

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2001

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation Into Interim PURPA Action.

COMMENTS OF
RENEWABLE NORTHWEST

Renewable Northwest thanks the Oregon Public Utility Commission of Oregon (“Commission”) for this opportunity to offer additional feedback as it considers whether to take interim action on PURPA. We also thank Staff for including an interconnection component in its recommended interim action in recognition of the concerns on utility interconnection processes raised throughout this process. In these comments, we encourage the Commission to also require an exploration of concerns with the timing of utilities’ interconnection queue processing as part as of an interim action on interconnection.

As we expressed at the February 14, 2019 Public Meeting, we are increasingly hearing from members of the development community concerned with Oregon utilities’ interconnection processes. Those concerns relate to the transparency of the process to determine needed upgrades, the cost of those upgrades, and the timing of utility interconnection queue processing. As a result, we continue to support the interconnection component in Staff’s recommended interim action as a reasonable first step in addressing developer concerns with the transparency of the process to determine what upgrades are needed and their cost.

We also encourage the Commission to adopt interim measures intended to address concerns with utility interconnection queue processing timelines. We understand that several members of the development community are facing significantly longer timelines than established in utilities’ Open Access Transmission Tariffs. We also understand that those developers may not be receiving adequate notice. As a result, we encourage the Commission to include in its interim action on interconnection a requirement that utilities report to the Commission on:

- Queue processing success metrics
- Current timelines for completion of studies
- Any backlog that utilities may be experiencing
- Actions that utilities are be taking to ensure timely processing of interconnection requests

Renewable Northwest again thanks the Commission for this opportunity to comment.

Respectfully submitted this 22nd day of February, 2019.

/s/ Silvia Tanner

Silvia Tanner

Senior Counsel & Analyst

Renewable Northwest