Before the
PUBLIC UTILITY COMMISSION OF OREGON

OREGON DEPARTMENT OF ENERGY
OREGON DEPARTMENT OF ENERGY’S ADDITIONAL TESTIMONY PHASE ONE
May 5, 2017
In its Order Number 17-085, dated March 6, 2017, the Public Utility Commission (Commission) requested that intervening parties file two additional rounds of testimony to complete Phase I. The Oregon Department of Energy (ODOE or Department) appreciates the opportunity to offer additional testimony, partitioned into three parts corresponding to the Commission’s request.

1. **Response to new issues raised at the hearing on January 31, 2017.**

   The Department participated in the January 31, 2017 meeting and has no additional comments to add at this time.

2. **Response to the Straw Proposal attached to Order No. 17-085.**

   ODOE is pleased to see the inclusion of separate elements entitled “Integration and Ancillary Services” and “Security, reliability and reserves,” and agrees with the next steps identified by the Commission. The Department looks forward to participating in the workshops or technical conferences proposed to examine methodologies to quantify these elements.

3. **Discussion of how to proceed in Phase II.**

   The Department agrees with the Commission’s proposal to convene separate workshops or technical conferences to examine more deeply the calculation methodologies for several of the
individual elements. These workshops may be utilized to evaluate the impact of equipment improvements which have been driven by integration challenges in more saturated solar markets. The workshops may also help the Commission to determine the appropriate granularity of initial model data and the sensitivity of model outputs to data inputs.

ODOE would like to express appreciation to the Commission, its staff and consultant, and the other intervening parties for their work in the first phase of this proceeding and looks forward to constructive discussion in the next phase of the investigation.

DATED this 5th day of May, 2017.

Respectfully submitted,

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