



**Portland General Electric**  
121 SW Salmon Street · Portland, Ore. 97204

May 29, 2020

*Via Electronic Filing*

Public Utility Commission of Oregon  
Attention: Filing Center  
P.O. Box 1088  
Salem, OR 97308-1088

**RE: UM 1930 – Comments on Staff’s Draft Proposal to Release an RFP for Third-Party Interconnection Review Services**

Portland General Electric Company (PGE) submits these comments in reply to Staff’s May 26, 2020 Proposal for a Request for Proposal for Third-Party Interconnection Review Services for the Community Solar Program (the “RFP Proposal”).

Staff’s RFP Proposal considers a cost sharing mechanism between PGE’s customers (through the contribution to Program Administrator (PA) start-up costs) and project managers (PMs), where projects must commit to covering some or all the costs of the additional review services outlined. However, the costs of additional third-party reviews completed on behalf of the PM should not be borne by PGE’s customers for either the standard or enhanced study. Developers are already compensated for interconnection costs because interconnection costs of the avoided resource are included in the avoided cost prices. These developers are compensated at a price higher than avoided cost and should not be allowed to pass even more costs on to customers. PGE remains intent on preserving the indifference principle for existing retail customers. The indifference principle means PGE customers must remain financially indifferent to PGE’s purchase of QF power. Purchase of power from a CSP already considers the costs of interconnection in avoided costs. Additionally, under the current structure, utility customers already share a portion of the cost burden of the program given that utilities are required to participate in data exchange and what could be multiple rounds of communication/review with the independent consultant. Notwithstanding the above PGE appreciates Staff’s proposal which would place a cap on shared costs at \$50k.

PGE acknowledges and thanks Staff for expanding the bidder evaluation criteria. PGE believes the additional evaluation criteria will increase trust in the results of any third-party review.

PGE reiterates that defining the independent review process clearly (eligibility, scope, timing) and understanding its downstream effects on projects in queue is as important as the qualifications of the independent reviewer. The independent review process should be limited to the study performed on behalf of the project requesting the review. Staff

notes that an eligible PM may request review of a different study or utility analysis. In PGE's view this opens the investigation to unnecessary costs and leads to a broad and un-focused review by the consultant.

A successful independent review process will be limited to reviewing study results. PGE looks forward to continuing the conversation on the RFP Proposal and appreciates Staff's work in preparing this RFP Proposal.

Please direct questions or comments regarding these comments to Santiago Beltran Laborde at (503) 464-7902. Please direct all formal correspondence and requests to the following email address [pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com)

Sincerely,

*\s\ Robert Macfarlane*

Robert Macfarlane  
Manager, Pricing and Tariffs