

UM 1751

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 **A. 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.¹

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25 ¹ Order No. 17-118 at 3.

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 at
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:

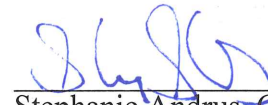
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- 24 • No later than August 14, 2017 – Each utility (PGE and PacifiCorp) must hold a
25 workshop for Staff and stakeholders to explain draft evaluation and answer
26 questions.

- No later than August 25, 2017 – Stakeholders submit informal comments to Staff
- No later than September 26, 2017 – Staff presents summary of draft evaluations and stakeholder comments to Commission at public meeting.

DATED this 26th day of July 2017.

Respectfully submitted,

ELLEN F. ROSENBLUM
Attorney General



Stephanie Andrus, OSB #925123
Senior Assistant Attorney General
Of Attorneys for Staff of the Public Utility
Commission