

Comments of ConnectDER Regarding Additional Topics for UM 2111

Oregon Public Utility Commission
201 High St SE #100
Salem, OR 97301

May 30, 2025

Re: UM 2111 Request for Additional Proposals

ConnectDER appreciates the opportunity to propose additional issues to consider in Phase 2 of UM 2111. We respectfully request that the Commission consider including a discussion around setting a statewide process for utilities to review and approve meter-socket adapters (MSAs) for the purpose of facilitating the deployment of distributed energy resources.

Meter Socket Adapter Background

MSAs are proven, safe, and innovative technologies that simplify the interconnection process for distributed energy resources and significantly reduce associated costs for consumers. MSAs lower costs for project deployment by enabling residential customers to bypass main panel upgrades, which can cost up to \$7,000 in Oregon, in favor of a lower-cost, easy-to-install technology. MSAs also streamline work for solar, battery storage, and EV charger installs by eliminating the need for complex and site-specific wiring solutions, reducing interconnection timelines and saving materials and labor costs.

Today, MSAs are accessible in utility service territories serving over 35 million Americans nationwide, including in Oregon. Currently, Oregon does not have a standardized process for electric utilities to test and approve MSAs. This lack of standardization has led to differential access to this cost-saving technology based on which utility service territory a customer lives in. MSAs are currently allowed for Oregon consumers served by Pacific Power (they refer to MSAs as "meter-mounted devices")¹ and co-op utility Consumers Power, but are "not allowed" in Portland General Electric (PGE) territory.²

¹ See Section 3.5.7 Pacific Power 2022 Electric Service Requirements Manual, R1 (2024), https://www.pacificpower.net/content/dam/pcorp/documents/en/pp-rmp/electric-service-requirements/ESR_FULL.pdf.

² See Section 3.9.7 in Portland General Electric Service Requirements January 2024, https://downloads.ctfassets.net/416ywc11aqmd/2PmrU1CptipEQUJAD1Ooyb/43581de150c7128aa885739bcc0a8b25/ESR_Current_Book_1.37.47_PM.pdf, p 39.

The unequal access to cost-saving technology for Oregon consumers has already impeded adoption of distributed energy resources. Customers in PGE territory that would otherwise have installed distributed energy resources that promote Oregon’s climate, clean energy, and electrification goals have been unable to when those installations are cost-prohibitive without an MSA. Solar companies operating in Oregon have reported PGE customers who have not proceeded with a solar installation because of the high cost of a service panel upgrade, which could have been avoided with an MSA.

ConnectDER had previously filed comments to Portland General Electric on their draft revised 2025 Distribution Interconnection Handbook, in line with the August 15, 2023 staff report in Docket No. AR 659 that identified PGE’s Interconnection Handbook as the “appropriate venue for adopting these detailed specifications” relating to requirements for integrating distributed energy resources with electric power grids.³ In their May 16, 2025 response, Portland General Electric replied to our comments declining to include testing criteria in their handbook, and instead offering to discuss testing directly with manufacturers:

“PGE does not think that specific testing and approval criteria for MSAs are appropriate for inclusion in the Distribution Interconnection Handbook. PGE instead believes that when a MSA is approved, the language that represents a blanket prohibition against the use of MSAs would be adjusted to reflect the conditions for use of any approved equipment. PGE is willing to discuss with interested individuals the testing criteria they have used to evaluate the safety of MSAs, historic results, and procedures where a manufacturer can request retesting or testing of newer models with the specific manufacturers of MSAs.”

As an MSA manufacturer, ConnectDER plans to work directly with PGE to perform testing of our MSA models and is already engaging in those conversations. In addition, we believe there is an opportunity for Oregon to set clear and consistent guidelines to help provide standardization to utilities conducting testing and provide transparency to meter socket adapter companies and DER installers. These guidelines could be similar to the existing utility review frameworks for other customer-owned equipment. We have found a lack of state-level

³ See *Public Utility Commission of Oregon. (2023, August 22). Docket Nos. UM 2111 and AR 659 Staff Report: Request to Move Phase 1 Interconnection Rules to Formal Rulemaking. <https://edocs.puc.state.or.us/efdocs/HAU/um2111hau171817.pdf>.*

standardization creates inefficiencies and barriers to adoption by utilities statewide. Without standardized, publicly-available guidelines that set requirements for review processes, manufacturers can face inconsistent timelines and unclear communication around review requirements, creating a lack of market certainty that is harmful to businesses in the state. States like Maryland and Connecticut have overcome these barriers by adopting guidelines through the regulatory process. In addition, in some states, the utilities have requested that the Commission establish requirements around testing and approvals to help them to shape their processes. By establishing clear guidelines for approving MSA models, the Commission can drive consistency across utilities and save utilities time associated with bespoke testing for device approval.

Rationale to include MSA approval processes in UM 2111

The Commission has taken important steps to improve interconnection policies and procedures through AR 659 and UM 2111. We appreciate the Commission's focus on reducing interconnection delays for DERs and resolving interconnection inefficiencies. Inconsistent access to MSAs and distinct utility review processes mean Oregonians still face inefficiencies and unnecessary costs to interconnect DERs depending on which utility service territory they live in. Including MSAs in UM 2111 is relevant and necessary because it is the clearest opportunity for the Commission to address these pain points. By setting standard MSA review guidelines for utilities, the Commission can streamline interconnection processes and improve outcomes for Oregon businesses and consumers.

Recommendation

In Staff's May 1, 2025 filing, Staff is interested in stakeholder feedback on the balance between "flexibility and prescriptive requirements" around interconnection; we believe that while utilities should be responsible for managing testing and approvals, the current situation demonstrates that Oregon would benefit from guidelines that set standard safety requirements and timelines for device approvals.

Oregon can follow a path that has been well-established in other jurisdictions to enable adoption of innovative technologies that reduce costs for consumers. In states like Maryland, Connecticut, and Illinois, public utility commissions have worked with utilities and stakeholders to establish basic product safety requirements and standard processes for introducing new

customer-owned MSAs to ensure consumer protection while enabling customer choice. On March 26, 2025, the California Public Utilities Commission issued a Proposed Decision that acknowledged the customer and clean energy benefits of meter socket adapters and required that the state’s investor-owned utilities “shall each update their respective electric service requirement manuals to include descriptions of customer-owned meter socket adapter installation processes and procedures.”⁴ Oregon can follow a similar path by including MSAs in Phase 2 of UM 2111.

ConnectDER would appreciate the opportunity to work with stakeholders in UM 2111 to establish a process that would create benefits for MSA manufacturers, utilities, businesses, and consumers. We’ve participated in processes in other states that have created market certainty and allowed for utilities to successfully conduct device review. Those guidelines set by other Commissions consistently include:

- **Clear timelines** to test and approve new MSAs after the manufacturer submits a request for approval, typically 60 days.
- **Clear and consistent minimum safety standards to be considered for approval**, including certain national standards and all applicable tests through a Nationally Recognized Testing Laboratory (NRTL).

We appreciate the opportunity to recommend topics to include in Phase 2 of UM 2111. Please let me know if you have any questions. Thank you for considering these comments.

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⁴ See *California Public Utilities Commission. (2025, March 26.) Proposed Decision Of Commissioner Houck, Phase 4 Track A Decision Establishing New Electric Service Line Upsizing Rules, Modifying Electric Line Extension Rules And Reporting Requirements, And Implementing Assembly Bill 157.*
<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M560/K138/560138225.PDF#page12>, page 124.