

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UM 1930**

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON,

Community Solar Implementation.

COMMENTS ON STAFF REPORT OF  
THE NORTHWEST AND  
INTERMOUNTAIN POWER  
PRODUCERS COALITION, THE  
RENEWABLE ENERGY  
COALITION, AND THE  
COMMUNITY RENEWABLE  
ENERGY ASSOCIATION ON  
PROPOSALS FOR COMMUNITY  
SOLAR INTERCONNECTION

**I. INTRODUCTION**

The Northwest & Intermountain Power Producers Coalition (“NIPPC”), the Renewable Energy Coalition (the “Coalition”), and the Community Renewable Energy Association (“CREA”) (collectively the “QF Trade Associations”) submit these comments regarding the Oregon Public Utility Commission (the “Commission”) October 4, 2019 Staff Report recommendations for resolving interconnection issues in this proceeding.

**II. COMMENTS**

The QF Trade Associations have submitted multiple rounds of comments, including on September 13, August 22, and July 24, 2019, and continue to support their earlier recommendations. The QF Trade Associations appreciate the work by the Commission Staff and other parties, but urge the Commission to adopt additional interconnection measures. Specifically:

- The QF Trade Associations continue to support their primary recommendation articulated in their August 22 comments, which is that all qualifying facilities and community solar facilities 3 MW and under be allowed to use Energy Resource Interconnection Service rather than Network Resource Interconnection Service and cost sharing among interconnection customers.
- The QF Trade Associations remain supportive of the other proposals by certain stakeholders, as explained in the QF Trade Associations September 13, 2019 comments.
- The QF Trade Associations also continue to support their recommendation that PacifiCorp should use its existing Bonneville Power Administration network transmission service to wheel the net output of projects to its load, rather than constructing (or requiring QFs or Community Solar Projects to construct) otherwise unnecessary network transmission upgrades. This proposal is explained in both the September 13 and August 22, 2019 comments.

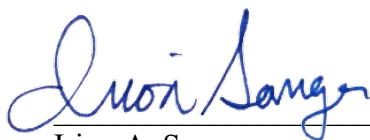
### **III. CONCLUSION**

The QF Trade Associations appreciate the opportunity for further comments.

Dated this 15th day of October 2019.

Respectfully submitted,

Sanger Thompson, PC



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