

November 8, 2023

**VIA E-MAIL TO**

Public Utility Commission of Oregon  
Filing Center  
201 High Street SE, Suite 100  
Salem, Oregon 97301-3398

**Re: Docket UM 2032 - In the Matter of PUBLIC UTILITY COMMISSION OF OREGON, Investigation into the Treatment of Network Upgrade Costs for Qualifying Facilities**

Attention Filing Center:

Attached for filing in the above-referenced docket is PacifiCorp's Errata to the Joint Utilities' Application for Approval of Compliance Filing. This errata corrects Attachment 10, Page 11 of PacifiCorp's Standard Oregon Qualifying Facility Large Generator Interconnection Procedures, Section 3.2 to clarify that an applicant must select either Network Resource Interconnection Service (NRIS) or request that it be studied concurrently for NRIS and Energy Resource Interconnection Service. The corrected language mirrors that in Section 3.2 of Portland General Electric Company's and Idaho Power Company's Standard Oregon Qualifying Facility Large Generator Interconnection Procedures in the Joint Utilities' Compliance Filing.

For convenience, both a corrected redlined version of the applicable page and a version showing the changes are enclosed with this filing.

Please contact Karen Kruse with any questions.

Sincerely,

/s/ Karen Kruse  
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**Docket UM 2032**

**CORRECTED REDLINED VERSION**

**ERRATA**

**Attachment 10, PacifiCorp's Standard  
Oregon Qualifying Facility Large Generator  
Interconnection Procedures, Article 3.2**

**(Originally filed September 12, 2023)**

then Transmission Provider will study the existing Generating Facility outside of the Cluster Study framework set forth in Article 7. The existing Generating Facility will be studied to determine if additional Interconnection Facilities and Network Upgrades are required to bring the existing Generating Facility into compliance with current requirements.

### **3.2 Type of Interconnection Services.**

At the time the Interconnection Request is submitted, Interconnection Customer must request either Network Resource Interconnection Service or request that it be concurrently studied for Energy Resource Interconnection Service, up to the point when an Interconnection Facility Study Agreement is executed. Interconnection Customer may then elect to proceed with Network Resource Interconnection Service or to proceed under a lower level of interconnection service to the extent that only certain upgrades will be completed.

#### **3.2.1 Energy Resource Interconnection Service**

##### **3.2.1.1 The Product.**

Energy Resource Interconnection Service allows the Interconnection Customer to connect the Large Generating Facility to the Transmission System and be eligible to deliver the Large Generating Facility's output using the existing firm or non-firm capacity of the Transmission System on an "as available" basis. Energy Resource Interconnection Service does not in and of itself convey any right to deliver electricity to any specific customer or Point of Delivery.

##### **3.2.1.2 The Study.**

The Study consists of short circuit/fault duty, steady state (thermal and voltage) and stability analyses. The short circuit/fault duty analysis would identify direct Interconnection Facilities required and the Network Upgrades necessary to address short circuit issues associated with the Interconnection Facilities. The stability and steady state studies would identify necessary upgrades to allow full output of the proposed Large Generating Facility and would also identify the maximum allowed output, at the time the study is performed, of the interconnecting Large Generating Facility without requiring additional Network Upgrades.

#### **3.2.2 Network Resource Interconnection Service.**

##### **3.2.2.1 The Product.**

Transmission Provider must conduct the necessary studies and construct the Network Upgrades needed to integrate the Large Generating Facility in a manner comparable to that in which Transmission Provider integrates its generating facilities to serve native load customers in the same manner as all other Network Resources. Network Resource Interconnection Service Allows Interconnection Customer's Large Generating Facility to be designated as a Network Resource, up to the Large Generating Facility's full output, on the same basis as existing Network Resources interconnected to Transmission Provider's Transmission System, and to be studied as a Network Resource on the assumption that such a designation will occur.

##### **3.2.2.2 The Study.**

The Interconnection Study for Network Resource Interconnection Service shall

**Docket UM 2032**

**VERSION SHOWING CHANGES**

**ERRATA**

**Attachment 10, PacifiCorp's Standard  
Oregon Qualifying Facility Large Generator  
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then Transmission Provider will study the existing Generating Facility outside of the Cluster Study framework set forth in Article 7. The existing Generating Facility will be studied to determine if additional Interconnection Facilities and Network Upgrades are required to bring the existing Generating Facility into compliance with current requirements.

### **3.2 Type of Interconnection Services.**

At the time the Interconnection Request is submitted, Interconnection Customer must request either Network Resource Interconnection Service or ~~Network Resource Interconnection Service, as described, provided, however, Interconnection Customer requesting Network Resource Interconnection Service~~ may also request that it be concurrently studied for Energy Resource Interconnection Service, up to the point when an Interconnection Facility Study Agreement is executed. Interconnection Customer may then elect to proceed with Network Resource Interconnection Service or to proceed under a lower level of interconnection service to the extent that only certain upgrades will be completed.

#### **3.2.1 Energy Resource Interconnection Service**

##### **3.2.1.1 The Product.**

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##### **3.2.2.2 The Study.**