



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

February 22, 2022

Re: UM 2111 Interconnection scoping comments

Dear Staff and Stakeholders,

Oregon Solar + Storage Industries Association (OSSIA) appreciates the diligence and thoroughness that went into the UM 2111 scoping announcement memo. 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 agrees with the three broad categories for the docket being cost, certainty and control, and process. We also agree that the priority issues to begin the docket should be root causes, customer and community benefits and decarbonization and that Group 1/Phase 1 is the right place to start.

OSSIA has two additional overarching priorities to suggest. The first is transparency and access to data. It is possible that many if not most interconnection issues could be more easily solved if there were a high level of transparency and access to data regarding the utilities system, costs, equipment, equipment ratings, and process. Without being able to independently verify utility information, it will be difficult to find appropriate solutions. In addition, it is critical that interconnection information be more publicly accessible so that non-energy related community groups are able to view and understand a utility map to plan for a solar project. OSSIA asks that maximizing transparency and data access be an additional priority for all issue groups within the docket.

The second overarching priority should be ensuring that utilities must be reasonable, non-discriminatory and act in good faith in the interconnection process. This issue is alluded to in Group 4, but is critical to all aspects of interconnection. Without ensuring that utilities are acting in good faith, solutions agreed to in this docket could be meaningless in practice.

Within Group 1, OSSIA appreciates the exploration of reasonable technologies, as sometimes technology is required by utilities for interconnection that is not technologically required from an engineering standpoint. These “gold-plated” requirements add unnecessary cost and delay to projects. However, there may be instances where “gold-plated” requirements provide additional benefit to the utility and the community, such as using fiber instead of microwave communication in order to help the utility locate outages faster. In these instances, it makes sense to share the cost of the upgrade to a “gold-plated” solution between the generator and the utility. OSSIA requests that the issue of cost allocation be considered in other issue groups when relevant to finding solutions, as it would be in the above-mentioned example. In addition, when discussing reasonable technologies, OSSIA believes it would be more useful to have the option for technology to vary depending on the project instead of having blanket requirements for all projects. The discussion of engineering stamps seems to belong in Group 1

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issues in addition to Group 3, in order to determine which technologies are appropriate and to ensure objectivity when it comes to interconnection technologies.

OSSIA appreciates that a priority focus in Group 1 is on hosting capacity analysis (HCA), which will provide an objective and transparent grid analysis. It is critical that interconnection is not just considering nameplate capacity, but is a more in-depth analysis that considers loads, time of day, location, etc. In addition, elevating the discussion of new technologies, including smart inverters and battery storage, is needed. These technologies are currently not being utilized to their maximum benefit to the grid, the community or the individual customer.

Related to customer and community benefits, Group 1 should also include a discussion of utility curtailment and how to avoid that practice. Curtailment not only decreases the value of a solar system to the customer or developer, but it also potentially reduces the amount of clean energy on the grid at any one time. Curtailment has been used as a potential solution to interconnection challenges but that is not a sustainable solution in either sense of the word.

OSSIA believes that the ability of a generator to perform studies – and a requirement that the utilities consider them – should be a part of group 1 issues. Independent studies provide transparency and information that is needed to inform all the issues in this docket. Currently, it’s one of the few ways that information from utilities can be independently verified, which is critical to ensuring a better interconnection process.

OSSIA recommends that Group 4 be prioritized above Group 3, or potentially even earlier. Group 4 issues include important process pieces that could give more immediate interconnection relief. The concept of a “fast track” review process could solve many current interconnection challenges, particularly those faced by community projects. Interconnection delays are a frequent occurrence and relief in this area could pave the path to faster solar adoption. In addition, the predictability of costs and limits on costs should be in this group, as it is related to delays. Cost increases and delays are the two main reasons that solar projects don’t move forward and the two should be addressed together and should have higher priority.

Prompt attention to interconnection issues is critical to both meet Oregon’s climate, community benefit and energy resilience goals. We encourage staff to look to our neighbors in California for best practices and lessons learned in improving interconnection. SEIA and IREC are also good sources of information<sup>1</sup>. OSSIA greatly appreciates the PUC’s comprehensive consideration of interconnection issues.

Thank you for your attention to these comments.

Sincerely,

A handwritten signature in black ink that reads "Angela Crowley-Koch". The signature is fluid and cursive.

Angela Crowley-Koch

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<sup>1</sup> <https://www.seia.org/news/clean-energy-trade-associations-urge-ferc-act-near-term-interconnection-improvements>.  
<https://irecusa.org/resources/irec-model-interconnection-procedures-2019/>