



## Workshop Notice & Agenda

### Docket No. UM 1930 – Community Solar Program

Date: Monday March 29, 2021  
Time: 2:00-4:00 pm  
Access: 1. [Join the Zoom videoconference](#); or  
2. Join by phone:  
Call 971-247-1195  
Enter Meeting ID: 890 1515 2441#  
Enter Passcode: 128 470 7115#

### Agenda

2:00-3:00 pm Topic 1: CSP PPA 90-day limit to purchase of start-up test energy

- Pacific Power perspective
- Renewable Energy Coalition perspective
- Other stakeholders/utilities perspectives
- Discussion

3:00-4:00 pm Topic 2: Criteria for pausing CSP interconnection queue

- Staff present existing criteria
- Pacific Power perspective
- Other stakeholders/utilities perspectives
- Discussion

### Purpose

The purpose of this workshop is to hear the perspectives of utilities, project developers, and other stakeholders on the following two Community Solar Program (CSP or Program) topics, and discuss potential solutions. Staff's goal is to identify solutions that meet Program objectives, can be practically implemented, and comply with legal requirements while recognizing the range of interests presented.

### Topic 1:

Proposed revisions to PGE and Pacific Power CSP Power Purchase Agreements (PPA) to limit the purchase of start-up test energy to 90 days.

Background:

- The [Staff report](#) for the Commission's regular public meeting on February 23, 2021, recommended approval of revisions to Pacific Power's (PAC) and PGE's CSP PPAs. The revisions clarified that energy delivered prior to Commercial Operation Date (COD) is treated as unsubscribed energy that is paid at the as-available rate, defined



- this energy as start-up test energy, and limited the purchase of start-up test energy to a period of 90 days.
- Renewable Energy Coalition (REC) submitted [comments](#) opposing the revision that limits the purchase of start-up test energy to 90 days.
  - Staff's recommendation was removed from the Feb. 23 agenda to allow time to gather more stakeholder and utility input.

Considerations:

- A CSP project may begin delivering energy to the utility no earlier than 90 days prior to the scheduled COD.
- A CSP project must meet certain Program conditions and be certified by the Commission before it can achieve a Commercial Operation Date (COD) under the CSP PPA.
- The utilities argue they could be required to purchase start-up test energy indefinitely if the project fails to get certified in the CSP.
- REC argues that the utility is required to accept energy from the project, so a time limit violates PURPA.

Topic 2:

Criteria for pausing acceptance of new project applications to the CSP interconnection queue.

Background:

- UM 1930 [Order No. 19-392](#), issued November 8, 2019, establishes a time and capacity limit to the CSP queue:  
"Unless the Commission chooses to extend the rule, the utility will accept interconnection applications under the CSP rule for 18 months following the rule's adoption or until the aggregate capacity (MWac) of generators with an executed CSP interconnection agreement that have received pre-certification equals the utility's capacity tier (2.5 percent of 2016 system peak load), whichever comes first." (Appendix A, p. 49)
- PAC has asked Staff to consider whether it is appropriate to pause accepting applications in the CSP queue now, based on the volume of pending interconnection applications currently in the queue.
- PAC's total CSP capacity tier referenced in Order No. 19-392 is 64.6 MW. Only 32.3 MW of that capacity tier has been made available to CSP projects. The aggregate capacity of active project applications in PAC's CSP interconnection queue is approximately 73 MW, or 1.13 times the size of PAC's total CSP capacity tier, and 2.26 times the size of PAC capacity that has been made available to CSP projects. The aggregate capacity of generators in the CSP queue with executed PAC CSP



interconnection agreements is approximately 16 MW, or 25 percent of PAC's total CSP capacity tier.

**Considerations:**

- The Program capacity that remains available to new CSP project applications is limited to the "carve-out", reserved for exclusive use by small and nonprofit-led projects. There is 7.6 MW of carve-out capacity available in PAC territory, and 11.6 MW of carveout capacity available in PGE territory.
- Idle projects sitting in the CSP queue awaiting the release of new Program capacity affect the interconnection studies performed for lower-queued projects, including small and nonprofit-led projects applying for CSP carve-out capacity and net-metered projects.
- Only half of PAC's and PGE's CSP capacity tier has been made available to CSP projects (32.3 MW of PAC's 64.6 MW tier and 46.6 MW of PGE's 93.2 MW tier). The Commission has not made any decisions on releasing additional capacity.

**Next Steps**

Topic 1: Staff will bring PGE's and PAC's CSP PPAs to a future Commission public meeting for approval. The utilities will refile their PPAs if any additional revisions are made.

Topic 2: Staff may recommend that the Commission alter the time and capacity limits it placed on the CSP queues. In that case, Staff will post proposed revisions for comment in UM 1930.