

August 22, 2024



## UM 2111 Interconnection Modernization Process – Schedule Update

This letter announces a workshop in the UM 2111 docket for Phase 2 on September 27, 2024, from 9:00 – 12:00. The workshop will focus on Staff's proposal for moving forward in Phase 2 of the UM 2111 investigation and the steps to wrap up the remaining items from Phase 1. Staff is looking for further discussion and feedback on both topics the workshop.

### Workshop Details

The following meeting information is for the upcoming workshop.

- **Location: Zoom**
  - [Link to Meeting](#)
  - **Dial-In: 1-551 285 1373**
  - **Meeting ID: 161 574 4592**
  - **Passcode: 1537531382**
  - **Date: 9/27/2024**
  - **Time 9:00-12:00**

### Phase 1 Remaining Issues:

Oregon Public Utility Commission (OPUC or Commission) issued Order No. 24-068 adopting the revised interconnection requirements for Division 82-Small Generator Interconnection Rules and Division 39-Net Metering Rules. The Order also contained directives to have a proposal allowing for updates to utility equipment requirements<sup>1</sup> and collecting feedback on utility handbooks from interested parties.<sup>2</sup>

Idaho Power Company (Idaho Power), PacifiCorp, and Portland General Electric (PGE) (collectively the Joint Utilities or JU) addressed a portion of the first directive in their respective handbooks in addressing Staff's concerns. From PacifiCorp's handbook for example:

At the time of this handbook publication, there are no commercially available inverters that are UL certified to take the generation offline within 0.1seconds and able to detect fault conditions on the high side of the step-up transformer, and therefore no inverter specifications or options will satisfy the requirement without the need for additional equipment. As inverter technologies advance and as Pacific Power periodically reviews and updates this handbook, Pacific Power will assess whether inverter specifications have advanced to the point where an inverter setting or option may satisfy the requirement to take the generation offline within 0.1 seconds. Until that time, projects seeking to interconnect to a circuit using high-speed reclosing will be required to install protective

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<sup>1</sup> See Order No. 24-068, page 2.

<sup>2</sup> See Order No. 24-068, page 3.

equipment. The specific equipment that will be required must be assessed on a case-by-case basis, but can include protective relays, reclosers, and/or direct transfer trip.

Staff believes that looking at the status of available equipment is something that can be addressed going forward at the time Staff collects feedback on the JU handbooks, as discussed below.

The second directive focuses on collecting feedback on the handbooks; Staff would like to establish a process that works for all parties. Staff's proposal would set a day for annual utility handbook updates. All utilities would update their handbooks concurrently on that day going forward. Utilities would be encouraged to make all updates at that time, although they could make out-of-cycle updates as needed. Prior to the updates Staff would collect feedback from parties on the handbooks, in line with Commission guidance. From the Order:

In addition to the rule modifications above, we direct Staff to hold a workshop or similar process to review and collect feedback on utility handbooks at least annually in order to determine whether Commission engagement with any issues related to the process and content of the utility handbook is warranted.

Under Staff's proposal, Staff would host a workshop annually to collect feedback from stakeholders, developers, and other interested parties. The workshop would be held approximately one month before the utilities issue their annual draft handbook updates. Staff anticipates the utilities would consider the workshop feedback in their handbook updates. The draft handbook updates should highlight where the feedback was addressed, or conversely, reasons why it was not addressed.

Also, the JU draft handbook updates would address the current status of inverter equipment, and whether there are commercially available inverter alternatives to negate the need for additional equipment.

Once the annual draft handbook updates are posted, the process under OAR 860-082-0030(1)(b) would follow as required. After that process is completed, Staff would prepare a report for the Commission on the feedback received as well as the utility response, including the status of equipment availability.

Staff would like to hear from parties on the approach set out here, see Attachment 1 for a graphical representation of the process and timeline, assuming a March 1 utility draft handbook filing. The example is based on when the utilities post their annual handbook updates, with the feedback workshop occurring a month prior to that day.

## **Phase 2**

Staff is also looking to move forward with Phase 2 of the UM 2111 investigation. Here Staff would like to address several issues of near-term importance for meeting legislative goals, including meeting small scale renewable resource requirements. Staff proposes the following next steps in this docket and others:

- 1) Initiate a process to address interconnection delays in UM 2111.
  - a) Should the Commission establish standards and enforceable timelines for interconnection studies and construction?
  - b) Should the Commission address the ability of third parties to construct interconnection facilities?
  - c) Should the Commission modify additional process rules for NEM and SGIP?

- 2) Initiate a process to address policies related to requirements associated with DTT in UM 2111.
- 3) Open a separate investigation into Commission frameworks needed for resilience projects. This will include islanding, interconnection, compensation, contracting, and any other policy or legal issues as required.

In order to address the issues above, Staff is not proposing to take on cost allocation-related Group 2 issues as originally proposed for this phase.<sup>3</sup> Staff is not proposing any process related to implementation of cluster studies pursuant to FERC Order 2023, either.

Staff would like to hear from stakeholders if the strategy above tackles the most important topics to address at this point, or if there are other topics that should be addressed. At the previous UM 2111 workshop there were several topics raised, unfortunately timing does not allow addressing all topics of interest.

**If you have questions about this investigation, or announcement, please contact:**

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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.

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<sup>3</sup> Staff's original proposal had cost allocation practices included as Group 2 issues. See page 10 of Staff's memo at: <https://edocs.puc.state.or.us/efdocs/HAU/um2111hau11929.pdf>.

## Attachment 1

