ORDER NO. 26-109

ENTERED Apr 01 2026

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2351

In the Matter of PACIFICORP, dba PACIFIC POWER, Application for Revision of Interconnection Procedures.	ORDER

DISPOSITION: STAFF'S RECOMMENDATION ADOPTED AS MODIFIED

This order memorializes our decision, made and effective at our March 31, 2026 Regular Public Meeting, to adopt Staff's recommendation in this matter, as modified to also adopt the Interconnection Trade Group' recommendation to direct PacifiCorp to provide an engineering-based definition of load pocket to avoid confusion. The Staff Report with the recommendation is attached as Appendix A.

Additionally, as discussed at the Regular Public Meeting, we recognize a need to manage the risk of disruption to the cluster study process. In instances when the cluster study process is at risk of being disrupted by a project or group of projects, we encourage those cases be brought to us for resolution.

Made, entered, and effective Apr 01 2026.

Letha Tawney
Chair

Les Perkins
Commissioner

Karin Power
Commissioner

A party may request rehearing or reconsideration of this order under ORS 756.561. A request for rehearing or reconsideration must be filed with the Commission within 60 days of the date of service of this order. The request must comply with the requirements in OAR 860-001-0720. A copy of the request must also be served on each party to the proceedings as provided in OAR 860-001-0180(2). A party may appeal this order by filing a petition for review with the Circuit Court for Marion County in compliance with ORS 183.484.

ITEM NO. RA3

PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: March 31, 2026

REGULAR X **CONSENT** ____ **EFFECTIVE DATE** N/A

DATE: March 23, 2026

TO: Public Utility Commission

FROM: Rebecca Feuerlicht

THROUGH: Caroline Moore, Nora Xu, and Sarah Hall **SIGNED**

SUBJECT: PACIFIC POWER:
(Docket No. UM 2351)
In the Matter of Application for Revision of Interconnection Procedures.

STAFF RECOMMENDATION:

Staff recommends the Oregon Public Utility Commission direct PacifiCorp to refile revised Small Generator Interconnection Procedures for Tier 5 interconnection review within 30 days with the modifications proposed by Staff.

Staff also recommends that the Commission approve PacifiCorp's proposed revisions to the Large Generator Interconnection Agreement filed in response to Order No. 25-355.

DISCUSSION:

Issue

Whether the Oregon Public Utility Commission (Commission) should direct Pacific Power (PacifiCorp or Company) to refile its Small Generator Interconnection Procedures (SGIP) with modifications and approve PacifiCorp's modified application for revision of interconnection procedures for the Large Generator Interconnection Agreement (LGIA).

Applicable Rule or Law

OPUC has adopted rules and policies for how large and small Oregon-jurisdictional generators, i.e., Qualifying Facilities (QFs), interconnect under the Public Utility Regulatory Policies Act (PURPA) and Oregon law.

In 2009, the Commission adopted OAR Division 82 of Chapter 860 Small Generator Interconnection Rules, which outline the interconnection requirements for Oregon-jurisdictional generators up to 10 MW in size.

As part of the investigation into interconnection of PURPA QFs, the Commission issued Order No. 10-132 in Docket No. UM 1401, in which the Commission established standard large generator interconnection procedures (LGIP) for generators 20 MW and larger and adopted a standard LGIA.

The Federal Regulatory Commission (FERC) issued Order No. 2023 in July 2023. FERC's Order No. 2023 required transmission providers to use a cluster study process for large generator interconnections over 20 MW and mandated certain project readiness and timeliness requirements.

In Order No. 25-355 the Commission approved PacifiCorp's application for revision of interconnection procedures with modifications.

Analysis

Background
On October 16, 2024, PacifiCorp filed to modify its Qualifying Facility Large Generator Interconnection Procedures ("QF-LGIP"), Qualifying Facility Large Generator Interconnection Agreement ("QF-LGIA"), and Small Generator Interconnection Procedures (QF-SGIP). PacifiCorp's proposed revisions were designed to align the Company's interconnection process with the cluster study process required for FERC jurisdictional generators under FERC Order No. 2023.[1]

In reviewing PacifiCorp's proposal, Staff expressed concerns that small community-based renewable energy projects and other small generators connecting to the distribution network may be disadvantaged if included in the cluster study with larger generators. Staff pointed to the Community Solar Program (CSP) queue as an alternative process where generators that are considered low risk for system upgrades to the transmission network can receive a streamlined interconnection review outside of the cluster study process. Staff noted that the CSP queue facilitated 17 interconnections

[1] On May 15, 2024, PacifiCorp submitted proposed revisions to its Open Access Transmission Tariff (OATT) to FERC in order to comply with FERC Order No. 2023. FERC approved the compliance filing in part, and the Company submitted an additional compliance filing on July 11, 2025, in response to FERC's request.

in PacifiCorp's service territory compared to seven SGIAs and zero operational small generator interconnections in the cluster study.[2]

On September 4, 2025, the Commission issued Order No. 25-355, approving PacifiCorp's application for revision of interconnection procedures with three modifications. The Commission's order directed the Company to modify two sections of PacifiCorp's QF-LGIA to align with the language in the FERC LGIA, and directed PacifiCorp to file a proposal with the Commission to streamline distribution-level interconnection procedures for Oregon-jurisdictional small generators that *builds off of* the CSP interconnection process.[3]

PacifiCorp filed revised interconnection procedures in compliance with Order No. 25-355 in November 2025 and subsequently presented a summary of its proposed "Tier 5" interconnection pathway for eligible small generators and discussed with Staff and stakeholders at a workshop on December 15, 2025.[4] On February 3, 2026, the Interconnection Trade Groups (comprised of Oregon Solar + Storage Industries Association, Renewable Energy Coalition, and Community Renewable Energy Association), WynneWorks LLC (WynneWorks), and OPUC Staff submitted Comments on PacifiCorp's revised filing. PacifiCorp submitted Reply Comments on February 25, 2026, and the Interconnection Trade Groups submitted Reply Comments on March 18, 2026.

This memo presents Staff's analysis of the Company's proposed modifications in response to Order No. 25-355, discusses stakeholder feedback, and offers recommendations for Commission consideration.

Tier 5 Queue Proposal

PacifiCorp's Tier 5 proposal creates a new, optional, serial queue for small generators to be studied outside of the cluster study process. To be eligible for Tier 5, PacifiCorp has proposed that generators must interconnect to PacifiCorp's distribution system and that the capacity of the proposed generation must be equal to, or less than the minimum daytime load (MDL), less any existing or proposed generation requests on the distribution circuit (feeder) to which the generator would be interconnected. Additionally, while Tier 5 interconnection requests may be submitted at any time, the Company has proposed that requests submitted before September 7 each year will be considered higher priority and studied ahead of annual cluster study requests. Tier 5 requests

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2 *In the Matter of PacifiCorp, dba Pacific Power, Application for Revision of Interconnection Procedures,* Docket No. UM 2351, Order No. 25-355, at 5. (September 4, 2025).

3 Order No. 25-355 at 10.

4 *See* Docket No. UM 2351 workshop recording here: Public Utility Commission : Public Meetings - Upcoming & Archived : News & Events : State of Oregon.

submitted after September 7 will be studied after cluster study requests. Importantly, while the Tier 5 proposal adopts the same application fee, deposit, study timelines, and MDL requirements as CSP,[5] PacifiCorp clarified in a meeting with Staff that it does not propose applying the energy resource interconnection service (ERIS)-like study parameters used in the CSP queue.[6] Instead, the Company proposes that QFs applying through Tier 5 are studied using network resource interconnection service (NRIS).

Interconnection Service

In 2019, the Commission established a streamlined interconnection review for CSP that included processing and studying eligible CSP projects separately from the traditional serial queue, limiting the interconnection study to consider only other existing or requested interconnections within a defined local area, and limiting the scope of the study to an analysis comparable to FERC's Energy Resource Interconnection Service (ERIS) evaluation.[7] Staff recommended that the CSP study approach serve as a pilot to understand whether this practice would place significant transmission upgrade costs on ratepayers and inform future consideration of the Network Resource Interconnection Service (NRIS) requirement for QFs.[8] To date, Staff is unaware of any of the 51 interconnected generators in the CSP queue,[9] including the 21 interconnected generators in PacifiCorp's service territory, introducing risk to the grid or triggering costs related to system upgrades to the transmission network. Staff believes this demonstrates the effectiveness of a limited study scope for CSP small generators that could be replicated for similar non-CSP, distribution-level small generators.

Staff note: Oregon's Small Generator Interconnection Procedures do not include the term Network Upgrades. They use the term System Upgrades to refer to both distribution interconnection facilities (what FERC would call "System Upgrades") and upgrades to the utility's transmission network (what FERC would call "Network Upgrades".) For the purposes of clarity of this Staff report, Staff will use the term "System upgrades to the transmission network" to refer to upgrades that the FERC interconnection process calls "Network Upgrades".

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5 Application fee, deposit and study timelines are modeled after Tier 4 requirements.

6 According to PacifiCorp's CSP Schedule 126, in addition to the ERIS study process, the Company will also perform a non-binding informational analysis of the requirements associated with interconnecting the CSP Project using its NRIS study process. *See* 126_Community_Solar_Program.pdf.

7 *In the Matter of Public Utility Commission of Oregon, Community Solar Program Implementation,* Docket No. UM 1930, Order No. 19-392, Appendix A, p. 6 (November 8, 2019).

8 Order No. 19-392 at Appendix A, p. 6.

9 ORCSP Bimonthly Progress Report – February 2026, accessible at the following link: Bimonthly Project Reports - Oregon Community Solar Program.

In Reply Comments, PacifiCorp states that Tier 5 should remain independent of the CSP interconnection queue, pointing to the less comprehensive study process for CSP projects as opposed to the Company's proposed Tier 5 study process that is "the same study that is applied to all non-CSP state and FERC-jurisdictional interconnection requests".[10] Staff's intent with the recommendations adopted in Order No. 25-355 was to expand access to the CSP queue to any generator that meets the other eligibility criteria. While Staff is less concerned with whether the Company maintains separate queues for CSP and Tier 5, Staff considers the ERIS-style treatment a defining feature of the CSP queue, and a primary reason why CSP interconnections have been successful overall.

Staff acknowledges that in 2023, the Commission broadly determined that "QFs should interconnect under NRIS, with limited exception[,]" when the "QF voluntarily commits to allow curtailment at a level that obviates the need for the Network Upgrades identified in a NRIS Report."[11] However, Staff believes that the recommendation to expand access to the CSP queue included a recognition that the UM 2032 NRIS decision would not apply to this subset of small generators that are low risk for system upgrades to the transmission network.

Additionally, Staff acknowledges that stakeholders have raised concerns with adopting certain elements of the current CSP screening process and have identified restrictions in PacifiCorp's Tier 5 proposal that may limit market participation. Staff appreciates the various issues and alternative suggestions raised by stakeholders, as well as PacifiCorp's revised Tier 5 proposals presented in Reply Comments and discussed below.

Minimum Daytime Load Analysis and System Size Limitations
In PacifiCorp's November 3, 2025 filing, the Company proposes that to be eligible for the Tier 5 study process, the generator's capacity, together with all other existing and proposed generation in the local area, must be less than 100 percent of the relevant MDL of the relevant feeder. This is the same qualifying criteria that currently applies to PacifiCorp's CSP interconnection process. Alternatively, the Interconnection Trade Groups recommend a staged analysis where if generation exceeds MDL at the feeder level, it should then be measured at the transformer level. If generation exceeds MDL at the transformer level, it should be measured at the substation level. Finally, if generation exceeds MDL at the substation, it should be measured at the load pocket level.[12]

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10 Docket No. UM 2351, PacifiCorp's Reply Comments, p. 15 (February 25, 2026).
11 *In the Matter of Public Utility Commission of Oregon, Investigation into the Treatment of Network Upgrade Costs for Qualifying Facilities,* UM 2032, Order No. 23-005 at 2, 33 (January 30, 2023).
12 Docket No. UM 2351, OSSIA's, the Coalition's, and CREA's Comments, pp.10-11 (February 3, 2026).

In the Company's Reply Comments, PacifiCorp states a willingness to apply the MDL screening up to the substation level, but no further. The Company explains that an exceedance of generation at the substation level would backfeed onto the transmission system and create a high likelihood of significant and expensive upgrades that impact the transmission system, increase the risk of withdrawal, and potentially impact cluster study generators interconnecting to the transmission system.[13] By contrast, the Interconnection Trade Groups state that there could be situations where analyzing the MDL at a broader level, including up to the load pocket, would not require significant system upgrades, would increase Tier 5 eligibility, and would give interconnection customers and the Company insight into whether more projects can be developed at lower costs before the federal tax credits expire.[14]

Staff finds PacifiCorp's counter proposal compelling from an engineering and policy perspective. Like CSP, the purpose of these new streamlined procedures for small generators is to allow for an efficient process for low-risk small generators to interconnect without triggering transmission-level impacts which can be achieved by analyzing MDL at the substation level.

Additionally, both PacifiCorp and the Interconnection Trade Groups agree that eligibility for Tier 5 should be limited to 10 MW to "enable low-risk projects that only require distribution-level upgrades to interconnect quicker."[15] Staff analyzed the most recently published interconnection data on OASIS[16] and found that 5 substations or zero feeders would be able to accommodate a Tier 5 project over 10 MW.[17] Staff believes that it would be reasonable to limit the Tier 5 queue to projects 10 MW and under, which aligns with the Commissions existing small generator interconnection procedures.

Further, Staff notes that a substation-level screen as opposed to a feeder-level screen would allow more places for generators larger than three MW to interconnect. Under the feeder-level eligibility screen, 18 feeders would allow eligibility for generators larger than three MW, with the maximum size of 4.8 MW. Under the substation-level eligibility screen, 59 substations comprised of 230 feeders would allow generators larger than three MW and up to 10 MW to be eligible for Tier 5. Staff will discuss the tradeoffs of using broader eligibility criteria for the ERIS-like interconnection review process in the recommendations section below.

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13 Docket No. UM 2351, PacifiCorp's Reply Comments, pp. 8-10 (February 25, 2026).
14 CREA/REC/OSSIA's Reply Comments, p. 3.
15 OSSIA's, the Coalition's, and CREA's Comments, p. 9; PacifiCorp's Reply Comments, p. 12.
16 *See* "Oregon UM 2000 Interconnection Data" at https://www.oasis.oati.com/ppw/index.html. The document is located under the "Generation Interconnection" folder and "Additional Information" subfolder. Data updated on February 11, 2026.
17 Based on OASIS data updated on February 11, 2026.

Table 1: Feeders and Substations by Capacity Under Each MDL Screen[18]

	Feeder-Level MDL Eligibility		**Substation-Level** MDL Eligibility	
Capacity	**Number of Feeders**	**MW Available**	**Number of Substations**	**MW Available**
> 0 to ≤ 1 MW	151	80.7	35 (46 feeders)	11.7
> 1 to ≤ 3 MW	237	403.8	40 (84 feeders)	82.9
> 3 to ≤ 5 MW	18	63.8	26 (74 feeders)	104.9
> 5 to ≤ 10 MW	0	0	33 (156 feeders)	237.3
> 10 MW	0	0	5 (36 feeders)	61.4

Flexible Solutions and the Limited Operation Framework

Interconnection Trade Groups support a Tier 5 modification that would allow interconnection customers to agree to temporary curtailment in limited-export mode to be energized and placed in service for tax purposes while PacifiCorp completes necessary system upgrades.[19] This opportunity would allow more projects to qualify for the federal tax credits before they expire and is aligned with the spirit of Executive Order No. 25-25. In response, PacifiCorp recommends that this policy be implemented by applying the "Limited Operation" framework in the QF-LGIA to small generators. The Limited Operation framework in the LGIA allows generators to operate prior to the completion of all the necessary interconnection facilities and network upgrades as long as interconnection studies demonstrate feasibility.[20] Specifically, the Company proposes that the interconnection customer must complete the standard study process, execute a Small Generator Interconnection Agreement (SGIA), then request an additional study for Limited Operation feasibility which may amend the SGIA to reflect the requirements of Limited Operation. In their Reply Comments, the Interconnection Trade Groups recommend allowing the additional Limited Operation study to be completed before the SGIA is executed in order for developers to understand the feasibility of Limited Operation before committing to the costs, schedule, and deposit payments within the SGIA.[21]

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18 Based on OASIS data updated on February 11, 2026. Table only includes feeders and substations with MDL above 0 and only substations where all feeder data is available. At the feeder level, out of 406 feeders with known net MDL of more than 0 MW, the maximum net MDL is 4.8 MW. At the substation level, out of 139 substations with all associated feeders of known net MDL, the maximum net MDL is 13.55 MW. Staff notes that the number and MW of feeders and substations reported are non-cumulative values. For example, a generator in the 0-3 MW range can connect to all 139 substations, whereas a generator in the >3-5 MW range can connect to 64 substations.

19 OSSIA's, the Coalition's, and CREA's Comments, p. 15.

20 PacifiCorp's Revised Interconnection Procedures in Compliance with Order No. 25-355, PacifiCorp's Revised Qualifying Facility Large Generator Interconnection Agreement (QF-LGIA) – Clean Version at 24 (Nov. 3, 2025) (hereinafter, Revised QF-LGIA).

21 CREA/REC/OSSIA's Reply Comments, pp. 2-3.

PacifiCorp clarifies that it does not support the use of Limited Operation to expand eligibility for Tier 5. Rather, the proposed process would be used primarily to remove known barriers that would allow eligible Tier 5 generators to place their projects in service more quickly. Staff agrees that Limited Operation would be useful in removing barriers for Tier 5 applicants and could be used to help utilities manage the enforceable timelines proposed in Docket No. AR 683.

Staff acknowledges that flexible solutions to maximize Tier 5 eligibility such as non-temporary curtailment and/or utility-side storage solutions presents additional technical complexities and broader policy questions such as cost allocation that span beyond the scope of the Commission's Tier 5 directive. Staff intends to prioritize the threshold issue of ensuring an ERIS-like interconnection review for Tier 5 and on identifying eligibility criteria that balance risk to customers at this time. Staff proposes revisiting additional opportunities in the next phase of UM 2111.

Scope and Frequency of Publicly Available MDL Updates
PacifiCorp updates its publicly available MDL data annually.[22] Staff and stakeholders agree that MDL data should be updated more frequently considering that MDL is to be used as one of the primary indicators for Tier 5 generator eligibility. The Interconnection Trade Groups initially recommended the Company provide monthly MDL updates that reflect new potential load on the system.[23] PacifiCorp states that it is willing to provide publicly available MDL data on a semi-annual basis moving forward. The Company argues that more frequent updates are labor-intensive and not likely to offer more useful information since the lowest load periods occur during the shoulder months when heating and cooling loads are much lower than their annual peaks. The Interconnection Trade Groups subsequently revised their recommendation to quarterly updates, noting that there could be new load additions that would affect the MDL analysis more than twice a year.[24] Staff notes that the most recent Distributed System Planning (DSP) Guidelines set an expectation that utilities should update their DSP system map data, including net daytime minimum load, every six months beginning in 2025.[25]

Aligning PacifiCorp's QF-LGIA Provisions with FERC Standards
Order No. 25-355 directed PacifiCorp to align its QF-LGIA section 2.2 (Term of Agreement) and section 5.14 (Permits) with the language in the FERC LGIA, which was not updated in PacifiCorp's October 2024 filing. Staff has confirmed that the Company's updates are consistent with the LGIA provisions in FERC's Order No. 2023.

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22 PacifiCorp's Reply Comments, p. 10.
23 OSSIA's, the Coalition's, and CREA's comments, p. 18.
24 CREA/REC/OSSIA's Reply Comments, pp. 10-11.
25 Docket No. UM 2005, Order No. 24-421, p. 10 (November 4, 2025).

Additional Stakeholder Comments
WynneWorks submitted several recommendations and requests concerning various elements of PacifiCorp's current SGIP. First, WynneWorks recommends revising the definition of "Transmission line" in Article 0015(63) to include sub-transmission facilities for Tier 2 and Tier 5. Additionally, WynneWorks recommends revising the Tier 5 $10,000 cost threshold for standard interconnection upgrades with a scalable, technology-neutral screening metric.[26] As PacifiCorp identified, the $10,000 limit is not specific to Tier 5 but is also included in each level of interconnection review within the SGIP. WynneWorks also raises the issue of applying a fair cost allocation for system upgrades, suggesting that cost allocation decisions consider the underlying condition and modernization needs of the local distribution system to ensure costs between the customer and utility are shared appropriately.[27] While these recommendations can be applied to Tier 5, the broader policy issues raised span multiple interconnection tiers and implicate the broader SGIP framework and beyond. As such, Staff agrees with PacifiCorp that these recommendations are best evaluated and addressed as part of a broader investigation, such as Docket No. UM 2111.

WynneWorks also requests that the Company provide clarifications and requests related to certain revisions found within the Company's latest SGIP filing, including the consideration of co-located generators with battery energy storage systems, new screening language in the Tier 2 interconnection review criteria, the revision from "Nameplate Capacity" to "Nameplate Rating", introduction of the article on "Export Controls", and removal of the 1 percent cluster allocation limit language.[28] Staff appreciates the detailed comments and notes that these comments may be better addressed in future phases of UM 2111. These prior revisions to PacifiCorp's SGIP are not exclusively related to Tier 5 and have been previously approved by the Commission in Docket Nos. AR 659, UM 2351, and UM 2111.

Staff Recommendations
Staff provides four recommendations for Commission consideration below.

Interconnection Service
Considering CSP's successful track record as a serial queue for low-risk small generators interconnecting to the distribution grid under a ERIS-focused study framework, Staff recommends that PacifiCorp refile its application for revision of its SGIP to clarify that eligible Tier 5 interconnection requests will be studied consistent

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26 Docket No. UM 2351, WynneWorks LLC's Comments, p. 5 (February 3, 2025).
27 WynneWorks LLC's Comments, pp. 9-10.
28 WynneWorks LLC's Comments, pp. 3, 6-9.

with the ERIS-like interconnection review available to applicants in the CSP queue.[29] Additionally, Staff recommends that similar to the Joint Utilities' Proposal adopted for CSP, if it becomes clear that system upgrades on the transmission network are needed to deliver a Tier 5 generator's output to load, PacifiCorp should bring the issue to the Commission.[30] This mechanism serves as a safeguard to ensure that ratepayers would not be automatically obligated to cover expensive interconnection-related upgrade costs and the Commission may consider other options.

The Interconnection Trade Groups similarly support expanding PacifiCorp's Tier 5 proposal to allow small generators to be studied as ERIS with substation level MDL analysis, asserting that it would expand eligibility while still limiting the likelihood of transmission impacts and retail ratepayer cost shifts.[31] Staff acknowledges that CSP's three MW system size limit and feeder-level MDL screening as compared to Tier 5's proposed 10 MW system size limit and substation-level MDL screening carries a greater risk of Tier 5 interconnections triggering system upgrades to the transmission network. Staff maintains that despite these differences, both CSP and Tier 5 small generators are similarly low risk of triggering system upgrades to the transmission network. Staff believes this is supported in part by PacifiCorp's Reply Comments directly supporting both a Tier 5 10 MW cap and MDL screen at the substation as a means to continue supporting low-risk projects that only require distribution level upgrades.[32]

Recommendation #1: Staff recommends that the Commission direct PacifiCorp to refile its revised SGIP within 30 days with the following modifications:

a. *Clarify that Tier 5 interconnection requests will be studied with the same ERIS-like approach used in the CSP queue.*
b. *Clarify that Tier 5 eligibility is limited to generators 10 MW or less.*
c. *Modify the Tier 5 MDL screening requirement so that the generator's capacity, together with all other existing and proposed generation in the local area, must be less than 100 percent of the MDL of the relevant substation.*

   If the Commission prefers to further mitigate potential risks related to system upgrades to the transmission network, Staff recommends that the Commission adopt one of two alternative recommendations below:

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29 Details of the CSP interconnection study process are found in Schedule 126, page 3, accessible at https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/rates-regulation/oregon/tariffs/rates/126_Community_Solar_Program.pdf.

30 Docket No. UM 1930, Joint Utilities' Final Interconnection Comments, p. 6 (October 15, 2019).

31 CREA/REC/OSSIA's Reply Comments, pp. 6-7.

32 PacifiCorp's Reply Comments, p. 9, 12.

I. *Clarify that Tier 5 interconnection requests meeting feeder-level MDL criteria are eligible to be studied with ERIS-like review, and interconnection requests exceeding feeder-level MDL criteria but meeting substation level MDL criteria can be processed through the Tier 5 queue, but are studied as NRIS and will need to enter the cluster if their Tier 5 study comes back with System Upgrades to the transmission network, or:*
II. *Maintain the feeder-level eligibility screen for Recommendation #1c.*

Limited Operation
Staff is pleased that both the Interconnection Trade Groups and PacifiCorp have identified the LGIA's Limited Operation framework as a solution that can be readily applied to Tier 5 interconnections, however Staff recommends that the Limited Operation framework applies more broadly through temporary rules that modify the SGIP in Docket No. AR 683. Staff acknowledges that the Interconnection Trade Groups additionally recommend adopting utility enforcement mechanisms[33] and propose allowing the Limited Operation study to be completed before the SGIA is signed for greater cost transparency.[34] Staff suggests any additional modifications to the Limited Operations framework previously established in PacifiCorp's current QF-LGIA (and consistent with FERC's Pro Forma LGIA counterpart) be considered in final rules under Executive Order No. 25-25.

Recommendation #2: Staff recommends that the Commission direct PacifiCorp to refile its revised SGIP consistent with the Limited Operation policy adopted in AR 683.

MDL Data
While Staff generally supports data updates as frequently as practical, Staff is comfortable with PacifiCorp's proposal to update MDL on a semi-annual basis, at this time. However, Staff's recommendation in this context is not meant to dissuade the consideration of more frequent or robust updates in the near future. The Interconnection Trade Groups raise a valid point in their Reply Comments that MDL may change more frequently as new load (particularly with the recent increase in data center load) is added to the system.[35] Staff is interested, for example, in exploring whether utilities should update hosting capacity on an ad hoc basis for feeders incurring significant load changes. However, further discussion with utilities and stakeholders is needed to fully assess feasibility, cost, and impact. Staff notes Staff's Proposal in AR 683 recommends utilities update their Oregon Hosting Capacity data[36] and AR 681 is currently exploring

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33 OSSIA's, the Coalition's, and CREA's comments, p. 14.
34 CREA/REC/OSSIA's Reply Comments, pp. 2-3.
35 CREA/REC/OSSIA's Reply Comments, p. 11.
36 *In the Matter of Temporary Interconnection Rules in Response to Executive Order No. 25-25,* Docket No. AR 683, Informal Phase: Staff's draft proposal, February 18, 2026, p. 2.

utility data sharing improvements for microgrid developers across Oregon's investor-owned utilities. Staff anticipates that learnings from these dockets will inform broader improved utility data sharing requirements to be codified in the relevant proposed rulemakings.

Recommendation #3: Staff recommends the Commission require PacifiCorp to update its publicly available MDL data no less than semi-annually.

QF-LGIA
Staff has confirmed that PacifiCorp's filing aligns its QF-LGIA section 2.2 (Term of Agreement) and section 5.14 (Permits) with the language in the FERC LGIA as directed in Order No. 25-355.

Recommendation #4: Staff recommends that the Commission approve PacifiCorp's modifications to QF-LGIA section 2.2 (Term of Agreement) and section 5.14 (Permits).

Interaction with AR 683
The temporary rules for the use of third-party system impact studies, enforceable timelines, and Limited Operation options considered in Docket No. AR 683 will establish additional requirements for utilities interconnecting small generators outside of a cluster study. Therefore, the policies adopted in AR 683 will apply to PacifiCorp's Tier 5 queue. When the Company files its revised Tier 5 small generator interconnection procedures in line with the Commission's decisions in this proceeding (UM 2351), Staff expects that the Company will also incorporate compliance with the temporary rules adopted in AR 683 into the same filing.

Conclusion

Staff appreciates PacifiCorp's timely filing in response to Order No. 25-355. Staff supports approval of the Company's LGIA filing and recommends the Company refile the Tier 5 SGIP proposal to better reflect the Commission's intention to expand the streamlined interconnection review available in the CSP interconnection process. Staff believes that the Commission should direct PacifiCorp to expand the eligibility criteria to be calculated at the substation level. However, Staff recognizes that this approach may carry a higher level of risk of system upgrades to the transmission network and therefore supports an alternative decision to: 1) study Tier 5 interconnection requests meeting only feeder-level MDL as ERIS and Tier 5 interconnection requests meeting substation-level MDL as NRIS, or 2) maintain the eligibility screening criteria at the feeder-level.

Staff's recommendations are intended to build upon the learnings from the successful CSP queue process and incorporate improvements to expand the interconnection process for small generators. Staff thank PacifiCorp and stakeholders for their constructive engagement in this docket.

PROPOSED COMMISSION MOTION:

Direct PacifiCorp to refile revised Small Generator Interconnection Procedures for Tier 5 interconnection review within 30 days with the following modifications proposed by Staff:

a. *Clarify that Tier 5 interconnection requests will be studied with the same ERIS-like approach used in the CSP queue.*
b. *Clarify that Tier 5 eligibility is limited to generators 10 MW or less.*
c. *Modify the Tier 5 MDL screening requirement so that the generator's capacity, together with all other existing and proposed generation in the local area, must be less than 100 percent of the MDL of the relevant substation.*

Approve PacifiCorp's proposed revision to the Large Generator Interconnection Agreement filed in response to Order No. 25-355.

RA3 – UM 2351