

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2032

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation into the Treatment of
Network Upgrade Costs for Qualifying
Facilities.

BENCH REQUESTS

DISPOSITION: ADDITIONAL INFORMATION REQUESTED FROM NIPPC

To assist the Commission in the review of its request for case certification, Northwest and Intermountain Power Producers Coalition (NIPPC) is requested to provide the following information to the Commission by Tuesday, February 18, 2020:

1. NIPPC states that it seeks intervenor funding to “represent all customers who buy interconnection services from utilities, i.e., all interconnection customers.”¹ I request that NIPPC provide a list or other evidence of current members that are interconnection customers, and a description of the different categories of membership in order to assist in review of this claim. Individuals need not be identified, but all member companies and businesses should be identified. The purpose of this request is to review and verify that NIPPC represents all customers who buy interconnection services; this category of customers includes a wide range of types of customers, from small customers seeking to interconnect distributed generation to developers of utility scale projects.

In addition or in the alternative, NIPPC could provide an agreement with the Renewable Energy Coalition, the Community Renewable Energy Association, or other organizations representing different categories of interconnection customers which could demonstrate the full scope of NIPPC’s claimed representation. The agreement, or NIPPC’s response should describe how these customers in associated groups may impact and guide NIPPC’s representation regarding interconnection issues.

2. Most recent year audited financials. If audited financials are not available, then a financial statement of current income and expenses, including the value of any in kind support, may be provided and attested to by an officer or board member of

¹ NIPPC Reply to Joint Response of CUB and AWEC at 8 (Jan 22, 2020).

NIPPC. The purpose of this request is to review NIPPC’s ability to independently contribute to any activity it may pursue with intervenor funding.

3. NIPPC proposed three cost of intervenor funding allocation processes, the first of which would be to establish “a new interconnection fee which is directly charged to new interconnection customers . . .”² AWEC and CUB replied that of NIPPCS’s three options, “only the first appears even potentially viable as a means of ensuring the costs of NIPPC’s participation are apportioned directly to interconnection customers, though CUB and AWEC believe more information is necessary on how such a new interconnection fee would be developed and whether measures would need to be established to ensure this fee is not passed on to retail customers.”³ NIPPC notes that cost allocation issues do not have to be decided at this time, and that NIPPC’s three proposals for cost allocation are not required under the Intervenor Funding Agreement.⁴ Nonetheless, if intervenor funding case certification is granted, the Commission will ultimately determine cost allocation. To provide Commissioners more information regarding how future costs may be allocated, I request that NIPPC provide more information about its first proposal demonstrating how it might work, and how it would ensure that the costs are borne by interconnection customers or applicants only and not by other customer groups.

I do not compel NIPPC to provide this information. However, the information requested will be valuable to the Commission in considering NIPPC’s request. NIPPC’s responses to bench requests one and two will be treated as confidential, and will not be disclosed on the website, or to other parties.

NIPPC may fax documents to Diane Davis at (503) 378-6163, or contact Diane Davis by email (diane.davis@state.or.us) for other delivery options.

Dated this 6th day of February, 2020, at Salem, Oregon.



Nolan M. Moser
Chief Administrative Law Judge

² NIPPC Notice of Intent to Seek Intervenor Funding and for Certification of Eligibility at 10 (Dec 16, 2019).

³ Joint Response of CUB and AWEC at 12 (Jan 15, 2020).

⁴ NIPPC Reply to Joint Response of CUB and AWEC at 3 (Jan 22, 2020).