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February 24, 2022

VIA ELECTRONIC FILING

Attention: Filing Center
Public Utility Commission of Oregon
201 High Street SE, Suite 100
P.O. Box 1088
Salem, Oregon 97308-1088

**Re: Docket UM 2111 – In the Matter of Public Utility Commission of Oregon,
Investigation into Interconnection Process and Policies.**

Attention Filing Center:

Attached for filing in the above-referenced docket is Portland General Electric Company's Response to Staff's Scoping Announcement.

Please contact this office with any questions.

Sincerely,

Alisha Till
Paralegal

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2111

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation into Interconnection Process and
Policies

**PGE’S RESPONSE TO SCOPING
ANNOUNCEMENT**

1 Portland General Electric Company (PGE) submits these initial comments in response to
2 Public Utility Commission of Oregon (Commission) Staff’s Scoping Announcement issued on
3 February 11, 2022. PGE recognizes the complexity and wide-ranging scope of potential issues in
4 this docket and appreciates Staff’s effort to begin a thoughtful scoping process. Given the breadth
5 of the issues, PGE agrees with Staff that a phased approach is appropriate. PGE also agrees that
6 issues should be prioritized that (1) ensure the continued safety and reliability of the grid, (2)
7 efficiently use and increase the availability capacity on the system, and (3) clarify applicable
8 requirements to avoid interconnection disputes. PGE recommends keeping the number of topics
9 in Docket UM 2111 to a manageable level to increase the likelihood of a prompt resolution. As
10 requested by Staff, PGE provides the following high-level comments regarding Staff’s proposal.¹

11 **A. Issue Prioritization and Phasing**

12 PGE generally agrees that Staff’s proposed grouping and order of issues make sense.²
13 However, PGE recommends that the “Interconnection Process” issues in Group 4 be moved into
14 Group 1, as both sets of issues relate to process and present opportunities for reforms that can
15 improve the interconnection process. Additionally, many of the issues in both groups have already
16 been discussed in other dockets. As a result, many stakeholders already have some familiarity

¹ Given the range of issues and the short timeline for preparing comments, PGE may raise additional issues as the scope and process for this docket become clearer.

² See Staff’s Scoping Announcement at 3-4 (Feb. 11, 2022).

1 with the “Interconnection Process” issues, and unlike other potential issues relevant to
2 interconnection, these issues are not highly technical. Thus, PGE suggests that the Group 4
3 “Interconnection Process” issues could be resolved in a relatively short timeframe. Addressing
4 the “Interconnection Process” issues at the outset of the docket will help avoid disputes, ensure
5 that interconnection requests are timely processed, and establish predictable interconnection
6 timelines, thus benefiting customers navigating the interconnection process. PGE concurs with
7 Staff that Groups 2 and 3 should follow Group 1. PGE also agrees with Staff that it may be more
8 appropriate to address the Group 4 “Rule Structure” issues later in the docket.

9 **B. Proposed Issues and Strategy for Group 1**

10 PGE has two initial comments about Staff’s discussion of the “Approach to Group 1
11 Issues/Phase 1 strategy.”³ First, Staff discusses hosting capacity, which has been addressed in
12 depth in the Distribution System Planning investigation in Docket UM 2005. Through Docket
13 UM 2005 and pursuant to the Commission guidelines and stakeholder guidance, PGE developed
14 a hosting capacity analysis map.⁴ PGE seeks clarification as it appears Staff’s discussion of
15 hosting capacity in Docket UM 2111 is focused on thresholds used to screen generators and
16 identify needed upgrades in the interconnection process—not on the hosting capacity analysis PGE
17 has already performed. PGE agrees with Staff that the inquiry into thresholds may be informed
18 by the hosting capacity analysis already undertaken in Docket UM 2005. However, to the extent
19 Staff envisions revising the hosting capacity analysis itself, that issue should remain in Docket UM
20 2005 to avoid duplicating the significant work already undertaken in that docket and ensure that
21 interested stakeholders from that docket are not excluded. PGE requests that Staff clarify which
22 specific issues related to hosting capacity will be addressed in Docket UM 2111.

23 Second, Staff proposes to explore “Storage and Flexibility” to integrate storage, islanding,
24 and other modern configurations more explicitly into interconnection rules, policies, and practices.

³ Staff’s Scoping Announcement at 4-5.

⁴ PGE’s hosting capacity map is updated regularly and is available at: <https://portlandgeneral.com/about/who-we-are/resource-planning/distribution-system-planning>.

1 PGE notes that there is currently no established regulatory framework addressing compensation
2 for storage- and flexibility-related products and services, and PGE understands that Docket UM
3 2111 will not address compensation. PGE agrees it is appropriate for Docket UM 2111 to explore
4 the process and technical evaluation required to connect storage to the electric system.

5 PGE has several additional questions regarding the specific issues in Staff’s Group 1
6 proposal, including:

- 7 • What specific issues does Staff expect to address regarding “[m]odernizing the
8 screening and interconnection study practices”?
- 9 • What does Staff plan to incorporate “advanced inverters, storage, islanding, and other
10 modern configurations” into?
- 11 • Is “modernizing and right-sizing the upgrade options considered when an upgrade is
12 needed” intended to explore the possibility of undertaking larger than needed upgrades
13 to make room for future interconnections? Or does Staff simply intend to reevaluate
14 the current approach of designing upgrades to produce the minimum incremental
15 capacity required to facilitate the specific interconnection?

16 PGE looks forward to discussing these questions at the upcoming workshop.

17 **C. Process**

18 Staff proposes that Phase I of Docket UM 2111 involve one or more workgroups that would
19 meet at least monthly to “fully refine issues and develop recommendations (consensus or document
20 different positions).”⁵ Based on PGE’s experience in Docket UM 2005, PGE has found that a
21 workgroup can be effective for educating Staff and stakeholders regarding technical issues and
22 constructively communicating stakeholders’ concerns. However, PGE is concerned that some of
23 the issues Staff identified for resolution in Docket UM 2111 are not likely to be successfully
24 resolved through consensus in the workgroup process, given the extensive dispute history and lack
25 of common ground. Therefore, PGE recommends Staff carefully consider in this scoping process

⁵ Staff’s Scoping Announcement at 5.

1 which issues are good candidates for the workgroup process and which issues are better addressed
2 through other processes. PGE also seeks clarity regarding how workgroup processes will inform
3 Commission determinations of disputed issues and, eventually, new or revised rules. Finally, PGE
4 requests clarification regarding the expected process for resolving issues not addressed in a
5 workgroup.

6 **D. Additional Recommendations**

7 PGE provides the following additional recommendations for Staff’s consideration during
8 the scoping process:

- 9 • In revising the interconnection process and policies, Staff and stakeholders should consider
10 how an affordable, equitable, flexible, and resilient energy platform can empower customer
11 choice and maximize value for customers, communities, and utilities.
- 12 • As Docket UM 2111 begins, it will be important to understand how recently adopted state
13 policy will be implemented in this docket, while also minimizing the shift of significant
14 costs or risks onto customers—especially environmental justice communities.
- 15 • Along with any reforms adopted in Docket UM 2111, the Commission should consider
16 how utilities will recover costs imposed upon them by interconnection customers and the
17 costs of utility investments that proactively expand the utility’s abilities to interconnect
18 small generating facilities.
- 19 • The outcome of this docket must ensure utility customers are protected from unreasonable
20 cost increases that could result from small generator interconnections, and that
21 interconnection customers are provided with clear and simple information.
- 22 • PGE supports evolution of the interconnection process and corresponding regulations to
23 allow distributed energy resources to be active participants in the power system.

1 **E. Conclusion**

2 PGE appreciates Staff's commitment to undertaking a thoughtful scoping process and the
3 opportunity to provide these initial comments. PGE looks forward to working with Staff,
4 stakeholders, and the Commission on these important issues.

DATED: February 24, 2022.

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