



October 7, 2022

Via Electronic Mail

Oregon Public Utility Commission
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Re: UM 2197 Comments on Portland General Electric's Distribution System Plan Part 2

Oregon Solar + Storage Industries Association (“OSSIA”) respectfully provides the following comments regarding Portland General Electric’s (PGE) Distribution System Plan (DSP) Report Part 2. OSSIA appreciates the effort that PGE has put into their DSP, especially the extensive stakeholder outreach and workshops they conducted. We look forward to working with them to fully implement their DSP in order to move toward a grid that is innovative, equitable, and fully integrated with distributed energy resources (DERs).

Overall PGE’s DSP Part 2 is promising; the narrative points to increasingly community-centered, grid modernization effort. However, OSSIA is troubled by the discrepancy between the narrative laid out and the actual commitments PGE makes to upgrade its grid. OSSIA respectfully asks the Commission to request important changes in PGE’s DSP in the following areas:

Distributed Energy Resources (DERs) Forecasting

OSSIA appreciates PGE’s use of stakeholder involvement for inputs in their DER forecasting process. However, PGE’s DER forecasting did not include new Oregon Programs that provide incentives to low and moderate incomes to go solar, particularly Energy Trust of Oregon’s Solar Within Reach program and Oregon’s Statewide Solar + Storage rebate. Both programs provide larger incentives, and especially when combined, make solar affordable for low- and moderate-income ratepayers. These programs are changing the demographics around who installs solar. PGE’s failure to include these incentive programs in their DER forecast, has resulted in some of their statements in the DSP Part 2 Report being inaccurate. For example, on page 81 PGE states that, “This indicates that, given current program designs incorporated into AdopDER, forecasted



PV installations would tend to be comparatively lower within environmental justice (EJ) communities compared to the rest of the service territory, all else equal.”¹

OSSIA does not understand why these incentive programs were not accounted for in PGE’s forecast. In the future we ask that PGE adjusts their forecast to incorporate the new focus on solar adoption for low- and moderate-income households. Additionally, we ask the Commission to assess how this will affect PGE’s choices for areas for DER system upgrades as these communities have not had historically high solar adoption rates.

Cost-effectiveness

To truly account for customer and community benefits from DERs, reimagining cost-effectiveness is a critical piece of DSP. In PGE’s near-term planning section, they indicate a “CE Project” to evaluate cost-effectiveness is currently underway.² OSSIA has not been made aware of this process; we would like to see stakeholder involvement in any change to PGE’s cost-effectiveness evaluation approach. Cost-effectiveness values will play a major part in the DSP as it can affect DER forecasting, NWS project assessment, and decision on system upgrades to prepare for DERs. OSSIA is curious to see how PGE’s advancements in cost effectiveness methods will be used in tandem with the risk-based cost benefit analysis.³

Other Considerations

Community solar is not addressed anywhere in PGE’s DSP. It is concerning that as the utility moves towards increased DER integration and pursuing carbon reductions it is not including community solar in their assessment of the distribution system. Community solar projects are renters only ability to create their own renewable energy, and renters make up a significant portion of PGE’s customers. In the future, OSSIA would like to see DSP support the community solar program as these projects provide tremendous resiliency benefits to customers.

In PGE’s discussion of solution identification, there is no discussion of distributed generation readiness.⁴ PGE’s climate goals are ambitious, and distributed generation will be a necessary tool in meeting these goals. Distributed generation readiness on the system should be included in PGE’s planning work, as they make other system improvements, they should look for improvements to distributed generation readiness as well.

In PGE’s discussion of their T&D Portfolio they list the input and score for metrics when they assess a project. OSSIA is curious how the benefits that DERs bring to the system factored into

¹ PGE Distribution System Plan, Part 2, August 2022, p. 81.

² PGE Distribution System Plan, Part 2, August 2022, p. 142.

³ PGE Distribution System Plan, Part 2, August 2022, p. 149.

⁴ PGE Distribution System Plan, Part 2, August 2022, p. 94.



these 5 categories.⁵ While DERs provide many different benefits that may fit into each category, it is not clear that they are being properly valued.

Conclusion

In conclusion, OSSIA would like to reiterate our appreciation for the better understanding of the utility distribution planning process through stakeholder participation at the workshops. We encourage the Commission to uphold the highest standards and expectations through their DSP best practices Guidelines and stand ready to collaborate with staff, utilities, and other stakeholders as this process continues to evolve.

Respectfully submitted this 7th day of October 2022,

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⁵ PGE Distribution System Plan, Part 2, August 2022, p. 100.