Edith Bayer,
Oregon Department of Energy

Subject: Energy Strategy Modelling Recommendations

MCAT (Mobilizing Climate Action Together) is a community of volunteers working on advancing a healthy climate and a green economy for future generations. MCAT members were pleased to hear that ODOE's planned modelling approach will look at every sector of our interconnected energy system so that the modelling and analysis can examine:

- trade-offs between sectors and fuels, such as vehicle electrification and heat pump adoption;
- trends in technology cost, performance and availability, and
- the impact of new and emerging technologies.

One of our Steering Committee members, Dr. Pat DeLaquil, submitted comments on April 9, 2024, and we support those recommendations. In addition, we want to emphasize the need to think outside the paradigm of the centralized utility model, and to fully explore the possibilities of a distributed and smart network composed of centralized and distributed generation and storage, with demand response enabled by virtual power plants and smart devices, and with the transmission system playing a key role in resilience and reliability, rather than employed only for bulk power delivery.

The current modelling paradigm for expansion of electrical capacity assumes that distributed energy resources, such as home solar panels and energy efficiency upgrades, are located exclusively "behind the meter", and that all new load is supplied by the bulk power system. However, this ignores the substantial potential of distributed generation and storage in residential and commercial buildings. The Oregon legislature has already primed this market with community solar legislation in 2017 and with small-scale renewable (SSR) and community benefit renewable energy (CBRE) project requirements in HB 2021. It is time to more fully envision such a future by enabling our models to critically evaluate the advantages and disadvantages of this approach.

A truly distributed system would integrate energy system planning with urban and economic development planning at the local level, by incentivizing the development of energy resources in warehouses, schools, malls, etc. Such a strategy would help mitigate the very real NIMBY and environmental issues associated with building new transmission lines.

In addition to the SSR and CBRE project types that are called out in HB 2021, the strategy should examine the potential for utilizing the rooftops available on existing buildings, through innovative commercial arrangements that incentivize building owners, investors and utility ratepayers. ODOE should solicit input on what these technical and commercial options might be and how best to model them.

Thank you for providing this opportunity to comment. We look forward to participating in the public workshops to come.

MCAT Steering Committee:
Brett Baylor, Rick Brown, Linda Craig, Pat DeLaquil, Dan Frye, Debby Garman, KB Mercer, Michael Mitton, Rich Peppers, John Perona, Rand Schenck, Joe Stenger and Catherine Thomasson