

June 3, 2019

VIA ELECTRONIC MAIL

To: Parties in Docket UM 2001

Re: Docket UM 2001 Response to Staff Interconnection Data Questions

As requested by Staff of the Public Utility Commission of Oregon (Commission), PacifiCorp d/b/a Pacific Power (PacifiCorp) respectfully provides these answers to questions presented to stakeholders in Staff's May 22, 2019 email regarding Staff's May 13, 2019 proposal that was discussed at the May 17, 2019 workshop. PacifiCorp understands that stakeholder responses to these questions will be used to further refine Staff's recommendation to the Commission regarding sharing of interconnection data by the utility companies (including PacifiCorp). Staff is scheduled to present its recommendation at the upcoming public meeting on June 18, 2019.

PacifiCorp appreciates Staff's efforts to facilitate a collaborative process, including solicitation of feedback from developers. This process has been informative for the company and PacifiCorp looks forward to a continued dialogue. As detailed below, there are several elements of Staff's proposal that the company agrees could increase coordination and transparency between the utilities and developers. Therefore, PacifiCorp does not oppose certain elements of the proposal. However, for the reasons set forth below, some components would be overly burdensome and time-consuming for the company to comply with and would provide no benefit to developers.

1. Interconnection Reports

PacifiCorp will continue to make available to the public through its OASIS website the redacted versions of interconnection studies it performs. The company redacts these studies only to remove information that would reveal the identity of an unaffiliated applicant.¹ This element of Staff's proposal does not require any changes to PacifiCorp's current practices and the company has no objections or proposed modifications to this proposal.

2. Utility System Information

The second component of Staff's proposal, utility system information, is described as "medium" in terms of how helpful Staff perceives it would be for evaluating interconnection potential. The company disagrees.

While the information has the potential to be a helpful data point (among many data points) to the members of the development community who routinely examine interconnection study-related information and understand serial-queue order study analyses, it is likely to be

¹ See, e.g., PacifiCorp OATT, Section 38.4, OASIS Posting ("Transmission Provider will maintain on OASIS a list of all Interconnection Requests...Except in the case of an Affiliate, the list will not disclose the identity of Interconnection Customer until Interconnection Customer executes an LGIA or requests Transmission Provider file an unexecuted LGIA with FERC.").

misinterpreted by other members of the development community—and perhaps those members that this reform is particularly aimed at assisting—as a replacement for, or indication of the likely outcome of, the traditional interconnection study process. That process identifies the requirements associated with granting a single generator interconnection request by considering the cumulative effect of that request *and* higher-queued requests in serial-queue order.

Bare utility system information that does not reflect this type of cumulative analysis, on the other hand, has the potential to create significant confusion for developers because it does not take into consideration how a serial-queue order study might identify significant requirements to interconnect even where, for example, a particular distribution substation may not have many existing generators or queued requests. Indeed, the Northwest & Intermountain Power Producers Coalition (NIPPC) recently filed comments on a draft business practice posted to the company’s OASIS website stating that “PacifiCorp’s interconnection queue process is not overwhelmed because developers have insufficient information or data to make informed decisions. Rather the queue process is overwhelmed in large part because higher queued projects are ‘squatting’ in the queue for any number of reasons without moving forward with their development.”²

Accordingly, the company would categorize this information as “low” for helpfulness in evaluating interconnection potential. The company continues to recommend that developers use the far more valuable pre-application process to obtain initial information related to a particular project. The pre-application process provides current, specific information that takes into account existing and queued requests that might affect a proposed interconnection point at little cost and effort to the developer.

However, subject to the above-referenced concerns regarding the limited value of such information, PacifiCorp agrees that it can provide the Oregon distribution system substation level information (*i.e.*, the unshaded information contained in Staff’s proposal) including distribution substation names, the county each distribution substation is located in, distribution substation voltages, distribution substation transformer capacity, feeder identifiers, feeder capacity at the distribution substation terminal, peak load and whether a distribution substation has SCADA.³ The company proposes to assemble this information about its Oregon distribution system in a table format, post the table to its OASIS website, and update the information annually.

The OASIS website page would need to include a disclaimer emphasizing the importance of understanding that the table cannot be relied upon to make generator interconnection siting choices, that the pre-application process is far more valuable as an initial test of a particular interconnection site, and that under no circumstances does consulting either the OASIS table (or receiving a pre-application report) replace the interconnection study process during which the request is assigned a queue position and the requirements to interconnect a generator are formally evaluated in a cumulative, serial-queue order manner.

² NIPPC Comments on PacifiCorp’s Draft Business Practice #73 (May 17, 2019), available at: https://www.oasis.oati.com/woa/docs/PPW/PPWdocs/BP73_NIPPC_Comments_0517192.pdf.

³ As discussed at the workshop, general information regarding whether a substation has a fiber connection will not be indicative that the substation has the necessary communication capabilities for a particular project. Therefore, it is more appropriate for this information to be provided on a case-by-case basis through the pre-application process.

The company is proposing to provide this information annually to limit the administrative burden associated with compiling this information. As noted in Staff's May 22nd email, it is important to balance effort with transparency and usefulness. Without the performance of a full system impact study, which, by definition, also considers the impact of higher-queued projects, it will not be possible for a developer to know the impacts of a new interconnecting generator at a particular location. Therefore, requiring information of such limited value does not warrant more frequent updates.

With respect to the shaded information contained in Staff's proposal, PacifiCorp has significant concerns with any requirement to provide such information on a routine basis and without protective treatment. The information that Staff has shaded and identified as requiring a longer compliance timeline would be very burdensome for the company to compile and would reference critical energy infrastructure information (*i.e.*, the information cannot be made publicly available). In light of these challenges, and the company's position that providing this information is of low value for the reasons noted above, the company recommends the requirement to provide information be limited to the unshaded items only.

3. Interconnection Milestones

As discussed at the May 17th workshop, it would reduce the administrative burden for PacifiCorp (and other utilities) if any interconnection milestone information required to be provided to the Commission is aligned with the information required by the Federal Energy Regulatory Commission (FERC) pursuant to its recent Orders 845 and 845-A⁴ with respect to both scope and timing.

First, with respect to scope, FERC Order 845 requires transmission providers to post information relating to the time required to complete certain interconnection studies.⁵ Staff's proposal to post information relating to the timing of all interconnection milestones would expand these requirements and create a significant administrative burden on top of the new requirements imposed by FERC.

Second, with respect to timing of any reporting, FERC's Order 845 required transmission providers to post aggregate information pertaining to study processing timelines quarterly beginning at the end of the first calendar quarter of 2020.⁶ Any reporting requirements imposed by the Commission should align with the FERC's aggregate requirements and quarterly posting schedule.

⁴ FERC Order 845 was issued on April 19, 2018 in FERC docket no. RM17-8-000; Order 845 amends the *pro forma* large generator interconnection procedures and agreement.

⁵ *See, e.g.*, Order 845-A (Feb. 21, 2019), Appendix B, Pro Forma Large Generator Interconnection Procedures, § 3.5.2 ("Transmission Provider will maintain on its OASIS or its website summary statistics **related to processing Interconnection Studies pursuant to Interconnection Requests, updated quarterly.**") (emphasis added).

⁶ *Id.*

The requirements imposed by FERC's Order 845 reflect an understanding that utilities can only be expected to make *reasonable efforts* to meet interconnection milestones.⁷ This is important because during the interconnection process, there are many delays beyond a utility's control. For example, there are delays caused by developers that fail to provide requested technical information in a timely manner, developers that fail to timely execute agreements, etc.

Staff's May 13, 2019 memorandum recognized the importance of gaining a complete picture of the factors contributing to interconnection study process delay, noting that the milestone tracking fields may need to capture other items, such as days added for a customer's delayed response. The company agrees. Only with the collection of additional information related to developer behavior (*e.g.*, developer responsiveness to requests for additional information) would Staff's proposal be able to achieve the goal of transparency and/or lead to improvements. To the extent that the Commission requires any information to be posted, it should also require the posting of developer-caused delays that cause or contribute to any milestone delays. However, the company notes that to the extent it must track developer-caused delays relating to *all* milestones, rather than just study timelines (as contemplated by Order 845), this will impose an additional administrative burden on the company and other utilities.

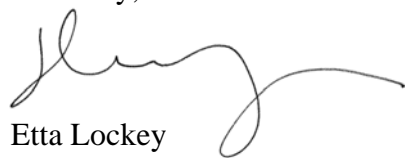
4. Interconnection Data Working Group

If an interconnection data working group is formed it should be limited to Staff, utilities, and a single developer representative (*e.g.*, NIPPC). Additional stakeholders could be included on an as needed basis. As an initial matter the working group could work to determine how data will be provided and how any reporting requirements should be complied with (*e.g.*, will Staff create a template for compliance to ensure uniformity or will the utilities be tasked with this responsibility).

PacifiCorp appreciates the opportunity to further collaborate with staff and stakeholders on these important issues, and looks forward to additional discussion on this important topic at the upcoming public meeting and workshop.

Please contact Cathie Allen at (503) 813-5934 if you have any questions.

Sincerely,



Etta Lockey
Vice President, Regulation
Pacific Power & Light Company

⁷*Id.*, § 3.5.4(i) (stating that the transmission provider may exclude from its report of study delays "any allowance for reasonable efforts.")

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of PacifiCorp's Response to Staff Interconnection Data Questions on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

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Dated this 3rd day of June, 2019.



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