



UM 2111

**Enforceable Timelines
February 28, 2025**



Agenda



- Welcome
- UM 2111 Update
- Guiding Principles
- Investigation Goals
- Identify Milestones
- Identify Expectations for Each Milestone
- Missed Timelines
- Path forward
- Additional Questions
- Conclusion

UM 2111 Updates



- Utility Interconnection Handbooks
 - Annual updates scheduled for March
 - No handbook comments at January workshop
 - Staff did hear after from one party asking about meter socket adapters (MSAs) being allowed in PGE service territory
 - Staff's current understanding
 - PGE – minor revisions
 - Idaho Power and PacifiCorp – no revisions
 - Will follow update process in OAR 860-082-0030
- OPUC Order 24-068 Timelines for Utility Legacy Data Updates
 - Order required legacy data conversions of 12 or 18 months from March 8, 2024
 - Idaho Power completed in 2024
 - PGE completed earlier this month
 - PacifiCorp on track to finish by September 8, 2025.

Enforceable Timelines

Guiding Principles



- Avoid rules that would unnecessarily increase time to finalize interconnection
 - Do not want IX Agreements to extend timelines as a way to meet obligations
- Transparency and ease of enforcement
- Recognize that individual projects are unique, and one-size-fits-all approach may not work
 - Projects with difficult terrain may require longer to interconnect
- Look for ways to leverage existing rules
 - OARs rules include number of days to send out notices, or replies to customers – could that work here?
- Would alternative approaches be useful?
 - Evaluate timeliness on a portfolio or individual interconnection basis?

Investigation Goals



- Understand key drivers of delays
- Identify:
 - Milestones to focus on
 - Expectations for each milestone e.g., timelines
 - What happens if the milestone timeline is not met e.g., penalties, option to use third party, exceptions or waivers
- Consider any other easy improvements e.g., improving site visits

Identify milestones



Steps from Interconnection Agreement to Energization

Note: steps may overlap

- Design
 - Continuation of work done in studies
 - Addresses cases where additional equipment is needed
 - Substations, line upgrades, protection, extensions, etc.
 - Reasonable timeline proposals?
 - Based on requirements out of studies, i.e. no upgrades needed, shorter time to complete
 - Avoid rules that would unnecessarily increase time to finalize interconnection
- Permitting/Easements
 - Construction permits, easements along road, traffic control, etc
 - Ensure permits needed for completing interconnection are obtained timely
 - Anecdotally, this doesn't appear to be common source of unexpected delays

Identify milestones



Steps from Agreement to Energization

- Procurement
 - Supplies to construct needed facilities for interconnecting
 - Timely acquisition of supplies needed
 - Based on findings in facilities studies?
- Construction
 - Build facilities as laid out in design phase to complete interconnection
 - Potential issue, coordination of crews and project managers
- Commissioning
 - Final tests to bring system online
 - Done by internal, or external parties?

Identify milestones



- Any missing process steps?
- Which steps are most problematic as to timing?
- Can we use the table to set priorities of what to address first?

Process Steps	Source of Delay?		
	High	Medium	Low
Design			
Permitting/Easements			
Procurement			
Construction			
Commissioning			

Identify expectations for each milestone



- How to set timelines?
- Based on
 - Contractual milestones
 - Timing from date interconnection agreement signed
 - Other

If the milestone timeline is not met



- Options for enforcing milestones
 - Penalties
 - Option to use a third-party
 - Others?
 - Exception/waiver provisions?

Depends on
the milestone?

If the milestone timeline is not met



- FERC Cluster Study Penalties – Applicable to serial queue?
 - FERC penalties applicable to cluster studies not meeting deadlines
 - Small generators not included in queue studies – should penalties be applied for missing study deadlines?
 - Pros: encourages timely studies
 - Cons: potentially one-sided
 - No withdrawal penalties for small serial applicants
 - FERC Order 2023 states withdrawal must have: material impact on the cost or timing of any interconnection requests with an equal or lower queue position.
 - Allow for exceptions – similar to FERC rules

FERC study	Fine per business day	Serial Studies
Cluster Study	\$1,000	Feasibility Study
Cluster Restudies	\$2,000	System Impact Study
Affected System Study:	\$2,000	
Facility Study:	\$2,500	Facility Study

Additional Questions



- Staff sent series of queries to JU
- Qualitative and quantitative issues raised
- Sample questions:
 - What activities in the interconnection process, that are controlled by the utilities, takes the most time?
 - Are there steps that the utilities could take to improve interconnection timelines?
 - What activities in the interconnection process, that are controlled by the developers, takes the most time?
 - Are there steps the applicants could take that would improve interconnection timelines?

Next Steps



- Further workshops for Enforceable Timelines workstream?
 - Move discussion to dedicated docket
1. Contested case
 - Spin off investigation to look for solutions to improve interconnection outcomes
 - Pros: Build a complete record, allow for data requests, additional information for determining optimal outcome
 - Cons: Extensive process, additional work
 2. Rulemaking
 - Not a contested case,
 - Pros: More streamlined process, potentially less work for stakeholders
 - Cons: Different standards for data requests, record not as fully developed

Conclusion



- Workshop in DTT workstream March 5
- Update for Enforceable Timelines to come

Thank You for Participating

Appendix

