

## UM 2111 Announcement

### UM 2111 Stakeholders:

This announcement contains additional questions from Oregon Public Utility Commission (OPUC) Staff related to the scoping approach for the UM 2111 Investigation into Interconnection Process and Policies.

### Background

Commission Order No. 20-211 opened [Docket No. 2111](#) as an umbrella docket to, “consider the broad range of interconnection issues in a manner that is inclusive of all generator types; organized into manageable segments; and builds off of existing efforts and pilot activities.”<sup>1</sup> On January 12, 2022 Staff released an announcement regarding the relaunch of the docket in the first quarter 2022. On February 11, 2022, Staff released a scoping announcement containing Staff’s approach to issues and prioritization. Stakeholders, including Interstate Renewable Energy Council, Inc. (IREC), PacifiCorp, Portland General Electric (PGE), Oregon Solar + Storage Industries Association (OSSIA) and the Interconnection Trade Associations (Trade Associations) made up collectively of, Community Renewable Energy Association (CREA), Northwest & Intermountain Power Producers Coalition (NIPPC) and Renewable Energy Coalition (REC).

The comments were generally supportive of Staff’s proposal of a phased approach that addresses the more pressing needs first. There were however differences on the prioritization of issues to address first. One item that many commentators thought should be addressed early were the Interconnection Processes.

Following the comments, a scoping workshop was held on March 8, 2022. At the scoping workshop presentations were made by Staff, PGE, Trade Associations, OSSIA and IREC, with additional discussion following. Parties had some areas of commonality that Staff believes could be explored with a slight delay in the earlier proposed schedule, see below. As such, Staff is presenting a list of questions for stakeholders to comment on in writing by March 25 for discussion at a second scoping workshop sometime the week of March 27.

Original Date	Revised Date	Activity
Feb 11		Release Relaunch Announcement
Feb 24		Comments on Issues, Prioritization, Phase 1 work group process from Stakeholders
March 9		Workshop to discuss issues lists and prioritization
	March 11	Announcement with second set of questions released
	March 25	Written comments responding to some or all of Staff questions (listed below)
	TBD	Second Scoping Workshop
April 5	April 19	Public Meeting for Commission to opine on Staff’s suggested approach
April →	April/May →	Work sessions scheduled

### Clarification of Staff’s Prioritization Approach:

Staff is not just looking to prioritize projects with community benefits (likely a wide set of Oregon jurisdictional generators), we are, more practically, trying to target the issues that will allow cost-effective interconnection for the specific types of distributed energy resources (DERs) that the state is driving with both taxpayer and ratepayer funds. 1. This includes generators like, “community renewable energy projects” and “community resiliency projects” defined in HB 2021 §29 and §30(4)(b), and generators utilizing “distribution connected

<sup>1</sup> See Docket No. UM 2111, Commission Order No, 20-211, July 6, 2020, Appendix A, p. 5.

March 11, 2022

technologies” under HB 3141 §1 which are currently defined as “A “smart inverter” that is part of a solar generation system and is capable of providing grid support; or 2. A battery energy storage system with a smart inverter and/or integrated controls capable of providing grid support, installed as either stand-alone storage or storage paired with a renewable energy system, and charged by either on-site renewable energy or the electric grid.”

HB 2021 provides \$50 million for community renewable energy projects; Oregon Department of Energy (ODOE) is moving forward with plans to distribute these funds, Staff does not want interconnection issues to be a roadblock to successful implementation of any related ODOE activities. Likewise, under HB 3141 Energy Trust of Oregon can fund advanced distribution system-connected technologies, via an expansion of the Public Purpose Charge (PPC). Staff does not want interconnection issues to be an impediment to Energy Trust activities.

Due to resource constraints Staff is also considering changes to the standard workshop format generally employed in these investigations. Staff is looking at the potential for Stakeholder-led processes for issues where appropriate. Issues could be resolved sooner in the event parties are able to move forward on a fast track outside of a Staff-led process. Staff is amenable to this approach.

### Questions:

The following is a list of questions that can help focus the issues and prioritization more fully. Please provide responses to some or all of the below by March 25, 2022.

1. Given Staff’s concerns with interconnection issues being a roadblock to the projects driven by state policy (including incentives and grants), are Staff’s proposed Group 1 issues the three most effective issues for these specific generators to cost-effectively interconnect? If not, which three issues are and why?
2. Which of the following actions would be most effective at reducing interconnection costs in the next twelve months and why (select one)?
  - a. Improving the analysis and other utility practices that identifies the upgrades and associated costs,
  - b. Providing transparency about current utility analysis, data, assumptions, prices, and other practices
  - c. Improving tools that allow interconnection customers the ability to contest cost estimates, and prevent them from changing?
3. What is the best way to address the overlap between Hosting Capacity Analysis (HCA) discussions occurring in Distribution System Planning (DSP) and Staff’s proposal for Group 1, which is to modernize the screens and other thresholds used in the interconnection study process which are used to identify the need for further study and/or major upgrades *and* modernize the upgrades that the studies identify. For example, Staff’s original proposal is for DSP forums to continue to work on mapping/data transparency under current utility practices as well as the planning use case *if* DSP parties choose to dedicate DSP resources to continuing that work. Once Group 1 issues are resolved, those policies should be incorporated into transparency/mapping efforts under DSP and parties can explore in UM 2111 whether to use the interconnection use case HCA and maps as part of the interconnection process.
4. Do you support the Interconnection Trade Association suggestion that storage and advanced inverter issues should be deprioritized to accelerate discussion of Group 3 (or Group 4) issues? If so, please explain how the Group 3 (or Group 4) issues are better positioned to address root cause issues for broad generator types, will best enable the community and resiliency projects driven by state policy (including grants and incentives) and will best maximize decarbonization value through enabling smarter, flexible resources?

March 11, 2022

5. How should the working group process and what can the working group do to facilitate resolution of contested issues?
6. Do you support IREC's suggestion to switch from organizing our interconnection rules based on size and policy (e.g., Net Metering, SGIP, LGIP) to point of interconnection (distribution or transmission).
7. Which topics under the umbrella of Group 1 or Group 4 could be addressed without a Staff-led process? Is there another way to accelerate Group 3 or Group 4 issues without diverting resources from Group 1?

Staff would like to see if there is time available for another two-hour workshop to discuss these issues and is requesting those interested to select their availability from the Doodle Poll at the following link.

[Doodle Poll](#)

Following that workshop Staff anticipates presenting recommendations to the Commission at the Public Meeting scheduled for April 19. Following a Commission decision on Staff's proposed approach, Staff will schedule workshops, tentatively on a monthly basis. While final timelines are not known at this point, Staff would envision updating the Commission on the status of UM 2111 every six months, or sooner if there are reasons, such as consensus on issues.

**Conclusion**

Staff appreciates the interest in this docket and looks forward to working with stakeholders to develop process and prioritization to address the issues of most importance in a timely manner.

**Questions**

If you have questions, contact:

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