

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2111

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation Into Interconnection Process
and Policies

COMMENTS ON HANDBOOK
REDLINES ON BEHALF OF THE
COMMUNITY RENEWABLE
ENERGY ASSOCIATION,
RENEWABLE ENERGY
COALITION, AND THE OREGON
SOLAR + STORAGE INDUSTRIES
ASSOCIATION

The Renewable Energy Coalition (the “Coalition”), Oregon Solar + Storage Industries Association (“OSSIA”), and the Community Renewable Energy Association (“CREA”) (collectively the “Interconnection Trade Associations”) respectfully submit these comments on proposed rules OAR 860-082-0030(1)(b) related to interconnection handbooks. The Interconnection Trade Associations propose the following redlines to Oregon Public Utility Commission (“Commission”) Staff’s proposed rules filed on June 13, 2023. The Interconnection Trade Associations recommend the following changes:

OAR 860-082-0030(1)(b) Interconnection requirements handbook. Each public utility must post an interconnection requirements handbook on its public website. Prior to revising its interconnection requirements handbook, a public utility must provide public notice **and notice to interconnection customers with an interconnection agreement or active interconnection request. The public utility must also provide-and** an opportunity to comment and the public utility must respond to any comments received. **If a person challenges the revisions to the interconnection requirements handbook, then the public utility will file the**

revised interconnection requirements handbook with the Commission for review and approval. The public utility would bear the burden of proof to demonstrate the revisions to the interconnection requirements handbook are reasonable. Each public utility must file a compliance filing of its interconnection requirements handbook to be reviewed by the Commission that incorporates the preferred default settings in OAR 860-082-0030(1)(c).

The proposed notice requirements will ensure that developers with operating projects and projects that are in development will become aware of a utility's proposed changes to its interconnection handbook. If a party has concerns with the utility's proposed changes to its interconnection handbook, then the utility should be required to file the proposed changes with the Commission for Commission review and approval. The Interconnection Trade Associations are open to suggestions on the review and approval process, but in any process the utility should bear the burden to demonstrate its proposed changes are reasonable.

These recommended changes will provide more certainty to developers when selecting sites to develop. Currently, developers rely on information from the utilities, including their interconnection handbooks, when making business decisions, including but not limited to the cost and feasibility of projects, selection of land parcels for development, and obtaining financing. If the utility requires an upgrade unrelated to safety, reliability, or adverse system impacts that was not specified in the utility's handbook, then that can disrupt the developer's siting choices and add unplanned costs. These recommendations will increase transparency and improve the working relationship between the utilities and the developers.

Dated this 3rd day of July 2023.

Respectfully submitted,

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