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Oregon Public Utility Commission

201 High Street SE, Ste. 100

Salem, OR 97301

RE: Interconnection Data Transparency (Interim Measure #2) Docket No. UM 1930

Dear Chair Decker, PUC Commissioners and Staff,

Thank you for considering ways to improve market efficiency in Oregon and ensure existing policies are implemented in a reasonable, transparent manner that is protective of public safety through the community solar implementation process.

The Professional Engineers of Oregon (PEO) is Oregon's professional association providing leadership in all engineering disciplines. We promote the professional engineer as a recognized voice in society through legislative advocacy, public education and adherence to engineering principles and standards.

On behalf of the Professional Engineers of Oregon, I am submitting these comments to document our understanding that Oregon's rules for the practice of engineering given in ORS Chapter 672 and OAR Chapter 820 are relevant and applicable to all activities associated with the interconnection, operation and transmission of Community Solar Facilities. As such, we encourage the PUC to require that Interconnection studies, applicant reviews, determination of interconnection requirements and issuance of related standards be conducted by a registered engineer with appropriate qualifications as determined by Oregon State Board of Engineers and Land Surveyors.

Further, in the interests of timeliness and cost effectiveness while retaining protection of the public welfare, we encourage the PUC to allow for applicants to the Community Solar program to provide their own interconnection studies and design requirements as developed by an appropriately licensed engineer. This allowance would increase transparency and reduce IOU staffing loads while providing the potential for shorter turn-around time for study and design.

We urge the PUC to abide by Oregon's engineering rules which present a simple mechanism to ensure the interconnection process is safely implemented and that all engineering studies, evaluations, and work is completed in a manner that minimizes costs to ratepayers and is in the best interest of the public welfare. We further encourage the allowance of third party interconnection studies and designs through this Community Solar pilot program as a means of testing the potential cost and time savings while upholding public safety.

Very truly yours,

David Y. Etchart, PE

PEO Board President

On behalf of the Professional Engineers of Oregon