



December 20, 2022

Via Electronic Filing

Oregon Public Utility Commission  
201 High St. SE, Suite 100  
Salem, OR 97301-3398

Re: Comments on UM 2000 Scoping

The Oregon Solar + Storage Industries Association (“OSSIA”) appreciates the opportunity to provide the below comments to Staff’s Process Proposal and Scope in Docket No. UM 2000, the Broad Investigation of PURPA. Overall OSSIA is supportive of the process laid out in Staff’s proposal, but we recommend adding an issue into phase 1 and advocate for addressing as much as possible prior to moving to a contested case.

### **Comments**

OSSIA recommends creating and setting an interim solar and storage rate in phase 1. The QF Trade Associations, with OSSIA, previously argued for this rate in Docket No. UM 1729, PacifiCorp’s 2022 Update to Standard Avoided Cost Schedule for Qualifying Facilities. During the Public Hearing and Commissioner Worksession Chair Decker stated, “I appreciate the point we need to find some low hanging fruit to move quickly on to help the QF Community deal with the impact of the changing market methodology, but this is a difficult forum to do that.”<sup>1</sup> While an individual utility’s annual avoided cost update may have been a difficult forum, this docket will allow for a solar and storage rate to apply to all utilities. Additionally, OSSIA believes this issue can be quickly resolved at the outset of this docket and can be a fast win. This issue should not be pushed to the end of the docket as this rate is already overdue and would bolster the QF community. A solar and storage rate will be easy to determine within the existing methodologies used by each utility and set at the outset of this docket. OSSIA recommends that the rate be an interim rate in effect only during the pendency of this docket until the commission makes the remainder of its decisions on changes to the methodology.

We do not need to over complicate the solar and storage rate. The avoided cost work papers of each utility should allow for a straightforward calculation. There is currently a solar calculation that can be updated with a different capacity contribution for solar and storage, with potentially some other minor tweaks depending on each utility’s specific methodologies. We can look to the

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<sup>1</sup> Oregon Public Utility Commission Public Meeting, Docket No. UM 1729, June 28, 2022.



utilities Integrated Resource Plans or some other publicly available and credible baseline for determining an interim capacity contribution for a solar and storage rate. As this rate will be interim until the conclusion of this docket, we believe stakeholders can reach an agreement on the capacity contribution of solar and storage and plug it into the existing methodologies.

OSSIA is supportive of the phasing approach laid out by Staff's proposal. We believe that waiting to address many issues in the contested case process will draw out the process and increase costs. Resolving some issues in phase 1 would narrow the focus for the contested case in phase 2. The joint utilities indicated at the workshop they would not like to make decisions in phase 1 that will narrow the options in phase 2. However, OSSIA believes that we can and should ask the Commission to make decisions in phase 1 to provide some direction on issues like type of methodology before reaching the contested case. Narrowing the focus seems especially necessary as the range of different methodologies can be quite broad and not easily compared. Making decisions in phase 1, therefore, will enable Stakeholders to focus in on more comparable types of methodologies and resolve peripheral issues.

Additionally, it is substantially more difficult for organizations like OSSIA to participate in the contested case process. Many of the issues staff has placed into phase 1 will have profound effects on our members and we would like to weigh in on and resolve as many of these issues prior to moving to a contested case. If the issues in phase 1 are not resolved prior to the contested case, then the contested case process will limit our ability to be involved in each issue.

### **Conclusion**

OSSIA appreciates Staff's efforts to lay out a path forward in UM 2000. We look forward to additional opportunities to comment in this docket and improve the avoided cost methodology in Oregon.

Respectfully submitted this 22nd day of December 2022,

Jack Watson  
Director of Policy and Regulatory Affairs