



Portland General Electric
121 SW Salmon Street • Portland, OR 97204
portlandgeneral.com

September 4, 2024

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street, S.E.
P.O. Box 1088
Salem, OR 97308-1088

RE: AR 659 – In the matter of Rulemaking to Update Division 82 Small Generator Interconnection Rules, and Division 39 Net Metering Rules
UM 2111 – In the matter of Public Utility Commission of Oregon, Investigation into Interconnection Process and Policies

In Commission Order No. 24-068, the Commission ordered Portland General Electric Company (PGE) to complete the update to its legacy data no later than one year from the date of the order and directed that *“[t]he utilities should prioritize congested feeders, use and share updated information as it becomes available, and provide Staff with progress updates every six months.”* In compliance with the Commission’s directive, PGE provides the following progress update.

PGE has spent the time since the order preparing to update the nameplate values for net metering projects. Prior to analyzing and updating the values for legacy projects we needed to implement the new regulations formalized in AR 659 regarding nameplate capacity and maximum export capacity. This will allow PGE to store the corrected values and have them consistently represent the size of the project across different vintages of projects. The system upgrades implementing the new size definitions went into effect on August 15, 2024. PGE is now capturing new applications using the new nameplate definitions.

Additionally, PGE has been evaluating the current systems that leverage and track the nameplate capacity of NEM facilities to understand the process to accurately overwrite the existing nameplate values. In some cases, those systems were not designed with the ability to edit the existing size characteristics of each facility. The IT/software development activities for those systems are ongoing.

PGE has received the system data from the Energy Trust of Oregon for projects that received incentive funding. The analysis of pairing the Energy Trust’s information with the specific site information included within PGE’s records is ongoing. This is a significant amount of work as PGE must review 14,000 projects to ascertain the correct nameplate value to use moving forward.

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Upon completion of the system development efforts and the often manual review to determine the appropriate nameplate across the ETO and PGE datasets, the data will be loaded into PowerClerk and will feed through the differing systems used to evaluate new applications. This project is targeted for completion within the one year timeline specified in the AR 659 order.

Please direct any questions regarding this filing to Chris Pleasant at the following email address Christopher.pleasant@pgn.com Please direct all formal correspondence and requests to the following email address pge.opuc.filings@pgn.com

Sincerely,

\s\ Robert Macfarlane

Robert Macfarlane
Manager, Pricing & Tariffs

cc: Service List – AR 659 and UM 2111