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June 3, 2019

VIA ELECTRONIC FILING

Attention: Filing Center
Public Utility Commission of Oregon
201 High Street SE, Suite 100
P.O. Box 1088
Salem, Oregon 97308-1088

**Re: Docket UM 2001 – In the Matter of PUBLIC UTILITY COMMISSION OF OREGON,
Investigation into Interim PURPA Action.**

Attention Filing Center:

In accordance with the schedule in Staff's May 22, 2019, email, Idaho Power Company ("Idaho Power" or the "Company") submits these comments on Staff's draft interconnection data proposal. Idaho Power appreciates Staff's efforts at the prior workshops and the opportunity to file these additional comments on Staff's proposal.

Staff outlined three criteria that it proposes to balance in the recommendation that will be made to the Public Utility Commission of Oregon ("Commission"): (1) the level of effort required to compile and provide the information; (2) the need for transparency in the interconnection process; and (3) the usefulness of the information to potential interconnection customers. Based on these criteria, Idaho Power offers the following response to Staff's recommendations.

I. Interconnection Study Reports

Idaho Power does not object to Staff's proposal to make interconnection study reports publicly available via the Company's OASIS website, comparable to how PacifiCorp currently posts its interconnection study reports. Idaho Power currently provides interconnection study reports to any interested customer upon request and therefore it will not be difficult to publicly post the reports on the internet.

Staff recommends that the utilities post all studies completed since January 2017. Idaho Power does not object to this request. However, studies issued nearly two-and-a-half years ago will likely have limited value to current and future interconnection customers trying to determine where to locate a potential project. The burden of posting pre-2017 studies outweighs any potential benefits resulting from access to older, often stale study reports. To the extent a customer wants access to pre-2017 study reports, Idaho Power will continue to provide earlier

reports on request, which has traditionally been sufficient for Idaho Power's customers. In addition, Idaho Power recommends the removal of studies that are more than five years old because those older studies have limited value and would still be available upon request.

When Idaho Power publicly posts its interconnection study reports, the Company will redact all non-public customer information included in the report. In addition, the Company will redact any material deemed Critical Energy/Electrical Infrastructure Information ("CEII"), consistent with Idaho Power's obligation to protect such information from improper public disclosure. The Federal Energy Regulatory Commission ("FERC") has defined CEII as specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that meets all of the following criteria:¹

- Relates details about the production, generation, transportation, transmission, or distribution of energy;
- Could be useful to a person in planning an attack on critical infrastructure;
- Is exempt from mandatory disclosure under the Freedom of Information Act (FOIA), 5 U.S.C. 552; and
- Does not simply give the general location of the critical infrastructure.

As relevant here, CEII would typically include drawings showing technical details of a project, such as plans and specifications, supporting design reports, facility details, electrical transmission systems, and communication and control center information; locations of critical or vulnerable components of the project; global positioning system (GPS) coordinates of any project features (precise surveyed or GPS coordinates at or above two decimal points of accuracy of equipment and structures); certain information related to transmission system maps and diagrams used for transmission planning; and substation blue prints.

CEII does not include information such as line voltage and general geographic information or narratives, such as the descriptions of facilities and processes, unless they describe specific engineering and design details of critical infrastructure. Distribution system information is typically not considered CEII.

Idaho Power currently requires a person requesting an interconnection study report to sign a non-disclosure agreement in order to receive the unredacted report including CEII. The Company recommends continuing to use this same approach even after the redacted study

¹ There are several relevant FERC orders discussing CEII, including Order Nos. 630, 662, and 683. Additional information is available here: <https://www.ferc.gov/legal/ceii-foia/ceii.asp>.

reports are publicly posted—*i.e.*, a customer can view the interconnection study reports with redacted CEII without signing a non-disclosure agreement but must execute a non-disclosure agreement to view the CEII. The Company has an affirmative obligation to protect CEII from improper public disclosure and believes that there is no reasonable basis to modify its current practice, particularly in light of the minimal burden on interconnection customers wishing to view the CEII.

The Company further agrees that Staff's proposed timeline is reasonable—*i.e.*, the Company will begin posting new interconnection study reports beginning on July 1, 2019, and will post all studies performed since January 1, 2017, by the end of the year.

II. Utility Distribution System Information

Idaho Power does not object to the provision of distribution system information outlined in Staff's draft proposal. For Idaho Power, much of the requested information will be straightforward to compile into a format that can be publicly posted.² The Company notes, however, that the provision of the daytime minimum loads on each distribution feeder will be more time and resource intensive to compile. Idaho Power also cautions that some of the information included in Staff's request may include CEII that cannot be publicly disclosed, consistent with the discussion of CEII above.

In terms of summarizing the communications within each substation, Idaho Power believes that it is sufficient to identify whether the substation has supervisory control and data acquisition ("SCADA") capabilities. The reported transformer voltage should be the voltage on the low side of each transformer measured as the feeder leaves the substation. The Company also agrees that the feeder capacity should be reported based on the capacity measured at the substation. Idaho Power's Oregon system includes long distribution feeders and the capacity is very location dependent. Reporting capacity at the substation is therefore a consistent and reasonable approach.

Once the information is compiled, Idaho Power recommends that the distribution system information be posted on OASIS. Idaho Power believes that reporting the information in a table format is reasonable and will allow potential interconnection customers to easily review and understand the information provided. Presenting the compiled information in a map format will be extremely time-consuming and provide limited incremental value to customers.

² By way of background, Idaho Power has 27 distribution substations in its Oregon service area and 63 distribution circuits.

The Company also believes that prior to accessing the utility distribution system information, customers should be required to acknowledge, through a disclaimer, that the data is provided purely for informational purposes and does not, in any way, convey a right or an expectation that a particular project will be able to interconnect at a particular point on Idaho Power's system.

Idaho Power believes that biennial updates are reasonable and will coincide with the Company's broader integrated resource planning cycle.

Finally, the Company also believes it can provide the information in accordance with the timeline proposed by Staff.

III. Interconnection Milestones

Idaho Power does not object to compiling and publishing information regarding the Company's performance relative to the interconnection process milestones reflected the Commission's rules and Staff's proposal. The Company notes that FERC has directed utilities to provide similar reports beginning in January 2020 for FERC-jurisdictional interconnection requests. Although the FERC reports will include different information applicable to FERC-jurisdictional interconnections, aligning both the state and federal reporting requirements is reasonable to minimize the administrative burden.

Idaho Power objects to the provision of historical milestone information because doing so is unduly burdensome and will provide little information to current or potential customers regarding the interconnection process. Moreover, because Idaho Power will publicly post its interconnection study reports, any current or potential customer will have full access to the historical information.

The Company also objects to compiling and reporting high level interconnection cost data. Not only will this information be publicly available through the interconnection study reports, it will be minimally useful to interconnection customers. Interconnection costs are specific to the unique circumstances of each interconnection customer and high-level composite information will shed little light on the potential interconnection costs for a particular customer. The burden of requiring the utilities to compile and report this information is far outweighed by the limited informational value that would result.

IV. Interconnection Data Workgroup

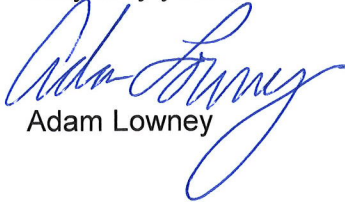
Idaho Power appreciates Staff's efforts to organize and convene a smaller workgroup to address implementation of the interconnection data discussed in Staff's proposal. Idaho Power has no specific proposal regarding who should be involved in the workgroup. In terms of

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process, Idaho Power believes that monthly meetings would be sufficient until the process for posting the requested information is entirely defined, at which time any future meetings could be convened only as needed.

In conclusion, Idaho Power appreciates the opportunity to file these comments and looks forward to continuing to work with Staff and stakeholders to refine and implement the interconnection data proposal.

Very truly yours,



Adam Lowney