



# 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

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## Summary of December 20 Workshop



The workshop held December 20 was the first to combine the workstreams to mainly focus on issues related to Screens, Study Methods, and Modern Configurations. While screens will be the major focus, this workshop discussed approaches to redlining the SGIP and NEM rules for IEEE 1547 Updates, Joint Utility comments on issues from both workstreams, as well as Staff's broad outline of a straw proposal for moving forward to the rulemaking phase of the docket. The following are highlights of the [discussion](#) as recorded by Staff, with questions for stakeholders italicized. If you believe anything is missing or in error please reach out to Ted Drennan.

### Hosting Capacity Analysis

The meeting started with a question related to hosting capacity analysis. Staff asked informally about interest in initiating a data transparency and hosting capacity focused discussion parallel to the current issues being discussed by the UM 2111 working groups. Discussion of utilities' current hosting capacity maps have not been prioritized in the DSP dockets during the review of utility DSP filings, but Staff wanted to gauge bandwidth and the usefulness of initiating these discussions in the first part of 2023 based on the availability of technical support from national laboratories.

*Please feel free to email Staff with any reactions to this concept.*

### Straw Proposal

Staff presented the broad outlines of a proposal to move to a rulemaking next year. This involves continuing to work on issues through the workshops. Depending on progress levels, Staff would present a set of proposed red-lines to the rules in March or April of 2023. These redlines would incorporate the consensus positions, as well as Staff's approach to the issues without consensus. There would be at least one additional workshop for Staff to present the proposal.

Following Staff's proposed redlines, and workshop, there would be two rounds of comments in the UM 2111 docket. These comments would help guide any revisions to the redlines, as well as help to document both consensus and competing viewpoints on issues addressed. Staff would prepare a final report for the Commission documenting the parties positions, along with Staff's proposal for the OAR redlines. This would be the vehicle to open a formal rulemaking process.

From the discussion it was apparent that there are several potential issues at play that need to be addressed. One threshold issue involves combining the [NEM](#) and [SGIP](#) rules in the OARs. Staff believes this is something that would be beneficial in the long-term, but at this point is not clear on the amount of work will need to be undertaken. As a takeaway from the discussion, Staff intends to address this prior to the next workshop.

*Staff would like to know if the framework of the straw proposal works for parties. Staff is interested if parties have other suggestions on a smooth process to move from the workshops to the rulemaking.*

### **Joint Utility Comments**

Following discussion of Staff's straw proposal was discussion of comments, and redlines, circulated by the Joint Utilities. The first topic discussed here were the redlines related to incorporation of the revised IEEE standards, IEEE 1547 – 2018 to be specific. The redlines removed references to specific sections of the IEEE standards as these can change from revision to revision. In the redlines for both Divisions 39 and 82 the Joint Utilities also provided revisions to other, dated standards, such as those with American National Standards Institute, where the latest version is from June 2022 as opposed to July, 2001. Also updated is UL 1741 Inverters, Converters, and Controllers for Use in Independent Power Systems from January 2001, updated to September 28, 2021. Staff believes use of the most current standards is appropriate.

*One question Staff has is the overall impact of updating the UL and ANSI standards. Would there be any material impact for customers looking to interconnect? Is the equipment currently available to meet these revised standards?*

The Joint Utilities also propose that equipment which needs replacement meet the current standards. This is an addition to 860-039-0050(6):

When a customer-generator needs to replace equipment that (a) was used to meet the requirements of IEEE Standards when interconnection of the net metering facility was originally approved and (b) has reached its end-of-life, the customer-generator must install replacement equipment that meets IEEE Standards.

There was discussion about the addition, and whether it needed some additional language for clarity. Others questioned if there should be exceptions for legacy equipment. That is, should the systems only be required to meet the obligations that were in place when the original interconnection agreement was signed.

*Staff would like to know if other stakeholders agree with the Joint Utilities proposal for end-of-life equipment replacement.*

Additional discussion focused on the Joint Utilities proposal to incorporate language that would allow for a limited reopening in the future to update the IEEE 1547 references. That is, not an extensive investigation similar to the current UM 2111 process. Staff appreciates the approach, but is not sure if a rules update could be narrowly limited, especially if there are major issues changing in the IEEE 1547 requirements. The IEEE updates in the past have been incremental – the changes in IEEE 1547-2018 however were substantial. Staff believes limited reopening for incremental changes is appropriate.

*Do parties have other ideas for limited updates of the IEEE 1547 standards?*

The Joint Utilities also eliminated language in the definition of “Point-of-Interconnection.” As part of the discussion it was asked if there was need for a Reference Point of Applicability (RPA) definition in the rules. One argument is that the RPS does not apply to every applicant, so it does not need a definition in the OARs.

*Do parties believe there is need to define the RPA in the OARs?*

Other discussion focused on the requirements, and where they should be housed, rules, tariffs of utility interconnection ‘handbooks’. Not all of the utilities use ‘handbooks’ (or call them that). PacifiCorp used a document titled “Engineering Services & Asset Management Policy 138”, PGE has a Distribution Interconnection Handbook, and Idaho Power relies generally on a tariff approach. There continues to be some question as to the impact stakeholders may have on updates to a utility handbook, or tariffs, and how what level of requirements should be included in the handbook.

There was also discussion on the use of standard-format files containing the standard settings for interconnecting customers. Staff believes standard requirements that are easy for developers to access for specific feeders would be beneficial for all parties going forward. While parties point out for larger generators there may be very specific requirements, it would seem reasonable for utilities to have simplified requirements for smaller resources.

One remaining question involved the amount of utility circuits that used fast reclosing. Fast reclosing is less than two seconds. It appears that the majority of the PGE and PacifiCorp service territory relies on fast reclosing.

In prior comments the Joint Utilities have also proposed using 80 percent of minimum load as opposed to IREC’s 100 percent for the following:

Establishing the Threshold at Eighty Percent where there is a Dedicated 1 Transformer Balances the Need to Ensure Reliability and Safety with Fast-Tracking DER Interconnections.

The comments indicated this was in line with IEEE 1547-2018 standards, but this was corrected in the workshop. The citation should be to Section 4.12.6 in the 2023 version, currently under development. Staff is uncertain as to adopting standards that are currently draft, however setting standards that will need to be changed in the near future does not seem to be the most efficient use of time.

*Do parties object to adoption of standards in the currently draft IEEE 1547 2023 edition/ Are there other updates in the 2023 version that should be incorporated here as well?*

The issue of requiring customers to include completed interconnection agreement as part of the application was also discussed. One potential issue involves the contractors submitting applications on behalf of the actual customer. Utilities have seen customers contact multiple contractors, who submit multiple application on behalf of the customer for the same location. In these cases it could be problematic to require an executed interconnection agreement as part of the application process.

*Do parties support including a requirement of an executed interconnection agreement for Tier 1 applicants?*

The final issue discussed was the impact of using nameplate capacity in DC as opposed to changing to AC for a more complete reflection of the system and availability. PGE estimated it would take 3,000 hours to examine the 12,000 individual projects. The effort does sound large, but it is likely that some effort will need to be undertaken for accuracy. The Joint Utilities were going to meet with Energy Trust of Oregon to see if the Energy Trust database could help streamline the process.

*Staff would like to know if the Energy Trust and Joint Utilities were able to limit some of the work required to move towards ratings in AC. Staff is also interested in any other approaches to standardizing projects in terms of AC. Would focusing on generation-limited feeders to begin with be an option worth considering?*

## **Next Steps**

The following table is contains the topics for the next set of workshops. As the workstreams have been combined the upcoming workshops were renumbered to reflect this and avoid potential confusion. This includes the currently scheduled workshops for Phase 1 of the UM 2111 investigation.

<b>Combined Workstreams</b>			
<b>Description</b>	<b>Event Date</b>	<b>Workshop Topic</b>	<b>Pre-meeting deliverable</b>
Workshop 10	January 17, 2023	Penetration Screens	
Workshop 11	January 31, 2023	Tier 4 Study and timelines Fast-track Screen Reports	
Workshop 12	February 15, 2023	TBD remaining issues – redline rule discussions	
Workshop 13	February 28, 2023	TBD – Staff intends to open a rulemaking in the first/second quarter of 2023. Final approach is not yet determined, but these workshops could be held for that purpose.	
Workshop 14	March 15, 2023		
Workshop 15	March 28, 2023		

Staff appreciates stakeholders taking the time and effort to participate in these discussions. To make these productive as possible, *as mentioned earlier, Staff would like to know, as early as practicable, if utility technical experts are unavailable to attend future workshops.* If necessary we will look to reschedule such meetings.

Please be sure to circulate all discussion, redlines, comments, etc. to the Service List as listed on the [OPUC UM 2111 webpage](#).

For any questions or concerns please contact:

Ted Drennan

503-580-6380

[ted.drennan@puc.oregon.gov](mailto:ted.drennan@puc.oregon.gov)

To receive meeting notices and agendas for this docket, send an email to [puc.hearings@puc.oregon.gov](mailto:puc.hearings@puc.oregon.gov), and ask to be added to the service list for Docket No. UM 2111. You will then receive emails with workshop details, when new documents have been added to the docket, or there is a change to the schedule.