

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2108

In the Matter of
PACIFICORP, dba PACIFIC POWER,
Application for an Order Approving Queue
Reform Proposal.

DALREED SOLAR, LLC'S REPLY TO
PACIFICORP'S RESPONSE TO
REQUEST FOR EXPEDITED
CONSIDERATION OF APPLICATION
FOR REHEARING AND
RECONSIDERATION

I. INTRODUCTION

Dalreed Solar, LLC (“Dalreed Solar”) submits this reply to PacifiCorp’s response to Dalreed Solar’s request for expedited consideration of its application for reconsideration or rehearing, and petition for waiver (“Application”). Dalreed Solar’s Application is requesting discrete and narrow revisions to the Oregon Public Utility Commission’s (the “Commission”) approval, with modification, of PacifiCorp’s Queue Reform Proposal (“QRP”). Dalreed Solar’s is submitting this reply to: 1) state that it does not object to PacifiCorp filing its response to the Application on September 29, 2020; and 2) respond to PacifiCorp’s allegations that Dalreed Solar “delayed” before filing its Application.

II. REPLY

A. Dalreed Solar Does Not Object to PacifiCorp Filing Its Response on September 29

Dalreed Solar did not request that the time for filing PacifiCorp’s Response to the Application be shortened, and it does not object to PacifiCorp filing its response on September 29, 2020.

B. Dalreed Solar Did Not Delay Its Application

Dalreed Solar is not certain what useful purpose PacifiCorp believed was served by alleging that Dalreed Solar delayed filing its Application, but Dalreed Solar hereby responds to PacifiCorp’s inaccurate assertions. Dalreed Solar filed its Application expeditiously and without delay because of the impending deadlines associated with PacifiCorp’s QRP, and because it believes that PacifiCorp would support and both PacifiCorp and Dalreed Solar benefit from expedited processing. Dalreed Solar had 60 days to file for reconsideration from the date of service,¹ and it filed its request less than one month after the Commission’s Order No. 20-268 (the “Order”) was served.²

Dalreed Solar notes that PacifiCorp did not provide Dalreed Solar with notice that it was planning on filing its QRP, PacifiCorp has never explained why Dalreed Solar’s studies have been delayed, PacifiCorp never stated whether it will even provide study reports, and PacifiCorp never provided an explanation to Dalreed Solar regarding how the changes would impact Dalreed Solar. Most businesses, especially those that charge their customers millions of dollars for their services, would take a different approach to customer relations and communications about major changes and delayed services.

PacifiCorp did not conduct any pre-filing workshops regarding its state jurisdictional QRP, and the Commission approved the QRP only two months after PacifiCorp’s filing. This has been an extremely quick process, and it continues to be difficult for interconnection customers to understand how the QRP would impact a state jurisdictional qualifying facility that

¹ OAR 860-001-0720(3).

² The Commission’s Order was served on August 19, 2020, and Dalreed Solar filed on September 14, 2020. Energy of Utah, LLC had filed comments on behalf of Dalreed Solar in the proceeding, but was not served a copy of the Commission’s Order.

is in the midst of the interconnection process. The QRP transformed PacifiCorp’s Oregon interconnection rules and policies in a very short period of time, and it is reasonable for interconnection customers to attempt to understand its impact prior to making important business decisions or requesting the Commission’s assistance. To the extent Dalreed Solar “delayed” filing, Dalreed Solar did so because it was seeking to understand the QRP, and resolve its concerns directly with PacifiCorp.

Following is a brief summary of events:

- On August 19, 2020, prior to the Order’s release, PacifiCorp provided Dalreed Solar with an email regarding its options to participate in Transition Cluster Study Eligibility. Dalreed Solar reviewed PacifiCorp’s email, the Commission’s Order, and PacifiCorp’s interconnection queue status—all of which raised significant questions. PacifiCorp’s email invited Dalreed Solar to respond with any questions.
- On August 24, 2020, Dalreed Solar requested additional information from PacifiCorp to better understand its options and next steps. Dalreed Solar noted the time constraints and asked PacifiCorp to respond by August 26, 2020.
- PacifiCorp initially did not respond.
- On August 28, 2020, Dalreed Solar followed up with PacifiCorp, and PacifiCorp then responded that all Dalreed Solar’s questions appeared to be issues that were addressed by the Commission Order. PacifiCorp stated it would provide a response following an internal meeting; PacifiCorp did not say when the meeting would occur. Dalreed Solar asked PacifiCorp to respond by August 31, 2020 and threatened to file a complaint if PacifiCorp did not commit to provide a written response. PacifiCorp responded that the meeting would be on August 31, 2020. PacifiCorp agreed to provide a written response but stated it may need additional time after August 31, 2020 to prepare a response.
- On August 31, 2020, PacifiCorp provided partial, yet incomplete and contradictory, responses. PacifiCorp also informed Dalreed Solar that, if Dalreed Solar wanted to file a complaint against PacifiCorp, that it would need to go through additional mediation steps, which likely would have led to PacifiCorp delaying the process and would have effectively precluded timely relief.
- On August 31, 2020, PacifiCorp filed its compliance filing, which Dalreed Solar reviewed.
- Dalreed Solar then elected not to file a complaint, but instead promptly filed its Application.

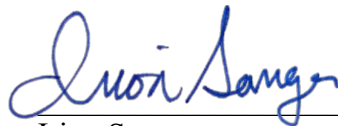
Dalreed Solar requests that when considering whether to review and process its Application on an expedited basis, the Commission ignore PacifiCorp's assertions that Dalreed Solar delayed filing the Application. As can be seen, Dalreed Solar has taken a serious and prompt approach to understanding and seeking redress from the Commission. Dalreed Solar is surprised that PacifiCorp simply did not support expedited processing, and Dalreed Solar is disappointed that PacifiCorp raised inaccurate allegations that only serve to confuse the ultimate issues in the case.

III. CONCLUSION

For the reasons explained above, Dalreed Solar does not object to PacifiCorp (or any other party) filing its response on September 29, 2020, and respectfully requests that the Commission disregard PacifiCorp's claims that Dalreed Solar delayed filing the Application.

Dated this 16th day of September 2020.

Respectfully submitted,



Irion Sanger
Joni Sliger
Sanger Law, PC
1041 SE 58th Place
Portland, OR 97215
Telephone: (503)756-7533
Fax: (503)334-2235
irion@sanger-law.com

Of Attorneys for Dalreed Solar, LLC