

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

AR 659

In the Matter of

Rulemaking to Update Division 82 Small
Generator Interconnection Rules, and
Division 39 Net Metering Rules.

COMMENTS OF THE OREGON
SOLAR + STORAGE INDUSTRIES
ASSOCIATION

I. INTRODUCTION

In accordance with the Public Utility Commission of Oregon (“Commission” or “OPUC”) Staff’s Schedule Announcement dated October 22, 2024, the Oregon Solar + Storage Industries Association (“OSSIA”) respectfully submits these comments on Portland General Electric Company (“PGE”), Idaho Power Company (“Idaho Power”), and PacifiCorp’s revised Small Generator Interconnection Agreements (“SGIAs”) filed on September 26, 2024, October 15, 2024, and October 21, 2024 respectively.¹

II. COMMENTS

A. Nameplate Rating

OSSIA recommends that the utilities’ SGIAs should add language clarifying the Nameplate Rating in the utilities’ SGIAs Articles 1 and 6 is the Alternating Current (AC) output to the utility, not a Direct Current (DC) rating.

B. Continuity Between the Utilities’ SGIAs and their Attachment Schedules

¹ PGE’s Revised Interconnection Agreement for Small Generator Facility, in Compliance with Order No. 24-068 (Sept. 26, 2024) (herein after “PGE SGIA”); Idaho Power Company’s Revised Interconnection Agreement for Small Generator Facility (Interconnection Agreement) (Oct. 15, 2024) (herein after “Idaho Power SGIA”); PacifiCorp’s Revised Interconnection Agreement for Small Generator Facilities (Oct. 21, 2024) (herein after “PacifiCorp SGIA”).

OSSIA recommends that the Utilities' SGIA's should be more aligned, so contractors can have standardized operations when working with different utilities. Specifically, OSSIA raises continuity issues with the following differences between the SGIA's:

1. The utilities' SGIA attachment schedules use different sequences and are different lengths. PGE's SGIA uses a letter sequence and PacifiCorp's SGIA uses a number sequence.² Additionally, the attachment schedules are different lengths, as PGE's SGIA has eight attachments and PacifiCorp's has six attachments.³
2. The One-Line Diagram attachment instructions are inconsistent between PacifiCorp's SGIA and PGE's SGIA.⁴ PacifiCorp wants the design as proposed, and PGE wants the as-built design filled in upon project completion.⁵ PGE's approach raises concerns about changing the agreement after signature.
3. The order of signatures is different for PacifiCorp's SGIA and PGE's SGIA.⁶
4. The references to the Oregon Administrative Rules (OAR) that govern the interconnection dispute resolution are different in PacifiCorp's SGIA and PGE's SGIA.⁷ OSSIA recommends that the utilities' SGIA's all consistently follow the OAR numbers.

C. Requests for Clarification

OSSIA requests additional clarification or instruction on the following items:

² Compare PGE's SGIA at Attachment A through Attachment H to PacifiCorp's SGIA at Attachment 1 through Attachment 6.

³ *Id.*

⁴ Compare PacifiCorp's SGIA at Attachment 2 to PGE's SGIA at Attachment E.

⁵ *Id.*

⁶ Compare PacifiCorp's SGIA at Article 10 to PGE's SGIA at Article 10.

⁷ Compare PacifiCorp's SGIA at Article 7 to PGE's SGIA at Article 7.

1. OSSIA requests clarification as to whether the utilities expect Critical Milestones to be declared for residential customer projects.
2. OSSIA requests clarification on an apparent conflict in PGE’s SGIA, between the requirements of Attachment D with the language in Attachment G, that states “no additional operating requirements have been placed on” the project.⁸
3. OSSIA requests clarification on the placement of periodic maintenance requirements in Attachment D, instead of in Attachment G as an additional operating requirement.

III. CONCLUSION

OSSIA recommends that the Commission should direct the utilities to make the requested changes, standardize the identified inconsistencies and clarify where appropriate.

Dated this 6th day of November 2024.

Respectfully submitted,



Alyssa Forest
Oregon Solar + Storage Industries Association
P.O. Box 14927
Portland, OR 97293
Telephone: 916-960-8884
alyssa@oseia.org

Policy and Regulatory Affairs Director for the
Oregon Solar + Storage Industries Association

⁸ PGE SGIA at Attachment D and Attachment G.