

May 31, 2024

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
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Salem, OR 97301-3398
puc.publiccomments@state.or.us

**Re: Investigation Into Distribution System Planning (Docket No. UM 2005)
Energy Advocates' Comments on Proposed DSP Guideline Revisions**

The undersigned organizations, collectively the Energy Advocates, appreciate this opportunity to comment on the Proposed Distribution System Planning (DSP) Guideline Revisions that Oregon Public Utility Commission (PUC) Staff filed in Docket UM 2005 on April 26, 2024.

We are grateful for Staff's efforts to draft Guideline Revisions with the goal of improving the DSP process. However, we are unable to provide substantive feedback today because we are experiencing significant capacity constraints due to the current level of regulatory activity. Staff, utilities, and other stakeholders engaged at the PUC can likely relate to these constraints.

We share an interest in moving this process forward so final revised Guidelines can inform the second round of distribution system planning and so we can have increased understanding and visibility of utility distribution-level investment decisions. As a result, we propose the following changes to the schedule:

- Conduct a workshop where Staff can outline their vision for the process that the revised Guidelines would create for the second DSP cycle. This workshop would offer an opportunity for stakeholders to ask questions, and to exchange insights, concerns, and ideas.
- Add an opportunity for supplemental comments a few weeks after the workshop.

These additional steps would help us better understand the proposed revisions and would give us the time we need to contribute substantively to this revision effort.

We appreciate Staff's work on this docket, as well as their openness to procedural flexibility to allow our engagement in this proceeding.

Respectfully submitted,

/s/

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