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December 9, 2020

Via E-mail

Public Utility Commission of Oregon

Attn: Filing Center

201 High St. SE, Suite 100

Salem, OR 97301

Re: In the Matter of the Investigation into the Treatment of Network Upgrade Costs for
Qualifying Facilities
Docket No. UM 2032

Dear Filing Center:

Please find enclosed the erratum page in clean and redline format for Interconnection Customer Coalition/100, Lowe/25 to replace the original page for Interconnection Customer Coalition/100, Lowe/25 that was filed on October 30, 2020. Please completely replace the page filed on October 30, 2020.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Min Hu". The signature is fluid and cursive, with a long horizontal stroke at the end.

Min Hu

1 as an ERIS might be reasonable and because it may lower cost for all impacted
2 stakeholders.

3 One, the QF generation could be delivered using Point-to-Point Transmission
4 (“PTP Transmission”). My understanding is that NRIS is not a prerequisite for PTP
5 Transmission, and the use of PTP Transmission may make sense in at least some
6 circumstances. From reviewing PGE’s data responses, I understand that PGE has
7 ~~interconnected~~ accepted power from at least some off-system QFs this way, because,
8 according to PGE, “doing so allows PGE to accept these QFs’ output while also making
9 unused transmission available for energy transfers in the Western Energy Imbalance
10 Market.”¹ This is a clear example of PTP Transmission enabling a more efficient use of
11 the electricity system. If PGE can purchase power from QFs when they are not a network
12 resource, then it might be reasonable to make this an option available to on-system QFs
13 as well.

14 Two, the QF might be willing to voluntarily curtail its power to avoid the need for
15 interconnection costs. The Joint Utilities assert that FERC-jurisdictional generators may
16 be economically curtailable but that this “operational and financial flexibility does not
17 exist for QF power.”² I am not taking a position on the legality of curtailing QF power.
18 From a policy perspective, I think some QFs would be happy to avoid Network Upgrade
19 costs by negotiating a voluntary curtailment arrangement. As a matter of public policy
20 and use of scarce resources, it makes sense to allow QFs the option to curtail their power
21 rather than pay for Network Upgrades, especially if the burden of paying for those

¹ PGE Response to NIPPC Data Request 1 (Exhibit Interconnection Customer Coalition/104, Lowe/1, 5).

² Joint Utilities/100, Vail-Bremer-Foster-Larson-Ellsworth/33:9-10 (Oct. 19, 2020).

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