



May 16, 2019

Chair Megan Decker
Commissioner Steve Bloom
Commissioner Letha Tawney
Oregon Public Utility Commission
201 High Street SE, Ste 100
Salem, OR 97301

RE: Interconnection Data Transparency (Interim Measure #2) Docket Nos. UM 2000/2001

Dear PUC Commissioners and Staff,

Thank you for considering ways to improve market efficiency in Oregon and ensure existing policies are implemented in a reasonable and transparent manner. OSEIA and its member companies support your effort to increase transparency into interconnection data through these dockets and appreciate the time and consideration that has been spent so far on this effort. OSEIA supports all three components of the staff proposed plan to increase transparency into interconnection data.

The first component, Interconnection Studies, is critical for every stakeholder. OSEIA believes that everyone will benefit when all three utilities make interconnection studies public through OASIS. OSEIA respectfully asks that PGE and Idaho Power also provide links to OASIS studies as PacifiCorp already does; all IOUs operating in the same state should provide the same types and level of information. OSEIA encourages the PUC to set standards or guidance for what type of information should be redacted, and in that guidance, OSEIA recommends that the standards should be consistent with what data is currently made public through PacificCorp's published studies on OASIS. Practices going forward should err on the side of more transparency than what we currently have, not less. OSEIA also recommends that the utilities also publish any standards they follow that are applicable to state jurisdictional interconnections.

OSEIA believes that the second component, Utility Systems Information, should actually be rated as a "high" level of usefulness, as opposed to the "medium" level. Information about basic utility systems is critical for a project developer to know before they begin the process of developing a project. Having this information available will save both developers and utilities time and money, allowing developers to focus on the locations that make the most sense for all stakeholders. This information goes hand in hand with distribution system planning and prepares Oregon for the future.

The last component, Interconnection Milestones, is also critical and we fully support the staff's recommendations. In addition, it would be useful for developers and potential PUC commissioners and staff to have some kind of tracking mechanism to understand how costs and

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requirements for a project change during the application process. Developers can learn from changes that other projects have faced and those changes can help them plan for a best and worst case scenario. In addition, it will be useful for PUC commissioners and staff to understand how the realities of moving a project forward are sometimes very different than the current rules would suggest. This includes considering faster timelines for approval; 24-36 months for even the simplest of interconnections is too long. Transparency around timelines for studies will help companies understand how long which kinds of studies generally take so they can know what to expect. OSEIA also hopes that it sheds light on concerns that sometimes relatively simple and straightforward studies can take as long as more complicated studies.

There are other issues regarding interconnection that we hope will be discussed in future workshops. OSEIA respectfully asks for a discussion around why “infeasible” is the result sometimes given for interconnection studies and what can be done after such a result is received. OSEIA also asks that there be transparency around the engineering standards that utilities use to determine upgrade requirements. There is concern among OSEIA members that existing engineering rules are not always followed and transparency around this issue would give certainty to the industry.

We look forward to continuing to engage on this important issue. Thank you for taking our perspective into account.

Sincerely,

A handwritten signature in black ink that reads "Angela Crowley-Koch". The signature is written in a cursive, flowing style.

Angela Crowley-Koch
Executive Director
Oregon Solar Energy Industries Association