



Portland General Electric
121 SW Salmon Street • Portland, Ore. 97204
PortlandGeneral.com

June 3, 2019

VIA ELECTRONIC FILING
puc.filingcenter@state.or.us

Public Utility Commission of Oregon
201 High Street S.E., Suite 100
Salem, OR 97308-1088

Attention: Filing Center

RE: UM 2001 – PGE’s Comments on Staff’s Proposal for Interconnection Data Transparency

Portland General Electric Company (PGE or the Company) submits these comments in response to the May 22, 2019 email from Staff requesting comments on Staff’s May 13, 2019 draft proposal for interconnection data transparency. PGE appreciates the opportunity to provide comments regarding Staff’s draft proposal, and thanks Staff for its efforts to engage with stakeholders to balance the need for transparency, the usefulness of the data, and the level of effort required to produce it. In PGE’s view, Staff’s proposal—with a few modifications—will fulfill the objective of increasing understanding of PGE’s distribution system and interconnection processes without compromising the safety of the Company’s system or placing an undue burden on Company resources.

PGE is prepared to produce most of the information identified by Staff on the timelines Staff proposes. However, PGE objects to other parties’ proposals to add significant amounts of additional information to that originally proposed by Staff. In addition, PGE asserts that it should not be required to produce daytime minimum load data, which would be excessively burdensome to produce and of limited value, and that communications and peak load data must remain confidential.

I. Small Generator Interconnection Queue

At the May 17, 2019 workshop, Staff clarified that it proposes for PGE and Idaho Power to post their small generator interconnection queue information by July 1, 2019. PGE has no objection to posting a spreadsheet on its Open Access Same-Time Information System (OASIS) site containing its small generator interconnection queue information by July 1, 2019. PGE’s queue spreadsheet will provide the same basic information as PacifiCorp’s posted queue.

II. Interconnection Study Reports

Staff proposes that PGE and Idaho Power post their Oregon-jurisdictional interconnection study reports publicly. Currently, PGE does not post its Oregon-jurisdictional study reports publicly but

provides them upon request. However, PGE has no objection to posting Oregon-jurisdictional interconnection study reports publicly on OASIS by the end of 2019. The posted study reports will be redacted to protect confidential customer information, the Company's internal asset ID numbers, and any Critical Infrastructure Protection (CIP) or Critical Energy/Electric Infrastructure Information (CEII) information they contain. In response to Staff's question regarding inclusion of system upgrades, PGE clarifies that all of PGE's studies include, as study assumptions, any upgrades that have been approved and budgeted by the Company.

Staff proposes that the utilities post studies going back to January 1, 2017. PGE supports Staff's proposed timeline. PGE completed approximately 300 studies between January 2017 and the present, and this volume of past studies—along with future studies—will provide a substantial amount of information to potential interconnection customers. However, studies conducted prior to 2017 will not provide useful information to a potential interconnection customer in 2019 and beyond, due to system and interconnected capacity changes in the intervening time. Moreover, producing additional, pre-2017 studies would increase the burden on the Company, which already must process and post hundreds of studies under Staff's proposed scope.

III. Utility System Information

Staff proposes that the utilities provide a variety of information regarding specific aspects of their systems to assist potential developers with initial project location screening. Specifically, *Staff proposes that the utilities produce the following utility system data by September 1, 2019:*

- Substation
 - name
 - county or other location identifier (e.g., “near Salem, OR”)
 - voltage going out
 - number of transformers
 - transformer size (MVA on the outgoing side¹)
 - communications
 - SCADA
 - fiber
 - number of feeders
- Feeder
 - name or identifier
 - peak load
 - line capacity at head of the feeder

PGE is generally amenable to providing the requested data for the Company's 148 distribution substations and 640 distribution feeders.² A few of these data—such as substation name—are

¹ This metric is not reflected in Staff's May-22 email but appeared to be the consensus at the May-17 workshop.

² As PGE explained at the workshop, the Company cannot provide information that could be used to identify specific customers—such as feeder names. *See* ORS 646.600 to 646A.628. However, PGE does not have concerns about providing feeder identification numbers.

already compiled in a usable format, but much of the data will have to be compiled specifically to comply with this request, which will require time and resources.

Staff asks parties to comment regarding how best to summarize substation communications—by identifying the presence or absence of SCADA or fiber, or in some other way. While the presence or absence of SCADA may be useful in determining possible interconnection upgrades, the presence or absence of fiber at a substation is unlikely to be useful. Fiber may be present at a given substation but not in the necessary direction, or the existing fiber may lack adequate capacity to accommodate additional communications. Determining whether a given substation has fiber that an interconnection customer could use would require substantially more review and would need to occur on a case-by-case basis during the study process. Therefore, PGE recommends that substation communications be summarized by identifying the presence or absence of SCADA only. As discussed below, PGE has significant confidentiality concerns about posting any communication information publicly.

In addition, Staff proposes that the following utility system data be produced on a date to be determined after September 2019:

- Feeder
 - DER capacity connected and in queue
 - Daytime minimum load

PGE does not object to providing aggregate DER capacity information, but PGE opposes the recommendation to produce daytime minimum load information because such information would be both extremely burdensome to provide and of limited value. *First*, system-wide daytime minimum load data are not readily available, and this information must be determined on a case-by-case basis through the study process. Therefore, PGE would need to develop processes to acquire and maintain this information, which would strain existing personnel and resources. *Second*, this information is of limited value in screening project locations, because DER and load are not evenly distributed along a feeder and therefore the daytime minimum load at the feeder breaker is unlikely to provide the potential capacity information for other locations on the feeder.

In response to Staff's question regarding whether daytime minimum load should be provided seasonally or annually, PGE responds that if this information must be provided, it should be on an annual basis to minimize the burden. Staff also asks whether these data could be improved by updating it each time a study of a feeder is completed. However, potential interconnection customers will have access to such studies, and PGE should not be required to calculate and produce data for its entire system, at great effort and expense, outside of the interconnection studies it already conducts. If PGE were required to produce system-wide daytime minimum load information, the Company estimates that it would need until at least the second quarter of 2020 to do so.

IV. Interconnection Milestones

Staff proposes that each utility track and publish the dates when each interconnection application that is complete as of July 1, 2019, meets the specific milestones in the small generator

interconnection rules, OAR Division 82. PGE does not object to this proposal. PGE proposes to provide this information in Excel format, and possibly in the same document as the interconnection queue.

In response to Staff's question regarding whether reporting of past milestones should be required, PGE opposes such a requirement. Reporting past milestones could be very burdensome—for example, PGE may need to review current and past employees' emails to determine when certain events occurred. More importantly, the *current* status of the utilities' and QFs' adherence to milestones will be the most informative and relevant information for the Commission to consider as it examines interconnection issues in UM 2000.

In response to Staff's question regarding whether interconnection costs should be summarized and reported, such a requirement would not add significant value to the information already available. Specifically, the study reports that will be posted publicly provide cost information, and PGE also files Tier 4 interconnection cost information with the Commission annually pursuant to OAR 860-082-0065.

V. Other Issues

A. How should the utility distribution system information be provided?

PGE proposes to produce the requested interconnection queue, studies, and milestone data on OASIS under the "Generation Interconnection" folder. The queue and milestone data will be in Excel format.

PGE has not yet determined the best method for providing the utility system information, and the approach may vary depending on confidentiality determinations and the structure of the disclaimer and user access. PGE plans to produce the utility system data in Excel or similar format, which would be sortable. The utility system data should be accessible only after the viewer reviews and accepts cautionary language and a detailed disclaimer—similar to that required by Xcel.

PGE proposes that the queue information and interconnection milestones be updated monthly, and that the utility system data be updated annually.

B. CIP/CEII requirements

CEII is specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure (physical or virtual) that:

1. Relates details about the production, generation, transmission, or distribution of energy;
2. Could be useful to a person planning an attack on critical infrastructure;
3. Is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. 552 (2000); and
4. Does not simply give the general location of the critical infrastructure.

Although critical energy/electric infrastructure³ is defined as a “system or asset of the bulk-power system,” PGE applies the above criteria more broadly to ensure its system is protected and because distribution-system information could impact the bulk power system under certain circumstances. In PGE’s view, some of the information proposed for disclosure may qualify as CEII. Specifically, PGE objects to publicly providing information regarding whether or not a substation has communications and the loading information for all feeders on the Company’s system. The communications and load information could help a bad actor determine areas of PGE’s system that are more vulnerable to an undetected attack. Therefore, these data must remain confidential.

C. Interconnection Data Workgroup

While some additional meetings between Staff, utilities, and stakeholders may be necessary to finalize what information will be provided and in what format, PGE questions whether a workgroup is necessary in the long-term. If additional conversations are necessary or questions arise in the future, those could be scheduled on a case-by-case basis, and PGE would be happy to participate in any such meetings. Limiting the duration of the workgroup would conserve parties’ and Staff resources, which are currently spread between many open dockets.

VI. Conclusion

PGE looks forward to continuing to discuss these issues with the Commission, Staff, and stakeholders. Should you have any questions regarding these comments, please contact Colin Wright at (503) 464-8011.

Please direct all formal correspondence and requests to the following email address pge.opuc.filings@pgn.com.

Respectfully submitted,
PORTLAND GENERAL ELECTRIC COMPANY



Karla Wenzel
Manager, Pricing and Tariffs
121 SW Salmon Street, 1WTC0306
Portland, OR 97204

³ See FERC’s definition at: (<https://www.ferc.gov/legal/ceii-foia/ceii.asp>).