



Oregon Public Utility Commission
201 High Street SE, Suite 100
Salem, OR 97301-3398

November 3, 2020

Dear Chair Decker, Commissioner Tawney and Commissioner Thompson,

Oregon Solar Energy Industries Association (OSEIA) submits these comments regarding UM 2099. OSEIA strongly agrees with the staff report and recommendations, which take steps to ensure that this proposed change is indeed temporary and that PGE is using the most accurate solar generation data, so that customers and the grid can more fully realize the benefits of solar and storage investments.

First, OSEIA strongly agrees with recommendation for a time limit on the practice of curtailment. By December 31, 2021, it will have been two full years since this problem arose, which is plenty of time for a longer-term solution to be developed. Oregon has aggressive greenhouse gas reduction goals and all state agencies are currently working to implement the Governor's Climate Executive Order to maximize their authority to reduce greenhouse gas (GHG) emissions; curtailing solar should not be the solution for "generation limited feeders." We agree with the staff report that PGE should look to more flexible solutions, such as customer storage and smart inverters. However, even with the staff proposed end date, we still have concerns that the new processes and expenses incurred with this proposed change may lead to a temporary rule becoming permanent, which would be the wrong direction for the state's GHG reduction goals.

We support staff's recommendation that the costs and benefits of PGE's system upgrades be part of the scope of UM 2111, in addition to the idea of cost-sharing. This docket has reinforced concerns raised in multiple dockets regarding transparency around IOU system upgrades and the unanswered question regarding whether solar customers are being treated fairly or not.

OSEIA appreciates staff's recommendation that PGE work with ETO to refine PGE's assumptions about solar PV generation, which could lead to fewer curtailments. ETO has detailed site level data on net metered solar projects in PGE territory regarding system size, tilt, orientation, and shading; this information can help the utility more accurately predict when solar generation will exceed anticipated load on the feeder.

While we appreciate that PGE has improved their plans over the last several months, the lack of commitment to a long-term solution is still very concerning. In particular, PGE suggests that a new QF could fund system upgrades to alleviate the pressure on a particular feeder. However, it is unlikely that new QFs will be built in PGE territory due to land-use restrictions placed on solar in PGE territory, which PGE is aware of. Maximizing clean energy should be part of PGE's



pledge to reduce GHGs; the lack of a plan or timeline to upgrade their equipment to accommodate more clean energy is very disappointing.

OSEIA is still concerned that PGE is only planning to tell customers about curtailment *after* the curtailment has occurred. If a customer is expecting their solar to generate at a certain level and it does not, that could affect their monthly bill in an unexpected way, potentially harming the customer. If PGE is using weather forecasts as part of its determination to curtail solar, notice could be given to customers that their system may be curtailed in the upcoming week.

While we appreciate PGE's acknowledgment that customer storage is part of the long-term solution, the manner in which storage is treated by PGE deserves immediate attention. PGE is assuming battery systems will export to the grid, which leads to inaccurate analysis of the need for curtailment. OSEIA and ETO have offered to work with PGE and to address any battery manufacturer issues and to work with installation requirements which could address energy export and OSEIA looks forward to continuing this conversation in upcoming workshops. Battery storage when paired with solar provides more benefits than either installed alone to both the grid and the community in the face of an emergency; the customer should not be punished for an investment they made that has benefits to the grid and the greater community. In fact, solar customers that install storage are actually *helping* "generation limited feeders" by storing excess solar production. More attention needs to be paid to how storage is treated in this solution.

Solar provides incredible societal benefits including enabling local benefits of resiliency and statewide helping Oregon meet its greenhouse gas reduction goals. Upgrading equipment to bring more solar online provides both ratepayer and societal benefits that should be considered when prioritizing upgrade timelines.

OSEIA appreciates staff's detailed work on this docket and fully agrees with the plan staff has laid out for the next year. We look forward to seeing PGE's report and plan by the end of this year and to participating in both of next year's workshops.

Thank you for your attention to this critical matter.

Sincerely,

A handwritten signature in black ink that reads "Angela Crowley-Koch". The signature is fluid and cursive, with the first name "Angela" being the most prominent.

Angela Crowley-Koch
Executive Director