

171 FERC ¶ 61,026  
UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Neil Chatterjee, Chairman;  
Richard Glick, Bernard L. McNamee,  
and James P. Danly.

Portland General Electric Company

Docket No. ER19-1927-002

ORDER ON COMPLIANCE

(Issued April 16, 2020)

1. In a filing submitted on January 21, 2020 (January Compliance Filing), Portland General Electric Company (Portland General) proposed revisions to its Open Access Transmission Tariff (Tariff) in compliance with the requirements of Order Nos. 845 and 845-A<sup>1</sup> and the Commission's November 22, 2019 order on Portland General's May 22, 2019 compliance filing.<sup>2</sup> As discussed below, we find that the January Compliance Filing partially complies with the Commission's directives in the November 2019 Order. Accordingly, we accept the filing, effective May 22, 2019, and direct Portland General to submit a further compliance filing within 120 days of the date of this order.

**I. Background**

2. Order Nos. 845 and 845-A amended the Commission's *pro forma* Large Generator Interconnection Agreement (LGIA) and *pro forma* Large Generator Interconnection Procedures (LGIP) to improve certainty for interconnection customers, promote more informed interconnection decisions, and enhance the interconnection process. In Order Nos. 845 and 845-A, the Commission adopted 10 different reforms to improve the interconnection process, and required transmission providers to submit compliance filings to incorporate those reforms into their tariffs.

3. In the November 2019 Order, the Commission found that Portland General's May 22, 2019 compliance filing, as amended, partially complied with the directives of Order Nos. 845 and 845-A. The Commission directed further revisions to the following sections of Portland General's LGIP: Identification and Definition of Contingent

---

<sup>1</sup> *Reform of Generator Interconnection Procedures and Agreements*, Order No. 845, 163 FERC ¶ 61,043, *errata notice*, 167 FERC ¶ 61,123 (2018), *order on reh'g*, Order No. 845-A, 166 FERC ¶ 61,137, *errata notice*, 167 FERC ¶ 61,124 (2019), *order on reh'g*, Order No. 845-B, 168 FERC ¶ 61,092 (2019).

<sup>2</sup> *Portland Gen. Elec. Co.*, 169 FERC ¶ 61,146 (2019) (November 2019 Order).

Facilities, Requesting Interconnection Service Below Generating Facility Capacity, and Material Modifications and Incorporation of Advanced Technologies.<sup>3</sup>

## **II. Notice and Responsive Pleadings**

4. Notice of Portland General's January Compliance Filing was published in the *Federal Register*, 85 Fed. Reg. 4964 (Jan. 28, 2020), with interventions and protests due on or before February 11, 2020. None was filed.

## **III. Discussion**

5. As discussed below, we find that Portland General's January Compliance Filing partially complies with the requirements of Order Nos. 845 and 845-A, and the directives of the November 2019 Order. Accordingly, we accept the filing, effective May 22, 2019, and direct Portland General to submit a further compliance filing within 120 days of the date of this order.

### **A. Identification and Definition of Contingent Facilities**

6. In the November 2019 Order, the Commission found that Portland General's proposed Tariff revisions lacked the requisite transparency required by Order Nos. 845 and 845-A because the proposed revisions did not detail the specific thresholds or criteria that Portland General would use as part of its method to identify contingent facilities. Therefore, the Commission directed Portland General to submit a further compliance filing that included in section 3.8 of its LGIP the specific thresholds or criteria that Portland General will use in its technical screens or analysis to achieve the level of transparency required by Order No. 845.<sup>4</sup>

#### **1. Portland General's Compliance Filing**

7. In section 3.8.1 of its LGIP, Portland General proposes revisions to its step-by-step method for determining contingent facilities. Specifically, Portland General proposes revisions to steps two, three, and four of its method and states that these revisions will allow interconnection customers to understand why and how a contingent facility is related to their interconnection request.<sup>5</sup>

8. Portland General revises the second step to provide that, to the extent interconnection facilities or network upgrades associated with higher-queued positions are identified as potentially necessary to accommodate the interconnection request,

---

<sup>3</sup> November 2019 Order, 169 FERC ¶ 61,146 at PP 23, 38, 39, and 59.

<sup>4</sup> *Id.* P 23.

<sup>5</sup> Filing at 2.

Portland General will consider such unbuilt facilities or upgrades potential contingent facilities.<sup>6</sup>

9. In the third step, Portland General proposes to use the potential contingent facilities identified in step two to identify any interconnection facility or network upgrade associated with a higher queued interconnection request on Portland General's transmission system, without which the transmission system and, if applicable, any affected system would be unable to demonstrate "acceptable pre- and post-contingency system performance" per applicable Reliability Coordinator (RC), Western Electricity Coordinating Council (WECC), or North American Electric Reliability Council (NERC) requirements due to the addition of the generating facility, or without which the generating facility would be unable to operate. Portland General's proposed revisions state that "acceptable pre- and post-contingency system performance" in this context utilizes the same criteria that Portland General uses when determining the need for network upgrades and interconnection facilities during the interconnection system impact study phase, pursuant to section 7.3 of its LGIP. Portland General provides that it will study any potential contingent facility identified in step two by removing each potential contingent facility from the study cases and performing steady state, short circuit, voltage stability, and/or transient stability analyses to determine if the transmission system demonstrates acceptable pre- and post-contingency system performance.<sup>7</sup>

10. Portland General revises the fourth step to provide that if, in the analysis performed in the third step, the transmission system fails to demonstrate acceptable pre- and post-contingency system performance, then the potential contingent facility will be confirmed as a contingent facility. In addition, it provides that potential contingent facilities identified in step two that are associated with communications, protection, and automation systems necessary for the operation of the generating facility, or associated with the delivery of its output, are deemed contingent facilities.<sup>8</sup>

## **2. Commission Determination**

11. We find that the proposed LGIP revisions partially comply with the directive in the November 2019 Order for Portland General to include in section 3.8 of its LGIP the specific thresholds or criteria that Portland General will use as part of its method to

---

<sup>6</sup> Portland General, Electric OATT Volume No. 8, Attachment O, § 3.8.1 Standard Large Generator Interconnection Procedures (LGIP) (6.0.0).

<sup>7</sup> *Id.*

<sup>8</sup> *Id.*

identify contingent facilities to achieve the level of transparency required by Order No. 845.<sup>9</sup>

12. Portland General's proposed revisions to its contingent facilities process provide additional detail about how it will identify contingent facilities, including that it will study potential contingent facilities to determine pre- and post-contingency effects on system performance. However, Portland General's proposed Tariff revisions do not state the specific thresholds or criteria that would result in the transmission system demonstrating unacceptable pre- and post-contingency system performance. Portland General's proposed Tariff revisions state only that "acceptable" pre- and post-contingency system performance will be based on "applicable" RC, WECC or NERC requirements but do not include the specific RC, WECC, or NERC requirements.<sup>10</sup> While Portland General's proposed Tariff revisions provide that Portland General will perform steady state, short circuit, voltage stability, and transient stability analyses, its proposed Tariff revisions do not include the specific thresholds or criteria for these analyses that, if not met by the transmission system, would result in the transmission system demonstrating unacceptable pre- and post-contingency system performance. In addition, although Portland General's proposed Tariff revisions provide that Portland General will use criteria from Section 7.3 of its LGIP as part of its method, this Section of the LGIP does not describe any specific thresholds or criteria. Therefore, Portland General's proposed method does not comply with the directive in the November 2019 Order. Accordingly, we direct Portland General to submit, within 120 days of the date of this order, a further compliance filing that includes the specific thresholds or criteria that Portland General will use as part of its method to identify contingent facilities to achieve the level of transparency required by Order No. 845 and the November 2019 Order.<sup>11</sup>

## **B. Other Compliance Directives**

### **1. November 2019 Order and January Compliance Filing**

#### **a. Requesting Interconnection Service Below Generating Facility Capacity**

13. In the November 2019 Order, the Commission found that Portland General's proposed Tariff revisions to Section 3.1 of its LGIP omitted some of the *pro forma*

---

<sup>9</sup> November 2019 Order, 169 FERC ¶ 61,146 at P 23.

<sup>10</sup> Portland General LGIP § 3.8.1.

<sup>11</sup> For example, Portland General could explicitly identify the RC, WECC, and/or NERC requirements that it will use to identify contingent facilities.

language required by Order No. 845.<sup>12</sup> In the January Compliance Filing, Portland General proposes revisions to section 3.1 of its LGIP to include the omitted *pro forma* language.

**b. Material Modifications and Incorporation of Advanced Technologies**

14. In the November 2019 Order, the Commission found that Portland General's proposal to use "reasonable efforts" to meet the 30-day deadline for the technological change procedure does not comply with the requirements of Order No. 845. Accordingly, the Commission directed Portland General to revise its proposed technological change procedure to state that it will complete its assessment under section 4.4.6 within 30 days.<sup>13</sup> In the January Compliance Filing, Portland General proposes to delete the "reasonable efforts" language in section 4.4.6 of its LGIP so that it now states that Portland General shall complete the assessment within 30 days.

**2. Commission Determination**

15. We find that Portland General's proposed revisions regarding Requesting Interconnection Service Below Generating Facility Capacity and Material Modifications and Incorporation of Advanced Technologies comply with the directives in the November 2019 Order.

The Commission orders:

(A) Portland General's January Compliance Filing is hereby accepted, to become effective May 22, 2019, as requested, subject to a further compliance filing, as discussed in the body of this order.

(B) Portland General is hereby directed to submit a further compliance filing within 120 days of the date of this order, as discussed in the body of this order.

By the Commission.

( S E A L )

Kimberly D. Bose,  
Secretary.

---

<sup>12</sup> November 2019 Order, 169 FERC ¶ 61,146 at P 39.

<sup>13</sup> *Id.* P 59.