



O C E A N

Oregon Coast Energy Alliance Network

October 28, 2020

Oregon Public Utility Commission  
201 High Street SE, Suite 100  
Salem, OR 97301-3398

RE: Oregon Coast Energy Alliance Network (OCEAN) comments on Public Utility Commission's (PUC) October 6<sup>th</sup> Climate Executive Order Work Plans

Dear Chair Decker, Commissioner Tawney and Commissioner Thompson,

OCEAN is a cross-cultural community-based organization with the mission to explore the opportunities and challenges of floating offshore wind and other advanced energy technologies for coastal Oregonians. We believe that our coastal interests should be front and center in shaping what Offshore Wind, and other coastal touching Advanced Energy projects, should look like in our region and advocate for coastal energy equity and security. Our actions are spurred by our life experiences of living in communities that have been hit first and hardest by climate change and a common drive to react, adapt and contribute to solutions as quickly as responsibly possible.

As active voices and rapt observers in the various, transformative, proceedings currently occurring within Oregon and regional energy jurisdictions we recognize and commend staff's efforts as evidenced by the proposed plan. We are pleased to see the focus on community engagement and believe that by working with and through stakeholder resources and assets the PUC and IOU staff could greatly accelerate meaningful participation through the networks and expertise of our community based rate payer advocacy groups and low income assistance service providers.

We also concur with comments included in POET's response regarding the other opportunities that exist for shared and expanded resources to "further economize and streamline the PUC's rapid (yet responsible) response". In general, they are categorized by leveraging opportunities through;

- existing processes for private and public investment in clean energy solutions,
- external intellectual resources, and
- collaboration with or participation in relevant agency and planning organization proceedings



As you know, the Oregon coast is isolated from the main grid that serves the Willamette Valley of Oregon, where the population base of the state resides. Several transmission lines serve the coast, but all of the generation comes from east of the Coastal Range, often resulting in poor power quality and frequent service interruptions to isolated coastal communities. Limits to east-west transmission flow and the lack of generation west of the Coast Range severely limit new industry opportunities along the coast while simultaneously compounding transmission constraining pressures on Oregon's grid to supply our remote needs. The Cascadia Subduction Zone Earthquake is predicted to result in severe isolation of coastal communities following the earthquake and could leave the coast without power for up to a year. At present, Oregon's Resilience Plan does not address energy security for these isolated coastal communities.

OCEAN advocates for the citizens, tribes, businesses, industry and organizations of isolated, load pocket, front line communities who live with the very tangible reality of our lack of energy security. Recognizing the importance of the opportunities and solutions that OPUC's plan proffer, we support the content of POET's OSW focused comments and offer our own, additional, input as follows:

#### Utility Planning

- Authorize staff to support or directly collaborate in relevant, complementary efforts to assess, develop and plan with other agencies, planning organizations and third party intellectual resources (such as our national labs). The necessary, formative work being pursued by others is often able to be scoped, informed and applicable for common interests for the greatest good. Our recent letter in support of PNNL's proposed work in transmission planning and capacity valuation was matched by letters of support from Oregon Department of Energy and Northwest Power and Conservation Council, however we were informed that PUC staff lack the authority to contribute letters of support for this work.
- DSP:
  - Elevate the urgency of integrating energy security into the planning process as a matter of reliability for load pocket communities. The aggregation of reliability data has resulted in a lack of recognition of the variances in service reliability at the distribution system level. Distribution systems with reliability records not meeting planning standards should be prioritized for microgrid and other advanced energy solution sets.

#### Utility Services and Activities

No additional comments

#### Transportation Electrification (TE)



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Impacted Communities

Oregon Coast Energy Alliance Network

- Engage directly with Affiliated Tribes of Northwest Indians for collaborated outreach to tribal nations within PUC service areas.

Wildfire Prevention and Mitigation

- Engage directly with county emergency response directors and the Governor's Resilience officer to coordinate effective prevention, response and recovery actions.
- See comments in DSP, above, regarding urgency of energy resilience as a matter of basic reliability

Once again, we commend the tremendous efforts of your staff and stakeholders bring us to this pivotal juncture and look forward to the progress of the months to come.

Respectfully,

Shannon Souza, PE  
Executive Director

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**Board of Directors**

Oregon Public Utility Commission  
201 High Street SE, Suite 100  
Salem, OR 97301-3398

**Kevin Banister**

POET President  
Simply Blue Energy

October 28, 2020

Dear Chair Decker, Commissioner Tawney and Commissioner Thompson:

**Justin Klure**

POET Vice President  
Pacific Energy Ventures

Pacific Ocean Energy Trust (POET) submits these comments regarding the Public Utility Commission's (PUC) October 6<sup>th</sup> Climate Executive Order Work Plans.

**Jason Busch**

POET Secretary/Treasurer  
Pacific Ocean Energy Trust

Committed to the responsible development of marine renewable energy in the Pacific Region, POET looks forward to working with the Commission to update, streamline and integrate processes and metrics under the PUC's authority. Floating Offshore Wind (OSW) offers Oregon the opportunity to relieve existing transmission power flow constraints, diversify and strengthen the state's coastal frontline community economies, and make significant contributions to robust state and regional clean energy portfolios.

**Michael Olsen**

Equinor

**Rebecca O'Neil**

Pacific Northwest National  
Laboratory

Together with our OSW industry advisors, we are poised to collaborate for rapid reductions in our state's greenhouse gas emissions in ways that prioritize frontline communities, recognize and reflect the values of energy security and decarbonization, and support a competitive, transparent energy market to economically and equitably serve stakeholder needs.

**Jim Lanard**

Magellan Wind

We applaud the PUC staff's comprehensive efforts developing the draft work plan; we also appreciate staff's strategy to prioritize actions facing the least amount of stakeholder conflict in order to expedite progress toward meeting our state's greenhouse gas emissions reduction goals.

In this same spirit, we urge you to further economize and streamline the PUC's rapid (yet responsible) response by seizing opportunities to leverage:

- existing processes for private and public investment in clean energy solutions,
- external intellectual resources, and
- collaborate with or participate in relevant agency and planning organization proceedings.



Accordingly, we encourage open communications among the various stakeholders and offer the following suggestions within each section of the proposed work plan's 12-24 month timeframe.

### Utility Planning

- Expedite and improve transparency through collaboration with other agencies, national labs, and regional organizations to develop consistent, non-biased resource and transmission planning valuation methodologies. This approach supports the development of longer planning horizons supported by scenario-based pathways from which stakeholders can make informed procurement and investment decisions. Most immediately, provide support, resources, input and/or direct advisement of methodology development for proposed efforts in:
  - Applying the Societal Costs of Carbon & Resilience Valuation;
  - Development of Locational Valuation methodology;
  - Evaluation of Capacity Contributions; and
  - Regional Transmission Planning Scenario Development.
- Develop consistent metrics, methods, and processes across IOUs and, where appropriate, in accord with regional authorities and planning organizations for expeditious sharing of common information, provisions of certainty into the regional market, and informed, transparent planning from distribution level to regional resource adequacy scale.
- Align PUC efforts to leverage external proceedings for the timely, informed, and collaborative updates to metrics and methods. In particular, the existing scope of OPUC's UM 2024 Direct Access, as well as the potential for expansion into Resource Adequacy considerations, is well timed to compliment regional RA proceedings at the NW Power Pool, articulate the financial impacts of externally owned resources on IOU's, and align Oregon's energy market for mutually beneficial participation in regional collaborations.
- IRP:
  - Schedule an OSW workshop early in the IRP docket as an illustrative example of third-party methodology development for locational and grid values, transmission assessments, and analysis of stacked capacity value contributions relative to Oregon and western grid synergies and projected shortfalls.
  - Include OSW as an emerging technology in IRP planning scenarios. OSW has been recognized by E3 in their work on the Oregon



Renewable Energy Siting Assessment as the predominant resource for one of four state energy portfolio scenarios meeting our state RPS goals and should be included in procurement and transmission planning proceedings.

- In addition to establishing well-defined carbon contributions, update and establish consistent metrics for all IOUs in regard to identifying capacity contributions so that they reflect best readily available data for renewables, storage, and emerging clean technologies. (The recent UM 2011 workshop exploring PacifiCorp's IRP solar and storage proxy revealed an urgent need to update this approach to accurately reflect the contributions of clean energy technology.)
- When assigning carbon contributions, include transmission losses, assessments of increased risk of wildfires caused by transmission systems, and avoided materials and resource costs associated with wires solutions.
- Integrate Transmission Planning into IRP procedures so they are mutually informative, rather than siloed.
- For transportation related load forecasting response in IRP, include hydrogen production as a scenario for decarbonization of the transportation sector while extracting, otherwise curtailed, value from renewable resources.
- DSP:
  - Integrate Transmission planning considerations into DSP procedures so they are mutually informative.
  - Prioritize data transparency and access from feeder to distribution levels to enable ease of collaboration with other stakeholders in defining equitable, economic solution sets.
  - Complement wire-based solution sets with a forward looking approach to anticipate and economize future grid needs with coordinated and synergistic investments.

#### Utility Services and Activities

- Prioritize updates to existing programs (with open dockets) that are poised for significant Non-IOU investments to support our state GHG goals such as:
  - Direct Access,
  - Community Solar, and



- PURPA/Interconnection.

Transportation Electrification (TE)

- Include hydrogen as a decarbonization scenario with stacked value as an extraction of otherwise curtailed clean, renewable resources.
- Match TE with RE: Transportation electrification should be matched with Oregon Renewable Energy capacity in order to avoid additional transmission impacts (including added carbon through transmission losses as well as increased risk of transmission related wildfire) to meet this growing load.

Impacted Communities

- Explore opportunities for funded collaboration (advocacy and outreach) with tribes, community energy organizations and other 3<sup>rd</sup> parties representing rate payers of disproportionately impacted communities.
- Support rural equity for energy security and economic benefit through distribution level reliability analysis and solution set design and procurement processes.

Wildfire Prevention and Mitigation

- Recognize and reflect the transmission contributions to wildfire risk in planning processes
- Include a locational value for societal benefit in the response to wildfires during safety shutoffs
- Include microgrid based energy security as a response and recovery mechanism for meeting distribution system level reliability metrics

We would like to thank you and your staff for the considerable efforts in furthering this transformative work, and we look forward to our continued engagement.

Respectfully

Jason Busch  
Executive Director