

**PUBLIC UTILITY COMMISSION OF OREGON
INTRAOFFICE CORRESPONDENCE**

DATE: April 23, 2024
TO: Caroline Moore
FROM: Ted Drennan
SUBJECT: Verification of Portland General Electric Company's Compliance Filing pursuant to Order No. 24-036 in UM 2032 effective March 15, 2024. Docket UM 2032.

In Order No. 23-005 the Public Utility Commission of Oregon (Commission) directed the Oregon-jurisdictional utilities to “develop and make filings, as necessary, to facilitate a QF’s ability to pay for both ERIS and NRIS analysis.”¹ The utilities were also directed to “negotiate a non-standard contract implementing a QF’s decision, after review of both ERIS and NRIS reports, to interconnect with a host utility using ERIS[.]”² Order No. 23-164 denied motions for rehearing, and clarified Order No. 23-005.

The Joint Utilities (Idaho Power, PacifiCorp, and Portland General Electric) submitted compliance filings on September 9, 2023, with an errata on November 8, 2023. Stakeholders filed initial comments on November 22, 2023, and the Joint Utilities along with other stakeholders filed reply comments on January 5, 2024. The Commission addressed the compliance filings at the February 6, 2024, public meeting and issued Order No. 24-036 approving the compliance filings subject to Staff’s recommendations. These recommendations included:

1. Remove the requirement that QF’s attest that they understand the “consequences” of selecting ERIS prior to executing a Facilities Study Agreement,
2. Allow a minimum of 120 days from receipt of the draft QF-LGIA for negotiating a non-standard PPA, and
3. Allow optional 30-day extensions for negotiating a non-standard PPA.³

On April 10, Portland General Electric submitted a compliance filing to meet with the requirements of Order No. 24-036. Article 8.1 of the QF-Large Generator Interconnection Procedures (LGIP) removed the following:

If Interconnection Customer chooses to be studied for Energy Resource Interconnection Service, then Interconnection Customer must provide to Transmission Provider a signed attestation that the Interconnection Customer intends to enter into a non-standard Qualifying Facility contract for the sale of electric energy or capacity from the Large Generating Facility.

The Company also revised Article 11.3 of the QF-LGIP, “to include the 120-day time period to execute a power purchase agreement, subject to mutually agreed upon 30-day extensions.”⁴ Schedule 202 was likewise revised to remove the attestation requirements, as well as incorporate the extended timeline to negotiate non-standard PPAs.

¹ Order No. 23-005, page 35.

² Order No. 23-005, page 36.

³ Staff’s language conditioned the 30-day extension on an “if-needed” basis, which the Commission replaced with “upon agreement of both parties.” See Order No. 24-036, page 1.

⁴ See Portland General Electric Compliance Filing dated April 10, 2024, at page 2.

As part of the verification, Staff reviewed the Company filing which included the revised QF-LGIP and Schedule 202 for completeness and accuracy. Staff confirmed the included documents removed the attestation requirements, and incorporated the required changes in the QF-LGIP.

Staff filed no information requests as the filing included all requisite documents to perform the analysis and review. Staff finds that all of the revisions are correct.

Based on the review of the Company's application, Staff concludes that the proposed Standard Contract forms and Schedules filed by PGE on April 10, 2024, are consistent with the requirements included in Order 24-036.