



Portland General Electric Company
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May 17, 2021

Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
P.O. Box 1088
Salem, OR 97308-1088

Re: UM 1930 – PGE Comments on Staff’s Proposed Revisions to PGE’s CSP PPA, and the CSP Queue

Portland General Electric Company (PGE or Company) respectfully submits these comments in reply to Staff’s May 5, 2021 Community Solar Program (CSP) Request for Comments.

Staff invites comments on two separate issues. 1) Proposed revisions to the PGE CSP Power Purchase Agreement (PPA) limiting the purchase of start-up energy to 90 days, and 2) Updated criteria for pausing the acceptance of new project applications to the CSP interconnection queue.

1) Proposed revisions to the PGE CSP PPA

Staff’s proposal limits the length of time that the utility must purchase start-up test energy to 90 days prior to project certification in the CSP but removes the time limit once a project becomes certified.

PGE supports Staff’s proposal given that it will prevent non-certified projects from delivering energy for an undefined amount of time should they fail to become certified under the CSP rules. PGE has edits for consideration to clarify the intent of the updates. The proposed edits are designed to clarify the eligibility for a project to provide test energy in excess of 90 days dependent upon whether the project is certified at the time it is delivering such test energy.

The relevant PPA language appears below with PGE’s clarifications in redline over Staff’s proposal submitted on May 5, 2021.

3.2 Delivery and Purchase of Net Output. Subject to Section 3.1 above and unless otherwise provided in this Agreement, commencing on the Commercial Operation Date, Project Manager will transmit to PacifiCorp all Net Output and PacifiCorp will accept all Net Output delivered to the Point of Delivery. To the extent permitted under applicable laws, regulations (including without limitation the Community Solar Program rules) and

other requirements applicable to Seller’s Community Solar Program Project, PacifiCorp will accept Start-up Test Energy delivered to the Point of Delivery as early as ninety (90) days prior to the Scheduled Commercial Operation Date, as long as PacifiCorp has commenced transmission service for the Facility; provided that, in such case, PacifiCorp’s obligation to purchase Start-up Test Energy from a Project that is not at such time a Certified Project will not exceed a maximum period of ninety (90) days ~~unless the Facility is a Certified Project~~. If Project Manager desires to begin transmitting Start-up Test Energy to PacifiCorp at a date earlier than ninety (90) days prior to the Scheduled Commercial Operation Date, PacifiCorp will only be obligated to purchase such Net Output (i) if PacifiCorp is able to modify its network resource designation for the Facility such that the output could be delivered using network transmission service as described in Section 3.1 above at no additional cost or other economic impact to PacifiCorp; and (ii) for any Project that is not at such time a Certified Project, unless the Facility is a Certified Project, only for a maximum period of ninety (90) days.

2) Updated criteria for pausing the acceptance of new project applications to the CSP interconnection queue.

PGE supports Staff’s proposal to limit the project applications for interconnection. Limiting the number of projects in the CSP interconnection queue will avoid the stagnation of projects in the interconnection queue. A limit will prevent unnecessary upgrades for other interconnection projects should a project stay in the queue and not be realized. Additionally, project withdrawals from the queue when the project is not feasible trigger restudies for lower queued projects, creating uncertainty. Creating a queue that more accurately reflects the available program capacity reduces the uncertainty.

Please direct questions or comments regarding these comments to Santiago Beltran Laborde at (503) 464-7902. Please direct all formal correspondence and requests to the following email address pge.opuc.filings@pgn.com

Sincerely,

\s\ Robert Macfarlane

Robert Macfarlane
Manager, Pricing & Tariffs