



Oct 15, 2019

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

RE: Docket No. UM1930-Comments on DRAFT Proposal for Community Solar Interconnection

To Whom it May Concern:

Sunthurst Energy, LLC ("Sunthurst") very much appreciates Staff's and other stakeholders' work in Docket No. UM 1930 and the opportunity to comment on Staff's Oct 4, 2019 memo.

We urge the Commission must go further than Staff proposed in its October 4 memo to fulfill objectives in the SB 1547 Community Solar Program. SB1547 followed by 42 months of implementing program rules allowed for projects up to 3mW-ac in size prior to Joint Utilities releasing feeder data under UM2000 on August 30, 2019 showing 3% of feeders meet utilities 25% proxy level proposed under this docket. In good faith, in reliance, and to the benefit of subscribers and Oregonians, candidate Project Manager's laid groundwork to support a successful launch. Approximately 16 Community Solar Projects between 2MW and 3 MW have interconnection requests pending with PacifiCorp. Of those, approximately 14 would not qualify for Staff's proposed Simplified CSP interconnection proxy process in Staff's Recommendation #1. Staff's recommendations creates a class of stranded CSP developments but faithfully participated in the CSP implementation process and now risk being leap-frogged in the CSP certification process and/or miss out altogether. What follows are some specific actions that would help some of these stranded facilities remain viable.

1. Interconnection recommendation #1: Simplified CSP interconnection process.

The Commission should require, not merely encourage as stated on pg 9, joint utilities to allow a CSP into the interconnection queue notwithstanding the 30% Peak Load criterion, where the CSP has the ability to utilize an existing transfer trip on a feeder. This additional eligibility criterion would make eligible at least one more 2-3 MW project currently in the PacifiCorp interconnection queue. Allowing existing relay trip upgrades under the CSP proxy screening criteria would be congruent with the widely supported goal that any new queue or arrangement be respectful of existing CSP's in the regular interconnection queue. Participants following the process and hostage in the only established queue while this program nears launch shouldn't be circumvented and prejudiced by the new CSP queue-- this requested change would help avoid that treatment.

2. Interconnection recommendation #2: Begin developing models for cost-sharing between generators.

UM1930 is a rare and timely opportunity to encourage cost-sharing opportunities. As rightly stated, this information would be very beneficial to Staff and PUC for consideration on UM2000 and UM2001. Furthermore, the Joint Utilities expressed conditional willingness to facilitate cost-sharing, in Joint Utilities' CSP Interconnection Proposal, August 16, 2019, p. 3.

Therefore, Staff recommended that the Commission:

- "1. Direct the utilities to study CSP generators jointly upon request if the generators are located in the same local area and apply for interconnection at the same time." (Emphasis added).

However, the 'same time' text will unnecessarily result in very little data to inform Staff and PUC on these dockets. It's strongly recommended the Commission replace the underlined language, above with:

“at the same time or, for projects that submitted interconnection applications prior to August 1, 2018, or at any time provided no other interconnection requests in a feeder or local service area is prejudiced.” If staff and stakeholders sincerely desire to collect data and promote cost sharing near term, the above change is imperative for at least one, and perhaps only opportunity NOW ready and easily qualifying to create cost-sharing data. Furthermore, grandfather eligibility for early CSP projects who entered the queue without foreknowledge of the “same time” requirement is fundamentally fair.

As we expressed in our July docket comments, interconnection queue seniority is critical in program fairness (section repeated below) to which there was overwhelming industry support in both subsequent workshops. Therefore, any CSP projects in the existing interconnection queue qualifying under the proposed language, above, should receive priority interconnection study results. Otherwise, at this juncture and with no pre-defined certainty when traditional queue requests will receive a study- are such projects to be forced to resubmit pending requests from the queue just to satisfy the overbearing “same time” requirement. And how would the existing interconnection study/ies be treated? Where a project has completed the effort and cost of a study in the traditional queue network upgrades costs identified and capable in sharing with a pending CSP study request- it that agreement to be shredded and started over, will it transfer? A reasonable party would agree where there is no prejudice to other requests on the same feeder or local area, the amended language best serves the CSP program.

3. Date certain to complete existing IX requests.

Finally, Sunthurst recommends that the Commission order the Joint Utilities to complete pending interconnection studies that have been on hold in the order that they were submitted and in any event no later than two months. This would allow projects filed for pre-certification with prerequisite study request, to have 16 months to still meet the CSP program's 18 month project certification deadline according to industry's schedule filed in this docket, as Exhibit 1 attached.

4. Fairness requires recognition of Queue Seniority (From previous comments on July 17).

As Staff works to implement a fair and functional process for pre-certification before the end of 2019, seniority of current project's interconnection request should be of paramount importance. In the event of scarcity, priority for pre-certification should be given to projects based upon the vintage of their interconnection request (assuming that their interconnect request has not been withdrawn). Seniority is a good policy for several reasons. First, seniority is an accepted principle in the current interconnection process upon which Sunthurst and other developers have relied. They should not be required to re-run a race to the pre-certification window that they already won. Second, by recognizing seniority, the Commission will instill faith in developers who took a large financial risk to participate in a program that the Legislature declared a high, emergency priority, and to remain committed when implementation timelines faltered. Any allocation method other than seniority could hamper the Commission's ability to garner interest and attract private investment in future policy initiatives.

Regarding Staff's Recommendation #4

We ask staff recommend and PUC to order Telemetry be dropped for all CSPs, currently at Utilities discretion under OAR 860-082-0070 for 3mW projects. We filed comments <http://edocs.puc.state.or.us/efdocs/HAC/um1930hac82848.pdf>. Where nearly all CSP requests in PacifiCorp's existing queue at 3mW do not meet telemetry size exclusion (2) , but would if 2.99mW-ac, according to (3) utility can and has applied telemetry cost for 3.0mW-ac system, where is no real difference. In the same vain, certainly, any CSP's or shared CSP's (at minimum) utilizing relay trip protections must be spared telemetry burden, irrespective of the aggregated generation on the feeder. Relay trip settings address the issue and utility's benefits to remotely monitoring is sacrificial to Legislature's mandate and intent to promote a robust CSP program. If CSP telemetry exclusion is ignored, these costs alone kill an otherwise is viable CSP request.

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Sunthurst appreciates Staff's active role in diagnosing and treating the many issues with interconnection preventing effective implementation of the State's community solar policy initiative, and asks Staff please consider its suggestions as it moves forward.

Again, thanks very much in advance for your work and support to resolve these concerns to ensure the CSP, that Oregonian's overwhelming support, is viable.

Sincerely,

Sunthurst Energy, LLC

Project Development Timeline

Community Solar Program Example Timeline

