To: Public Utility Commission of Oregon
From: Matt King, Wallowa Resources Renewable Energy Program Manager
Date: October 29, 2020
RE: Wallowa Resources' Comments on Draft Guidelines for Distribution System Planning
Docket No. UM 2005

To the Public Utilities Commission,

Wallowa Resources would like to take this opportunity to present the following comments on the draft Distribution System Planning (DSP) Guidelines in Docket No. UM 2005. Wallowa Resources joined with NW Energy Coalition and several other stakeholder groups for a separate filing, although here we submit some additional comments.

First and foremost, we greatly appreciate the efforts of the Commission in this process, particularly the emphasis on the inclusion of community engagement in the proposed DSP guidelines, as well as in this Docket process itself. The Commission included a myriad of perspectives over the course of the Docket and the proposed guidelines will create more collaboration between communities on the customer side of the distribution system, the utilities, and the PUC. This spirit of collaboration will drive outcomes that create the most benefit for Oregonians.

Wallowa Resources was founded specifically to create a stewardship economy based on sustainable utilization of our natural resources, enhancement of working lands, and supporting rural communities, both here in Wallowa County as well as other small, rural communities like us across the West. One facet of this mission has centered on development of locally owned and operated distributed energy resources that not only generate renewable electricity but also realize a number of other positive externalities, which depending on the particular project can include water conservation, economic development, educational opportunities for youth, workforce training, and other social and ecological benefits. While not commonly considered in the context of renewable energy development, these benefits can drive real and positive change in rural communities. The DSP process has the potential to facilitate these benefits, and we believe that the guidelines as proposed can and will succeed in doing so. There are however a few areas in the guidelines where we think the process could do better for rural Oregonians and would like to offer comments on. The comments below follow the outline of the draft DSP Guidelines, and are in addition to the comments provided in the NW Energy Council submission.

- **Long Term Goals (Introduction)** – We believe that an additional long-term goal should be the following: Consider non-electric service-related social, economic, and environmental benefits in distribution system planning, as identified and described by community-based organizations (CBOs) and local governments.
- **Cost Recovery (Introduction)** – There should be guidance on reasonable levels of spending for communities to participate in the DSP process and funding to support those efforts.
- **Process and Timing** - Distribution Systems are incredibly localized, with community scale projects coming down to individual feeders. The two workshops proposed do not seem likely to be adequate to legitimately engage with local communities, particularly in rural areas. We propose that in addition to the two workshops, regional representatives of the utilities engage with communities directly and at the County scale in partnership with CBOs.
- **Baseline Data and System Assessment** - Utilities should immediately publish maps of substations, feeders, and existing DERs which would allow CBOs and energy developers to begin prioritizing projects using existing

data, such as the UM 2000. This would also allow CBOs to begin cross-referencing energy development potential with other community resilience and development projects, such as irrigation modernization.

- **Load, DER, and EV Forecasting** - In addition to the information that could be leveraged to determine a forecast of DER and EV adoption, as described in "Initial Requirements section B," Community Energy Plans (CEP) should be considered when available, especially in cases where the CEP has been ratified by local municipalities and CBOs. These plans will reflect the comprehensive and collaborative analysis of the greatest benefits that can be realized from intentional development of DERs at the community level and will generally create the most inclusion and equity, as well as the most community support.
- **Hosting Capacity Analysis-** The analysis of hosting capacity needs to be granular in terms of specific locations, including down to individual feeders, as well as seasonality, as not all DERs operate on a year-round basis, such as irrigation hydropower projects that can only operate when farmers are using water for irrigation. While PGE's Net Metering Map is a good start, it seems to be specifically useful for large, sometimes multinational, solar developers that are looking to develop rooftop solar. Much more detail is needed to create better opportunities for CBOs to develop projects that drive benefits beyond carbon-free DERs.
- **Community Engagement Plan**- As mentioned above, we believe that Community Engagement should be at a County level in Counties that are served by utilities regulated by the PUC. Community engagement should be done in a way that allows rural communities to both understand and contribute to the DSP process. CBOs can assist in this engagement through directed outreach and by compiling community recommendations.
- **Solutions Identification**- The initial requirement that suggests at least two proposals for pilots in which non-wires solutions are used in place of traditional utility infrastructure investment should include a requirement that at least one proposal is in a rural area, as defined by the US Department of Agriculture Rural Development. It is important to recognize the different circumstances in rural and urban infrastructure, as rural communities typically have the least reliable system and the highest cost of traditional utility investment due to the nature of dispersed communities, and therefore may have some of the greatest opportunities in non-wires alternatives and associated non-electricity benefits.
- **Overview of the Planning Process**- As a CBO engaged in energy development as well as a number of other community development activities, we believe that there should be collaboration with CBOs earlier in the process, for example in Figure 7 there should be a connection between "Community Engagement" and "Load, DER, and EV Forecast" and "Hosting Capacity Analysis."

In conclusion, we want to reiterate our appreciate for the OPUC's efforts in this matter and we thank you for your consideration of these comments as well as comments of all stakeholders.

Sincerely,

Matt King

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