



Oregon

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Summary of November 17 Meeting



The fourth workshop in the Incorporating updated standards: IEEE 1547-2018 workstream was held on November 17, 2022. The workshop started with a process update and questions on the investigation's path forward. Next on the agenda, the Joint Utilities went through their comments sent to the Service List on November 11. IREC continued the meeting by completing presentation of their Decision Matrix, starting with mid-term issues, followed by long-term issues. The following are highlights of the discussion as recorded by Staff. If you believe anything is missing or in error please contact Ted Drennan.

Process Update

The workshop started with a process update. Staff discussed the process of opening a rulemaking as a forthcoming step in this investigation. The process would require a Commission decision at a Public Meeting. Staff would present a memo at the Public Meeting which would cover the approach to the rulemaking and which Oregon Administrative Rules (OARs) would be subject to the rulemaking. It would also cover areas of consensus, and areas of disagreement.

There are several outstanding questions on the path forward that Staff is looking for stakeholders opinion regarding the rulemaking. One question involves the potential for combining workstreams going forward for the rulemaking, or if they need to be on separate paths. There was discussion on this at the meeting, one thought was that the overlaps in the two workstreams made combining the two a reasonable approach. Another thought was combining would be dependent on the approach to updating, specifically for IEEE 1547. If all of the items in IREC's grid were incorporated into the rules it could be very technical, and would likely be best as a stand-alone rulemaking.

Staff intends to raise the rulemaking issue at the next workshop in the Screens, Study Methods, and Modern Configurations workshop for parties not in attendance at the IEEE 1547 workshop. That workshop is scheduled for December 7, 2022.

Another process question involves how much of the issues discussed to date will be included in the OARs, and how much in the utility handbooks. Overly prescriptive rules will likely require updates in the future, requiring resources from stakeholders. Current rules do not include the level of specificity that has been included in the current workshops. Keeping many of the details in the utility handbooks, as opposed to OARs would likely have a lesser administrative

burden. This approach could be easier in the near term, the question is if it provides the transparency that DER installers, and interconnection customers would prefer.

It was also noted that the most recent update to the standards is more of a generational update, unlike the incremental changes in the past. As such, incorporating these updates in the OARs would not necessarily imply a similarly long process with the next update to IEEE 1547.

Staff would like to hear from parties on their preferred approach to moving forward. Parties are asked to respond to the following questions, please provide details. Also – add anything additional you believe should be considered as part of moving the docket forward.

1. *Should the two workstreams be combined for a single rulemaking?*
2. *Should both Divisions 29 and 82 be considered in the same rulemaking?*
 - a. [Division 82 Small Generator Interconnection Rules](#)
 - b. [Division 29 Net Metering Rules](#)
3. *Do parties believe Divisions 29 and 82 should be combined into a single Division?*
4. *Do parties have opinions on where specific issues should reside? That is, which items should be included in the OARs versus utility handbooks?*
5. *Are there other details to be considered or additional questions to ask?*

Joint Utilities Comments

The Joint Utilities provided comments in response to questions posed in the last workshop. These were circulated to the Service List on November 11. They presented a synopsis of the comments, and took questions following the process discussion.

One suggestion the Joint Utilities had was to keep the rules simple, and allow the details to reside elsewhere, such as utility handbooks. Incorporating detailed settings and requirements in the OARs could lead to both lengthy rules, and rulemaking process. Requirements will vary across systems, feeders, and customers looking to interconnect. It will be challenging to incorporate all requirements for all scenarios in the OARs.

Part of the proposal would have the rules simply reference the most recent version of the IEEE 1547 standards. This would also simplify the process and lessen the burden that could come with future updates. There was discussion on what parts of the OARs would need to change to incorporate this proposal.

A request of the group was for parties to identify parts of Divisions 29 and 82 that would need to change when updating for the IEEE 1547 standards. Please also offer potential language for the areas needing changes.

There were concerns raised about overly simplifying the OARs and relying on the utility handbooks. Issues raised included consistency, Commission oversight, and stakeholder engagement on updates. Consistency between the utilities would help with transparency. The lack of Commission oversight was seen as potentially problematic. Finally, there is not a

pathway for providing feedback when the handbooks are updated; there is a lack of stakeholder engagement.

Staff would like to know more about the update process for the utility interconnection handbooks. Is it a stakeholder-involved process? Is there an ability for external parties to participate? How long is the process, and any other relevant information.

The Joint Utilities also took questions on the specific decision matrix near-term issues discussed in their November 11 comments.

One of the topics discussed was DO 8 – Voltage regulation modes by reactive power. Here the Joint Utilities preference is for 8c-2, leaving the process for selecting settings on site-by-site undefined. This is because voltage requirements are dependent on size, type, location, position on feeder, and other items.

There was a request for transparency, ways to identify what standards would apply to areas or feeders. It was also mentioned that California and Hawaii do have required settings, both of which use volt-var.

Staff would like to know what level of specificity could be offered to interconnection customers. Could there be a standard based on the size of the generator for instance, or at the area/feeder level?

Additional discussion focused on the Reference Point of Applicability (RPA), and whether there should be a parallel process for reviewing. The Joint Utilities did not believe a parallel process was necessary, the issue is not big enough. It would also be an administratively burdensome, and potentially confusing process. Other stakeholders wanted to ensure additional time would not be added to the review process due to inclusion of an RPA.

IREC Decision Matrix

The last part of the workshop was an IREC presentation of the final near-term and long-term issues included in their decision matrix.

Near-term Issues

The first issue discussed was Communications – Protocols, Ports & Telemetry. There was a question on if there was a desire in the group to specify these requirements now. In Oregon currently, telemetry equipment cannot be required for facilities under three megawatts. This is a requirement that could be implemented in the future. California has implemented requirements, but no other states have.

Several other issues also included in the other workstream were covered, including the Secondary Transformer Screen. There are three questions to consider in DO 21 – 22 assuming voltage regulation are set by default. Line Configuration Screen (LCS) is important as existing LCS may not recognize the difference between inverters vs. rotating machines. Export controls, which may be used for some aspects of IEEE 1547 implementation, were also discussed.

Long-term Issues

Long-term issues from the IREC Decision Matrix were covered briefly at the end of the workshop. These are issues for consideration after implementation of the IEEE 1547 standards. These are more strategic decisions that may help in the future development of the network.

Issues covered included DER communications/controls roadmap, communications deployment, interconnection updates, prioritization vs export limiting, ongoing reevaluation of default settings, and evaluation/commissioning. The approach to many of these are dependent on choices made earlier. One such example is prioritization vs export limiting. Here prioritization could be more important than adhering to export limits; with generation in excess of required export limits could help frequency droop.

Reevaluation of default settings could benefit from analysis of data collected by utilities. There could also be available research pointing to items needing updates. There is also the potential for ongoing workgroups to keep utilities and contractors talking about issues.

Next Steps

Staff believes the discussion to date in the IEEE-1547 workstream has been productive. Given the status of the issues as discussed in the last workshop it appears the majority of the issues have been introduced, with the next step incorporating updates into the rules. At this point, Staff believes the best approach now would be to complete the Screens, Study Methods, and Modern Configurations workstream. As such, Staff is planning on repurposing the December 20, 2022 workshop (and likely future workshops) to address Screens issues. This will be part of the discussion at the December 7 workshop; parties who object to repurposing such workshops should identify their reasoning. See the table below for continuation of the Phase 1 discussions.

IEEE 1547 Workstream			
Description	Event Date	Workshop Topic	Pre-meeting deliverable
Workshop 5	December 20, 2022	Staff planning to repurpose IEEE-1547 meetings for the Screens Workstream	Responses to the questions above would be part of IEEE discussion prior to transitioning to the Screens workstream.
Workshop 6	January 31, 2023	TBD – future workshop topics will be dependent on discussion at upcoming meetings.	
Workshop 7	February 28, 2023		
Workshop 8	March 28, 2023		

Staff appreciates stakeholders taking the time to participate in these discussions. To make these productive as possible, *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.

As mentioned earlier, Staff requests stakeholders circulate response, redlines, comments, etc. to the Service List as listed on the [OPUC UM 2111 webpage](#).

For any questions or concerns please contact:

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To receive meeting notices and agendas for this docket, send an email to 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.