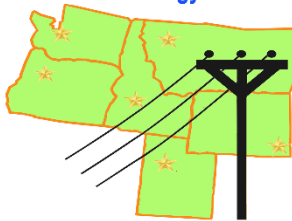


Renewable Energy Coalition



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November 21, 2025

Via Electronic Mail

Letha Tawny
Commission Chairwoman
Oregon Public Utility Commission

Nolan Moser
Executive Director
Oregon Public Utility Commission

RE: Swift Execution of Executive Order 25-25

Chair Tawny and Director Moser,

In appreciation of the daunting tasks presented to your staff and leadership, the urgency of the need for generation, storage and network resources to safely, reliably and affordably provide Oregonians residing and transacting business in investor-owned utility (IOU) service territories with the energy resources necessary to protect life and earn living wages we respectfully provide the following recommendations for the swift and efficient implementation of EO 25-25.

Our recommendations are based on the contemporary realities of regulatory, procurement and development roadblocks facing our collective memberships. These memberships are uniquely poised to contribute competitive market pricing, county level project hosting, expeditious economic development, and energy security to Oregon rate payers.

We have organized our specific recommendations for actions that should be taken by the Oregon Public Utility Commission (the Commission or OPUC) in response to the three elements of EO 25-25 directed to your agency.

“To the extent practicable, accelerate Request for Proposal timelines”

1. *Direct immediate requests for proposal (RFP) issuance and procurement for distributions system-level generation plus storage microgrids and virtual power plants:*

Renewable energy generation coupled with storage on the load side of a substation can defer or eliminate distribution system-level network upgrades identified through Distribution System Planning (DSP) processes and Network Needs evaluations. Accordingly, they provide a least cost, least risk solution for Oregon rate payers obligated to purchase power from monopoly IOUs. In addition to system capacity contributions, projects with energy storage components that are interconnected to the load side of a substation can serve as DSP identified solutions for voltage regulation, increased hosting capacity of additional privately funded distributed resources and peak demand shaving. These benefits have been acknowledged, and corresponding compensation authorized, by your agency for behind the meter battery energy storage systems (BESS) in PacifiCorp’s Watt Smart program.

In appreciation of agency staffing shortfalls and the requirements of implementing HB 2064, the expeditious collection of free market proposals for the development of grid enhancing energy security measures at the community level will serve the agency and ratepayers alike by providing a deeper set of solutions and related costs for you to conduct a transparent evaluation and comparison of the all-in least cost, least risk solutions for serving Oregon customers. The OPUC should immediately require all three IOUs in Oregon to issue RFPs for the procurement of distributed renewable and storage resources with a reasonable minimum number of megawatts to be acquired based on each utility’s overall need and most recent Distribution System Plan.

2. *Direct immediate RFP issuance and procurement evaluation for Community Based Renewable Energy resources (CBRE):*

CBREs are differentiated from other renewable resources, including small-scale renewable energy resources, by the non-energy benefits that they bring to communities. PGE’s 2023 Integrated Resource Plan (IRP) found that though proxy CBRE resources are “generally higher cost than utility-scale proxy resources, their location on-system makes them an effective means in portfolio analysis to reduce cost and risk”.¹ Finding #2 of the same IRP concluded that “Adding 100% of the CBRE potential would best balance cost, risk and community benefits²”.

¹ Portland General Electric 2023 Clean Energy Plan and Integrated Resource Plan at p. 304.

² Portland General Electric 2023 Clean Energy Plan and Integrated Resource Plan at p. 288.

As the Pacific Northwest region faces energy and capacity shortfalls beginning in 2026 and into the foreseeable future, as well as the hindrance of economic development due to lack of access to energy and fuels, it is in ratepayers' interests to understand the procurement potential costs, risks, and benefits of CBREs in a transparent and expeditious manner. The OPUC should require Oregon's IOUs to issue an RFP for CBREs and evaluate procurement of the bid resources through the on-system lens identified by PGE.

“and support expedited public utility procurement of clean energy resources.”

1. Increase Staff proficiency in technical interconnection issues:

Our members report repeated instances where Staff have acknowledged lacking the technical resources to fully exercise their authority. Staff would benefit greatly from in-house expertise, capable of evaluating technical interconnection obstacles (including but not limited to unreasonable interconnection requirements) and potential remedies. Such expertise, including persons experienced in small generator interconnection design and construction, would expedite procurement of clean energy resources by giving Staff the means to diagnose and mitigate the major causes of the IOUs demonstrated poor performance interconnecting small generators in a timely, cost-efficient manner. Such staff will also be needed for implementation of SB 688, which empowers the OPUC to set benchmarks for IOU performance, penalize non-performance, and reward good performance.

2. Revisit Docket No. UM 2032 decision to make QFs solely responsible for the cost of network upgrades without reimbursement:

FERC has determined that Network Upgrades provide system-wide benefits and should be reimbursed and spread across all transmission customers.³ Oregon's adoption of this same rule would reduce risk and encourage development of new generating resources in state.

3. Expedite and streamline Docket No. UM 2111:

Interconnection barriers, including long timelines, delays in meeting those timelines, high estimated costs, and failure to keep costs reasonably close to those estimates, are persistent elements delaying or obstructing the procurement of clean energy resources. While the intention of Docket No. UM 2111 – Investigation Into Interconnection Process and Policies – was to address interconnection reform, Phase II has slowed down due to the loss of engineering staff at OPUC. As a result, the docket has sat largely idle since June of 2025.

Previously, Staff and parties identified key issues to address in the interconnection investigation docket. Several of them should be expedited and streamlined either in Docket No. UM 2111 or in another docket in accordance with EO 2025 and the issues presented in this letter. These include:

- Generator's ability to perform studies and construct upgrades;
- Interconnection request process, remedies for utility and generator violations, requirement for non-discriminatory good faith actions;
- Access to an efficient, effective, dispute resolution process(es) for all generation types;
- Utilities acting in good faith in the interconnection process;

³ See FERC Order 2003.

- Utilities hiring adequate staff to achieve standards and enforceable timelines;
- Utilities and interconnection customers freely negotiating payment options and timing;
- The Commission providing appropriate process and remedies for utility violation of interconnection rules;
- The Commission providing appropriate process through which an interconnection customer may challenge utility cost estimates and propose alternatives.

4. *Require a cost and time tracking report for solar interconnections:*

To improve transparency and level-set developers' expectations regarding costs and timelines of interconnection, the OPUC should establish a requirement for a publicly accessible anonymous report that tracks the costs estimated by electric utilities for solar interconnections in Oregon. The report would list county, size of project, the dates of the various IOU estimates, the cost and schedule projected in each estimate, and the actual final cost and duration. Developers need to know the overall accuracy of IOU cost and schedule estimates. Such data is also very helpful for legislators and regulators to identify and remedy systemic concerns.

5. *Enforce existing rules to allow for the interconnection costs to be financed over the course of the first half of the power purchase agreement (PPA) contract:*

Interconnection costs are currently under the discretion of the hosting utility and subject to fluctuations throughout the interconnection and development process. This uncertainty and lack of transparency into the underlying cost requirements undermines the ability for projects to secure financing. Enforcement of existing rules that allow for interconnection costs to be financed by the host utility over the first half of the PPA contract⁴ would levelize risk over a longer period, protect rate payer investments, and derisk private investment.

6. *Obligate IOUs to increase the PPA/Interconnection Agreement (IA) contract length for two days for every day of IOU controlled delay from interconnection:*

The existing cost-plus procurement paradigm incents IOUs to delay and increase the costs of interconnection of a Qualifying Facility (QF) and Community Solar generating or storage resources. IOUs control the timelines and requirements of interconnections, which are often well beyond what would occur if all parties were held to free market standards. Directing IOUs to increase the PPA/IA contract length by two days for every day of IOU-caused interconnection delay could cause IOUs to pay more attention toward the rapid deployment of identified least cost, least risk resources to serve Oregonians.

7. *Obligate IOUs to offer extensions to existing PPAs and IAs:*

The challenges of financing, permitting, developing, and delivering new projects to Oregon rate payers are well documented. These issues have been the focus of revisited PURPA implementation and regulation for a long time. Continuing the operation of existing projects that already provide great value to utility ratepayers should have its own focus. This is especially true considering that many projects may face critical decisions in the next few years regarding their continued operation. Coupled with the unprecedented energy resource adequacy challenges facing our region, it behooves our ratepayers to extend the contracts of projects

⁴ https://oregon.public.law/rules/oar_860-029-0060.

already financed, permitted, developed and delivering energy. Directing IOUs serving Oregonians to offer extensions or revisions of existing contracts, including harmful index-based pricing, should be considered. Retention of existing projects should be a first step in meeting renewable energy requirements and goals.

8. *Exercise authority to penalize IOU to Interconnection Customers and Community Solar Project Managers:*

ORS 756.990 authorizes the OPUC to exert penalties to IOUs for failure to comply with a Commission order. The OPUC should also remove any limitations on the ability for interconnection customers to obtain damages from IOUs. Issuing a broad order in Docket No. UM 1930 requiring utilities to prioritize interconnection of community solar projects at reasonable costs would send the appropriate signal to IOUs and community solar developers that IOUs will be held accountable for unreasonable delays and cost overruns.

Commission Staff shall propose for the Commission's adoption provisions of House Bill 2065 that if applied will allow use of interconnection studies conducted by third parties to solar or wind projects subject to this Order.

1. *Require that interconnection requests be responded to in no more than 30 days from the request:*

Interconnection delays and cost over runs are some of the most significant barriers to accommodating private sector, free market participation, and delivery of clean, renewable energy resources to Oregon ratepayers. Requiring that interconnection studies be expedited by IOUs will drive expansion of resources necessary to respond to the urgency of Oregon's energy resource inadequacy.

Utility resources have proven insufficient to maintain the necessary cadence of transparent evaluation and documentation of directly related network upgrades. These in-house interconnection resources also operate with an exemption from Oregon professional engineering licensure obligations unique to the sector.

HB 2065 provides a pathway for third party, Oregon-licensed Professional Engineers, to contribute to the pool of resources available to IOUs for interconnection evaluations and network upgrade requirements. These assessments would be paid for by project developers and based on the highest applicable state and national electrical and fire safety codes. The Commission should utilize the opportunity provided by HB 2065 to speed up responses to interconnection requests.

2. *Require IOUs to have enough staff to meet their interconnection requests in a timely manner.*

Small generators interconnecting to an IOU are customers who must take service from their monopoly service provider, and therefore statutorily entitled to service on just and reasonable, non-discriminatory terms. IOU cost overruns, inaccurate cost estimates, and delays in studying, contracting, and constructing interconnections due to inadequate manpower should not be tolerated.

3. *Obligate IOUs to allow for project self-built network upgrades.*

In Oregon, IOUs are provided a return on investment from Oregon ratepayers for utility-owned assets. IOUs also compete with third party generators. This means that every delay, cost overrun, or failed non-utility project increases the amount of electricity that they can own, sell and earn profits on. This condition presents obvious conflicts of interest between investors in the utility and Oregonians financing utility assets and reliant on the energy delivered.

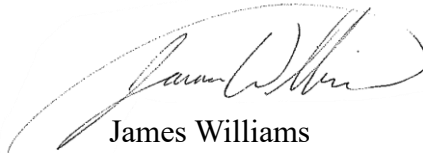
By contrast, directing IOUs to follow the precedent of many community-owned utilities seeking to lower costs and deliverability timelines for their ratepayers by encouraging project owner provided network upgrades results in lower project development costs and expeditious deliverability of the energy that we so urgently need.

We offer all of the above recommendations in alignment with your mission to provide reliable, safe and affordable power to Oregonians and with the perspective of those who are readily poised to help you fulfill that mission.

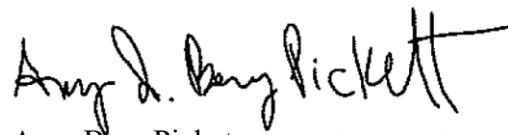
Respectfully,



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Amy Berg Pickett
Policy Chair
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Cc: Governor Kotek
Commissioner Power
Commissioner Perkins