

September 7, 2021

*VIA ELECTRONIC MAIL*

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

**Re: UM 1930 - Feedback on proposed revisions to the Program Implementation Manual**

PacifiCorp, d/b/a Pacific Power (PacifiCorp) respectfully provides these brief comments in response to request from the Public Utility Commission of Oregon Staff (Staff) for feedback to the proposed revisions of the Community Solar Program (CSP) Program Implementation Manual (PIM).

PacifiCorp agrees with many of the changes proposed by Staff. Most of the revisions provide corrections or otherwise streamline processes in the PIM. PacifiCorp is appreciative of the time and consideration put forth by Staff in drafting this proposal.

Regarding the interconnection of small CSP projects, however, PacifiCorp is not aware of any issues that have prohibited a smooth interconnection process for community solar interconnection requests of any size. To date, PacifiCorp has executed 27 interconnection agreements for community solar requests including three for smaller (360 kilowatt) projects, two of which are nearing commercial operation.

PacifiCorp does not agree that creating an additional path for interconnection beyond the paths that currently exist would provide benefit to the CSP. While community solar projects may have size characteristics that are similar to larger Tier 2 and Tier 3 net metering projects, CSP interconnection is different from net metering and is appropriately evaluated as a small generator interconnection, as the power does not offset load onsite.

PacifiCorp has no other concerns about the proposed PIM revisions. We appreciate the opportunity to provide these comments and look forward to the continued evolution and improvement of the program.

UM 1930  
Public Utility Commission of Oregon  
September 7, 2021

Informal inquiries may be directed to Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934 or Ryan Harvey, Project Manager, at (503) 813-6232.

Sincerely,

A handwritten signature in cursive script that reads "Shelley McCoy".

---

Shelley McCoy  
Director, Regulation

Cc: [kacia.brockman@puc.oregon.gov](mailto:kacia.brockman@puc.oregon.gov)  
[administrator@oregoncsp.org](mailto:administrator@oregoncsp.org)