

December 2, 2019

***VIA ELECTRONIC FILING***

Public Utility Commission of Oregon  
201 High Street SE, Suite 100  
Salem, OR 97301-3398

Attn: Filing Center

**Re: UM 1930—PacifiCorp’s Update on State-Jurisdictional Small Generator  
Interconnection Applications**

On November 8, 2019, the Public Utility Commission of Oregon (Commission) issued its Order No. 19-392 approving with modification the October 4, 2019 Staff Report for docket UM 1930, which adopted additional elements of the Community Solar Program. In Order No. 19-392, the Commission directed PacifiCorp d/b/a Pacific Power (PacifiCorp) to provide additional information on its queued state-jurisdictional interconnection requests.<sup>1</sup> In accordance with Order No. 19-392, PacifiCorp submits to the Commission the requested update.

**Update Request 1**

For all Oregon small generators that have applied for interconnection but not yet received a study agreement:

- The status of providing the agreement or study.
- The date on which PAC will provide the study results.

*PacifiCorp Response:*

*All Oregon small generators that have applied for interconnection have received a study agreement.*

**Update Request 2**

For all Oregon small generators that have executed a study agreement and not yet received the study:

- The status of providing the agreement or study.
- The date on which PAC will provide the study results.

*PacifiCorp Response:*

*PacifiCorp currently has approximately 25 small generators that have not yet received their study. At this time, PacifiCorp estimates that the studies for these generators will be completed between the third quarter of 2020 and the first quarter of 2022. That said, these estimates assume that PacifiCorp continues to process generator interconnection requests using a serial-queue order process—processing requirements that are currently the subject of a months-long*

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<sup>1</sup> Docket UM 1930 Order No. 19-392 at 5, adopting Staff’s recommendations in the October 4, 2019 Staff Report attached as Appendix A except where modified by Ordering ¶¶ 1-4, and Appendix A at 16-17.

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*public stakeholder process examining potential reforms. PacifiCorp has recently posted to OASIS a second revised straw proposal and asked for written stakeholder feedback by December 9, 2019. In addition, PacifiCorp noted in its second revised straw proposal that it is currently aiming to file a request to reform its processing requirements with Federal Energy Regulatory Commission (FERC) by the end of 2019. Depending on the details of the proposal to FERC, FERC's ruling on that proposal, and the proposal's ultimate impact on state-jurisdictional requests for interconnection service, the study timing estimates provided above could be affected.*

PacifiCorp requests that all formal information requests regarding this matter be addressed to:

By email (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232

Informal inquiries may be directed to Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934.

Sincerely,



Etta Lockey  
Vice President, Regulation