



Oregon Public Utility Commission
201 High Street SE, Suite 100
Salem, OR 97301-3398

October 4, 2024

RE- UM 2005 – Investigation into Distribution System Planning

Dear Staff and Stakeholders,

OSSIA appreciates the efforts of staff and other stakeholders to inform meaningful and timely updates to the Distribution System Planning Guidelines and offers the following comments on Staff's proposed Guideline revisions of September 17, 2024.

1. Process and Timing

We appreciate staff's approach to proposed processes "through aligned, streamlined processes, inclusion, and transparency" and offer no comment on the proposed dates for the filing of next Plans. However, in the interest of transparency and setting of expectations for the timing of interconnected processes, we would like the Guidance to maintain and document an anticipated cadence of two years for subsequent plan filing with the allowance for potential deviations to be established by Commission order or future Guideline revisions.

2. Commission Action

We concur with staff's conclusion that providing additional, specific information about expected projects results does not result in a pre-prudency review and support regular updates between Plans and General Rate Cases.

3. Community Engagement

Community-based organizations (CBOs), local governments, and Tribal nations should play an important role in community engagement as well as in informing bottom-up forecasting of technology deployment and identifying customer-sited and other non-wires solutions. However, many CBOs, local governments and Tribal nations – particularly those most vulnerable and traditionally underserved, lack the internal capacity to respond to requests for participation in this process. As such, we offer the following revisions indicated as strike throughs with suggested language italicized:

a) The workshops ~~may shall~~ include in-person meetings located in a community, and ~~may shall~~ include presentation of the Plan outline, data and assumptions under consideration or challenges encountered, and the utility's approach to community engagement.

d) i) ... Engagement of the local community ~~may shall~~ include in-person meetings located in the community...

d) iii) ... ~~Consider eEngagement of~~ local governments and Tribal nations for.....



e) Utilities should aim to create a collaborative and accessible environment among all interested CBO Partners, local governments, Tribal nations and stakeholders and demonstrate acknowledgement, valuation and compensation for CBOs, local governments and Tribal nations as vital experts in the planning process.

4. Current System Data and Assessment

We strongly encourage staff to reconsider proposing a Hosting Capacity Analysis threshold as a grid need. HCA is essential to facilitating transparent and inclusive engagement of affected stakeholders, technical experts and solutions developers through fair and efficient access to existing system constraints and operating conditions. While we appreciate staffs' recognition of ongoing or planned efforts to increase transparency and access into legacy and current system data and assessment, we remain gravely concerned that no deadlines or milestones have been established. For example, PGE's planned development of a community facing page for their AdopDER software has yet to establish a timeline for initial stakeholder input, let alone delivery of an accessible dataset.

Levelizing system understanding through access to system status unlocks the potential for technical and application experts to identify newly emergent solutions potentially unrecognized by IOU planners while providing a platform for enhancing local government and Tribal nation participation opportunities as their schedules, needs and priorities dictate.

Lacking HCA threshold, Guidelines should, at a minimum, establish milestones for providing public facing interfaces capable of accommodating expeditious analysis of feeder level system capacities, equipment, resources, threats and loads. The investments and urgency required to accommodate will ultimately serve rate-payers, Oregonians and Tribal nations through the exponential expansion of the free market problem solving brain trust while reducing time consuming and expensive demands on IOU staff currently required to respond to uninformed interconnection requests. As such, we support Staff's intention for recommendation that utilities develop and share public facing schedules to update and maintain the maps by March 2025, and that beginning in 2025, in coordination with completion of updating legacy data, the utilities update their maps' system data at a minimum twice a year, approximately every six months, and other data annually

5. Forecasting of Load Growth, DER Adoption, and EV Adoption

We support Staff's April revisions directing that forecasting granularity for load growth and distributed energy resource (DER) and electric vehicle (EV) adoption increase from the substation-level to the feeder-level, and that DSP forecasts include data, inputs, and assumptions from the most recent IRP/Clean Energy Plan (CEP). We further suggest that forecasts be updated at a minimum every other year as adoption rates and geographies continue to evolve in response to unprecedented environmental and technology developments and with significant implications to Oregon community level grid reliability.

6. Grid Needs

We concur with Staff's proposed revisions to this section.

7. Solution Identification



We support Staff's April proposal for integrating non-wires solutions into the front end of the solution identification process for fair and thorough evaluation and comparison with traditional solutions. The subsequent proposal for a minimum of two non-wires solution pilot concept proposals supports a modicum of progress in this area but it is not clear from the proposed language at what level and to what granularity these pilots would be applied for thorough consideration. We recommend that pilot solutions be applied at the substation level wherever grid needs have been established and underscore the importance and urgency of increased public access to current system conditions to facilitate third party assistance and community engagement in identifying non-wires solutions and reducing IOU staff burdens in this area.

8. Near-term Action Plan

We support Staff's proposed guidelines for this section and suggest that a sample one-page description be prepared to demonstrate the level of granularity and detail envisioned by staff for this effort. We also support Staff's recommendation for regularly scheduled updates on distribution system improvements and projects identified in the most recently filed Plan.

9. Long-term Action Plan

We support Staff's proposed guidelines for this section and suggest that a sample one-page description be prepared to demonstrate the level of granularity and detail envisioned by staff for this effort. We also support Staff's recommendation for regularly scheduled updates on distribution system improvements and projects identified in the most recently filed Plan.

Thank you for your consideration of these comments.

Respectfully,

A handwritten signature in black ink that reads "Angela Crowley-Koch". The signature is fluid and cursive, with the first name being the most prominent.

Angela Crowley-Koch
Executive Director