

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UM 1751

In the Matter of

PUBLIC UTILITY COMMISSION  
OF OREGON,

Implementing Energy Storage Program  
Guidelines pursuant to House Bill 2193.

ALEVO ANALYTICS  
COMMENTS ON DRAFT  
PROJECT GUIDELINES

Alevo Analytics appreciate this opportunity to submit these comments in response to the Public Utility Commission's (PUC or Commission) Order No. 16-316 proposing guidelines to implement an energy storage program, pursuant to House Bill 2193. We commend the Commission for drafting and proposing these energy storage project guidelines.

We propose that the Commission encourage electric utilities to consider commercially available supply chain optimization models and storage evaluation tools in addition to the Pacific Northwest National Laboratory's Battery Storage Evaluation Tool and/or the Electric Power Research Institute's Energy Storage Valuation Tool to estimate the value of storage applications, from which the results will be considered when selecting energy storage projects to submit for authorization. This consideration of models and tools such as production cost tools and chronological capacity planning tools, in addition to a use case modeling approach, is necessary to perform a least cost optimization across the entire electricity grid supply chain of generation, transmission, distribution and demand.

These additional energy storage modeling tools to be considered should account for the chronological optimization of the supply chain in terms of hour to hour and minute to minute operations, as well as constraints and the equal treatment of all types of capacity in terms of MW/MWh. These models should also be capable of selecting the locations for the distributed energy storage throughout the grid with the greatest potential value for economics, reliability, environment and other considerations, as well as the storage sizing, technology selection, provision of grid services, and locational value.

They should also be able to account for the aggregation of benefits of multiple energy storage sites rather than only an energy storage site by site basis. These optimization tools can be used to co-optimize the generation, transmission, distribution, and DER investments and operational costs to derive a least cost resource plan to meet the reliability standards stated in PacifiCorp and Pacific General Electric's Integrated Resource Plans, while minimizing overall system cost and risk, as well as environmental assessments and associated compliance costs.

Alevo Analytics appreciates the opportunity to comment on the proposed guidelines, and appreciates the work of the Commission in developing them. This concludes Alevo Analytics comments.

Dated at Concord, North Carolina, this 30th day of September, 2016.

Respectfully Submitted,

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