1	BEFORE THE PUBLIC UTILITY COMMISSION				
2	OF OREGON				
3	UM 2032				
4	In the Matter of				
5 6	PUBLIC UTILITY COMISSION OF OREGON,	AMENDED STAFF PROPOSED ISSUES LIST			
7	Investigation into the Treatment of Network Upgrade Costs for Qualifying Facilities.				
8					
9	Background				
10	At the July 30, 2019 public meeting, Staff presented its recommendation to open several				
11	different investigations regarding the implementation of PURPA, including an investigation into				
12	the appropriate cost allocation of interconnection-related Network Upgrades for qualifying				
13	facilities (QFs). During the meeting, stakeholders asked the Commission to expand the scope of				
14	the investigation into the cost allocation of Network Upgrades to include additional issues such				
15	as whether utilities should be required to allow generators to hire third parties to conduct				
16	interconnection studies and to build Network Upgrades. After some discussion the Commission				
17	ordered:				
18	prehearing conference and after considering recommendations from the				
19					
20	network upgrade costs for QFs should be expanded to include a limited number of additional, discrete issues related to interconnection of QFs. <sup>1</sup>				
21	Staff and parties to Docket No. UM 2032 have conferred regarding the appropriate scope				
22	of this docket and have not reached agreement. Instead the parties agreed that on April 27, 2020				
23	Staff will submit a proposed issues list to the Administrative Law Judge and parties will file				
24	comments regarding their recommendations for the scope of the investigation on May 4, 2020.				
25					
26	<sup>1</sup> In the Matter of the Oregon Public Utility Commission Request to Adopt a Scope and Process for the Investigation into PURPA Implementation (Docket No. UM 2000); Order No. 19-254.				

1	Staff anticipates that the ALJ will hold a prehearing conference to consider the scope of the			
2	investigation and the procedural schedule on May 18, 2020.			
3	Proposed Issues List			
4	Staff recommends limiting the initial phase of this docket (Phase 1) to the following			
5	questions as Staff recommended to the Commission in July 2019:			
6 7	1. Who should be required to pay for Network Upgrades necessary to interconnect the QF to the host utility?			
8 9	2. Should on-system QFs be required to interconnect to the host utility with Network Resource Interconnection Service (NRIS) or should QFs have the option to interconnect with Energy Resource Interconnection Service (ERIS) or an interconnection service similar to ERIS?			
10	Depending on the Commission's resolution of Issues 1 and 2, a second phase may			
11	be necessary to address how to implement the Commission's decisions. If so, Staff			
12	recommends a second phase of the docket (Phase II) to address the following issue:			
13 14 15 16	Upgrades, (which typically are primarily utility customers), should pay for the Network Upgrades necessary to interconnect the QF to the host utility, how should that policy be implemented? For example, should utility customers, and other beneficiaries and/or users, fund the cost of the Network Upgrades upfront or should the QF provide the funding for the Network Upgrade subject to reimbursement from utility customers? Should the QF, utility customers, and other beneficiaries and users if any share the costs of Network			
18	Staff recognizes that the following issues identified by the Renewable Energy			
19	Coalition (REC), the Community Renewable Energy Association (CREA), and other			
20	intervenors are appropriate to include in a general investigation of interconnection			
21	process and policies. These issues are:			
22	1. What are the appropriate circumstances under which an Interconnection			
23	Customer should be provided an option to build (or hire third parties to build) Network			
24	Upgrades?			
25				
26				

1	2.	What are the appropriate circumstance	es under which an Interconnection
2	Customer should have an opportunity to hire third parties to perform Interconnection		
3	Studies?		
4	3.	What is the appropriate process through	gh which an Interconnection Customer
5	may challenge utility cost estimates and propose alternatives?		
6	4.	In what circumstances should identifie	ed transmission upgrades should be
7	reviewed using power flow analysis to confirm that the upgrades are necessary and		
8	prudently designed and sized.		
9	Staff does not recommend investigating the additional issues identified by the QFs		
10	in Phase I of Docket No. UM 2032. Instead, Staff believes the issues identified by the QFs		
11	are appropriately addressed in a broader investigation of interconnection issues that is not		
12	tied to the timeline to resolve the specific Network Upgrade issues. The questions raised		
13	by the QFs are technical and of interest to all interconnection customers subject to the		
14	Commission's jurisdiction, including Community Solar Program projects and net metering		
15	customers. Staff does not believe it is appropriate to incorporate these issues into this		
16	narrow investigation of how costs of Network Upgrades for QFs should be allocated.		
17	Staff anticipates recommending that the Commission open a general investigation into		
18	interconnection process and policies relatively soon. However, Staff commits that if the general		
19	investigation is not opened prior to the resolution of the issues identified by Staff in this docket,		
20	Staff will not object to considering the issues identified by the QFs in Phase II of this docket.		
21	DA	ATED this 28th day of April 2020.	
22		I	Respectfully submitted,
<ul><li>23</li><li>24</li></ul>			ELLEN F. ROSENBLUM Attorney General
25		/	/s/ Stephanie Andrus
26		9	Stephanie Andrus, OSB # 925123 Sr. Assistant Attorney General Of Attorneys for Staff of the Public Utility Commission of Oregon