

**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.

COMMENTS OF THE ENERGY FREEDOM
COALITION OF AMERICA

Introduction

The Energy Freedom Coalition of America is pleased to submit these comments regarding the Draft Guidelines issued on August 19, 2016 in Proceeding UM 1751 (“Draft Guidelines”). These comments more specifically address the proposed storage potential evaluation requirements included in the draft. Overall, EFCA is pleased with the Draft Guidelines, which lay the groundwork for a robust discussion and process that can help ensure that the utilities think expansively about the various opportunities to deploy energy storage on their systems to address the goals of HB 2193.

To improve the Draft Guidelines, we suggest they be amended to more explicitly require the utilities to supplement their efforts to evaluate the potential to deploy storage to address system needs with a market-based approach via the issuance of a request for information (“RFI”) through which developers would identify what systems needs or constraints they believe they would be able to address via the deployment of storage solutions. Additionally, and consistent with the above, to maximize the value of this effort in terms of animating the market for storage and other distributed energy resources (“DER”), we also underscore the importance of making as much data available as possible regarding the specific constraints and needs the utilities see on their systems and the investments they plan on making to address those constraints.

Overview of the Energy Freedom Coalition of America

EFCA represents a broad range of businesses that are fully integrated providers of DER products and services, including rooftop solar, distributed generation, battery energy storage, micro grid products, demand response and load management services, and smart energy home services. EFCA’s current members include 1 Sun Solar Electric, LLC, Ecological Energy Systems, LLC, Go Solar, LLC, Silevo, LLC, SolarCity Corporation and Zep Solar, LLC. Members also provide solar generation, including products for residential, commercial, government, community solar, and utility-scale applications. EFCA member companies serve thousands of customers in Oregon with on-site solar electricity.

EFCA Comments on Proposed Storage Potential Evaluation Requirements

1.) The Proposed Storage Potential Evaluation Approach Should Be Supplemented via a Request for Information

EFCA commends the staff for developing Draft Guidelines that provide a robust, stakeholder-driven process to guide the utilities' evaluations of storage potential on their systems. Overall, the approach appears reasonable and quite comprehensive. That said, an amendment we would ask the Commission to consider before putting this process into motion would be to provide more explicit direction to the utilities to leverage the creativity of storage providers to identify storage-based solutions to address identified grid needs or constraints via the issuance of an RFI. This is distinct from the RFI identified in the Draft Guidelines, which we understand would seek only to vet potential vendors and their specific storage technologies as opposed to soliciting information on the types of solutions that might be pursued to address an identified system or grid need.¹

As drafted, the approach appears very much reliant on a highly centralized approach to determining whether a given constraint on the utilities' systems could be addressed via the deployment of energy storage. EFCA is not opposed to this approach as one component of the process used to identify storage potential. However, we believe it would also be valuable to augment this approach by requiring the utilities to issue an RFI soliciting proposals from the prospective solution providers, giving interested providers an opportunity to consider the host of system constraints the utilities face and putting forward potential solutions to address those constraints. While we would anticipate some overlap between these two approaches, we also believe that an RFI may elicit responses that address constraints that stakeholders active in the proceeding, including the utilities, may not have considered as relevant or viable for storage solutions to effectively address.

2.) To Support the RFI, The Utilities Should Be Directed to Provide Detailed Information and Data Regarding System Constraints and Planned Investments

To support the RFI described above and to ensure stakeholders and prospective solution providers have the information necessary to develop alternative approaches, the utilities should be directed to provide a granular overview of the system constraints they face and the investments they plan on making or procurement activities they intend to undertake to address those constraints, regardless of whether the utilities believe those constraints could be addressed through the deployment of storage solutions. Again, the point of this RFI is to elicit a response from solution providers regarding which of the system constraints or investment needs they believe could be addressed via the deployment of storage. In the June 22nd comments we submitted in this proceeding, we suggested that the utilities should "provide detailed information that describes the investments or initiatives the utilities plan to undertake, the cost of those investments or initiatives, the system constraints these investments are intended to address, and the drivers of those constraints." We reiterate that request here. Absent this type of information, solution providers will be limited in their ability to propose approaches to address identified needs.

¹ Draft Guidelines, pp. 2 and 5.

We also believe it would be appropriate for the Commission to be somewhat more prescriptive in terms of the level of granularity required of the utilities to ensure that the information provided is sufficiently detailed to allow appropriate solutions to be brought forward. Consistent with the efforts being pursued in California and New York to improve the transparency of the utility distribution planning process, we believe circuit and feeder level data regarding system needs should be provided.²

Consistent with the recommendations above, we offer the following edits/additions to staff's Draft Guidelines (Underlining indicates new text. ~~Strikethrough~~ indicates removed text).

C.1.e. Determine the approach for identifying system locations with the greatest storage potential, including but not limited to a Request for Information to solicit potential storage projects to address identified grid needs or system constraints from solution providers.

C.1.f. Establish the type of data to be provided to inform prospective solution providers' proposals responding to the Request for Information to address identified grid needs or system constraints. To the degree possible, data regarding system needs should be provided at the feeder and circuit level.

C.1.g. Establish the level of detail required to in the evaluation results and required supporting data.

C.2.d. Identify system locations with the greatest storage potential including a high level summary of the proposals identified via the RFI and the grid needs these proposals would address.

Conclusion

EFCA appreciates the opportunity to provide this feedback on the Draft Guidelines developed by Commission staff and looks forward to fruitful discussions on these issues in the months ahead.

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Respectfully Submitted,

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² See, for example, California Public Utilities Commission Assigned Commissioner's Ruling (1) Refining Integration Capacity and Locational Net Benefit Analysis Methodologies and Requirements; and (2) Authorizing Demonstration Projects A and B, R.14-08-013, May 2, 2016, p. 6. Also see State of New York Public Service Commission Order Adopting Distributed System Implementation Plan Guidance, Case 14-M-0101, April 20, 2016, pp 33-42.

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