



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

August 21, 2020

Dear Chair Decker, Commissioner Tawney and Commissioner Thompson,

Oregon Solar Energy Industries Association (OSEIA) submits these comments regarding UM 2099. We appreciate the efforts by staff to ensure that this temporary rule is fair for solar customers, to ensure both that customers are realizing the benefits of their investment and also that the grid is benefiting from customers' solar.

OSEIA largely agrees with the staff recommendations and appreciates the consideration given to this docket. OSEIA will continue to engage with the PUC and PGE in order to find a long-term solution to the problem of "generation limited feeders."

The proposed solution to PGE's "generation limited feeders" raises larger interconnection issues which we hope will be addressed in UM 2111. However, it is worth noting those issues here as they are impacting PGE customers now. Currently, there is a lack of transparency about PGE's schedule to upgrade its equipment. There is no method to determine if PGE is regularly upgrading their equipment or if PGE is waiting for solar customers to pay for those upgrades. While it is the responsibility of solar customers to pay for upgrades their particular system may require, it is PGE's responsibility to maintain and upgrade all of its own equipment for the benefit of all customers and the grid. Without information regarding PGE's upgrade system or schedule, it is impossible to know if solar customers are paying more than their fair share. It seems logical that the current list of "generation limited feeders" have not been upgraded in some time, as half are in more rural areas with slower load growth. While the cost of installing two meters is indeed cheaper for the customer than upgrading substation equipment, the customer is still bearing extra costs that could have been avoided if PGE had upgraded its own equipment in a timely manner. It was concerning to hear that PGE was internally trying to "justify the upgrade costs;" taking care of equipment which a company owns is a cost of doing business and serving customers, which should be justification enough. Oregon has aggressive greenhouse gas reduction goals; curtailing solar should not be the first solution for "generation limited feeders." PGE should look to other more flexible solutions, such as installing electric vehicle charging stations connected to solar, to manage "generation limited feeders."

It was also concerning to hear a narrative from PGE that upgrades only benefit solar customers. Solar adds value to the grid and therefore to PGE and it appears that PGE is ignoring these ratepayer and societal benefits. The vast majority of solar systems installed today are paired with smart inverters and are capable of providing several grid services autonomously including conservation voltage reduction (CVR) which is a benefit that PGE has acknowledged



in their smart grid reports. PGE is coordinating with Energy Trust of Oregon (ETO) on a smart inverter pilot within the smart grid test beds. Solar provides incredible societal benefits such as 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 has concerns with several unanswered questions about how PGE will implement this temporary solution. First, PGE has not adequately answered the question of when it will curtail solar. PGE stated that they do not have real time data at substations and so instead will do a predictive analysis of when to curtail solar. PGE stated that the goal is to curtail solar as little as possible – if this is the case, PGE should make use of all available data to ensure their analysis is as accurate as possible. ETO has detailed site level data on net metered solar projects in PGE territory – PGE should work with ETO to get specific details on the system size, tilt, orientation, and shading to better understand the estimated solar production for systems installed on “generation limited feeders” so that the utility can more accurately predict when solar generation will exceed anticipated load on the feeder.

OSEIA is also concerned that PGE will not tell customers about curtailment until *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. PGE does not appear to have a plan to notify customers – how long will it take for them to notify customers? Will it be in their monthly bill or some other way? PGE has not yet answered what supporting documentation it will provide the customer regarding how PGE reach the decision to disconnect the customer’s solar, as is required. The Commission deserves answers to these questions in order to protect customers. OSEIA appreciates staff’s recommendation that customers be notified within 48 hours of curtailment but advance notice is preferable.

PGE has also not addressed how this temporary solution will address storage paired with solar. PGE has already identified benefits that behind the meter battery storage systems provide the grid and ratepayers. When installed correctly, battery systems should not export to the grid unless designed and programmed to do so, but PGE is assuming they will, which leads to inaccurate analysis of the need for curtailment. OSEIA and ETO offered to work with PGE and to address any battery manufacturer issues and to work with installation requirements which could address energy export. In addition, PGE is working on a storage pilot project in which it *wants* storage systems to export to the grid. 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.

Lastly, OSEIA was appreciative to hear staff reinforce that this solution is temporary. While OSEIA agrees with the staff recommendation of a quarterly report, OSEIA believes more should



be done to ensure the solution is only a temporary one. Solar ratepayers have made investments over the course of years and they should be able to realize the full value of their investment and not have a longer return on that investment due to a “temporary” solution becoming quasi-permanent. This docket demonstrates that this temporary solution will be creating a new process and new expenses outside of the existing distribution planning process and also outside of the utility grid operators’ roadmap to developing expertise with managing distributed energy resources. New processes and expenses may lead to a temporary rule becoming permanent.

In conclusion, the “generation limited feeders” issue highlights ongoing concerns regarding transparency around IOU system upgrades and the unanswered question regarding whether solar customers are being treated fairly or not. This new process does not allow PGE to access the benefits of the solar systems being installed and instead it inaccurately identifies solar as a risk to be mitigated. There are unanswered questions and processes that PGE should develop before this temporary solution is finalized, including how storage when paired with solar is treated.

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 letters of each word being capitalized and prominent.

Angela Crowley-Koch
Executive Director