

ORDER NO. 26-204

ENTERED Jun 09 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

At its public meeting on June 9, 2026, the Public Utility Commission of Oregon adopted Staff's recommendation in this matter. The Staff Report with the recommendation is attached as Appendix A.

BY THE COMMISSION:



Alison Lackey

Chief Administrative Law Judge



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.

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: June 9, 2026**

REGULAR CONSENT EFFECTIVE DATE June 10, 2026

DATE: June 1, 2026

TO: Public Utility Commission

FROM: Rebecca Feuerlicht

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

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

STAFF RECOMMENDATION:

Staff recommends the Oregon Public Utility Commission approve PacifiCorp's revised Small Generator Interconnection Procedures in response to Order No. 26-109; open Tier 5 for new applications as of the effective date of this memo; and implement minimum daytime load data updates as specified by Staff.

DISCUSSION:

Issue

Whether the Oregon Public Utility Commission (Commission) should approve Pacific Power's (PacifiCorp or Company) revised Small Generator Interconnection Procedures (SGIP), open Tier 5 for new applications as of the effective date, and direct the Company to update minimum daytime load data on OASIS on November 2, 2026, and include the date for the next scheduled semi-annual update in May and November of each year thereafter.

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.

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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.

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.

Order No. 25-355 approved PacifiCorp's application for revision of interconnection procedures with modifications. PacifiCorp filed revised interconnection procedures in November 2025.

In Order No. 26-109, the Commission directed the Company to refile its SGIP for Tier 5 with additional modifications.

Analysis

Background

In October 2024, PacifiCorp filed to modify its interconnection procedures to align with the cluster study process required for FERC-jurisdictional generators under FERC Order No. 2023.¹ During its review, Staff raised concerns that small generators may be disadvantaged if included in cluster studies with larger generators. Staff noted that the Community Solar Program (CSP) queue provides a process where generators that are low risk for system upgrades to the transmission network can be reviewed outside of the cluster study process.

In September 2025, the Commission issued Order No. 25-355 directing PacifiCorp to file a proposal with the Commission to streamline distribution-level interconnection procedures for Oregon-jurisdictional small generators that build off the CSP interconnection process.² PacifiCorp filed revised interconnection procedures in November 2025 that included a "Tier 5" interconnection process proposal for eligible small generators.

Staff review of the Company's revised filing concluded that to better reflect the Commission's intention to create a streamlined process that builds off CSP, Tier 5 interconnection requests should be studied with the same Energy Resource

¹ *In the Matter of PacifiCorp, dba Pacific Power, Application for Revision of Interconnection Procedures*, Docket No. UM 2351, Application for Revision of Interconnection Procedures, (October 16, 2024).

² Order No. 25-355 at 10.

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Interconnection Service (ERIS)-like approach used in the CSP queue. Additionally, Staff recommended that the Company modify the Tier 5 minimum daytime load (MDL) screening requirement from the feeder to the substation level, and clarify that Tier 5 eligibility is limited to generators 10 MW or less. On April 1, 2026, Commission Order No. 26-109 adopted Staff's recommendations³ and further directed the Company to provide an engineering-based definition of "load pocket" in response to Comments from the Interconnection Trade Groups.⁴

Revised Small Generator Interconnection Procedures

On May 1, 2026, PacifiCorp filed its revised SGIP and provided a definition of load pocket in response to Commission direction. On May 7, 2026, OSSIA filed Comments to PacifiCorp's May 1 filing. Staff has confirmed that PacifiCorp's revised SGIP aligns with the Commission's direction to clarify that Tier 5 interconnection requests will be studied using an ERIS study process, eligibility is limited to generators 10 MW or less, and modifies the screening requirement to be evaluated at the substation level, rather than the feeder level, as directed in Order No. 26-109.⁵

In its Comments on PacifiCorp's revised filing, OSSIA stated that the Company confirmed Tier 5 generators can still be studied as NRIS upon request by the interconnection customer.⁶ Staff recognizes that stakeholders generally value optionality within the interconnection process, and Staff has no concerns with PacifiCorp offering the option of an NRIS for Tier 5 generators. Staff recommends the Commission approve the Company's revised SGIP.

Load Pocket Definition

PacifiCorp provided its definition of load pocket as "an aggregation of substations or substation buses, which are used to disaggregate the jurisdictional long-term load forecast to transmission-constrained areas."⁷ Asserting that the Company's definitions lacks clarity and sufficient engineering details, OSSIA proposed the alternative definition: "a group of substations that are electrically contiguous with each other via shared source power connections at a voltage demarcation that separates local sub-

³ Order No. 26-109 at 1.

⁴ The Interconnection Trade Groups collectively consist of the Oregon Solar + Storage Industries Association (OSSIA), the Renewable Energy Coalition (Coalition), and the Community Renewable Energy Association (CREA). See Docket No. UM 2351, CREA, REC, and OSSIA's Comments on Staff Report, March 30, 2026, p.8.

⁵ Docket No. UM 2351, PacifiCorp's Compliance per Order No. 26-109, Revised Small Generator Interconnection Procedures, May 1, 2026, p. 43.

⁶ Docket No. UM 2351, OSSIA's Comments on Staff Report, May 7, 2026, p.2.

⁷ PacifiCorp's Compliance per Order No. 26-109, Revised Small Generator Interconnection Procedures, May 1, 2026, p. 1.

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transmission source power from the regional transmission system.”⁸ Staff met with PacifiCorp to discuss the Company’s definition and OSSIA’s alternative suggestion. The Company explained that adopting OSSIA’s definition would be overly prescriptive and not aligned with how the Company currently uses the term. While Staff acknowledges that OSSIA’s definition seeks to clarify additional details such as the electrical connectivity of a load pocket and its boundary, Staff defers to PacifiCorp’s definition as it is ultimately the Company’s responsibility to define and apply. Importantly, the Commission did not adopt the MDL screen for Tier 5 at the load pocket level, so the definition of load pocket is not directly related to Tier 5 requirements. Nevertheless, Staff encourages PacifiCorp to apply a consistent definition across dockets to avoid future confusion.

MDL Updates

Order No. 26-109 requires PacifiCorp to update its publicly available MDL data at least semi-annually. Because the Company did not address this requirement in its revised filing, OSSIA seeks confirmation that PacifiCorp will adhere to the Commission’s direction and requests clarification on whether a compliance filing will be required when updates occur.⁹

The current Distributed System Planning (DSP) guidelines that set an expectation that utilities should develop and share public-facing schedules to update and maintain certain DSP Map data every six months, including MDL.¹⁰ Rather than require the Company to submit a compliance filing when MDL updates occur, Staff recommends the Commission require PacifiCorp’s semi-annual MDL updates to:

- 1) Include information on the “Oregon UM 2000 Interconnection Data” spreadsheet on the Company’s OASIS site specifying the data that is updated; the date on which the update occurred; and the date of the next scheduled update, accounting for non-business days such as holidays and weekends.
- 2) Adhere to a predictable schedule of updates in May and November of each year to align with DSP Guidelines and address potential ambiguity; and commence on November 2, 2026.

⁸ OSSIA’s Comments on Staff Report, May 7, 2026, p.1.

⁹ OSSIA’s Comments on Staff Report, May 7, 2026, p.1.

¹⁰ *In the Matter of Public Utility Commission of Oregon, Investigation Into Distribution System Planning*, Docket No. UM 2005, Order 24-421 at 10. (November 4, 2024).

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Tier 5 Effective Date and Supporting Documentation

Staff proposes that the Tier 5 queue open to new applications as of the effective date of the Commission's Order approving Staff's recommendations in this memo. Staff notes that the Interconnection Application for Tier 5 is currently available on PacifiCorp's OASIS website.¹¹

Conclusion

Staff finds that PacifiCorp's revised SGIP and load pocket definition align with the Commission's direction in Order No. 26-109. Additionally, to address potential ambiguity regarding Tier 5 implementation, Staff recommends that the Commission direct PacifiCorp to open Tier 5 to new applications as of the effective date of this memo; update the MDL data on November 2, 2026; and upon each subsequent update, indicate on the "Oregon UM 2000 Interconnection Data" spreadsheet on OASIS when the next semi-annual MDL update will occur.

PROPOSED COMMISSION MOTION:

Approve PacifiCorp's revised Small Generator Interconnection Procedures in response to Order No. 26-109; direct PacifiCorp to open Tier 5 for new applications as of the effective date of this memo; and direct PacifiCorp to implement the following practices for minimum daytime load data updates:

- 1) Include information on the "Oregon UM 2000 Interconnection Data" spreadsheet on the Company's OASIS site specifying the data that is updated; the date on which the update occurred; and the date of the next scheduled update, accounting for non-business days such as holidays and weekends.
- 2) Adhere to a predictable schedule of updates in May and November of each year to align with DSP Guidelines and address potential ambiguity; and commence on November 2, 2026.

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¹¹ See PacifiCorp's Application for Small Generator Facility Interconnection Tier 2, Tier 3, Tier 4 or Tier 5 Interconnection here: https://www.oasis.oati.com/woa/docs/PPW/PPWdocs/Oregon_Tier_2-3-4-5_application.pdf.