

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 2000**

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON,

Investigation Into PURPA Implementation.

SUPPLEMENTAL  
COMMENTS OF  
RENEWABLE NORTHWEST

Renewable Northwest thanks the Oregon Public Utility Commission (“Commission”) and Commission Staff (“Staff”) for this opportunity to submit supplemental answers to Staff’s March 14, 2019 Questions (“Staff’s Questions”). We thank Staff for extending the timelines for the scoping face of this investigation.

Renewable Northwest again reiterates the importance of explicitly addressing throughout this investigation the statutory considerations and policy guidance on PURPA implementation in ORS 758.515.<sup>1</sup> We include below answers to several of Staff’s Questions that we did not address in our March 29, 2019 comments.

Question 13: Please explain an optimal process for a QF requesting an energy sales agreement with a utility. For this process please note any differences between applications for standard rates, standard contracts, or non-standard contracts.

From our perspective, an optimal process for a QF requesting a power purchase agreement with a utility would be transparent and predictable. The informational and procedural requirements, as well as the timelines would be public and reasonable, and changes would be subject to Commission approval. Finally, QFs would not be unreasonably penalized for non-substantive errors in their applications.

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<sup>1</sup> In ORS 758,515, “[t]he Legislative Assembly finds and declares that: (1) The State of Oregon has abundant renewable resources. (2)It is the goal of Oregon to: (a)Promote the development of a diverse array of permanently sustainable energy resources using the public and private sectors to the highest degree possible; and (b) Insure that rates for purchases by an electric utility from, and rates for sales to, a qualifying facility shall over the term of a contract be just and reasonable to the electric consumers of the electric utility, the qualifying facility and in the public interest. (3) It is, therefore, the policy of the State of Oregon to: (a) Increase the marketability of electric energy produced by qualifying facilities located throughout the state for the benefit of Oregon’s citizens; and (b) Create a settled and uniform institutional climate for the qualifying facilities in Oregon.

Question 14: Please describe an optimal interconnection process for a QF requesting interconnection.

At a high level, the path to an optimal interconnection process would begin before a QF requested interconnection, with the utility making information available to prospective QFs to possibly guide site selection and/or aid them in estimating interconnection costs. This is an issue that could be addressed in UM 2001.

Once the application process begins, utilities would clearly and promptly update QFs when they are unable to follow their estimated study timelines. QF developers (and their technical staff or consultants) would be able to engage with the utilities in a manner that results in a thorough understanding of what is driving any required upgrades and associated costs, as well as in an opportunity to constructively engage when the QF developer has technical questions or desires to independently verify the utility's study results.

Like an optimal contracting process, an optimal interconnection process would provide QF developers predictability regarding the timeline of the different studies and steps of the process.

Question 25. Assuming a two-phase process, what issues do you believe could be fast-tracked within Phase 1?

We see potential value in fast-tracking issues related to transparency in the interconnection and contracting processes as it could result in decreased litigation. For example, Staff could fast-track efforts to increase consistency in contracting practices among utilities, require that models used to set standard prices can be easily found and compared, and require both consistency across utilities in the interconnection process (Please see our answer to question 14).

Finally, we would favor prioritizing the issue of treatment of storage under PURPA and the issue of cost allocation for network upgrades associated with QFs.

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Question 27: Please share one to two specific suggestions you would make to change how the cost of network upgrades are assigned and socialized?

To the extent that network upgrades benefit the utility's system, QFs should not have to bear the full costs of those upgrades. Renewable Northwest is open to exploring different mechanisms to ensure that compensation for the benefits to the utility's system resulting from the network upgrades associated with interconnecting a QF.

Respectfully submitted this 26th day of April, 2019.

/s/ Silvia Tanner

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