

December 10, 2020



To: Oregon Public Utility Commission

From: Spencer Moersfelder, Energy Trust of Oregon

Re: Oregon Public Utility Commission Updated Distribution System Planning Guidelines

Energy Trust of Oregon applauds the OPUC's efforts thus far to refine Utility Distribution System Planning through UM 2005. Moreover, Energy Trust appreciates the opportunity to provide comments on the updated Distribution System Planning (DSP) Guidelines as part of the docket process. Energy Trust recognizes the importance of these efforts and is prepared to assist as best we can.

Energy Trust already provides benefits to utility systems by providing energy efficiency savings and renewable energy generation Distributed Energy Resources (DERs) that help to defer investments in system expansions. As utilities identify areas where their systems may be experiencing constraints or are expected to run into constraints in the future, Energy Trust can provide additional resources to help address these constraints. One possible approach is to conduct scanning and scoping analysis to identify portions of utility systems that show a need for additional capacity that cannot be met by rebalancing the system or through other quick and low-cost strategies. If there is sufficient reaction time for demand-side solutions to be feasible, then these areas may warrant a deeper examination for how Energy Trust provided DERs can be called upon to address constraints in these areas. In addition to procuring energy efficiency savings and renewable energy generation resources through a well-developed delivery infrastructure and expertise in related customer market segments, Energy Trust also has other resources that can be leveraged for utility distribution system planning efforts. These resources include detailed project data, a statewide trade ally contractor network and planning and forecasting capabilities.

In response to the Updated Guidelines, Energy Trust has revised the comments that Energy Trust previously submitted on October 29th in relation to the Draft Guidelines. You can see our edits in the Appendices. Consistent with the OPUC process of providing a "revised" and "red-lined" version of the guidelines, Energy Trust has provided an Appendix A with "revised" comments and an Appendix B with "red-lined" comments.

In the comments below, Energy Trust has identified five primary areas of organizational activities or processes that are related to the objectives outlined in the Guidelines and may potentially be impacted by outcomes of this docket. Furthermore, based on the role that Energy Trust plays in procuring energy efficiency savings and renewable energy generation for our funding utilities it seems that data related to our activities and program plans is inseparable from the requirements outlined for utilities in each of the identified stages. Our overarching question is how Energy Trust fits into the DSP process and what role and services Energy Trust is expected to provide to assist utilities in meeting the requirements of the Guidelines. You will see from the comments below that Energy Trust can provide resources to help meet DSP objectives; the resources associated with Energy Trust's role in providing related services and analyses is dependent on what is required and useful from Energy Trust. The related resource

impact could vary from relatively minimal to a significant increase in the scope of Energy Trust services.

Please let me know if you have questions or need further clarifications on our comments.

Best regards,

Spencer Moersfelder

A handwritten signature in black ink that reads "Spencer Moersfelder". The signature is written in a cursive style with a large, prominent "S" at the beginning.

Planning Manager

Energy Trust of Oregon

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Appendix A: Revised Energy Trust Comments on Draft Distribution System Planning Guidelines



December 10, 2020

To: Oregon Public Utility Commission

From: Spencer Moersfelder, Energy Trust of Oregon

Re: Oregon Public Utility Commission Draft Distribution System Planning Guidelines

Energy Trust of Oregon appreciates the opportunity to provide comments on the draft Distribution System Planning (DSP) Guidelines as part of UM 2005. While Energy Trust does not have an expansive role identified in the DSP Guidelines, the guidelines may have a significant impact on Energy Trust's delivery of energy efficiency programs on behalf of customers of Portland General Electric, Pacific Power, NW Natural, Cascade Natural Gas and Avista Corporation and renewable energy services on behalf of customers of PGE and Pacific Power. Furthermore, Energy Trust programs and the consequent energy savings and renewable generation may have a significant impact on distribution system use and upgrade needs. Energy Trust has identified five primary areas of organizational activities or processes that are related to the objectives outlined in the Guidelines and may potentially be impacted by outcomes of this docket:

1. Targeted Load Management
2. Distributed Renewable Energy
3. Energy Efficiency Potential Forecasting
4. Energy Efficiency Avoided Costs
5. Community Engagement

These comments: A) provide a description of each of these five areas and how each of the areas are potentially impacted and B) identify how specific distribution system guidelines potentially impact and/or overlap with Energy Trust activities and processes.

A. Description of five primary areas of Energy Trust organizational activities or processes that may potentially be impacted by outcomes of this docket and how these areas are potentially impacted by guidelines.

1. Targeted Load Management

Targeted Load Management is an example of a non-wires and non-pipe solutions to address improvement needs in the grid. Under this title, Energy Trust has undertaken projects with Pacific Power and NW Natural to determine how energy efficiency and

renewable energy deployment can defer investments in distribution system infrastructure in areas of the grid that are identified as load constrained. Potential system expansions may be deferred in these areas based on Energy Trust support for geographically focused deployment of Distributed Energy Resources (DERs), providing incremental energy savings and/or generation that alleviates local system constraints during peak periods. Incremental savings and generation go beyond Energy Trust's forecast of the DER adoption that would have been achieved in these areas through standard Energy Trust program implementation.

Outcomes of this docket could potentially impact Targeted Load Management efforts if the guidelines define analytical processes used to identify load constrained areas and identify peak periods within these areas. In addition, location-specific avoided costs may be applied to determine the cost-effectiveness of specific efficiency measures in these areas. The proposed guidelines could provide increased visibility on areas that are experiencing local system constraints this would allow Energy Trust to address these constrained areas in forecasting and program planning to help provide additional value to utilities and customers.

2. Distributed Renewable Energy

The viability of distributed renewable energy projects that Energy Trust supports are heavily dependent on feeder level hosting capacity and project economics. The economics are dependent on the value of the generation and/or energy services the project delivers which are compensated through utility bill savings or in payment for power from qualifying facilities. Clarity early in project development regarding where utilities have system capacity for renewable project installations can help Energy Trust solar trade ally contractors, project developers and communities identify viable sites for projects on suitable feeders. In addition, avoided costs are a primary determinant of the price that utilities will pay for energy generated by qualifying facilities. We hope that this docket may produce analytical guidelines that are used to quantify the distribution capacity value of these avoided costs on both a system basis and a localized basis.

3. Energy Efficiency Potential Forecasting

Energy Trust works closely with PGE, Pacific Power, NW Natural, Cascade Natural Gas and Avista Corporation to provide forecasts of energy efficiency potential for utility Integrated Resource Planning. Utilities use these energy efficiency potential forecasts to plan holistic approaches to meet future system needs that include a mix of demand-side energy efficiency resources and supply-side resources. The energy efficiency forecasts that Energy Trust assembles for these plans are currently scaled to the utility system level, although we have provided local forecasts for Targeted Load Management on a customized basis. If it becomes necessary to routinely produce efficiency forecasts on a more local distribution system level, Energy Trust will need to adapt existing efforts to produce a streamlined, efficient process for doing so according to the requirements that result from this docket.

4. Energy Efficiency Avoided Costs

The Oregon Public Utility Commission requires all energy efficiency measures to pass two cost-effectiveness tests in order to be eligible for Energy Trust incentives (unless the OPUC otherwise grants an exception via criteria outlined in UM 551): 1) Utility Cost Test and 2) Total Resource Cost test. The primary value in the numerator of both tests is the avoided cost of the equivalent energy that the utility would otherwise have to provide if the energy were not being saved. Energy Trust works with the OPUC and PGE, Pacific Power, NW Natural, Cascade Natural Gas and Avista Corporation via OPUC UM 1893 to calculate blended electric and natural gas avoided costs to apply to cost-effectiveness testing. Energy Trust electric and gas avoided costs include distribution capacity values and it is assumed that outcomes of this docket may produce analytical guidelines that are used to quantify the distribution capacity value of these avoided costs via UM 1893. Outcomes of this docket may also produce analytical guidelines that are used to quantify the distribution capacity value of these values on a localized basis.

5. Community Engagement

The proposed DSP Guidelines underscore the importance of community engagement in the distribution system planning process to ensure the development of an approach that benefits impacted and vulnerable customers. Energy Trust renewable energy and energy efficiency projects are an outcome of working with individual customers, trade ally contractors and other product and service suppliers. We are increasingly engaging with communities to identify and scope projects that meet local needs and achieve community goals. We recognize the importance of creating requirements for community engagement during Distribution System Plan development and implementation. In addition to the activities unique to the Distribution System Planning process that are outlined in the guidelines, it may be worth considering community engagement efforts already underway so that utilities can build from what exists and use the time of community leaders efficiently.

Additionally, a community may engage in a planning process that sets goals and activities which have distribution system planning implications. For example, many communities in Oregon are actively creating climate action plans and community energy plans that identify an increase in adoption of energy efficiency and renewable energy as a method to meet broader community goals. As part of the development process and in preparation for community engagement it may be instructive for utilities to collect existing information from communities that have engaged in energy, climate or sustainability planning to better understand plans that communities have underway which have an impact on the distribution system.

B. Energy Trust Activities and Processes Potentially Impacted by and/or overlap with Distribution System Guidelines

Distribution System Guideline	How Guideline Potentially Impacts Energy Trust
1. Process and Timing	Utility Plans that Encompass Energy Trust Activities have coordination and implementation implications that impact Energy Trust resources and workflows. Please see related comments below.
3. Scope	Utility Plans that Encompass Energy Trust Activities have coordination and implementation implications that impact Energy Trust resources and workflows. Please see related comments below.
4.1 Baseline Data and System Assessment	Energy Trust has already installed efficiency and renewable projects throughout utility territories. Baseline characterizations that include information on these projects will require coordination and analysis with Energy Trust that go beyond Energy Trust’s current analytical and reporting practices. The geographical scaling of the data needs has implications for related resource needs. Energy Trust may be able to provide data at a zip code level to help utilities with this requirement. Parsing data at a more finite level and iteration on individual projects will require additional effort.
4.2 Hosting Capacity Analysis	Hosting Capacity Analysis impacts perspective on where utility systems are constrained, and this has implications for the viability and benefits of efficiency and renewable energy projects. Hosting Capacity Analysis can potentially: a) help to identify areas that are good candidates for Energy Trust Targeted Load Management projects b) help to identify areas that are able to host new renewable generation projects and c) influence the capacity components in system-wide or localized avoided cost stacks.
4.3 Community Engagement Plan	As utilities engage communities for Distribution System Planning there is overlap with the efficiency and renewable Distributed Energy Resources (DER) that Energy Trust provides to these communities. Portions of community engagement efforts associated with these DERs relate back to Energy Trust program planning and implementation. Energy Trust aims to educate customers on the products that we offer and similarly seeks to gain insight on customer needs. As such, Energy Trust will need to strike the right balance to provide representation associated with these engagement efforts with Energy Trust’s available resources. Per the above, it may be possible to maximize available resources by leveraging community engagement efforts that are already underway and using existing community objectives in conjunction with Distribution System Planning efforts.

<p>4.4 Overarching Requirement – Long-term Distribution System Plan</p>	<p>It seems like the plan described in Guideline 4.4 would need to be founded on baseline activities address in 4.1 and the forecast addressed in 5.1. Energy Trust energy efficiency and renewable resources provide benefits by helping to defer utility system investments in generation and transmission and distribution system enhancements. In addition, to providing these resources throughout utility service territories, Energy Trust may be able to provide additional services to plan and implement energy efficiency and renewable project development services in targeted areas that utilities have identified as load constrained. Per previous comments Energy Trust is already working with Pacific Power and NW Natural to plan and implement energy efficiency and renewable energy solutions to address localized constraints in a few targeted areas of the utility system via Targeted Load Management efforts. Energy Trust anticipates that we may be able to expand, evolve and streamline this effort to address a few additional locales.</p>
<p>4.5 Plan for Part 2 Development</p>	<p>Depending on the content and scope of the utilities' Part 2 plans, Energy Trust may need to engage to provide perspective on the resources that Energy Trust can contribute to the action items in the plans.</p>
<p>5.1 Forecasting of Load Growth, DER Adoption and EV Adoption</p>	<p>Energy Trust is already working with utilities to provide 20-year energy efficiency forecasts at a utility system level. Energy Trust believes that we can also provide renewable energy forecasts at a utility system level without too much additional effort. There may be future opportunities to refine forecasting methodologies to provide a more comprehensive perspective on localized efficiency and renewable energy resource potential assuming related utility data is refined and available and Energy Trust is able to invest in refining modeling processes for forecasting.</p>
<p>5.2 Grid Needs Identification</p>	<p>This appears to be technical assessment forecasting the future needs of a utility system. It is assumed that a thorough review of future grid needs will require a forecast of the efficiency and renewable energy resource potential that Energy Trust can provide through activities addressed in Energy Trust comments in sections 4.1, 4.4 and 5.1 above.</p>
<p>5.3 Solution Identification</p>	<p>It is anticipated that utilities may need to engage Energy Trust to identify efficiency and renewable technologies and quantify their related energy impacts in order to itemize how efficiency and renewable solutions contribute to the overall utility plans to meet future system needs. Energy Trust welcomes the opportunity to discuss possible pilot opportunities that leverage Energy Trust programs and expertise to help utilities meet their obligations in relation to this requirement.</p>

<p>5.4 Overarching Requirement - Near-Term Action Plan</p>	<p>Similar to comments in section 4.4, it seems like the plan addressed in Guideline 5.4 would need to be founded on baseline activities address in 4.1 and the forecast addressed in 5.1 Energy Trust energy efficiency and renewable resources provide benefits by helping to defer utility system investments in generation and transmission and distribution system enhancements. In addition, to providing these resources throughout utility service territories, Energy Trust may be able to provide additional services to plan and implement energy efficiency and renewable project development services in targeted areas that utilities have identified as load constrained. Per previous comments Energy Trust is already working with Pacific Power and NW Natural to plan and implement energy efficiency and renewable energy solutions to address localized constraints in a few targeted areas of the utility system via Targeted Load Management efforts. Energy Trust anticipates that we may be able to expand, evolve and streamline this effort to address a few additional locales.</p>
<p>6. Overview of Distribution System Planning Process</p>	<p>The intention of this portion of the guidelines is intended to result in a holistic planning process. Because Energy Trust provides significant Distributed Energy Services on behalf of the Investor Owned Utilities in Oregon it is assumed that Energy Trust will need to be engaged to formulate holistic plans.</p>

Thank you,

Spencer Moersfelder



Planning Manager

Energy Trust of Oregon

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Appendix B: Red-lined Revised Energy Trust Comments on Draft Distribution System Planning Guidelines



~~October 29, 2020~~ December 10, 2020

To: Oregon Public Utility Commission

From: Spencer Moersfelder, Energy Trust of Oregon

Re: Oregon Public Utility Commission Draft Distribution System Planning Guidelines

Energy Trust of Oregon appreciates the opportunity to provide comments on the draft Distribution System Planning (DSP) Guidelines as part of UM 2005. While Energy Trust does not have an expansive role identified in the DSP Guidelines, the guidelines may have a significant impact on Energy Trust's delivery of energy efficiency programs on behalf of customers of Portland General Electric, Pacific Power, NW Natural, Cascade Natural Gas and Avista Corporation and renewable energy services on behalf of customers of PGE and Pacific Power. Furthermore, Energy Trust programs and the consequent energy savings and renewable generation may have a significant impact on distribution system use and upgrade needs. Energy Trust has identified five primary areas of organizational activities or processes that are related to the objectives outlined in the Guidelines and may potentially be impacted by outcomes of this docket:

6. Targeted Load Management
7. Distributed Renewable Energy
8. Energy Efficiency Potential Forecasting
9. Energy Efficiency Avoided Costs
10. Community Engagement

These comments: A) provide a description of each of these five areas and how each of the areas are potentially impacted and B) identify how specific distribution system guidelines potentially impact and/or overlap with Energy Trust activities and processes.

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energy savings and/or generation that alleviates local system constraints during peak periods. Incremental savings and generation go beyond Energy Trust's forecast of the DER adoption that would have been achieved in these areas through standard Energy Trust program implementation.

Outcomes of this docket could potentially impact Targeted Load Management efforts if the guidelines define analytical processes used to identify load constrained areas and identify peak periods within these areas. In addition, location-specific avoided costs may be applied to determine the cost-effectiveness of specific efficiency measures in these areas. The proposed guidelines could provide increased visibility on areas that are experiencing local system constraints this would allow Energy Trust to address these constrained areas in forecasting and program planning to help provide additional value to utilities and customers.

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The Oregon Public Utility Commission requires all energy efficiency measures to pass

two cost-effectiveness tests in order to be eligible for Energy Trust incentives (unless the OPUC otherwise grants an exception via criteria outlined in UM 551): 1) Utility Cost Test and 2) Total Resource Cost test. The primary value in the numerator of both tests is the avoided cost of the equivalent energy that the utility would otherwise have to provide if the energy were not being saved. Energy Trust works with the OPUC and PGE, Pacific Power, NW Natural, Cascade Natural Gas and Avista Corporation via OPUC UM 1893 to calculate blended electric and natural gas avoided costs to apply to cost-effectiveness testing. Energy Trust electric and gas avoided costs include distribution capacity values and it is assumed that outcomes of this docket may produce analytical guidelines that are used to quantify the distribution capacity value of these avoided costs via UM 1893. Outcomes of this docket may also produce analytical guidelines that are used to quantify the distribution capacity value of these of values on a localized basis.

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Additionally, a community may engage in a planning process that sets goals and activities which have distribution system planning implications. For example, many communities in Oregon are actively creating climate action plans and community energy plans that identify an increase in adoption of energy efficiency and renewable energy as a method to meet broader community goals. As part of the development process and in preparation for community engagement it may be instructive for utilities to collect existing information from communities that have engaged in energy, climate or sustainability planning to better understand plans that communities have underway which have an impact on the distribution system.

B. Energy Trust Activities and Processes Potentially Impacted by and/or overlap with Distribution System Guidelines

Distribution System Guideline	How Guideline Potentially Impacts Energy Trust
1. Process and Timing	Utility Plans that Encompass Energy Trust Activities have coordination and implementation implications that impact Energy Trust resources and workflows. <u>Please see related comments below.</u>
3. Scope	Utility Plans that Encompass Energy Trust Activities have coordination and implementation implications that impact Energy Trust resources and workflows. <u>Please see related comments below.</u>
3.14.1 Baseline Data and System Assessment	Energy Trust has already installed efficiency and renewable projects throughout utility territories. Baseline characterizations that include information on these projects will require significant coordination and analysis with Energy Trust <u>that go beyond Energy Trust's current analytical and reporting practices. The geographical scaling of the data needs has implications for related resource needs. Energy Trust may be able to provide data at a zip code level to help utilities with this requirement. Parsing data at a more finite level and iteration on individual projects will require additional effort.</u>
3.2 Load, Distributed Energy Resource and EV Forecasting	Energy efficiency and renewable projects represent significant Distributed Energy Resource potential in utility service territories. Energy Trust already provides efficiency forecasts to utilities in conjunction with utility Integrated Resource Planning. Permutations of this existing process for Distribution System Planning and incorporation of renewable resources into these forecasts may require significant resources from Energy Trust for analysis and coordination.
3.34.2 Hosting Capacity Analysis	Hosting Capacity Analysis impacts perspective on where utility systems are constrained, and this has implications for the viability and benefits of efficiency and renewable energy projects. Hosting Capacity Analysis can potentially: a) help to identify areas that are good candidates for Energy Trust Targeted Load Management projects b) help to identify areas that are able to host new renewable generation projects and c) influence the capacity components in system-wide or localized avoided cost stacks.

<p><u>3.44.3</u> Community Engagement Plan</p>	<p>As utilities engage communities for Distribution System Planning there is overlap with the efficiency and renewable Distributed Energy Resources (DER) that Energy Trust provides to these communities. Portions of community engagement efforts associated with these DERs relate back to Energy Trust program planning and implementation. Energy Trust aims to educate customers on the products that we offer and similarly seeks to gain insight on customer needs. As such, Energy Trust will need to strike the right balance to provide representation associated with these engagement efforts with Energy Trust’s available resources. Per the above, it may be possible to maximize available resources by leveraging community engagement efforts that are already underway and using existing community objectives in conjunction with Distribution System Planning efforts.</p>
<p><u>4.4</u> Overarching Requirement – Long-term Distribution System Plan</p>	<p><u>It seems like the plan described in Guideline 4.4 would need to be founded on baseline activities address in 4.1 and the forecast addressed in 5.1. Energy Trust energy efficiency and renewable resources provide benefits by helping to defer utility system investments in generation and transmission and distribution system enhancements. In addition, to providing these resources throughout utility service territories, Energy Trust may be able to provide additional services to plan and implement energy efficiency and renewable project development services in targeted areas that utilities have identified as load constrained. Per previous comments Energy Trust is already working with Pacific Power and NW Natural to plan and implement energy efficiency and renewable energy solutions to address localized constraints in a few targeted areas of the utility system via Targeted Load Management efforts. Energy Trust anticipates that we may be able to expand, evolve and streamline this effort to address a few additional locales.</u></p>
<p><u>4.5</u> Plan for Part 2 Development</p>	<p><u>Depending on the content and scope of the utilities’ Part 2 plans, Energy Trust may need to engage to provide perspective on the resources that Energy Trust can contribute to the action items in the plans.</u></p>
<p><u>5.1</u> Forecasting of Load Growth, DER Adoption and EV Adoption</p>	<p><u>Energy Trust is already working with utilities to provide 20-year energy efficiency forecasts at a utility system level. Energy Trust believes that we can also provide renewable energy forecasts at a utility system level without too much additional effort. There may be future opportunities to refine forecasting methodologies to provide a more comprehensive perspective on localized efficiency and renewable energy resource potential assuming related utility data is refined and available and Energy Trust is able to invest in refining modeling processes for forecasting.</u></p>

<p>3.55.2 Grid Needs Identification</p>	<p>This appears to be technical assessment forecasting the future needs of a utility system. It is assumed that a thorough review of future grid needs will require a forecast of the efficiency and renewable energy resource potential that Energy Trust <u>can provide through activities addressed in Energy Trust comments in sections 4.1, 4.4 and 5.1 above. expects to be able to garner through its programs.</u></p>
<p>3.65.3 Solution Identification</p>	<p>It is anticipated that utilities will <u>may</u> need to engage Energy Trust to identify efficiency and renewable technologies and quantify their related energy impacts in order to itemize how efficiency and renewable solutions contribute to the overall utility plans to meet future system needs. <u>Energy Trust welcomes the opportunity to discuss possible pilot opportunities that leverage Energy Trust programs and expertise to help utilities meet their obligations in relation to this requirement.</u> Permutations of existing forecasting processes to meet Distribution System Planning requirements may require significant resources from Energy Trust for analysis and coordination.</p>
<p>3.7.15.4 <u>Overarching Requirement - Near-Term Action Plan</u></p>	<p><u>Similar to comments in section 4.4, it seems like the plan addressed in Guideline 5.4 would need to be founded on baseline activities address in 4.1 and the forecast addressed in 5.1 Energy Trust energy efficiency and renewable resources provide benefits by helping to defer utility system investments in generation and transmission and distribution system enhancements. In addition, to providing these resources throughout utility service territories, Energy Trust may be able to provide additional services to plan and implement energy efficiency and renewable project development services in targeted areas that utilities have identified as load constrained. Per previous comments Energy Trust is already working with Pacific Power and NW Natural to plan and implement energy efficiency and renewable energy solutions to address localized constraints in a few targeted areas of the utility system via Targeted Load Management efforts. Energy Trust anticipates that we may be able to expand, evolve and streamline this effort to address a few additional locales. If utilities engage with Energy Trust to assemble components for the Near-Term Action Plans that they submit, this could require a significant investment of Energy Trust resources to assist in formulating these plans per some of the items outlined above.</u></p>
<p>3.7.1 Long-term Distribution System Plan</p>	<p>If utilities engage with Energy Trust to assemble components for the Long-term Distribution System Plans that they submit, this could require a significant investment of Energy Trust resources to assist in formulating these plans per some of the items outlined above.</p>
<p>4.6 Overview of Distribution System Planning Process</p>	<p>The intention of this portion of the guidelines is intended to result in a holistic planning process. Because Energy Trust provides significant Distributed Energy Services on behalf of the Investor Owned Utilities in Oregon it is assumed that Energy Trust will need to be engaged to formulate holistic plans. As a result, Energy Trust assumes that this process will require a significant incremental investment in Energy Trust activities to meet this objective.</p>

Thank you,

Spencer Moersfelder

A handwritten signature in black ink that reads "Spencer Moersfelder". The signature is written in a cursive style with a large, prominent 'S' at the beginning.

Planning Manager

Energy Trust of Oregon