

October 25, 2022

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, OR 97301-3398

Re: UM 2111 – Relative Distributed Energy Resource Rating as an
Export Control Method

On March 30, 2022, the Interstate Renewable Energy Council (IREC) placed the *Toolkit and Guidance for the Interconnection of Energy Storage and Solar-Plus-Storage* into the record in this proceeding¹ and requested that the UM 2111 work group to consider Toolkit’s recommendations and associated model language when developing revisions to Oregon’s interconnection procedures. The work group considered the Toolkit’s proposed export control provisions at its workshops on August 9, 2022 and September 14, 2022. On September 16, 2022 the Commission issued a workshop summary and requested written comments on certain issues. IREC provides the following comments on the use of a relative distributed energy resource rating as an export control method.

IREC encourages work group participants that plan to submit comments or suggest changes to the export controls section to closely review the Toolkit. The Toolkit describes the rationale behind each part of the export control proposal. The Toolkit in many places explains the importance of providing a transparent and predictable policy for export controls, including the relative distributed energy resource rating. The Toolkit addresses the relative distributed energy resource rating in chapter III; it is one of the “Traditional Export Control Methods” discussed in section C.

To date, interconnection rules in California, Hawaii, Illinois, and Nevada allow relative distributed energy resource rating using the 50% threshold endorsed in the

¹ The Toolkit is also available online at <http://energystorageinterconnection.org/>.

toolkit.² In addition, the near-final draft of revised interconnection rules in New Mexico includes the 50% threshold.³ IREC is not aware of any interconnection rules that use a different threshold. To date IREC has not come across any data or empirical evidence showing that a more conservative threshold increases the safety and reliability of the distribution system.

IREC does not provide written comments concerning its supplemental review proposal at this time, however IREC looks forward to additional discussions with the work group on this and other topics in the future. Please do not hesitate to contact Midhat Mafazy at midhatm@irecusa.org or me if you have any questions.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

/s/ Yochanan Zakai

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² California Rule 21 § G.1.i (Option 4); Hawaiian Electric Rule 22, Appendix II (Option 4); Nevada Power Co. Rule 15 § I.4.b (Option 4).

³ NM Pub. Reg. Comm., Dkt. 21-00266-UT, Order Opening Commentary Period and Request for Written Commentary, Attachment, § 17.9.568.12(C)(1)(c) (September 20, 2022).