The Hood RiverCounty Energy Council would like to take this opportunity to present the following comments on the Draft Distribution System Planning (DSP) Plan presented by Pacific Power in Docket No. UM 2198.

First and foremost, we appreciate Pacific Power's efforts in this process, as well as the ongoing effort of the Public Utility Commission. Distribution System Planning (DSP) is both an engineering exercise, requiring diving into the technical details of existing and future systems, as well as a socioeconomic exercise, requiring a broad understanding and appreciation of a history of unequal access and the potential to positively impact our communities. The latter requires a dialogue between Pacific Power and communities to quantify and qualify the ways the distribution system can create more resilience, more equitable access, and a broader range of benefits to communities. This spirit of collaboration will drive outcomes that create the most benefit for Oregonians.

The Hood River County Energy Council (HRCEC) was formed following the formation and adoption of the Hood River County Energy Plan[1] (Energy Plan). HRCEC is a community-led advisory body supporting implementation of the Energy Plan in collaboration with the governing bodies that adopted the plan: Hood River County, the City of Hood River, the Port of Hood River, and the Port of Cascade Locks. The Energy Plan is a blueprint to improve community resilience, increase energy independence, and increase economic benefits related to energy use in Hood River County while reducing emissions from the burning of fossil fuels. The Energy Council advances the goals and sets strategies to meet the goals of the Energy Plan in partnership with local stakeholders.

HRCEC's goal is to ensure the DSP process results in the greatest likelihood of success for the Energy Plan and generally the greatest energy related outcomes for Hood River County and surrounding communities. To that end we offer the following specific comments on the current draft DSP report:

- **Hosting Capacity Analysis** The analysis of hosting capacity needs to be granular in terms of specific locations, including down to individual feeders, as well as seasonality, as not all distributed energy resources (DERs) operate at the same level on a year-round basis, Irrigation hydropower projects are one example of this. While Pacific Power's "Distribution Generation Capacity Availability and Readiness Status" map (Figure 20, DSP) is a good start, it is not descriptive enough to provide much benefit for developers of small DERs. In addition to mapping, the data that goes into this analysis and the criteria to determine suitability, such as minimum load, needs to be made available. Feeder lines should be clearly labeled, individually identifiable and include information on existing load and current hosting capacity for additional DERs. Additionally, the report says "As a result of this historic experience and current inventory process, the company is developing plans as opportunities arise to proactively modify equipment within substations that do not have the required equipment for Distributed Generation (DG) so that it can be completed in a cost-effective way." Modifications to substation equipment meant to enhance capacity for Distributed Generation will not result in the greatest benefits to customers unless community plans and potential future

[1] https://www.mcedd.org/wp-content/uploads/2019/04/Hood-River-Energy-Plan_6-18-18.pdf

development of DER are considered. An example of this would be if HRCEC compiled a list of potential projects that various stakeholders aimed to build and if this list is not considered when making modifications to a substation, then as the projects are developed it becomes apparent that there is not enough additional capacity incorporated into the modifications. This would result in either A) additional modifications and cost and/or B) limiting the number of DER's that can be developed and commensurately limiting the community benefits that DER's can create.

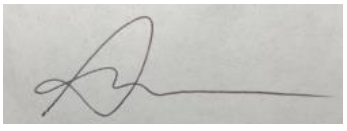
- **Community Engagement Plan**- We believe that community engagement should be conducted at the county level and in partnership with local Community Based Organizations (CBOs). The intention for online and phone surveys with individual customers as the primary and secondary means of engagement is inadequate as the typical customer has no experience or knowledge of the potential for DER's or the importance of said DER's for the resilience of the local energy system. Local CBO's can assist in this engagement through directed outreach and by compiling community recommendations and existing plans. This is not just a matter of "checking the box" of stakeholder engagement, it is a matter of finding solutions that align with identified community needs and goals. HRCEC and the Energy Plan is an example where the local elected officials and the community at large have decided what we want our energy future to look like and this plan and process should be considered throughout the DSP.

- **Public Power Safety Shutoffs-** Hood River County is also affected by Public Safety Power Shutoffs. Given the significant risks to people and the economy, the DSP process should prioritize collaboration with PSPS affected communities and develop plans that mitigate the potential impact of PSPS in these communities, particularly through tapping into the power of DERs to ensure grid resiliency, power supply redundancy and other grid stabilization services such as frequency regulation, capacity and energy storage.

- **Engagement Plan Accessibility-** Pacific Power should prioritize accessibility in community engagement. Engagement sessions leading up to the creation of the DSP prioritized sharing technical details and few left time for dialogue. Moving forward, engagement should be appropriate for the intended audiences and focus on how the plan relates to known community and interest group priorities. It should be designed to facilitate dialogue and meaningful input.

HRCEC looks forward to engaging with Pacific Power throughout this process and we appreciate the opportunity to provide input on the DSP.

Signed,
The Hood River County Energy Council



Hood River County Energy Council Co-Chair