



9/29/2024

Summary of September 27 Workshop



The initial workshop for phase two of the UM 2111 investigation into interconnection was held on September 27, 2024. The workshop focused on two remaining issues from phase one, as well as issues to address in phase two. Portland General Electric (PGE) made two presentations on filings that were recently submitted, one on their QF-LGIP Filing ([UM 2346](#)), the other on their revised Interconnection Agreement for Small Generator Facility (SGIA) ([AR 659](#)). The following is a highlight of the discussion at the workshop. The [presentation](#) and workshop [announcement](#) are located in the [UM 2111 directory](#). You may view the workshop recording [here](#).

Phase 1 Issues

The workshop started with brief recap of what occurred in phase 1, including the incorporation of IEEE 1547-2018 standards and updates for both Division 82 and 39. Ongoing efforts on data conversion as required by [Order 24-068](#) were highlighted as well. Reports were received by the three utilities Idaho Power, PacifiCorp, and PGE collectively known as the Joint Utilities (JU). [Idaho Power](#) has completed updating their data. The update processes for [PGE](#) and [PacifiCorp](#) are ongoing, with both companies receiving data from the Energy Trust of Oregon to help deal with historic data.

There were two ongoing phase 1 issues addressed as well. These include the approach to collecting handbook feedback and future changes in equipment. In order 24-068 the Commission directed Staff to:

(W)e 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.¹

Staff's proposal is based on the JU making annual handbook updates in March going forward. Prior to the Companies' updates, Staff would hold a workshop to collect Stakeholder feedback on the handbooks. This workshop would be targeted for mid- late-January. The timing would allow the JU to incorporate relevant feedback in their March interconnection handbook updates. After the handbook updates are final, following the regular update process as covered in OAR [860-082-0030\(b\)](#), Staff would prepare a memo to the Commission on feedback received from stakeholders, as well as steps taken by the utilities to address the feedback.

¹ See Order 24-068 at page 2

In Order 24-068 the Commission also directed Staff to:

We direct Staff to work with utilities and interested persons, as a part of the subsequent handbook update process, to deliver a proposal for regular proactive investigation of the potential for inverter specifications and configurations to eliminate the need for additional equipment.²

The presentation included a quote from PacifiCorp's handbook stating inverters meeting specific safety requirements are currently unavailable. This is the same approach used by the other utilities as well. Staff's proposal to address the Commission requirements is to include a check on the state of equipment available at the handbook feedback workshop in January. This would be an ongoing process, as equipment evolved it would be discussed at the workshops, and then incorporated in the utility handbook updates.

Question: Are parties satisfied with Staff's approach on the handbook updates, and addressing equipment requirements?

Phase 2 Issues

The discussion then turned to the issues to address in phase two of the investigation. There was an initial highlighting of things that have changed since the initial scope of phase 1 of the docket was determined. Some things that changed included an increase in the number of complaints Staff is aware of, changes at the federal level, see FERC Order 2023 requiring movement towards cluster studies. Other issues of legislative importance were mentioned including microgrid and other resilience projects, and hosting capacity.

Staff introduced two potential topics to address in phase two, interconnection delays, and direct transfer trip requirements (DTT). These topics would be addressed in two workstreams, although the investigation into internal delays may require a contested case approach.

There was a good discussion on the proposed topics to address, with multiple suggestions received. Under interconnection delays it was suggested that utility staffing levels should be examined, along with QFs renewing contracts, ability of third parties to do interconnection work, and enforceable timelines. Discussion was not detailed, but there were varying interpretations on FERC Order 845, one side arguing the order allows for third-party construction, with the counterpoint being these are stand-alone upgrades, not applicable to the situations being discussed here.

Parties would like more clarity on reasonable costs for interconnection. There was a suggestion to allow for upgrade costs to be shared by developers, this would allow more cost certainty and lead to more development.

Parties believe interconnection delays are not one-sided, with issue on the interconnection customers side, not only utilities. Enforceable timelines should consider how each utility is situated and allow some flexibility to allow for unforeseen events.

Instead of addressing only DTT, suggestions were made to look more broadly at communications, metering and monitoring. Participants suggested there are additional IEEE mandates on interoperability that should be addressed as well. Some parties were not onboard with an expanded scope beyond DTT, arguing staffing and budget levels may not support an expanded technical analysis.

Questions:

Interconnection delays:

Should the Commission establish standards and enforceable timelines for interconnection studies and construction?

Should the Commission address the ability of third parties to construct interconnection facilities?

Should the Commission modify additional process rules for NEM and SGIP?

DTT

The first technical workshop is to focus on DTT. Presentations on the requirement that address the engineering details is requested. The JU plan is to collaborate on this amongst the utilities. Presentation topics will likely include: overall description of DTT, and reasoning for why it is the best solution in some circumstances. Staff has seen the following justifications: short reclose interval, feeder generation to load ratio, line work, wildfire mitigation, open phase conditions, and substation power transformer protection. Staff would like for the presentations to include the engineering analysis for these justifications (and any others not listed above).

The date of the first workshop is to be determined. The proposed format is three hours, with presentations during the first half, and working through examples in the second half. Presentations are requested from the utilities and stakeholders. Staff will work with interested parties on the proposed presentation topics. Staff intends to send example interconnection requests at least two weeks prior to workshop. Then parties will try to solve them at the workshop together. Discussing various issues and how to resolve them, with and without DTT.

Please let Staff know if you are interested in presenting at an upcoming workshop. Staff may reach out to parties as well with additional questions, or requests for information.

Subsequent workshops may also focus on DTT, but it is intended to move on to other technical topics including:

- Grounding transformers at the point of interconnect
- 3V0 sensing on high voltage side of substation power transformers
- Testing procedures or requirements that are (or can be) used at IBR's that ensure operation as expected by the utility
- Metering and interoperability
- And any others that come up

Preferably these workshops will with be with design and/or operations staff directly; personnel that can articulate the protection and operations considerations at a detailed level. Management and anyone else are welcome, but the aim is to reduce the amount of "I'll have to get back to you on that" type comments, stemming from lack of familiarity. Staff will look to coordinate the workshops with the appropriate personnel.

PGE Filings

QF-LGIP Filing

Jennifer Galaway of PGE made a presentation on PGE's filing to move toward a Transitional Cluster Study as of January 1, 2025. This approach would only apply to QF interconnection requests greater than 20 MW, with no changes to the small generator interconnection study process. According to the Company, this filing substantially aligns with FERC Order 2023.

SGIA

Jordan Schoonover walked the participants through changes PGE submitted to their small generator interconnection application submitted for Commission approval on September 26. Changes were made to align with the rule changes in AR 659.

Next Steps:

Staff is hoping to hear back from stakeholders on the suggested scope, as well as items that should (or should not) be considered in the upcoming phase 2 of the UM 2111 investigation. Informal comments are requested from parties addressing questions raised here in italics, and at the workshop, by October 11. Following receipt of the comments, Staff will finalize the scope and approach for this phase, and send out an announcement and initial workshop schedule. If you have questions or concerns, please contact either:

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