

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UM 1716**

4 In the Matter of

5 PUBLIC UTILITY COMMISSION OF
6 OREGON,

7 Investigation to Determine the Resource
8 Value of Solar.

MOTION TO ADOPT PROCEDURAL
SCHEDULE FOR COST SHIFT
INVESTIGATION (INVESTIGATION NO. 2)

8 Staff files this motion to request that the administrative law judge (ALJ) adopt a
9 procedural schedule for the investigation into the extent of cost shifting, if any, from customers'
10 with solar facilities participating in Oregon's net metering program.¹

11 The Commission opened Docket No. UM 1716 to investigate the resource value of solar
12 (RVOS), the extent of cost shifting, if any, that occurs when customers with solar facilities
13 participate in Oregon's net metering program, and impacts to system reliability from solar. On
14 November 9, 2015, the administrative law judge (ALJ) established procedural schedules for all
15 three of these inquiries (Investigation Nos. 1, 2, and 3). The procedural schedule for
16 Investigation No. 1 into the RVOS consists of three rounds of testimony starting on June 1, 2016,
17 briefs and a hearing. The procedural schedule for Investigation No. 2 into cost shifts, consists of
18 two workshops on November 16 and December 15, 2016, and a status report on December 22,
19 2015. The procedural schedule for Investigation No. 3 is a public meeting workshop tentatively
20 scheduled in January 2016.

21 The December 15, 2015 workshop in Investigation No. 2 (cost shift) was attended by
22 Staff, Portland General Electric (PGE), Pacific Power, The Alliance for Solar Choice (TASC),
23 Idaho Power, Renewable Northwest (RNW), Citizens' Utility Board of Oregon (CUB),
24 Northwest Seed, Oregon Department of Energy (ODOE), SolarCity, Oregonians for Renewable
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26 ¹ Staff files this motion under OAR 860-001-0390(2)(a) and OAR 860-001-0420.

1 Energy Progress (OREP), Energy Trust of Oregon (ETO), and Interstate Renewable Energy
2 Council, Inc. (IREC). These parties agreed to hold one more workshop and then proceed to an
3 evidentiary phase to establish a methodology for determining whether there is a cost shift related
4 to Oregon's solar net metering program and if so, to what extent.

5 The parties agreed that the evidentiary portion of Investigation No. 2 should be
6 concurrent with the evidentiary portion of Phase 1 of Investigation No. 1 because of overlapping
7 issues. Accordingly, Staff asks that the ALJ issue a ruling adopting the following procedural
8 schedule for Investigation No. 2:

9 April 7, 2016 – Workshop to discuss DRAFT methodologies

10 June 1, 2016 – Opening testimony on methodologies to determine cost shift

11 June 30, 2016 – All parties file response testimony

12 July 21, 2016 – All parties file cross-response testimony

13 August 5, 2016 – Prehearing brief

14 August 12, 2016 – Cross-examination statement

15 August 23, 2016 – Hearing

16 September 19, 2016 – Post hearing brief

17 The Commission plans to hold a prehearing conference for Phase II of Investigation No.
18 1 after the conclusion of Phase I. Staff anticipates that additional proceedings will be necessary
19 for Investigation No. 2 (cost shift), because whether there is a cost shift, and if so, to what extent,
20 cannot be determined until after the RVOS is determined, which will not be until the conclusion
21 of Phase II of Investigation No. 1. The schedule for additional proceedings for Investigation No.
22 2 can be addressed at the prehearing conference scheduled for after the conclusion of Phase I in
23 Investigation No. 1.

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Page 2 - MOTION TO ADOPT PROCEDURAL SCHEDULE FOR COST SHIFT
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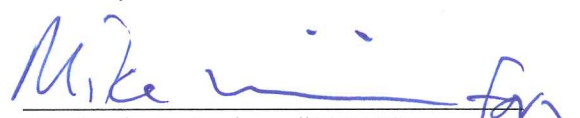
1 Counsel for Staff notified all parties to UM 1716 by e-mail on December 22, 2015, of the
2 proposed motion to adopt a procedural schedule for Investigation No. 2. No party objected.

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DATED this 22nd of December, 2015.

Respectfully submitted,

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