



Oregon Public Utility Commission
201 High Street SE, Suite 100
Salem, OR 97301-3398

March 26, 2021

Dear Chair Decker, Commissioner Tawney and Commissioner Thompson,

Thank you for the opportunity to comment on UM 2141, PGE's Flexible Load Plan. We agree with PGE's long-term vision of moving to a multi-year planning, budgeting and cost recovery approach and appreciate their detailed plan. Overall, we ask PGE to ensure that Distributed Energy Resources (DERs) are appropriately brought into the plan. The plan appropriately has a Demand Response (DR) focus, but DERs often act in similar ways to DR by reducing demand on the system and we request that this plan brings DERs more fully into the plan. OSSIA's specific suggestions are below and we look forward to working with PGE and the Commission to improve the plan.

OSSIA's suggestions, comments and questions:

- Creation of a DER Advisory Group, similar to the Demand Response Advisory Group, with OSSIA and Solar Oregon invited to participate.
- Increased transparency regarding the methodology review of cost-effectiveness.
- Increased focus on storage – in particular clean storage – as a path to provide grid benefits and increased adoption of net metered solar systems.
- Increased focus on equity and a reminder that low- and moderate-income ratepayers cannot participate in all programs, as some options – electric vehicles, solar and storage, etc – are cost prohibitive.
- Community resiliency in the face of power outages should be a factor in potential benefits to ratepayers, not just grid resiliency
- OSSIA would like to participate in stakeholder engagement but was not listed. PGE has not reached out for “cross-industry collaboration.”
- PGE states that they are “committed to investments in DERMS” but in the UM 2099 docket OSSIA has learned that DERMS are not currently being considered to alleviate existing problems with “limited generation feeders” and would like to see this issue prioritized during DERM roll out. OSSIA is interested to learn more about the DERMS pilot and how it went.
- OSSIA appreciates the commitment to quantifying locational value for DERs and DR.
- What is the methodology for future enrollment projections? OSSIA is concerned that projections about future adoption of solar may not be accurate, leading to additional “limited generation feeders.”
- Why isn't the storage pilot part of the modeled ELCC against the portfolio?

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- Solar + Storage should be reflected in avoided costs of Transmission and Distribution.
- OSSIA is excited to see how the storage pilot program goes and looks forward to future updates and learnings.

Thank you for the opportunity to submit comments and we look forward to working with you further on this plan.

Sincerely,

A handwritten signature in black ink that reads "Angela Crowley-Koch". The signature is fluid and cursive.

Angela Crowley-Koch
Executive Director