

Oregon Citizens' Utility Board

610 SW Broadway, Suite 400
Portland, OR 97205

(503) 227-1984
www.oregoncub.org

May 31, 2024

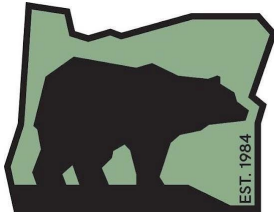
Public Utility Commission
Attn: Filing Center
P.O. Box 1088
Salem, OR 97308-1088

RE: Docket No. UM 2005 - distribution system planning guideline revisions + public comment

First off, the Oregon Citizens' Utility Board (CUB) thanks Staff for initiating the distribution system planning (DSP) guidelines and reflecting on revisions to these guidelines. We recognize there are important and significant changes that are proposed that both CUB and our community partners intend to provide meaningful feedback on.

In the past, CUB collaborated extensively in crafting the DSP guidelines with Staff, our community partners, and other interested stakeholders. That being said, given the timeline of this summer, including four complex rate cases and IRP reviews, CUB does not have the capacity to provide the reflection and feedback we would otherwise have on today's filing deadline. While we support Energy Advocates' proposal for a workshop in July with supplemental comments due in August, this is as an alternative to today's comment deadline. CUB understands that this proposal is based on existing deadlines adopted by the Commission, however, CUB still has concerns about meaningfully participating. Alternatively, CUB proposes to provide review and feedback in the fall. And poses the question: does the risk of pushing this out 5-6 months outweigh the opportunity for meaningful impact from customers? The DSP guidelines will be incredibly important to informing cost-effective, resilient strategies for customers. Meeting our future capacity needs and grid hardening in the near- and long-term and going to require investment. How utilities prioritize those investments needs to be intentional and customer-focused.

CUB's request falls under the same reasoning recently used by the Commission in UM 2024. There the Commission has postponed the investigation into Direct Access for the fall because of the packed timeline of this summer. CUB does not take this request to shift the deadline lightly and recognizes that Staff too is resource constrained due to rate cases and IRP reviews. Nevertheless, CUB stresses the need for quality review of the DSP revisions to balance the utilities' necessary drive for grid hardening with the associated rate increases and the need for meaningful community engagement and robust analysis by CUB given the ongoing rate increases Oregon's IOU customers are currently facing.



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Respectfully submitted,

/s/ Claire Valentine-Fossum

Staff Attorney
Oregon Citizens' Utility Board
610 SW Broadway, Ste. 400
Portland, OR 97205
T. 503.227.1984
E. claire@oregoncub.org

/s/ Jennifer Hill-Hart

Policy and Program Director
Oregon Citizens' Utility Board
610 SW Broadway, Ste. 400
Portland, OR 97205
T. 503.227.1984
E. jennifer@oregoncub.org