



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

Re: Comments on draft Interconnection Data Proposal, UM 2001

May 31, 2019

Oregon Public Utility Commissioners and staff,

The Oregon Solar Energy Industries Association (OSEIA) respectfully submits the following comments in regards to UM 2001, following the recent May 17th workshop. OSEIA is a trade association founded in 1981 to promote clean, renewable, solar technologies. OSEIA members include businesses, non-profit groups, and other solar industry stakeholders. We provide a unified voice of the solar industry and focus exclusively on the solar value chain; from workforce development to permitting, advocacy, policy, and regulation for manufacturing, residential, commercial, community, and utility scale solar projects on the local, state and regional level.

OSEIA supports the current recommendations that PUC staff proposed and also seek additional data to assist OSEIA members in understanding more fully the challenges in the interconnection process. OSEIA also appreciates the scope that staff have laid out for this work. More transparency will help all stakeholders understand the system constraints, the engineering practices and standards used, the timelines and cost considerations. We hope it will provide clarity on delays and cost increases when they happen and that the PUC will have the information it needs to provide fair rules of the road for all participants.

Redactions

When it comes to transparency, OSEIA requests that the commission err on the side of more transparency, both to assist interconnection customers but also to inform the PUC's process for UM 2000. OSEIA strongly encourages the PUC to use as a baseline existing levels of transparency. Since PacifiCorp already makes studies public with limited redactions, we encourage the PUC to require PGE and Idaho Power conform to the existing levels of transparency that PacifiCorp has to date.

Historical Studies

OSEIA supports the requests of NIPPC and REC to have the IOUs make historical interconnection studies public. The speed at which interconnection requests are processed has slowed dramatically in recent years and so it is important to understand what happened to create this slowdown. Data from older studies will help make it clear what has changed and how to improve the process. Therefore, OSEIA requests that PGE make public studies from the previous five years and that PacifiCorp produce the last seven years of studies. This historical data will allow the PUC and utility customers to understand how the process worked before there were severe interconnection issues.



Utility System Information

OSEIA agrees with NIPPC and REC that the system information provided by the utilities should provide a baseline of data to enable a potential interconnection customer to make appropriate decisions before getting too far down the development path and then discovering constraints on the system. Staff's list of utility system data detailed in their Initial Interconnection Data Transparency Proposal is appropriate and useful in this regard. In addition, OSEIA joins NIPPC and REC in supporting additional data discussed at the May 17, 2019 workshop:

- Provide the county or other location identifier for each substation;
- Define the substation voltage to be provided as the low-side feeder voltage rather than the high-side transmission voltage;
- Provide two "yes/no" items under the communications line item for the utilities to state whether there is SCADA at the substation and whether there is fiber to the substation;
- Define the feeder line capacity to be provided as the capacity at the head of the feeder; and
- Provide all generation on a feeder, regardless of type (QF, non-QF, net metering, etc.).

Daytime minimum load data should also be provided. While we heard that this information changes and thus will vary in its usefulness, OSEIA members still find the information highly valuable. Since studies already calculate daytime minimum load, it is a data point that should be updated quarterly and included in any system information made available.

Interconnection Metrics

OSEIA agrees with NIPPC and REC that the FERC Order 845 data is a good start for metrics to be made public in Oregon and that in addition, the application date, date the study begins and ends, and the total number of hours spent on each study should be made public. This level of transparency will help give OSEIA members more information on what they're likely to encounter with their studies. It should also provide greater clarity for the PUC and all stakeholders about how the studies actually work and the time needed to complete studies of various levels of complexity. OSEIA also agrees with NIPPC and REC that the data should be available in advance of the FERC deadline, since the information will help inform UM 2000.

OSEIA believes that it's useful to have access to historical metrics as well for the same reason that past studies should be provided; historical data should show why interconnection requests slowed and what the particular reasons for slow down are. In addition, we request that the historical data for PacifiCorp include seven years of data and that PGE provide five years of data.

OSEIA concurs with the data requests that NIPPC and REC outlined in their comments. In summary, we request that the following be included in historical metrics:

- Data included in NIPPC/RECs "Attachment A" to their comments
- Basic project information including name, queue number, date of application, applicable rules, project type (QF, non-QF, network or energy resource, generation type), size, requested in service date and voltage.



- Timing and cost data, both at the interconnection agreement date and upon completion of the project, including when the agreement is signed by each party, and the interconnection and network upgrade costs in the agreement.
- Entity that performed the study, alternative studies or re-studies

Interconnection Standards

OSEIA agrees with NIPPC and REC that interconnection standards should be made public and the IEEE 1547 standard in the Oregon small generator interconnection rules should be updated to the most current standard. OSEIA requests that the PUC open a rulemaking to update to the 2018 version of the standard in order to improve interconnections. OSEIA also requests for its Executive Director to be included in any Interconnection data workshops in the future, in addition to several OSEIA members that have on the ground interconnection experience, along with NIPPC and REC representatives.

In conclusion, OSEIA supports the PUC staff's draft recommendations and would like to see additional information included in order to fully understand the issues both the utilities and industry face in the interconnection process. Only with a complete and transparent data set will the PUC and stakeholders be able to evaluate current practices and where barriers exist to a smooth interconnection process. A complete data set will also inform that UM 2000 process.

Sincerely,

A handwritten signature in black ink that reads "Angela Crowley-Koch". The signature is fluid and cursive, with the first name being the most prominent.

Angela Crowley-Koch
Executive Director
Oregon Solar Energy Industries Association