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WITNESS: ROBERT DELMAR

# Before the
# PUBLIC UTILITY COMMISSION OF OREGON

## OREGON DEPARTMENT OF ENERGY

## Opening Testimony of Robert DelMar

## March 16, 2018

**Q. PLEASE STATE YOUR NAME AND ORGANIZATION.**

A. My name is Rob DelMar. I am a Senior Policy Analyst for the Planning and Innovation Division within the Oregon Department of Energy ("ODOE"), working out of the field office in Bend, Oregon with particular expertise in solar energy. I am testifying on behalf of ODOE.

**Q. PLEASE SUMMARIZE YOUR QUALIFICATIONS.**

A. I have a degree in Architectural Engineering from Drexel University and have worked in the solar energy industry for 18 years. I started my career in the private sector as a design engineer and project manager at an engineering firm in New England responsible for the design, construction and monitoring of commercial and residential solar thermal and photovoltaic energy ("PV") systems. I worked at ODOE from 2007 to 2011 as an operations analyst and policy analyst, and at Energy Trust of Oregon from 2011 to 2013 as a senior project manager in the solar program. In 2013 I returned to ODOE, working as a senior policy analyst responsible for technical and policy support for solar technologies.

**Q. PLEASE PROVIDE YOUR TESTIMONY.**

A**. Introduction**

ODOE's testimony is divided into comments addressed to all three utilities – with recommendations for future improvements to resource value of solar ("RVOS") calculations and suggestions for future investigations by the stakeholders concerned with the RVOS process – and comments specifically addressed to

Idaho Power Company. The general comments are offered in ODOE's testimony in each of the proceedings for UM 1910, UM 1911, and UM 1912, while the utility-specific comments are included only in the respective proceeding.

**General Comments on RVOS Calculations**

ODOE would like to acknowledge the hard work completed by PGE, Pacific Power, and Idaho Power in developing the initial RVOS calculations. It is clear in their UM 1910, 1911, and 1912 filings that considerable effort was made to develop the RVOS values and the accompanying testimony. ODOE is committed to seeing accurate and comprehensive RVOS values that undergo regular analysis and revision as described in UM 1716 and by the individual utility filings. The process of analysis and revision will ensure the RVOS maintains accuracy under future market scenarios including higher solar saturation, which may impact hourly pricing scenarios, as well as technology developments that may minimize integration challenges and increase the value of solar on the grid. In the absence of an ancillary services market, the RVOS may also provide market signals that promote the development of solar projects that use innovative technologies to support grid operations.

**Integration Costs and Grid Service Value**

ODOE looks forward to participating in future efforts to quantify the grid services element of the RVOS. ODOE staff is engaged in a number of activities that may support this effort, including interactions with utility and community partners

regarding resiliency planning and development of technical workshops regarding battery storage systems. For example, ODOE is a co-sponsor of a resiliency demonstration pilot at Eugene Water & Electric Board ("EWEB") that will deploy solar PV and battery storage to provide multiple benefits to EWEB customers and grid services for the utility.

In the Public Utility Commission of Oregon's ("PUC") order 17-357, an invitation is extended to Renewable Northwest or other parties to develop a proposal for valuing smart inverters. ODOE would like to offer support to the PUC and other RVOS partners in exploring grid service values and recommends that the discussion also include storage systems and other potential technology advances. Below are a few examples of how advanced technologies may impact RVOS values:

Smart Inverters: Modify start-up and drop-off characteristics of PV facilities. May impact integration charges. Opportunities also exist to operate the inverters to provide reactive power, including during periods without any solar production. Storage systems: Storage systems may modify the production profile of PV facilities, which would impact energy, capacity, and deferred transmission and distribution ("T&D") maintenance values. Storage systems may also be operated to provide additional ancillary and load arbitrage services to the grid.

Solar Trackers: Tracking systems modify the production profile of PV facilities, which would impact energy, capacity, and deferred T&D maintenance values.

One outcome of this investigation should be to determine how the benefits of advanced technologies are distributed within the RVOS. One possibility would be to identify the additional value advanced technologies bring to each discreet element within the RVOS. Another option would be to group all of the benefits into a bonus value, which may or may not be the grid services element already identified but currently set at zero. There may be value in identifying a market-based bonus associated with advanced technologies to help facilitate their adoption. There are, however, complications such as how location-specific benefits should be considered and what to do when advanced technologies become common practice. These complications should be considered but not necessarily resolved until future RVOS proceedings.

Advanced technologies may also impact the negative value of integration costs. The integration charges are developed through utility integrated resource plan ("IRP") using variable integration value assessments based on acknowledged integration studies. For the purposes of the RVOS, it may be helpful to evaluate the integration charge with the aim of identifying opportunities to reduce the cost through strategic technology adoption.

**Administration Costs**

There is considerable discrepancy between the projected administrative costs presented in the Idaho Power Company's Compliance Filing Regarding the

Resource Value of Solar[1] for "standard sized systems" compared to those presented by PGE and PacifiCorp. As it currently stands, the cost of administration almost completely negates the value of solar to the system for Idaho Power. While Idaho Power justifies the rate based on actual experience in the 2016 Pilot Volumetric Incentive Rebate ("VIR") program, the company and commission should consider strategies to reevaluate or mitigate these costs. One consideration should be the relative size of the community solar program compared to the VIR program. While Idaho Power is likely to have a smaller community solar program in Oregon than PGE and PacifiCorp, Idaho Power's community solar program is still likely to be much larger than its allocation under the VIR program, which was less than 0.5MW. As such, a similar administrative effort could be spread over more capacity and therefore reduce the unit cost of administration.

**Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

A. Yes.

[1] http://apps.puc.state.or.us/edockets/edocs.asp?FileType=HAA&FileName=haa131832.pdf&DocketID=21120&numSequence=1