# Energy Trust of Oregon

# UM 2005 Response to Stakeholder Questions for August 25 Special Public Meeting

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The following written survey responses are provided to OPUC staff as requested to inform UM 2005: Investigation into Distribution System Planning. As directed by OPUC staff, responses are provided regarding Energy Trust planning and investments in electric efficiency and renewable energy, and do not include information related to natural gas efficiency planning and investments.

# Organizational Overview

Energy Trust is an independent nonprofit organization, selected and overseen by the Oregon Public Utility Commission, to lead 1.7 million Oregon utility customers in benefiting from saving energy and generating renewable power. Energy Trust is funded by and serves Oregon customers of Portland General Electric, Pacific Power, Cascade Natural Gas and Avista, and Oregon and Washington customers of NW Natural.

Since 2002, Energy Trust's technical services, cash-back incentives and energy solutions have helped participating residential, commercial and industrial utility customers save nearly $3.9 billion on their utility bills. Energy Trust maintains a robust network of trade ally contractors, retailers, engineers, designers, architects and builders to serve customers. Energy Trust contributes to Oregon's energy goals by acquiring least-cost energy efficiency, helping transform markets to higher-efficiency products and practices, and making small-scale renewable energy investments more affordable.

Energy-efficiency programs support a range of customer investments, from efficient technologies and operations and maintenance practices to whole-building retrofits and new construction. As required by law, energy-efficiency measures supported by Energy Trust must be cost-effective, and the OPUC oversees Energy Trust's implementation of this requirement. Energy Trust designs and delivers the following efficiency programs: Existing Buildings, Existing Multifamily, New Buildings (including new multifamily buildings), Production Efficiency and Residential. Energy Trust maintains a contract with the Northwest Energy Efficiency Alliance (NEEA) for residential, commercial and industrial market transformation efforts.

Renewable energy programs and incentives are available for small-scale (less than 20 megawatt) renewable energy systems generating power from solar, hydropower, biopower, geothermal and, in limited cases, municipal owned community-scale wind. Energy Trust can fund the above-market costs of systems delivering power to PGE or Pacific Power. Energy Trust designs and delivers the following renewable energy programs: Solar and Other Renewables. The Solar program supports both residential and non-residential solar and solar plus storage projects. The Other Renewables programs supports hydropower, biopower, geothermal and municipal owned community-scale wind projects.

More information about Energy Trust's background, funding sources, strategic plans, annual budgets, policies and energy-efficiency and renewable energy programs are available at www.energytrust.org/about.

# Stakeholder Questions for August 25, 2020, Special Public Meeting Discussion

### 1) What kind of actionable baseline data and system assessment information should be included in the first utility DSP plans in order to help parties reach a shared understanding of the current state of the distribution systems?

With more detailed information Energy Trust could support renewable energy (RE) and energy efficiency (EE) investments that benefit customers and communities. These investments could also benefit the grid, including by providing grid services such as peak management. We are increasingly deploying RE and EE in a targeted fashion to help with grid constraints. In addition, we sometimes encounter challenges to deploying renewables in specific locations that are load constrained or have other grid and interconnection constraints. The use cases described above would benefit from additional information beyond what is currently available. Examples of additional information and data that would be value include but are not limited to the following:

- Interval usage data – 15-min or hourly – at the site, feeder, and/or substation level
- Locations on the grid that would most benefit from additional distributed energy resources (DERs) including EE and RE
- Locations on the grid that have been identified as having constraints or where Level I net metering applications have been denied
- Existing feeder capacity and usage
- Information showing what sites are served by each feeder
- Details on what distribution system upgrades are planned, how upgrades are being prioritized, and their timing.
- Information about sectionalizing equipment on distribution circuits to better understand the planning area for targeted load management projects designed to defer infrastructure upgrade costs and to provide visibility into the impact of seismic events and other natural hazards for community energy resilience planning.
- Information that helps with siting renewable generation; for example, whether reclosers are present on a feeder and their location

### 2) When considering the first utility DSP plans, is a “bottom-up” DER/EV forecasting methodology worth the likely additional cost when compared to a “top-down” forecasting methodology? Why or why not?

Generally, we would be in favor of a bottom up approach because it allows for considering the specific needs and characteristics of different locations on the grid and the communities it serves. Since a bottom up approach can be time consuming and complicated, this approach might require an initial analysis and “top down” scanning to identify the areas of greatest benefit to communities and the utility grid to focus on first.

**3) When considering the first plans utilities file, what are likely to be the best uses for HCAs, and in what ways would your organization use them? For example, to screen projects (as a partial substitute for interconnection studies)? To help utility customers understand the general state of their feeder? For researching the overall opportunity for DERs in a given area?**

Hosting capacity analyses would be valuable to Energy Trust's work, most notably for renewables. We have had customers and solar trade ally contractors describe to us the difficulty in learning after initial project design has been complete and initial investments made that a relatively small rooftop project cannot be installed in a specific location without incurring prohibitive costs due to constraints on the distribution system. Having HCA available would help us focus solar trade ally outreach, support customers in their decisions, and evaluate feasibility of projects.

**What form of data presentation would your use benefit from (e.g. raw, tabular data or visualized on a map)?**

Information is most useful when provided in a format that can be manipulated such as Excel workbooks or GIS shapefiles, rather than as a PDF or an image. Having data provided in format that is readily accessible (e.g., Excel file) and uses similar naming and data conventions as the same information provided by another utility would be valuable. Some data is made more valuable when visualized on a map; especially if there is a single platform or user interface where information can be accessed for sites across the state rather than each utility, and/or each business group within a utility, creating and maintaining their own map.

**4) How could a Community Engagement Plan and process lead to improved distribution project outcomes for residents, business owners, and stakeholders in impacted areas? When should community engagement around a project begin? What is a practical "project threshold" to determine which projects warrant this? What metrics, evaluation and reporting should be required? How might the PUC support utilities to develop and showcase projects co-created with community partners?**

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 larger community goals. These plans may envision increasing adoption of energy efficiency, providing equitable access with an emphasis on resilience and vulnerable communities, and deploying distributed renewable generation projects within the community including irrigation-sourced small hydro, municipal biogas, residential and non-residential solar, and solar plus storage to enhance community resilience during extended power outages. The effects of these community-led efforts currently occur independent of utility long-term energy resource planning process. Community-led energy planning efforts, when coordinated with utility planning efforts, have the potential to create benefits for the electricity grid.