OREGON SOLAR + STORAGE INDUSTRIES ASSOCIATION

October 7, 2022
Via Electronic Mail

Oregon Public Utility Commission
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Re: UM 2198 Comments on Pacificorp's Distribution System Plan Report Part 2

Oregon Solar + Storage Industries Association (OSSIA) respectfully provides the following comments regarding PacifiCorp's ("PAC") Distribution System Plan (DSP) Part 2. OSSIA appreciates the effort that PAC 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 PAC's DSP Part 2 is promising; the narrative points to increasingly community-centered, grid modernization effort. However, OSSIA is troubled by the lack of substantive actions the utility will pursue. OSSIA respectfully asks the Commission to request important changes in PAC's DSP in the following areas:

Community Engagement

OSSIA worked closely with PAC as they worked to develop their non-wire solution proposal to address grid needs in their Klamath Falls service territory. OSSIA submitted two pilot proposals for PAC to consider, one on smart inverters, and one on a solarize campaign. PAC also received a pilot proposal from the Farmers Conservation Alliance.[1] These three proposals were the only three NWS proposals PAC received from stakeholders. While OSSIA was glad to provide potential solutions to the utility, this process felt like a subversion of the DSP process, while other utilities prepared clever solutions for NWS pilots, PAC relied exclusively on stakeholder proposals to develop solutions. In future DSP efforts, OSSIA would like to see PAC use some more creativity in their assessment on NWS and bring some of their own solutions to the table for stakeholder discussion. While feedback was sought between March and May, stakeholders were not told about the pilot proposal form on PAC's website until PAC's May DSP meeting.

[1] PAC Distribution System Plan, Part 2, August 2022, p. 122.

We believe PAC would have received more pilot ideas in the future if they disseminate this information to the DSP stakeholder earlier in the process.

PAC held an NWS community engagement meeting in Klamath Falls during their DSP process to solicit local feedback on their DSP efforts and to review their NWS to a specific grid need in the area.[2] While OSSIA is extremely supportive of PAC pursing local feedback on their plan from the community, we have some concerns about the additional selection of energy efficiency as an additional potential NWS. We did not hear the community stakeholder select energy efficiency as a solution they wanted. This is a concerning result and we would like additional stakeholders, and Commission staff, from the DSP process to have access to PAC's community engagement meetings in the future.

Forecasting Load Growth, DER Adoption, and EV Adoption

OSSIA continues to hold concerns that Legacy based forecasting, while of some value, will result in upgrade planning that only strengthens the inequitable access and level of services between communities with traditionally higher levels of DER adoptions due to income levels. Forecasting should be informed by new and emergent policy and market supports as well as equitable remote system performance tracking and management capable of providing a fair and equitable access for all rate payers to systems capable of supporting DERs.

We appreciate PAC's efforts to incorporate our suggestions into their DER adoption forecasting methodology.[3] The inclusion of incentives to low and moderate income should help to alleviate the concern that the model will only upgrade the distribution system in areas that have historically had high DER adoption. We would like to see more details from the inputs into PAC's private generation study, though we understand PAC only received the results before filing. We would recommend that PAC goes through the study in more detail at one of their next DSP meetings with stakeholders. As PAC continues to model SCADA throughout their Oregon service territory, we believe it will allow for more equitable grid need identification.

Non-Wire Solutions

After discussing viability of the three pilot proposals with PAC at several meetings separate from the DSP meetings, OSSIA understood that the grid problem in the Klamath service area was likely not the right area for the NWS being examined as the wired solution was a relatively small upgrade. PAC initially selected the Pendleton and Klamath Falls areas because of their SCADA availability, the study cycle timing, and historical distributed energy resource project activity.[4] However, neither area seems to be the proper location for a non-wire solution at this time. Neither the solar and storage proposal nor the energy efficiency proposal seem viable to address this specific grid need. The solar and storage proposal would be an interesting pilot in other

[2] PAC Distribution System Plan, Part 2, August 2022, p. 145.
[3] PAC Distribution System Plan, Part 2, August 2022, p. 49.
[4] PAC Distribution System Plan, Part 2, August 2022, p. 34.

circumstances, however the sheer number of participants required to invest into solar and storage seems unattainable in a short period of time.[5] We have similar thoughts about the energy efficiency proposal, it would take years to increase energy efficiency adoption to the levels required to remedy the grid need.[6]

While we do not believe the NWS proposals are effective alone, we would like to see what some combination of the two separate solutions would look like. Additionally, we would like to encourage PAC to continue pursuing the irrigation solution originally put forward by the Farmer's Conservation Alliance. While it will take some time to determine the exact details and the appropriate compensation mechanism, that solution is the type of creative approach to using customer needs and grid needs together. We are excited at what PAC might develop in the future on that matter.

OSSIA is excited to see PAC implement their learnings from this DSP process in their next DSP report. Hopefully more appropriate grid needs can be selected for NWS in the next cycle of this process.

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,

Jack Watson
Director of Policy and Regulatory Affairs
Oregon Solar + Storage Industries Association

[5] PAC Distribution System Plan, Part 2, August 2022, p. 111.
[6] PAC Distribution System Plan, Part 2, August 2022, p. 119.