

Announcement

UM 2111 Stakeholders:

This letter serves as an update from Staff on the status of UM 2111.

On January 4, 2022, the Renewable Energy Coalition, the Community Renewable Energy Association, Oregon Solar + Storage Industries Association, and the Northwest & Intermountain Power Producers Coalition, (collectively the “Interconnection Trade Associations”) submitted a letter requesting the Oregon Public Utility Commission (Commission) “initiate the interconnection discussion in Docket No. UM 2111 and providing a list of top priority issues to address in a timely manner.” The letter also included a list of issues the Interconnection Trade Association believes should be addressed first. The following is Staff’s response.

Staff agrees with the Interconnection Trade Association that investigating the modernization of interconnection policies and practices is a priority for achieving the state’s goals for just and equitable transition to a decarbonized electricity sector.¹ While the Commission’s General Interconnection Investigation, Docket No. UM 2111, has previously not advanced due to resource constraints, Staff is preparing to relaunch the docket in the first quarter of 2022 (See Staff’s discussion of the Docket No. DR 57 at the November 30, 2021 Public meeting and the Staff memo in Docket No. UM 2099 included in the December 28, 2021 Public Meeting agenda.) As part of the relaunch Staff will follow the plan laid out when the docket was opened. The steps included were as follows:

1. Open the investigation at the June 30, 2020, Public Meeting;
2. Thereafter Staff will release an integrated plan to address the range of interconnection issues across a combination of existing dockets and additional activities in the general interconnection investigation;
3. Following the circulation of the draft issues list and plan, Staff will hold a workshop to receive feedback on the scope of issues list and plan;
4. Staff will then recommend, at a Public Meeting, that the Commission adopt a scope of issues and a plan to address the issues in the general interconnection investigation.

Step 1 is completed. Staff will be releasing a plan in accordance with Step 2 in the near future. Following that will be a workshop to discuss both the plan scope, as well as the issues to be addressed. Once the Commission opines on these issues, working groups and/or other interconnection modernization efforts will commence.

Staff appreciates the concerns raised by the Interconnection Trade Associates and is committed to including the issues raised within its proposed plan. Staff remains resource constrained and understands that many stakeholders are in a similar position. Relaunching Docket No. UM 2111 will require careful issue identification and prioritization, including:

- Issues that address the root causes of interconnection barriers, complaints, and disputes;
- Issues that reduce interconnection barriers across state-jurisdictional generator types;

¹ For example, see House Bill (HB) 2021 decarbonization targets and emphasis on the development of local renewable energy and resiliency projects and HB 3141 expansion of the Public Purpose Charge to fund customer investments in distribution system-connected technologies that support reliability, resilience and the integration of renewable energy resources with the distribution systems of electric companies.

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- Issues that will help enable smarter, flexible DERs in order to minimize the costs and maximize the benefits of decarbonization, e.g., fossil dispatch offset, grid services, T&D avoidance; and
- Issues that reduce barriers to projects that provide direct customer and community benefits, including resiliency-focused projects, and help maximize the impact of incentives and grant opportunities through interconnection costs efficiencies.

Staff looks forward to working with the Interconnection Trade Association and other stakeholders to develop a comprehensive issues list and prioritization strategy for UM 2111 in the coming months. As to concerns with PGE's independent System Impact Studies Business Practice (iSIS Business Practice), Staff is likewise unaware of a collaborative process involving PGE and stakeholders. That said, PGE's iSIS Business Practice is not generally reviewed and approved by the Commission. Staff would however be interested in participating in future stakeholder processes related to changing PGE iSIS Business Practices, whether they involve workshops, opportunities to comments, or some other format.

Please direct questions to Ted Drennan at Ted.Drennan@puc.oregon.gov or 503-580-6380.