

May 21, 2021

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, OR 97301-3398

**RE: UM 1930 – Community Solar Program Interconnection Queue – PacifiCorp’s
Comments on Staff’s Proposal**

PacifiCorp dba Pacific Power (PacifiCorp or Company) respectfully submits these comments in response to the Public Utility Commission of Oregon (Commission) Staff’s May 5, 2021 request for comments on the proposed criteria for pausing acceptance of new project applications to the Community Solar Program (CSP) interconnection queue.

On November 8, 2019, the Commission issued Order No. 19-392 approving, among other things, the creation of a standalone interconnection process and queue for CSP projects. In that Order, the Commission directed:

Unless the Commission chooses to extend the rule, the utility will accept interconnection applications under the CSP rule for 18 months following the rule’s adoption or until the aggregate capacity (MWac) of generators with an executed CSP interconnection agreement that have received pre-certification equals the utility’s capacity tier (2.5 percent of 2016 system peak load), whichever comes first.

The pre-certification capacity threshold has not yet been reached, but the capacity of projects currently in PacifiCorp’s CSP interconnection queue exceeds PacifiCorp’s initial program capacity tier. The 18-month period identified in the Order concluded on May 8, 2021.

On May 5, 2021, in a Request for Comments filed in docket UM 1930, Commission Staff (Staff) proposed to extend the term through which the utilities will accept and process interconnection applications to June 16, 2021. At that point, PacifiCorp would stop accepting new CSP interconnection applications for projects categorized as representing general program capacity. Projects categorized as carve-out eligible—projects smaller than 360 kilowatts (kW) or with a nonprofit or public Project Manager—would still be permitted to apply for CSP interconnection until the queue reflects a certain capacity of carve-out projects.

PacifiCorp supports Staff’s proposal, but provides two additional points of consideration. First, PacifiCorp is concerned that it may lack the authority to process CSP interconnection applications in the absence of Commission direction to do so. As such, PacifiCorp has continued to accept CSP interconnection applications after May 8, 2021, but it will not begin processing

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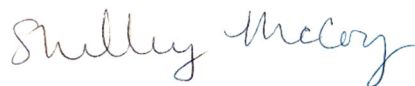
those applications until the Commission authorizes the extension of the term the CSP interconnection rules. If Staff's proposal is adopted, PacifiCorp will process the applications that have come in in the order received, and cease accepting new applications for general program capacity projects at that point.

Second, while eligibility for the small project carve-out (360 kW and below) will be self-evident, PacifiCorp would prefer to avoid having to make verification determinations related to nonprofit and public Project Manager eligibility. Accordingly, PacifiCorp requests that the Commission direct nonprofit and public Project Managers to provide documentation demonstrating compliance with the nonprofit and public Project Manager eligibility requirements along with their CSP interconnection application materials.

PacifiCorp appreciates Staff's attention and thoughtful approach to this issue.

Please direct any informal correspondence and questions regarding this filing to Cathie Allen Regulatory Affairs Manager, at (503) 813-5934.

Sincerely,

A handwritten signature in blue ink that reads "Shelley McCoy". The signature is written in a cursive, flowing style.

Shelley McCoy
Director, Regulation