

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1716

In the Matter of)
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PUBLIC UTILITY COMMISSION OF) REPLY TESTIMONY OF THE OREGON
OREGON) DEPARTMENT OF ENERGY
)
)
Investigation to Determine Resource)
Value of Solar)
_____)

Oregon Department of Energy (“ODOE,” or “Department”) appreciates the opportunity to provide feedback on the straw proposal under Public Utility Commission (PUC) Order number 17-085 and subsequent comments by stakeholders. The Department generally supports the straw proposal for calculating the elements of the Resource Value of Solar (RVOS) as well as the Phase II timeline proposed by PUC staff, including an initial work period for utilities to develop values for the elements to be followed by stakeholder technical workshops and testimony by the intervening parties.¹ Moving to a compliance filing process for Phase II seems premature to the Department as it does not allow for significant exchange between the utilities and stakeholders.

Regarding the Phase I development of RVOS elements and calculation methodologies, ODOE agrees with comments by the Citizens Utility Board that the proposed methodologies largely remain at a conceptual level, and hence the RVOS proceeding should allow for additional opportunity to evaluate methodologies following the first round of data modeling by utility

¹ Staff/500, Bassett/4, line 10.

partners.² This iterative process in evaluating the methodologies will result in greater confidence in the final RVOS model and ensure transparency in the development process.

ODOE also agrees with comments provide by Renewable Northwest et al. regarding the need to strive for the best data granularity that can be cost-effectively provided by utilities. This is especially true for Element 3-Transmission and Distribution Capacity³ and Element 4-Line Losses,⁴ as noted in the opening testimony by Renewable Northwest et al. Distribution capacity and line losses are both elements that can vary significantly by time and location, even due to weather, therefore granularity of system data is essential.

The Department looks forward to further discussion and collaboration with the other intervening parties in this proceeding to develop RVOS methodologies and values.

DATED this 7th day of June, 2017.

Respectfully submitted,

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² CUB/100, Jenks/1, line 11.

³ RNW, OSEIA, NWECA, NW SEED/300, O'Brien/9, line 9.

⁴ RNW, OSEIA, NWECA, NW SEED/300, O'Brien/10, Line 21.