OSSIA
OREGON SOLAR + STORAGE INDUSTRIES ASSOCIATION

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

March 25, 2022

Re: UM 2111 Interconnection scoping comments, second round

Dear Staff and Stakeholders,

Oregon Solar + Storage Industries Association (OSSIA) appreciates the diligence and thoroughness from staff to ensure an appropriate UM 2111 scoping, process and timeline. Interconnection is the biggest challenge facing efforts to decarbonize the grid and deserves significant attention. OSSIA looks forward to engaging with PUC staff and stakeholders to find innovative solutions to the interconnection challenges Oregon faces.

OSSIA provides the following answers to staff's additional questions:

1. Of the four issues that staff stated were a priority for Group 1 (1- Modernizing the screening and interconnection study practices, 2- Incorporating updated standards such as IEEE 1547-20184, 3- Incorporating advanced inverters, storage, islanding, and other modern configurations, 4- Modernizing and right-sizing the upgrade options considered when an upgrade is needed) OSSIA recommends moving Interconnection process issues from Group 4 up to Group 1, and moving #4 [Modernizing and right-sizing upgrade options] down to Group 2 or 3. An effort to improve interconnection process could provide more immediate improvements and speed to interconnection and so that should be prioritized. A discussion of upgrade options is likely to be a longer and broader conversation that is unlikely to come to a timely conclusion.
2. OSSIA believes that 2(c), Improving tools that allow interconnection customers the ability to contest cost estimates, and prevent them from changing, is the action that would be most effective at reducing interconnection costs in the next 12 months. While improving the analysis process and transparency would be helpful, without a way to give interconnection customers a full and active role in the process, the interconnection process will still be a utility driven process without a way for a specific project to challenge, verify and contest utility findings.
3. OSSIA would prefer that HCA methodology not wait until UM 2111 Group 1 issues are resolved, which may take a year or more. There are HCA best practices and methodologies available now and that process should start through UM 2005. The decision about what inputs to use for what purposes should remain an open question until UM 2111 makes better progress.

PO Box 14927, Portland, OR 97293-0927
Email: angela@oseia.org
www.orssia.org

OREGON SOLAR + STORAGE INDUSTRIES ASSOCIATION

4. While OSSIA disagrees that storage and advanced inverter issues should be deprioritized, we agree that interconnection process issues should be elevated to Group 1, for reasons stated in response to question 1 above.
5. OSSIA recommends that each topic have a pre-meeting or scoping meeting so that stakeholders can agree about what issues will be on the table for discussion. OSSIA recommends the PUC explore having an outside facilitator for some of these discussions, in order to move efficiently and without PUC staff having to navigate the various dockets and existing complaints. Overall, a working group is very helpful in order to hear all sides of an issue and explore what issues can be solved with stakeholder involvement. However, it is unlikely that many issues in this docket will be able to find consensus. OSSIA supports PUC staff making recommendations to the Commission for action if stakeholders cannot agree on a solution. Staff and the Commission should proceed on an issue when staff feels confident in a recommendation, and not wait for consensus among stakeholders.
6. OSSIA is open to IREC's suggestion but the discussions in this docket should inform that suggestion. A change should not be made until issues in the docket have been thoroughly examined. It is important to OSSIA that NEM interconnection maintain a fast process for residential and commercial customers; if a different process would make NEM interconnection faster and cheaper, OSSIA is interested in exploring those options, but is not open to changes that would slow down or make NEM interconnections more expensive.
7. The only topic OSSIA thinks could be addressed without a staff-led process would be technical discussions of IEEE 1547 and storage and smart inverters. However, in order for that process to be stakeholder led, it would require expertise from the renewables side that OSSIA would look to IREC or other experts to provide. In addition, any such process should have full staff participation in order to inform recommendations to the Commission.

Thank you for your attention to these comments.

Sincerely,

Angela Crowley-Koch

PO Box 14927, Portland, OR 97293-0927
Email: angela@oseia.org
www.orssia.org