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August 22, 2011

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

Oregon Public Utility Commission
550 Capitol Street NE, Ste 215
Salem, OR 97301-2551

Attn: Filing Center

RE: UM 1452 – Closing Comments of Pacific Power and Portland General Electric

PacifiCorp d/b/a Pacific Power (“Pacific Power”) encloses for filing the Closing Comments of Pacific Power and Portland General Electric Company on the VIR Pilot Program Rule Changes and Implementation in the above-referenced docket.

Please contact Joelle Steward, Regulatory Manager, at (503) 813-5542 for questions on this matter.

Sincerely,

Andrea L. Kelly
Vice President, Regulation

Enclosure

cc: Service List – UM 1452

CERTIFICATE OF SERVICE

I certify that I have cause to be served the foregoing document in OPUC Docket No. UM-1452 by electronic mail and/or US mail on the attached service list.

DATED: August 22, 2011

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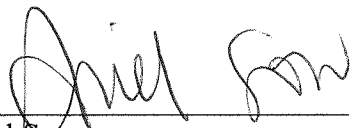
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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1452

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON

Investigation into Pilot Programs to
demonstrate the use and effectiveness of
Volumetric Incentive Rates for Solar
Photovoltaic Energy Systems

**Closing Comments of Portland General
Electric Company and Pacific Power on
the VIR Pilot Program Rule Changes &
Implementation**

1

Introduction

2

Portland General Electric Company (“PGE”) and PacifiCorp d/b/a/ Pacific Power
3 (“Pacific Power”) (together “Joint Utilities”) appreciate the opportunity to provide
4 closing comments on the pilot program implementation in Docket UM 1452.

5

Commission Staff was the only other party besides the Joint Utilities that filed
6 opening comments on July 29, 2011. Staff commented on bifurcation of medium-scale
7 capacity reservations between net metering and the competitive bid options (split or
8 alternating), determination of successful winners, duration of the application window,
9 and updating the automatic rate adjustment mechanism (“ARAM”).

10

The Joint Utilities filed opening comments recommending rule revisions and
11 placing emphasis on the time table needed to implement the lottery system. In opening
12 comments, the Joint Utilities proposed a seamless and transparent lottery followed by a
13 first-come, first-serve (“FCFS”) capacity application process where the queuing system
14 effectively manages capacity and applications. Because the Joint Utilities’ concern was
15 and continues to be for parties to reach consensus on the implementation aspects so that
16 the Joint Utilities can begin developing the custom software that manages the application

1 process, the Joint Utilities recommended a settlement discussion in August to attempt to
2 resolve critical path issues. The Joint Utilities vendor requested six weeks to develop this
3 more complex online system. Therefore, Staff hosted an implementation workshop on
4 August 10, 2011 so that Parties could address concerns and reach consensus.

5 At the workshop, the Joint Utilities presented the proposed lottery process and
6 online system, which is included as Attachment A. Staff supported the Joint Utilities
7 proposed lottery online system, screening of applicants, and selection of winners.
8 However, Staff, REC Solar, Oregonians for Renewable Energy Policy (“OREP”), and the
9 Renewable Northwest Project (“RNP”), and the Joint Utilities did not reach consensus on
10 the purpose of the application fee, which affects the Joint Utilities’ ability to begin
11 incorporating this aspect into the online system. The Joint Utilities address the
12 application fee in these comments. Parties raised other issues not affecting development
13 of the online system, but related to the rate, which are the determination of the resource
14 value and the ARAM. The Joint Utilities address those issues in these comments as well.

15 Finally, the Joint Utilities appreciate Staff’s support in trying to resolve the
16 outstanding issues expeditiously so that development of the online system can begin for
17 implementation for the October 3, 2011 application window. The Joint Utilities also
18 thank the Commission for acting in a timely manner in issuing the Rate Update Order on
19 August 1, 2011.

20 **Enrollment Process**

21 Online Reservation System

22 The Joint Utilities designed an online queuing capacity application system that
23 will provide customers with a seamless transition from a 24-hour lottery to a FCFS

1 enrollment period, while effectively managing capacity. This new online system allows
2 customers to apply starting at 8 A.M. on the first day and at any time throughout a three-
3 month enrollment period. As soon as the lottery window closes the FCFS enrollment
4 window opens. If capacity fills at any point in either the lottery or the FCFS period,
5 customers are placed on a waitlist in the order applications are received until the end of
6 the enrollment period. If a successful applicant relinquishes their reservation, capacity
7 will be offered to the next applicant on the list. At the end of the period, the waitlist
8 expires and customers must reapply in the next enrollment window.

9 The difference between this online system and the previous one is there is a
10 queuing system that enables us to manage the selection of customers and the available
11 capacity. If an applicant who successfully reserved capacity voluntarily drops out, fails to
12 pay the deposit in three days, or fails to submit the interconnection application within two
13 months, that capacity is offered to the next applicant in the queue. Under this new system,
14 the Joint Utilities expect capacity to be more fully allocated in the current enrollment
15 period with less rolled over to the subsequent period.

16 24-hour Lottery Application Window

17 The Joint Utilities agree with Staff that a 24-hour period is an appropriate amount
18 of time for “seriously committed applicants to submit their requests.” The proposed rule
19 requires a 24-hour period or as otherwise directed by Commission Order.¹ The online
20 form takes only minutes to complete and in the Joint Utilities experience, participants and
21 installers have been very aware of the information participants will be required to provide
22 at the time of application.

¹ See AR 558 - Proposed OAR 860-084-0195(2)(b), Electric companies must collect reservations applications for 24-hours before selecting winning participants unless otherwise directed by Commission Order.

1 Three-Month Enrollment Window

2 The Joint Utilities propose that the enrollment period close in three months. This
3 will allow the Joint Utilities time to evaluate capacity for the next enrollment window and
4 provide the data to the Commission for use in adjusting the VIR for the following
5 enrollment period. OAR 860-084-0220(1) requires the utilities to announce available
6 capacity for the next enrollment period no later than two months in advance. The
7 proposed revised rule requires the Joint Utilities to announce available capacity prior to
8 each enrollment period. The Joint Utilities propose announcing the capacity around the
9 same time as the volumetric incentive rate (“VIR”). The Joint Utilities agree with Staff
10 that “that notifying the parties of the new VIR two months before the effective date of the
11 enrollment window is a reasonable timeframe for the parties to plan for the next
12 enrollment period.” Also, at the workshop parties expressed an eagerness to see the
13 results of the lottery and the impact of enrollment on the determination of the
14 forthcoming VIR. By closing the enrollment window at three months it will give the
15 utilities time to provide the results to the Commission and the interested parties in time to
16 inform the VIR adjustment process.

17 Capacity Reservation Application Form

18 The online reservation form remains largely consistent as the previous version
19 with only minor changes. The first change is the inclusion of a field for the meter
20 number. Pacific Power added a field for the meter number in the previous enrollment
21 period and PGE will add this new field for the upcoming enrollment period. The purpose
22 of requiring the meter number in addition to the account number is that these unique
23 customer identifiers provide an initial screen to prevent duplicate applications and

1 opportunities to game the system. This will not only minimize duplicate applications, but
2 also the administrative cost to screen for duplicates. It has been the Joint Utilities’
3 experience that serious customers are submitting applications and that there is not
4 significant evidence of frivolous applicants. This initial screening process of requiring the
5 meter and account numbers results in “satisfactorily completed applications prior to
6 running the selection process.”

7 The other modification is that the deposit payment will not be required until the
8 applicant is notified that they received a capacity reservation. This capacity reservation
9 deposit will still deter frivolous applications. In the existing rules, applicants pay a \$20
10 per kW deposit that is refundable. In the proposed rules, applicants will pay \$500 or \$20
11 per kW of the proposed system capacity, whichever is larger. For example, a typical
12 residential system of 5 kW would have paid \$100, but will now pay a minimum of \$500.
13 This will help ensure that small and medium size system applications are not frivolous.

14 Determination of Successful Winners in Lottery

15 At the end of the 24-hour lottery period, a randomizer program will assign each
16 application a queue position. Capacity reservations will continue to be accepted and
17 added to the queue on a FCFS basis after the 24-hour period. Capacity will then be
18 awarded to applicants in the order of their queue position.

19 Successful applicants will receive an email notification. The email provides an
20 application tracking number and a link to the deposit payment web site. Deposits must be
21 paid within three business days from the date of the email notification. Unsuccessful
22 applicants receive an email notification advising them that no available capacity remains.
23 The email will state that should capacity become available for their queue position within

1 the three months of the enrollment period, they will be notified of capacity reservation
2 acceptance. Finally, those applicants not awarded a capacity reservation will be advised
3 that they may reapply in the next enrollment period if not selected from the waiting list.
4 Updates will be posted on the Joint Utilities' web sites providing information about
5 available capacity and notifying potential applicants when capacity is fully subscribed,
6 while encouraging applicants to fill out the application to enter the queue.

7 **Application Fee**

8 The Joint Utilities do not support the adoption of an application fee for
9 participation in the application queue. Staff proposed this fee to offset the administrative
10 costs of prescreening lottery applicants, and noted that the amount of the fee should be
11 based on a reasonable estimate of the utilities' costs for prescreening. The inclusion of
12 the meter number in the application process will provide a sufficient screen to prevent
13 gaming of the lottery process through multiple submissions for the same project. The
14 Joint Utilities are reluctant to undertake any more substantial prescreening review of the
15 viability of projects as there are no criteria upon which to base that decision. The meter
16 number based prescreening will be automated through the online application process and
17 add only minimal costs, eliminating the need for a cost-based fee.

18 The Joint Utilities also do not support the adoption of a fee as a bar to frivolous
19 applications. At the workshop, solar industry representatives proposed that the fee should
20 be included to prevent applications in the lottery for projects that have little chance of
21 being built. The Joint Utilities have numerous concerns with using an application fee in
22 this manner. First, for an application fee to work as suggested, the fee would have to be
23 nonrefundable and sufficient to alter a potential applicant's behavior. If the fee were

1 simply refundable or set too low the applicant would not be deterred. The Joint Utilities
2 have not seen evidence of frivolous applications sufficient to charge potential participants
3 a nonrefundable fee before they even secure a reservation. Based on the feedback
4 received from participants, only serious customers have applied and frivolous applicants
5 have been successfully deterred. Participants who dropped out voluntarily, failed to
6 submit an interconnection application by the two month deadline, or failed to complete
7 interconnection in a year have offered legitimate reasons. The deposit requirement
8 sufficiently prevents the inclusion of frivolous applications.

9 Second, the collection of an application fee in addition to the deposit would add
10 significant administrative costs for the Joint Utilities. The collection of the fees through a
11 credit card has associated transaction fees. While individually 2-3 percent seems
12 insignificant, it is an additional administrative cost with no apparent benefit. The
13 collection of this fee through any other payment form or through simply holding the
14 credit card number until the applicant is confirmed as a participant would not comply
15 with the financial controls put in place to comply with Sarbanes Oxley regulations. At the
16 minimum the application fee would cause an additional transaction that would need to be
17 processed, monitored, and accounted for while serving no apparent purpose.

18 Finally, the VIR pilot program is supported by and for the benefit of the Joint
19 Utilities' customers, along with all Oregonians. Any individual that meets the eligibility
20 requirements under the statute and rules should have the opportunity to participate in the
21 pilot program. An application fee may have the effect of discouraging participation
22 among the very individuals that generally support the pilot program through retail rates.

1 For all of these reasons, the Joint Utilities recommend that the Commission not adopt an
2 application fee at this time.

3 **RFP for Medium Systems - Contingent Waiver Request**

4 In the event that the Commission adopt a bid process for medium-size systems in
5 the October enrollment window, the Joint Utilities request a waiver, pursuant to OAR
6 860-084-0000(3), of rules potentially adopted in the companion rulemaking Docket AR
7 558 that would require utilities to issue a request for proposals (“RFP”) for medium-size
8 systems no later than 30 business days prior to October 1 (*See* OAR 860-084-0195(2)(a)
9 under the current rules as well as the Joint Utilities proposed rule revisions included in
10 the July 29, 2011 Opening Comments to apply the rule to medium systems under OAR
11 860-084-0195(4)(a)).

12 If the Commission adopts the rules as proposed by the Joint Utilities in AR 558,
13 the rules will not be known in time to allow compliance with this rule. In the alternative,
14 the Joint Utilities recommend that if the Commission adopts a bid process for medium-
15 size systems for the October enrollment window, that the Commission grant the utilities
16 five (5) business days from the date the order is issued to issue its respective RFPs for
17 medium-size systems in October. Subsequent bid processes would then be subject to the
18 30 business day requirement.

19 **Automatic Rate Adjustment Mechanism**

20 In opening comments Staff proposed modifications to the ARAM. In previous
21 enrollment periods the ARAM was based on the amount of time it took for the available
22 capacity to be reserved. The rapid pace with which this capacity was reserved caused the
23 Commission to modify the ARAM formula during the last two enrollment periods.

1 Accordingly, the criteria for the adjustment should be modified to establish a presumable,
2 yet rebuttable benchmark to adjust the VIR that more accurately reflects the historical
3 realities of the program. Staff proposed a matrix format where the ARAM is based on the
4 ratio of capacity reservation *requests* to available capacity rather than the time based
5 methodology.

6 The Joint Utilities agree that the ARAM warrants modification to effectively
7 adjust the rate. The Joint Utilities' proposed queue-based reservation method will allow
8 greater data collection on the total amount of interested participants. This will facilitate
9 Staff's modified ARAM formula. The Joint Utilities propose that the ratio for
10 determining the ARAM be based on the total number of applications collected over the
11 entire three months that the queue is active, which would include all lottery submissions
12 and those added to the queue through the FCFS process.

13 Staff's proposed ARAM formula provides a predetermined framework on how
14 much to change the VIR for remaining enrollment periods. Given the uncertainty about
15 the number of requests there will be in excess of actual capacity reservations in this new
16 lottery process and how that will effectively adjust the rate, the Joint Utilities recommend
17 the Commission evaluate the results of the data collected before determining the amount
18 of the VIR changes in the ARAM matrix. This information will be available shortly after
19 the enrollment period closes. If capacity filled in the initial ARAM in less than three
20 months, the VIR automatically dropped 10 percent. The Joint Utilities recommends that
21 the parameters of the VIR changes prescribed in the ARAM reflect the Commission's
22 recent decisions in Order No. 11-280 and Order No. 11-090.

1 **Resource Value**

2 OAR 860-084-0370 requires each utility to file its estimate of the 15-year
3 levelized resource value for the company on November 1, 2010, 2012 and 2014. The
4 Joint Utilities filed their first reports and cost estimates on November 1, 2010. Pacific
5 Power noted in its report that at this early stage of the program, estimates of system
6 benefits from the distributed solar generation associated with the program are difficult to
7 quantify due to the small number of installations and generation, along with the widely
8 dispersed nature of the installations. The solar incentive pilot program is an opportunity
9 for the utilities, Commission Staff and concerned stakeholders to work collaboratively to
10 develop a research plan to assist the utilities in calculating a methodology for the resource
11 value of solar distributed generation. The utilities can then use this data and any
12 corresponding methodology to provide a more accurate resource value calculation for the
13 2012 and 2014 reports. Accordingly, the Joint Utilities recommend that the Commission
14 open an investigation to examine the types of data and methodologies that would be
15 useful to determine resource value for solar distributed generation for this pilot.

16 **Conclusion**

17 The Joint Utilities appreciate the Commission’s and Commission Staff’s diligent
18 efforts to adapt the Pilot Program based on lessons learned and to do so in a timely
19 manner.

1 DATED the 22nd day of August, 2011

2 Respectfully Submitted,

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PGE/Pacific Power Enrollment Process

Oregon Solar Incentive Program – October 3rd, 2011

Enrollment Day – Oct 3rd 2011

- Enrollment Program opens at 8am
 - Customers/vendors can apply at any point in the first 24 hours.
 - The reservation process/form remains unchanged with two exceptions:
 - Added new fields for the meter and account numbers to prevent duplicate applications/gaming
 - Deposit payments not required until applicant has been notified they received a capacity reservation
 - After 24 hours, a randomizer program will assign each application a queue position
 - Capacity Reservations continue to be accepted and added to the queue on a first come first served basis after the 24 hour period
 - Available capacity is distributed in the order of the application queue until capacity allocation is reached
 - Enrollment period remains open for 3 months

Enrollment Day – 1st 24 hours

- Successful applicants receive e-mail notification
 - E-mail provides application tracking number and a link to deposit payment website
 - Deposit must be paid within 3 business days from date of e-mail notification
- Unsuccessful applicants receive e-mail notification
 - Advises that no available capacity remains at this time
 - Advises that should capacity become available within 3 months of the enrollment start date, they will be notified of capacity reservation acceptance
 - Advises applicant that they must reapply in next enrollment period if not selected from waiting list
- Updates posted on utility websites
 - Provide capacity updates if not fully subscribed
 - Notifies when capacity is fully subscribed

Enrollment Process Ongoing

- Receipt of deposit payment confirmation sent after 72-hour window expires
 - Applicants who miss the deadline are removed from participation
 - The capacity allocation will be offered to next applicant in the queue
 - Process repeated through the 3-month enrollment period
- Utilities review application after deposit payment
 - Review and correct deficiencies in application or problems with system size within 10 days of deposit payment
- Utilities award capacity reservations once review complete
 - Applicants have 2 months from Capacity Reservation Start Date to submit Interconnection Application
 - Applicants have 1 year to install systems

Enrollment Process Closing

- Close enrollment after 3-month period
 - Will allow time to evaluate capacity for next enrollment window
 - Announce available capacity 2 months prior to next enrollment period
 - The queue is dissolved
 - Those remaining in the queue advised via FAQ and e-mail that they must re-apply for the program on April 2, 2012 if applicant does not receive a reservation for current enrollment period