



Oregon

Kate Brown, Governor

Public Utility Commission

201 High St SE Suite 100

Salem, OR 97301-3398

Mailing Address: PO Box 1088

Salem, OR 97308-1088

503-373-7394



UM 2005 Investigation into Distribution System Planning: All Stakeholder, Energy Trust of Oregon, and Public Utility Commission Staff Surveys

On March 22, 2019, the Public Utility Commission opened an investigation into Distribution System Planning (DSP)¹. The key drivers for this investigation are increasing insight into utility distribution system planning and investments and ensuring that plans and investments are optimizing system efficiency and customer value. The first phase of this investigation focuses on establishing a shared understanding of what distribution system planning currently looks like for Oregon's investor-owned utilities and how it is evolving, so that the Commission can issue guidance for utilities to file initial distribution system plans. Staff has released a Utility Survey to document utility perspectives and practices. In addition, Staff finds that it is critical to create a transparent understanding of all stakeholders' views on how the Commission can foster insight and optimization through DSP.

Staff requests that all interested stakeholders share their perspective in the form of written survey responses. Further, Staff has prepared additional survey questions to capture the enhanced roles of both OPUC Staff and the Energy Trust of Oregon within utility distribution system planning. All responses will be posted to the docket to support a shared understanding among stakeholders.

The survey is a continuation of the Utility Survey and divided into three sections:

- Section D – Questions for all stakeholders
- Section E– Questions for Energy Trust of Oregon
- Section F – Questions for PUC Staff

Stakeholders are welcome to answer all or some of the survey questions in Section D, and are welcome to provide additional information or suggestions that are relevant to the general purpose of this document.

Staff requests that interested stakeholders respond in writing to the questions contained in Section D of this document to the extent possible based on current practices and knowledge. Further, Staff requests that the Energy Trust of Oregon respond in the same manner to section E of this document. **Responses should be filed as comments in Docket No. UM 2005 by July 10, 2019.** PUC staff plans to respond fully in writing to Section F by this date as well.

Please direct questions to Caroline Moore at (503) 480-9427 caroline.f.moore@state.or.us.

¹ Commission Order No.19-104.

Section D All Stakeholders

In Section D all interested stakeholders are asked to provide responses to the following questions:

- 1) Commission principles for distribution system planning:
 - a) What principles should the Commission adopt? Please explain and define.
 - b) What level of specificity is most helpful to include in principles?
- 2) Maximizing customer value:
 - a) How you would define “maximize customer value” in the context of distribution system planning?
 - b) What considerations (from Staff whitepaper or other thoughts) are most important to focus upon when maximizing customer value in planning for the distribution system?
- 3) Evaluation of utility distribution system plans:
 - a) Which criteria or metrics should the Commission use in evaluating the proposed distribution plans (Plans)?
 - b) How will your organization evaluate and/or otherwise use the proposed Plans?
 - c) How should distribution system plans be integrated with other planning activities, such as resource planning, interconnection, transmission, or others?
 - d) What are reasonable options for stakeholder participation in the planning process: direct engagement in the development of plans, the review of draft and final plans, other?
 - e) How often should a utility distribution plan be submitted for Commission review?
- 4) Planning Scenarios:
 - a) How should the selection of scenarios used in distribution planning be determined?
 - b) What criteria should be used by utilities to identify relevant planning scenarios?
- 5) Access to grid and planning data by customers and third parties:
 - a) Discuss categories of data needed by third parties to:
 - i. Participate in developing system plans.
 - ii. Critically review proposed plans.
 - iii. Prepare commercial projects in response to plans.
 - b) Identify any categories of data that may be unsuitable for access, e.g. for reasons of security, trade secret, customer privacy, or burdensomeness.
 - c) How should and in what format should the results of a hosting capacity analysis or native loading analysis be made available by utilities? Please indicate which formats are currently available and which are not currently available.
 - d) How should the commission evaluate utility investments that enable more transparent interconnection data to be made available? What are the costs and benefits that the Commission should consider?
- 6) Are there other issues or topics not covered here that are relevant to discuss in distribution system planning? If so, what are they and why are they relevant?

Section E

Energy Trust of Oregon

Energy Trust of Oregon, as a nonprofit third-party administrator of energy efficiency and small scale renewable programs in Portland General Electric and PacifiCorp's Oregon territory, please provide the following information. Note: Idaho Power (IPC) will include DER responses in their reply to Utility Survey Section C because Energy Trust does not provide these services in IPC's service territory.

- 1) Program results: For both electric energy efficiency and small scale renewable programs:
 - a. Provide annual savings / generation for years 2014-2018 for PGE and PAC service territories.
 - b. At what level of granularity are these results available? Locational? Hourly?
 - c. What program result details are shared regularly with utilities?
 - d. What level of certainty do you have in those results? Estimated? Metered/measured? Pre/post evaluation?
 - e. Are there different levels of certainty associated with results for different types of measures and resources? If so, please explain.

- 2) Planning and program design:
 - a. How are program results forecasted?
 - b. At what level of granularity are program impacts forecasted? Broadly across the service territory or by region? By location?
 - c. How is planning data shared with utilities?
 - d. Use of program targeting to meet specific utility system needs as a non-wires alternative.
 - e. How do you incorporate customer accessibility and inclusivity into program planning and design?

- 3) Are there other issues or topics not covered here that are relevant to discuss in distribution system planning? If so, what are they and why are they relevant?

Section F
Public Utility Commission Staff

In Section F, PUC Staff plans to provide responses to the following questions:

- 1) Planning: Discuss the current regulatory oversight process for utility distribution system planning related to:
 - a. Grid modernization
 - b. Distributed energy resources
 - c. Efficient integration of distributed energy resources
 - d. Load growth
 - e. Bulk system planning
 - f. Maintaining system reliability and safety
- 2) Current utility system operations and maintenance: Discuss the current regulatory oversight process for utility operations and maintenance of the distribution system including:
 - a. System reliability and safety
 - b. Efficient integration of distributed energy resources
- 3) Cost Recovery: Discuss the current typical regulatory process for utility recovery of costs related to the distribution system including:
 - a. Grid modernization
 - b. Replacement of aging infrastructure
 - c. Operations and maintenance
 - d. System expansion for load growth
 - e. R&D and programs
- 4) Are there other issues or topics not covered here that are relevant to discuss in distribution system planning? If so, what are they and why are they relevant?