

AR 659/ UM 2111

Handbook Updates May-2024



Agenda



- Introduction
 - Background
 - Requirements
- Utility Handbook Presentations
 - Idaho Power
 - PacifiCorp
 - Portland General Electric
- Next Steps
- Future Updates
- Scope of Phase 2 Issues



Background



- Order 24-068: Updated Rules adopted
 - Division 82 Small Generator Interconnection Rules
 - Division 39 Net Metering Rules
- Utility Interconnection Handbook OAR 860-082-0030(1)(b)
 - Interconnection requirements handbook. Each public utility must post an interconnection requirements handbook on its public website. Prior to revising its handbook, a utility must provide public notice on its website and use best efforts to notify organizations representing interconnection customers as specified and periodically updated in the handbook. The utility must provide a minimum of 30 days for interested persons to comment, and the utility must respond within 30 days to any comments received and make its responses public.

Handbook Requirements Default Settings



- Utility Interconnection Handbook contents OAR 860-082-0030(1)(c)
- (c) Preferred default settings. A public utility must allow small generator facilities to interconnect using the public utility's preferred default settings, except when the application reviewed under Tier 4, OAR 860-082-0060, or the application fails the Tier 1, Tier 2, or Tier 3 approval criteria in OAR 860-082-0045(2), OAR 860-082-0050(2), or OAR 860-082-0055(2). Interconnection requirements handbooks must include preferred default settings. As applicable, the following must be identified in the interconnection requirements handbook:
 - (A) Voltage and frequency trip settings;
 - (B) Frequency droop settings;
 - (C) Activated reactive power control function and default settings;
 - (D) Voltage active power (volt-watt) mode activation and default setting; and
 - (E) Communication protocols and ports requirements.



Handbook Requirements Protection Devices



- 860-082-0033 Export Controls 3(a)(A)
 - (A) Reverse Power Protection (Device 32R): To limit export of power across the Point of Interconnection, a reverse power protective function is implemented using a utility grade protective relay. The default setting for this protective function is 0.1 percent (export) of the service transformer's nominal base nameplate power rating, with a maximum 2.0 second time delay to limit inadvertent export. When a project is located on a circuit using high-speed reclosing, the utility may require a maximum delay of less than 2.0 seconds to safely facilitate the reclosing. To minimize the need for case-by-case design, which shall remain available, the utility handbook must provide:
 - (i) The rationale and standards that interconnection applications must meet;
 - (ii) A list of specific additional equipment that, if installed, will satisfy the requirement; and
 - (iii) A list of any inverter specifications and options that, if configured, will satisfy the requirement without the need for additional equipment.
- Requirements also incorporated
 - 860-082-0033 3(a)(B) (Device 32F)
 - 860-082-0033 3(b)(A) (Device 32)



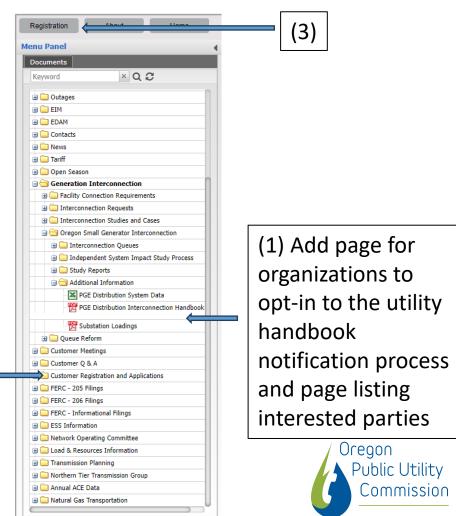
Handbook Requirements Interested Parties



- From Order No. 24-068
- Organizations (trade associations, installers, et al.) representing interconnection applicants and customers that regularly interact with the utility should request to be listed in each utility's handbook and these lists should be updated periodically as a part of the handbook update process.

Handbook Requirements Staff Notification Proposal

- Allow for parties to opt-in to update notifications
- Utilities to notify parties via email of handbook notification list:
 - UM 2111 and AR 659 parties
 - Known developers/installers
 - All interconnection customers?
- Include a page that informs parties how to register for the handbook updates on OASIS site
- Include stand-alone notification list
- Post two documents:
 - (1) Position with the handbook itself
 - (2) Could add under "Customer Registration and Applications
 - (3) Add additional button under the Registration at the top



Handbook Requirements Initial Update



Initial update process as presented in AHD Report:

- 1. Identify areas where the interconnection requirements are contained, be it tariff, handbook or some other document, collectively referred to as "handbooks;"
- 2. Ensure handbook information is posted online;
- 3. Follow the process listed in OAR 860-082-0030(1)(b)-(c), and;
- 4. Provide proposed revisions to UM 2111 parties that will align handbooks with rules changes following the conclusion of the formal rulemaking process.
- 5. Present proposed revisions at a workshop for UM 2111 and any other interested parties

Utility Handbook Update Presentations



- Presentations
 - Idaho Power
 - PacifiCorp
 - Portland General Electric

Utility Handbook Next Steps



- Under OAR 860-082-0030 (1)(b) utility must:
 - Provide public notice on its website
 - Use best efforts to notify organizations representing interconnection customers*
 - Thirty days for stakeholder comments
 - Thirty days for utility response
- Parties will have an opportunity to raise concerns with the filings, if there are no objections they will be implemented.
- Parties, including Staff, may request Commission intervention if concerns raised are not addressed by the utility.



^{*}Order 24-068 includes customers

Future Handbook Updates



- Evolving Equipment (high-speed reclosing)
 - Although we require the handbook to provide a clear and objective safe harbor option, which today
 may warrant additional equipment, we expect the utilities to work actively with industry toward
 specification of an inverter model and a set of standardized configurations that can be safely relied upon without additional equipment.
 - We direct Staff to work with utilities and interested persons, as a part of the subsequent handbook update process, to deliver a proposal for regular proactive investigation of the potential for inverter specifications and configurations to eliminate the need for additional equipment.
- Feedback and Future Workshops:
 - In addition to the rule modifications above, we direct Staff to hold a workshop or similar process to review and collect feedback on utility handbooks at least annually in order to determine whether Commission engagement with any issues related to the process and content of the utility handbook is warranted.
- Potential for utility annual updates to be coordinated?
 - Specific timing?
- Staff to request feedback on interconnection handbooks prior to utility updates
 - Allow for utilities to address feedback when updating handbooks



Phase 2 Issues

- What's changed since initial phasing proposal?
- Interconnection delays
 - Staff is aware of interconnection customers concerns with PacifiCorp delays
- FERC order 2023 Cluster Studies
 - Timelines
 - Group study for FERC
- Microgrid/islanding policies and practices
- Hosting capacity
 - Do CBRE's have the information they need?
 - Increasing transparency impact/incorporation of updated data requirements/ screens?
- HB 2021/Transmission Constraints
- Will come back for a more structured scoping conversation
 - Timing?

Figure 2. Staff's Final UM 2111 scope proposal Group 1: Identification of Group 23: Cost allocation Group 34: Generator's Group 4-5: Processes and upgrades and readiness for practices ability to manage costs predictability Rule priority projects Structure Interconnection request process, construction Process discriminatory good faith (incl. O&M) Rule structure for 10 MW -20 MW generators. New Issue: Whether to consolidate rule: between the NEM, SGIP, and LGIP (no current rules for