



September 13, 2019

Public Utility Commission of Oregon
201 High Street SE
Salem, OR 97301

RE: Docket No. UM1930 – Draft Proposal for Community Solar Interconnection

Dear PUC,

The Bonneville Environmental Foundation (BEF) appreciates the opportunity to provide our perspective on the community solar program and the associated interconnection complexities. The amount of work that the PUC and stakeholders have put into resolving these issues is appreciated and it is encouraging that some barriers could be overcome.

BEF would also like to express thanks to the utilities for proposing potential solutions to community solar interconnection that will allow the program to launch, give projects a reasonable path for development, and not disadvantage small projects or non-profit solar developers.

BEF supports the following proposals from the utilities and other stakeholders:

1. Allowing small projects (>360kW AC) to interconnect at secondary voltage will avoid many costly and unnecessary medium voltage costs for community solar projects (CSP).
2. Providing non-profits with no-cost interconnection pre-application reports will be helpful and eliminate much uncertainty for these organizations. The wording in the joint utilities' proposal indicated an attestation that the CSP is a "non-profit" project which is not defined. BEF would suggest that instead any non-profit organization or governmental entity is able to receive 5 free pre-app reports per calendar year, without any attestation as to who will be the subscribers.
3. BEF is open to allowing QFs under 3MW AC to participate in this interconnection pilot, provided that the QF capacity allowed to participate does not preclude the community solar initial capacity tier (~160MW) or reduce it in any way.



BEF also recommends the following additions or improvements to the community solar interconnection pilot:

1. We urge the PUC to define the timelines in which these interconnection studies should be completed under this pilot program to avoid some of the delays and uncertainty seen in the serial QF interconnection queue. Time and certainty are of critical importance for community solar to succeed. We believe giving communities and developers clear timelines like net metering projects have, would be a reasonable request.
2. The thresholds to allow CSP into this pilot program would be restrictive if set at only 25% of the local area peak load. As shown in Exhibit A, BEF has received results from many pre-application reports for potential low-income community solar projects. These projects are not small and are striving for a cost-effective size of 2-3MW. When using a figure of 25% of peak load, the average project size would be reduced by .5MW. This is important because using this threshold reduces the average project size in the program and may not have any impact on the interconnection costs. The average day time minimum load from this sample is 2.95MW and in theory this capacity could be taken to load on the utilities distribution systems. A successful pilot program should be inclusive enough to allow for all sizes of projects up to 3MW. Based on the information on the local area minimum loads, BEF recommends that projects that are under the circuits daytime minimum load be able to participate in this CSP interconnection pilot program. Any lower level will be too restrictive and exclusive.

We are grateful for the PUC's willingness to overcome some of these barriers and work toward a functional and successful community solar program. We realize there will be many other considerations regarding interconnection and appreciate the contributions of the stakeholders in this process. This could be an opportunity for the PUC to make some meaningful changes to the program and incentivizing participation by Oregon's utility customers.

Sincerely,

A handwritten signature in black ink, appearing to read 'Evan Ramsey', is written over a large, faint, dotted circular graphic that spans the lower half of the page.

Evan Ramsey
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Exhibit A:

| Project | Utility | Proposed Project Size (MW) | Annual peak hrv load (MW) | Annual min hrv load (MW) | 25% of peak (MW) | 50% of peak (MW) | 75% of minimum (MW) | 100% of minimum (MW) |
|--------------------------------------|---------|----------------------------|---------------------------|--------------------------|------------------|------------------|---------------------|----------------------|
| 1 | PAC | 3 | 10.6 | 3.2 | 2.65 | 5.3 | 2.4 | 3.2 |
| 2 | PGE | 3 | 10.9 | 2.75 | 2.725 | 5.45 | 2.0625 | 2.75 |
| 3 | PGE | 3 | 3.8 | 2.2 | 0.95 | 1.9 | 1.65 | 2.2 |
| 4 | PGE | 3 | 13.3 | 3.7 | 3.325 | 6.65 | 2.775 | 3.7 |
| 5 | PGE | 3 | 7.6 | 2.8 | 1.9 | 3.8 | 2.1 | 2.8 |
| 6 | PGE | 2.6 | 11.2 | 3.5 | 2.8 | 5.6 | 2.625 | 3.5 |
| 7 | PAC | 3 | 9.2 | 2.5 | 2.3 | 4.6 | 1.875 | 2.5 |
| Proposed system size qualified? >>>> | | | | | 2 of 7 pass | 6 of 7 pass | 1 of 7 pass | 3 of 7 pass |