proposals are for the initial capacity allocation only (i.e., 50% of initial capacity tier), or apply to the entire initial capacity tier, or something else.

While we recognize this (interconnection) aspect of the program involves a learning process where improvements may be made along the way, we flag that future uncertainty in the foundational elements of the process (particularly for Solution #1) could prevent sustainable growth in the market. Specifically, uncertainty in whether this CSP interconnection process could fundamentally change for successor capacity allocations would enhance the risk and uncertainty already inherent in the program created by the lack of a future credit rate. This would further reduce market confidence and prevent long-term planning and investments which underly community solar development. It could also threaten the ability to leverage federal funding due to scheduled declines in tax credit values over the next two years.

PacifiCorp’s “Informational” Analysis

PAC states that it will perform a non-binding informational analysis of the requirements associated with interconnecting a CSP project using the Network Resource (NR) evaluation. Staff notes that PAC should propose a detailed process for this by the time it files the tariff. The Solar Parties seek clarification regarding the source of potential cost recovery for an NR study as well as any potential network upgrade requirement identified by PAC. If PAC were to institute network-related costs on projects that are considered otherwise eligible for the CSP queue (i.e., do not exceed 100% of MDL), the foundation of Solution #1 as a policy would be significantly undermined. Further, the Solar Parties are concerned that PAC’s incorporation of additional studies could add more time and delay to the study process.

Interconnection Process Timelines

As the Solar Parties have called out in previous comments¹, the solar industry has been frustrated by delays in moving projects through interconnection processes in PAC and PGE territories. This has implications on costs, permitting, and other contracts engaged by the project owner. Order 19-392² targets the single greatest barrier to viable interconnection opportunities in PAC territory through the establishment of a CSP queue in Solution #1. Our expectation is that the narrower (energy resource) scope associated with a CSP-eligible interconnection should support a more efficient study and upgrade process relative to what qualifying facilities currently experience. This should be an objective for the program. Solution #1 does require “tracking and reporting” of CSP interconnection processes (including costs and application timing and subsequent milestones) to allow Staff to gather data to inform other dockets as well as the community solar program. We hope that this tracking along with the potential support of a 3rd-party interconnection review expert will fuel immediate and long-term process improvements by the utilities.

Separately, for projects in PAC’s traditional queue, Solution #6 required the utility to provide an update in December 2019 regarding the status and outlook for those interconnection applicants. PAC did provide this update³, as noted in Staff’s memo, though it’s vague and non-committal in suggesting a potential range for when small generator studies may be completed (~6-18 months). In fact, a solar industry member notes that they still do not have an expected study completion date from PAC for a (community solar project) study request filed in July 2018.

Interconnection Upgrade Costs

Similar to frustration with interconnection processing timelines discussed above, the Solar Parties have also voiced⁴ concerns regarding utility estimates for distribution upgrade requirements and associated costs. The Small Generator Interconnection Rules require interconnection customers to pay the “reasonable costs⁵” of interconnection facilities. However, solar industry members have found it challenging to obtain complete and objective information from utilities regarding the justification of costs and upgrades established in studies. The Solar Parties recommend considering ways to ensure the cost responsibility provisions in OAR 860-082-0035(2) are implemented fairly and efficiently. This investigation could also be included in the scope of a 3rd-party expert interconnection review service, if obtained following the RFI.

Calculation of Available Feeder Capacity

The Solar Parties seek clarification on the utility calculation that will be used for determining available capacity on a feeder based on 100% of MDL and/or 30% of peak load. PAC’s summary states that:

Interconnection requests to PacifiCorp desiring to participate in the CSP will be eligible if the proposed generator, together with all other interconnected and requested generation in the local area, is less than 100 percent of MDL on the circuit/substation to which the generator is

¹ <https://edocs.puc.state.or.us/efdocs/HAC/um1930hac95746.pdf>

² pg. 16-17 of Appendix A; and pg. 10 of Appendix A. <https://apps.puc.state.or.us/orders/2019ords/19-392.pdf>

³ <https://edocs.puc.state.or.us/efdocs/HAH/um1930hah162852.pdf>

⁴ <https://edocs.puc.state.or.us/efdocs/HAC/um1930hac95746.pdf>

⁵ https://secure.sos.state.or.us/oard/viewSingleRule.action;JSESSIONID_OARD=xE-gFjYWLUXgUS0QDnu7bNXuZkZSx3RyiULQ0ehLu48nYulrweFZ!-213933845?ruleVrsnRsn=223933

proposing to interconnect, less any existing or proposed generation on the same circuit/substation.

The latter part of this statement seems redundant, and may be an edit error?

The Solar Parties assume the calculation is as follows:

- For staying at or below 100% of MDL:
 - Available capacity = MDL *minus* existing generation *minus* proposed generation

- For staying at or below 30% of peak load:
 - Available capacity = (Summer peak load multiplied by 30%) *minus* existing generation *minus* proposed generation

Eligibility Screening Considerations

The Solar Parties recommend allowing for pilot/test case projects to be proposed to the utilities with regards to broader eligibility screening (e.g., load/generation profiles beyond a single feeder) and/or the incorporation of proven technologies such as storage and relay trip protections. As with Staff and the utilities, we do not want these areas to hold up the program launch or implementation. However, the very nature of the interconnection solutions established for the community solar program is to test new processes and resources. Further, these areas have been recognized by Staff and the utilities as carrying potential benefits. We recommend case-by-case consideration for projects – maybe limited to just a few for each utility in the first capacity allocation - to help evaluate options and considerations and ultimately inform broader implementation of these more advanced solutions.

In a similar vein, consideration may be needed for projects interested in affirming a distribution upgrade cost sharing opportunity ahead of the utility tariff filings slated for February 25.

The Solar Parties appreciate this opportunity to provide input on the interconnection solutions proposed in Oregon to facilitate a successful community solar program and support broader solar development improvements.

Respectfully submitted,

/s/ Charlie Coggeshall
Policy Advisor for OSEIA and CCSA
charlie@communitysolaraccess.org