1		BEFORE THE		
2		PUBLIC UTILITY COMMISSION OF OREGON		
3	UM 1751			
4	In the Matter	of	MOTION TO MODITY PROCEDURE	
5	PUBLIC UTILITY COMMISSION OF OREGON,		MOTION TO MODIFY PROCEDURE ORDERED IN ORDER NO. 17-118	
6				
7	Implementing Energy Storage Program Guidelines pursuant to House Bill 2193.			
8			•	
9	Staff seeks modification of the process determined by the Commission in Order No. 17-			
10	118 for stakeholder and Commission review of draft Storage Potential Evaluations that			
11	PacifiCorp and Portland General Electric Co. (PGE) must submit to the Commission no later			
12	than July 15, 2017. Currently, Order No. 17-118 calls for the Commission to hold a Special			
13	Public Meeting Workshop within 30 days of the last utility submission for the purpose of			
14	receiving stakeholder input on the draft evaluations. However, given that the draft evaluations			
15	are very technical, Staff believes the following would be more helpful to the Commission and			
16	stakeholders.			
17	•	No later than August 14, 2017 – Each utility (PGE and PacifiCorp) must hold a		
18		workshop for Staff and stakeholders to explain draft evaluation and answer		
19		questions.		
20	•	No later than August 25, 2017 –	Stakeholders submit informal comments to Staff	
21	•	• No later than September 26, 2017 – Staff presents summary of draft evaluations		
22		and stakeholder comments to Commission at public meeting.		
23	///			
24	///			
25	///			
26				
	Page 1 - MOTION TO MODIFY PROCEDURE ORDERED IN ORDER NO. 17-118 SSA/8391267			

Department of Justice

```
1
             On Monday, July 17, 2017, Staff sent a draft of this motion to the service list asking the
 2
     parties to notify Staff of any objection to the motion by close of business on Wednesday, July 19,
 3
     2017. PacifiCorp, Portland General Electric Company, the Oregon Citizens' Utility Board,
 4
     Renewable Northwest, the Northwest Energy Coalition, and the Oregon Department of Energy
 5
     have noted they support or do not oppose the motion. No party has indicated that they object to
 6
     the motion.
 7
                    Background.
 8
            HB 2193 requires the Commission to evaluate electric companies' proposals for
 9
     procuring qualifying energy storage systems and to implement guidelines to facilitate the
10
     submission and Commission review of proposals. HB 2193 specifies that each energy storage
11
     proposal must be accompanied by the electric company's evaluation of the storage potential on
12
     its system (Storage Potential Evaluation). In Order No. 16-504, the Commission directed Staff
13
     to convene workshops with stakeholders to develop a framework for the Storage Potential
14
     Evaluations and the Commission's review of the evaluations. The Commission included specific
15
     requirements for the components of the plan and the framework. For example, the Commission
16
     directed Staff to establish a consistent list of use cases or applications to be considered in the
17
     evaluation, assess the potential valuation methodology or methodologies the electric companies
18
     may use for estimating storage potential in each use case or application, determine the
19
     appropriate for identifying the system locations with the greatest storage potential, and establish
20
     the level of detail required in the evaluation results and required supporting data.<sup>1</sup>
21
     111
22
     ///
23
     111
24
     111
25
     <sup>1</sup> Order No. 17-118 at 3.
26
     Page 2 - MOTION TO MODIFY PROCEDURE ORDERED IN ORDER NO. 17-118
```

Department of Justice

SSA/8391267

1	Staff presented its recommendations regarding the framework for Storage Potential			
2	Evaluations and Commission review at a public meeting on March 27, 2017, and the			
3	Commission adopted them. Under Commission Order No. 17-118, utilities have until July 15,			
4	2017 to submit draft storage potential evaluations and the Commission will hold a special public			
5	meeting workshop within 30 days of the date of submission of the latest report.			
6	B. Request for modification.			
7	The draft evaluations will be highly technical. Accordingly, Staff believes that it is more			
8	appropriate for stakeholders to submit written comments regarding the evaluations rather than			
9	attempt to convey such comments at a public meeting workshop. Once the comments are			
10	submitted, Staff will synthesize the comments in a report and present them to the Commission a			
11	a public meeting. Stakeholders will have the ability to present individual comments to the			
12	Commission, but will have the benefit of Commission consideration of Staff's report			
13	summarizing these comments. Also, utilities will have the opportunity to review stakeholder			
14	comments and can be prepared with responses or clarifications at the public meeting.			
15	Further, Staff recommends that the Commission require that prior to August 14, 2017,			
16	each utility host a workshop to present their draft storage evaluations to Staff and stakeholders			
17	and to allow opportunity for questions.			
18	C. Conclusion.			
19	Staff asks that the Commission modify the process specified in Order No. 17-118 for			
20	submission and review of draft Storage Potential Evaluations. Specifically, Staff recommends			
21	that the Commission omit the Special Public Meeting workshop to be held within 30 days of the			
22	last submitted draft storage evaluation and replace it with the following process:			
23	N. 1			
24	workshop for Staff and Stakeholders to explain draft evaluation and answer			
25	questions.			
26	Page 3 - MOTION TO MODIFY PROCEDURE ORDERED IN ORDER NO. 17-118			

1	• No later than August 25, 2017 – Sta	ikenoiders submit informal comments to Staff
2	<ul> <li>No later than September 26, 2017 – and stakeholder comments to Comments</li> </ul>	Staff presents summary of draft evaluations nission at public meeting.
3		
4	DATED this 2614 day of July 2017.	
5		Respectfully submitted,
6		ELLEN F. ROSENBLUM
7		Attorney General
8		3 Ly 13 day 1100 5100
9		Stephanie Andrus, OSB #925123 Senior Assistant Attorney General
10		Of Attorneys for Staff of the Public Utility Commission
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		• ,
25		
26	Page 4 - MOTION TO MODIFY PROCEDURE OSSA/8391267	ORDERED IN ORDER NO. 17-118

Department of Justice

,
,
(503) 947-4520