



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

December 16, 2021

Dear Commissioners,

Oregon Solar + Storage Industries Association (OSSIA) submits these comments regarding UM 2141, PGE's draft Flexible Load Plan. While we agree with the concept of a flexible load plan, OSSIA has deep concerns about both the overall framework and its omission of the role of solar and also the lack of specifics about the many new programs the plan proposes, some of which duplicate current Energy Trust of Oregon (ETO) programs and others which would fundamentally change net metering.

Due to the lack of specifics, duplication of programs, and large changes proposed, OSSIA respectfully requests that the Commission delay a decision on UM 2141 until more specifics are provided by PGE and the plan is further refined.

At the highest level, OSSIA would like to highlight these primary core principles and concerns:

- **Redefine Demand Response (DR) and/or Flexible Load to acknowledge the role of solar.** PGE's current definition of DR does not clearly include solar and the Flexible Load definition relies on that definition of DR. However, solar plays a key role in the plan and should play an even bigger role.
- **Avoid overlap with ETO.** A number of the programs PGE proposes duplicate existing efforts by the ETO. Creating new in-house programs is unnecessary, will confuse customers, and waste ratepayer dollars.
- **Revise the plan to include specifics on new proposals.** PGE proposes large shifts in the way current programs act but gives little detail on why the shifts are needed, how they would impact ratepayers, and how they would operate. Stakeholders were not involved in the creation of this plan, making it very difficult to evaluate new programs without sufficient detail to understand their costs and impacts.
- **Adjust priorities so that customer benefits and moving to 100% clean electricity are the focus of the plan.** Throughout the plan PGE discusses key metrics but customer benefits like bill savings or how the plan increases equity for historically disadvantaged communities are rarely mentioned. In addition, the plan overlooks key opportunities to reduce greenhouse gas (GHGs)



emissions and does not outline specifics of how this plan fits into their 100% clean electricity goal.

- **Include solar in all resilience plans and programs.** Batteries alone do not provide resilience to customers or the grid. In a power outage, stand-alone batteries will only provide short-term power. Solar + storage provides actual resilience on an ongoing basis during outages, in addition to moving PGE's grid toward 100% clean electricity and therefore solar + storage should play a larger role in this plan.
- **Include stakeholders in plan development before the plan is adopted.** OSSIA was not included in any conversations regarding the development of the plan or any of the new proposals. It is unclear if other stakeholders such as ETO or community-based organizations were included either. The plan requires much more stakeholder input in creating the plan and its programs, not just "vetting" the programs, before they are ready to be heard by the Commission.

Since PGE's plan leaves more questions than answers, OSSIA requests more time to engage with PGE and other stakeholders before the plan is approved.

OSSIA's detailed comments are as follows:

Redefine Demand Response (DR) and/or Flexible Load to acknowledge the role of solar.

- PGE's overall framework for the plan omits the role that solar plays in DR and therefore in flexible load. In many ways PGE treats solar as demand response already; solar reduces the demand on the grid and the need for additional fossil fuel generation. This is clear since solar is included throughout the plan. However, the role of solar is missing in many key areas of the plan. Solar is not included in Chart 3 on p. 19, Smart inverters should also be included in Transmission Services and congestion and upgrade deferral in Table 16, p.111 in the discussion of T&D upgrade deferral, p. 116 Environmental benefits, and in other areas.
- On p.29 in the discussion of LEA, PGE acknowledges the need to upgrade outdated infrastructure to accommodate electric vehicles, heat pumps, water heaters and batteries, but not solar. Since electric vehicles increase load on the system and solar decreases load on the system, it is unclear why solar is left out.
- PGE includes solar in many places in the plan, including Virtual Power Plants on p. 30, Flexible Feeder proposal and Smart Inverter proposal on p.44, cross cutting considerations on p. 47, in Table 8 (although OSSIA disagrees with some information in Table 8), on p.63 regarding grid benefits, p. 66, p. 67-68, and in Table 11, underscoring the need for solar to be included in the overall framework and plan.
- The plan largely disregards the role of solar in the roll-out of electric vehicles (EVs) and charging infrastructure, even ignoring the fact that switching to EVs does not currently mean that a customer will be moving to clean fuel for their vehicle (p. 92). The plan mentions charging



coinciding with peak demand on p. 46, which solar charging can provide grid benefits to, especially during the summer. In addition, if PGE is treating EVs as generation and/or grid balancing, it raises the question of how and why it is or is not treated similar or different to solar and storage. Solar is also not mentioned on p. 98 in regards to EV charging in emergencies, which cannot be done without solar.

Avoid overlap with ETO.

- The Single Family New Construction Bundle is duplicative of an existing ETO program. PGE should detail how its proposal is different from current ETO programs and why moving any programs away from ETO and to PGE would result in customer savings.
- ETO already has programs to conduct home energy evaluations and to work with ratepayers regarding solar adoption, making PGE's Home Energy Bundle and Home Energy Evaluations on p. 63 duplicative and confusing.
- ETO already has programs similar to the Residential New Construction bundle on p. 66 and their work with PGE in the Smart Grid Test Bed. It is unclear how this new program would be cost-effective and provide new or different benefits for ratepayers.
- ETO is already working on many resilience efforts, including ones similar to those discussed on p. 96-99. It is unclear why PGE would consider a new tariff on p.98 that would duplicate much of ETO's existing work and plans.

Revise the plan to include specifics on new proposals.

- In several places in the plan (pages 53, 62, 65, 68, 98, 101 and others) PGE proposes switching to a model of PGE "owning, operating and maintaining" customer resources, including on-bill financing and "as a service (AaS) models. This is a big shift from current programs; such a shift should contain many more specifics before being approved and should include a thorough stakeholder process that examines potential customer and social benefits and downsides, including any duplication of current programs and additional costs to ratepayers.
- PGE's "Home energy bundle" concept completely changes the way Net Energy Metering (NEM) programs work today. The lack of specifics make it unclear how the program would work and if it would benefit customers and the competitive market or harm customer savings. Such a broad proposal should not be approved in a plan without greater understanding of what this would mean for customers and solar small businesses. Does PGE intend to install solar or start a solar installation affiliate? Would this change NEM for current and future customers? If so, how would it benefit or harm customer savings and the current push to expand access to solar to low-income and historically excluded communities?
- While OSSIA applauds PGE's attention to microgrids, the Community Microgrid proposal does not have the level of detail needed for approval. Why and how would residential units be included in microgrids, since they are not the most important community or emergency needs for



resilience? What is Diversifying Energy's role, given the recent expose of the organization's leader by the Oregonian? Why isn't solar mentioned as a key component of resilience?

- PGE's Commercial Resiliency concept ignores the existing market for commercial solar and storage. How would this new concept be integrated into the existing market and what would the benefits be for ratepayers and the existing market? While some entities may be interested in AsS models, that does not necessarily mean it is appropriate for PGE to install, own and maintain the systems. This concept needs more input from stakeholders before approval.
- The discussion of Coordinated Resiliency and Energy Storage Activities on p.96 -103 includes very few specifics despite the fact that this focus is critical for Oregonians to be resilient in emergencies. How would this work with existing ETO programs? How would existing solar and storage markets be included and affected? In addition, this section includes mention of vehicle fleet owners being credited for energy sent to the grid, a new concept that deserves much more attention regarding its impact on NEM before being included in a plan.

Adjust priorities so that Customer benefits and moving to 100% clean electricity are the focus of the plan.

- PGE's discussion of cost-effectiveness briefly mentions social benefits, but does not spell out the breadth of what those might be and does not explain how cost effectiveness is calculated in Table 5 on p. 25. Does this cost-effectiveness calculation include social benefits? Which ones? Are resilience and reduction of GHGs included? Did PGE include the Resource Value of Solar (RVOS) as they did in UM 2197, despite the Commission putting use of the RVOS on hold? Cost-effectiveness figures should not be included in this plan until there has been a stakeholder process to determine how PGE should calculate cost-effectiveness.
- The "key metrics" of new programs rarely include customer savings throughout the plan, underscoring that the plan is focused on benefits for PGE and not benefits for customers or GHG reductions.
- Solar is largely ignored in the plan's discussion of EVs. If clean energy is not used for new EV load, customers are continuing to depend on fossil fuels. Moving to EVs alone does not decrease GHGs; PGE's plan for EVs should always include a discussion of solar combined with new EVs, to ensure immediate clean energy fueling this load, instead of waiting until PGE's entire generation mix is free from fossil fuels. There needs to be a systematic approach for including solar for EV charging for both residential and commercial applications.
- The discussion of participant benefits on p. 116 does not include customer savings or GHG reductions.

Include solar in all resilience plans and programs.

- Community Microgrids on p. 64-65 do not discuss the role of solar in microgrids. Without solar, stand-alone batteries will not provide ongoing resilience during an outage. All resilience



proposals should include solar as a main component and PGE should develop the programs with OSSIA, ETO and community organizations.

- The discussion of Coordinated Resiliency and Energy Storage Activities on p.96 -103 largely ignores the role of solar. Again, stand-alone storage does not increase resiliency in power outages. The development of any resiliency programs should be led by ETO with PGE taking a supporting role.

Include stakeholders in plan development before the plan is adopted.

- In its distribution system plan PGE acknowledges that it needs direction from the PUC and to work with stakeholders to determine how it should evaluate cost-effectiveness. The way that cost-effectiveness is measured is a critical component of the value of the concepts laid out in this plan. Cost-effectiveness should be determined first and with the input of stakeholders and the PUC before this plan is adopted.
- OSSIA acknowledges and appreciates many of the forward-looking components of the plan such as Virtual Power Plants, SALMON, the expansion of the Smart Grid Test Bed, the Flexible Feeder proposal, the Energy Partner program, Community Microgrids, Resilience and Storage plans, and the Storage pilot. OSSIA requests that a new stakeholder process be initiated, similar but larger than the Smart Grid Test Bed Phase II stakeholder process, before individual concepts in the plan are approved, to ensure that stakeholders have the opportunity to shape the programs.
- OSSIA was excited to learn about the research PGE is involved in but disappointed that this report was the first the solar industry has heard of this research. OSSIA requests some kind of stakeholder involvement or reporting for the many research projects PGE is involved in.
- ETO should be a co-creator of many pieces of this plan. It appears that ETO was not involved in the creation of the plan, since many proposals duplicate existing ETO programs, such as the Single Family New Construction Bundle, the Commercial and Industrial program, the Home Energy Bundle, Community Microgrids, and coordination on the data sharing described in Chapter 6.1. OSSIA recommends that PGE work more closely with ETO when revising this plan.
- PGE proposes new concepts of “bundling” and PGE “owning, operating and maintaining” customer resources, including on-bill financing and “as a service (AaS) models. These changes would drastically change existing programs. OSSIA would like to be included in their stakeholder process in developing (not just vetting) bundling proposals and requests that ETO and community groups are as well.
- OSSIA is concerned that PGE has begun research with EPRI (p. 63) to “study customer preferences, influences, and decision-making for co-adopting solar PV with energy storage and/or EVs.” OSSIA has concerns about EPRI’s work in other areas such as Hosting Capacity Analysis that has proven ineffective in California. In addition, such an exploration should include OSSIA, ETO and Solar Oregon, along with other community groups.



While OSSIA agrees with the overall vision of a flexible load plan and appreciates the work that PGE put into the document, the plan is not yet ready for Commission approval. Much more work needs to be done with stakeholders to develop the concepts, define cost-effectiveness, and truly understand what the benefits of these programs are to communities, resiliency, customer savings, and GHG reduction. OSSIA respectfully requests that the PUC slow down the approval process until PGE is able to provide more details and conduct more engagement with stakeholders.

Thank you for your attention to these comments.

Sincerely,

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

Angela Crowley-Koch