November 4, 2026

Oregon Public Utility Commission
Attn: Filing Center
201 High Street SE, Suite 100
Salem, OR 97301

Re: Request for PUC Investigation into PGE Tariff No. 19 Rule B
Docket No. XX

Dear Filing Center Staff,

By this letter, Oregon Solar + Storage Industries Association ("OSSIA"), Electrify Now, Electrify Oregon, Solar Oregon, Mobilizing Climate Action Together("MCAT"), Third Act Oregon, and Oregon Physicians for Social Responsibility, collectively "the Joint Advocates", request the Public Utility Commission of Oregon ("Commission" or "PUC") open an investigation pursuant to ORS 765.515 to evaluate Portland General Electric's ("PGE" or "the Company") Tariff No. 19 Rule B.

I. Introduction

Members of OSSIA have documented a significant change in PGE's practices concerning interconnection of customer-owned solar and storage systems. This change has resulted in unexpected and substantial costs for customers seeking to install solar and/or storage, and in many cases has caused customers to cancel projects altogether. On September 12, 2025 PGE filed to update its No. 19 Rule B tariff by adding two new definitions for "service equipment" and "service upgrade".[1] The changes were approved by the Commission in October, and PGE started implementing the new definitions into practice as early as December 2025. Subsequently, PGE began imposing new requirements of solar and/or storage customers to upgrade their customer-owned electrical equipment to proceed with a solar or storage project. PGE began requiring meter base upgrades and meter relocations at late stages of the project development process. These requirements have resulted in customers being required to incur unexpected costs, around $2,000-$9,000 to upgrade their existing electrical equipment. For customers who have already committed to a solar and/or storage project based on an expected project cost from a

[1] ADV 1786, PGE Advice No. 25-27, Rule B, Adding Defined Terms (Sept. 12, 2025), https://edocs.puc.state.or.us/efdocs/UAA/uaa339791160.pdf.

solar installer, PGE's new requirements are significant. OSSIA members have reported that customers have been forced to cancel projects altogether because they cannot absorb the unexpected costs. The new requirements can also delay project timelines by weeks to months, creating additional costs and uncertainty for customers and solar installers.

The impacts observed by OSSIA members appear to be inconsistent with the understanding PGE presented to the Commission in their original filing that the proposed changes would not impact current PGE customers. Solar installers have witnessed a direct impact on customer costs and project timelines. In practice, the new requirements have resulted in thousands of dollars in additional project costs to customers without a commensurate customer benefit.

In response, OSSIA raised concerns regarding these new definitions and practices in UM 2111 and solar installers raised their concerns with PGE. In July 2026, PGE announced they would pause implementation of the new requirements until January 1, 2027. While this pause provides temporary relief to customers and installers, it does not resolve the underlying issue or provide sufficient certainty going forward. Accordingly, the Joint Advocates request that the Commission exercise its oversight authority to investigate and address the changes PGE's tariff and subsequently their Electric Service Requirements ("ESR"). The Joint Advocates seek Commission review of the relevant tariff and ESR language and, ultimately, appropriate revisions to establish clear and standardized requirements for customers and installers. The Joint Advocates further request that the Commission direct PGE to extend its current pause on implementation of the new requirements until the Commission has resolved the issues raised in this filing. Such an extension is necessary to prevent additional customers from being subjected to unexpected costs or project delays while the Commission considers the appropriate requirements.

Below, the Joint Advocates provide relevant procedural and factual information for background. Then, the Joint Advocates discuss each argument in turn: (A) The tariff language is too broad; (B) Adding solar and storage does not always result in an upgrade to service; (C) The tariff change is having a discriminatory impact on solar; and (D) The tariff change threatens low-income energy programs and energy equity.

II. Background

A. Procedural History

On September 12, 2025, PGE filed a request to add two defined terms to its No. 19 Rule B "Service Equipment" and "Service Upgrade", with an effective date of October 29, 2025.[2] PGE stated that the terms "Service Equipment" and "Service Upgrade" were not defined in the Electric Service Requirements ("ESR") or PGE's Tariff No. 19 in Rule B, but that the terms were "indirectly addressed in PGE's [ESR] book in section 1.2.3 and section 3.5."[3] PGE provided the reasoning that it has a "long-standing practice" where it "can require" the service to be brought up to current electric service requirements if a customer upgrades a service, adds a service, or modifies a service by adding load.[4] PGE acknowledged that this can be costly to both

[2] *Id.* at 1.
[3] *Id.*
[4] *Id.*

commercial and residential customers.[5] Additionally, PGE explained that the Tariff update was intended to clearly define expectations for providing design information because "a few bad actors" had communicated incomplete information to PGE Design Project Managers, which resulted in litigation.[6] PGE represented under OAR 860-022-0025 that the change did not increase, decrease, or otherwise change existing rates, or impact revenues.[7] PGE defined Service Equipment as "Any and all electrical equipment included in the delivery of electrical power to a customer's premises", and Service Upgrade as "Anytime a service is being altered, modified, replaced or updated, including in instances of service failures."[8]

In response, OPUC Staff issued a report recommending the Commission approve PGE's proposed filing and redlined changes to Rule B, effective October 29, 2025.[9] Staff reiterated PGE's concern that when the need for an upgrade is not communicated at an early stage in the project, the cost can increase significantly for the customer, and that the purpose of the Tariff update is to clearly define expectations for providing design information.[10] Staff concluded the filing made no changes to PGE rates, the proposed changes did not affect existing PGE customers, and that the changes reflected the intent of the tariff previously approved by the commission.[11] The Commission approved Staff's recommendation at a public meeting on October 28, 2025. Subsequently, on April 6, 2026, PGE submitted the redlined version of its draft Distribution Interconnection Handbook 2026 Update in UM 2111.[12] PGE included a list summarizing the proposed changes and stated that the Handbook had been posted on its OASIS website on March 30, 2026.[13]

On May 7, 2026, OSSIA submitted comments regarding PGE's handbook update.[14] OSSIA expressed concerns regarding how PGE's new tariff definitions and ESR rules would be applied to solar projects.[15] Specifically, OSSIA identified an inconsistency between Section 9.1 of PGE's Handbook and Section 3.6 of the ESR.[16] Section 9.1 states, "PGE considers the installation of new generating or storage equipment as rewiring of existing services."[17] However, Section 3.6 of

[5] *Id.*
[6] *Id.*
[7] *Id.* at 2.
[8] *Id.* at 6.
[9] ADV 1786, Staff Report for the October 28, 2025 Public Meeting (Item No. CA4) (Oct. 23, 2025), https://edocs.puc.state.or.us/efdocs/HAU/adv1786hau341042027.pdf.
[10] *Id.* at 2.
[11] *Id.*
[12] UM 2111, Staff Investigation into Interconnection Process and Policies, PGE's Distribution Interconnection Handbook Update (Apr. 6, 2026), https://edocs.puc.state.or.us/efdocs/HAH/um2111hah345211028.pdf.
[13] *Id.*
[14] UM 2111, Staff Investigation into Interconnection Process and Policies, OSSIA Comments Regarding PGE's Interconnection Handbook Changes (May 7, 2026), https://edocs.puc.state.or.us/efdocs/HAC/um2111hac346076030.pdf.
[15] *Id.*
[16] *Id.* at 1.
[17] *Id.* at 1.

the ESR, describes upgrades to an existing service to require a PGE inspection before reconnection for "increasing the amperage of a service like for a renovation, add-on, solar system, etc.…"[18] The proposed Handbook redlines resulted in requiring solar installations to be treated like service upgrades, even when the installation does not increase the utility service amperage.[19] Further, OSSIA emphasized PGE has begun implementation of this policy through its PowerClerk interconnection application software, which now requires every net-metering solar applicant to self-attest that they will upgrade their meter base prior to inspection, regardless of whether the solar installation will increase PGE's service amperage.[20] OSSIA explained mandatory meter base replacements will increase project costs by thousands of dollars.[21] Importantly, these upgrade requirements provide no actual benefit to the customer if amperage is not increased, and even when amperage is increased, the customer's load profile may not actually yield a benefit commensurate with the expense.[22] Consequently, OSSIA requested PGE amend its interconnection handbook and ESR text to clarify that a service upgrade occurs only when utility service amperage increases and to remove solar-specific upgrade references.[23] OSSIA also requested that PowerClerk instead ask if a solar installation will increase the utility service amperage and only require installers to self-attest to a meter base upgrade where service amperage actually increases.[24]

PGE filed reply comments and the final 2026 Distribution Interconnection Handbook on June 5, 2026.[25] When asked by OSSIA to define the specific technical or regulatory criteria that distinguish a "qualifying service upgrade" from "standard customer-side modifications," PGE stated it was "unable to discuss differences between the two terms" because neither term appears in its Interconnection Handbook or ESR.[26] PGE explained the "addition of generation equipment that operates in parallel with the distribution grid" is the "technical reason" that PGE considers a solar installation an "upgrade to an existing service" because "the generation equipment must sense the characteristics of the service on the grid and has the potential to feed power to the grid through the meter base," which is "a fundamentally different configuration and usage of the system then a site that only takes power from the grid to serve load."[27] PGE noted that "in many cases" it will install "a new meter at the location hosting a generating facility to facilitate and meter the bidirectional flow of energy" and that that reason is sufficient for requiring that the

[18] *Id.*
[19] *Id.*
[20] *Id.*
[21] *Id.*
[22] *Id.*
[23] *Id.*
[24] *Id.*
[25] UM 2111, Staff Investigation Into Interconnection Process And Policies, PGE's Response to Stakeholder Comments and Final Distribution Interconnection Handbook (Jun. 5, 2026), https://edocs.puc.state.or.us/efdocs/HAC/um2111hac347025039.pdf.
[26] *Id.* at 4.
[27] *Id.*

meter base at a facility hosting a generating facility to "meet current standards."[28] However, PGE did not address OSSIA's comments regarding the PowerClerk applicant attestation requirement, which uniquely targets solar installations because they require PGE interconnection notification, whereas installing heat pumps or hot tubs, for example, does not.

Additionally, when responding to OPUC comments, PGE stated, "even if the installation does not increase the amperage of service, an upgrade may still be required if the existing meter technology is outdated or does not meet current safety standards" and where a meter base fails to meet PGE's ESR specifications, "a replacement will be required before the solar installation can proceed."[29] When asked whether PGE has historically allowed solar net metering interconnection with ringless-style meter bases, it admitted, "Yes, PGE has historically allowed solar net metering interconnections with ringless-style meter bases."[30] Additionally, when responding to OPUC's request for PGE to provide reasoning for the new reversal, it stated "PGE's meter technicians identified that modern meter bases offer significant safety improvements over ringless-style meters" and "As a result, PGE now requires all new solar installations to use meter bases that meet current safety standards as outlined in the ESR."[31] Staff further inquired whether PGE is undertaking a service territory-wide replacement of all ringless-style meter bases, or just those where solar is installed.[32] PGE evasively stated, it is "not conducting a blanket replacement of all ringless-style meter bases across its service territory", but new solar installations qualify as a "significant rewiring or upgrade," which necessitates ringless-style meter base upgrades because this "ensures that any modifications made to the electrical system comply with modern safety requirements."[33] Finally, when asked, "Under what circumstances would PGE pay for the replacement of a meter base?" PGE stated, "specific circumstances or exceptions may apply, and customers are encouraged to contact PGE directly for further clarification on their individual situation."[34]

In July 2026, PGE issued a memorandum titled "PGE 's Service Upgrade Requirements - Solar Customers" addressed to "Solar Installers, Customers Installing Solar Systems, Electricians."[35] PGE announced it had updated the definition of service upgrades and that it would pause this policy until the end of 2026."[36] PGE warned "customer-equipment, like meter bases, that does

[28] *Id.* at 8.
[29] *Id.*
[30] *Id.*
[31] *Id.*
[32] *Id.* at 7.
[33] *Id.* at 8 ("PGE is not conducting a blanket replacement of all ringless-style meter bases across its service territory. However, PGE requires that ringless-style meter bases be brought up to current code and safety standards whenever significant rewiring or upgrades occur at a property, including new solar installations. This ensures that any modifications made to the electrical system comply with modern safety requirements").
[34] *Id.* at 7-8.
[35] Portland General Electric, Memorandum on PGE's Service Upgrade Requirements – Solar Customers (July 2026), https://assets.ctfassets.net/416ywc1laqmd/5Wv7iMu6RAekcqbmaU5vTb/c1571d05ca9a37089ce729af02231423/Solar_Customers_Service_Upgrade_Requirements_Memorandum__July_2026___1_.pdf.
[36] *Id.* at 1.

not meet current PGE requirements will not pass PGE personnel inspections as of January 1st, 2027."[37] PGE further emphasized that if "service equipment fails or they upgrade their service in the future," customers will "need to correct the service equipment … including replacing ringless meter bases and relocating meter bases in non-approved locations."[38] To qualify for the pause, a site must meet specific criteria, including no service panel or service entrance conductor replacement, no physical/mechanical/electrical defects in the meter base, which must be mounted on the exterior of the structure, and compliance with ANSI requirements (specifically no A-base or banjo meter bases), NESC clearances (NEC requirements do not trigger a meter base replacement), and PGE's working clearances.[39]

B. Factual History

Prior to PGE's tariff change and subsequent ESR changes, OSSIA members understood PGE's practices to include allowing ringless meter bases and that PGE did not require any specific electrical upgrades to the customers' meter bases resulting from a solar or storage installation. According to OSSIA's membership, PGE first started requiring meter base upgrades in December 2025 but did not update PowerClerk until March 2026. Following PGE's implementation, OSSIA members have reported a non-exhaustive list of projects that the new requirements impacted. The names of the companies have been redacted. The projects discussed below illustrate that PGE's new upgrade requirements have imposed substantial unexpected costs, significantly delayed project timelines, and caused customers to cancel projects. The reported experiences span multiple installers and include meter base upgrades, meter relocations, and associated electrical and civil work.

First, PGE's requirements have imposed thousands of dollars in unexpected costs on customers and installers. Upon gathering information for this filing, the Joint Advocates report costs ranging from $2,000 in upgrades all the way up to $9,000. The costs vary and are project-specific, so the reported costs can extend beyond the replacement of a meter base. In one project, PGE required trenching, conduit installation, and a secondary vault in connection with a meter upgrade, at a reported cost of $6,527.73. In another project, PGE required the customer to take on lengthy landscaping changes, including tree removal, to do the meter upgrade and relocation costing approximately $4,000. While PGE requires the customer to pay for upgrading their own equipment, multiple installers have elected to pay for the cost of the upgrades to prevent a customer from cancelling the project. Installers have reported absorbing upgrade costs of $7,000, $5,800, $4,800, and $2,500.

Second, PGE's requirements have caused lengthy project delays. OSSIA members have documented projects delayed for weeks to months while customers and installers navigate PGE's new requirements. As with project costs, the length of the delay for an installation is project-specific. One project was only delayed a week for a simple upgrade, while other projects have been delayed anywhere from four months to eight months. PGE causes the delay by reportedly needing time to inspect the site and determine what upgrades are needed, and to calculate the cost of an upgrade. Some installers reported projects that were initiated by

[37] *Id.* at 2.
[38] *Id.* at 1-2.
[39] *Id.* at 1.

customers in the first quarter of 2026 and took all the way until August of 2026 to complete. For these projects, customers missed out on valuable summer solar production, postponing the customer's ability to generate electricity and realize the anticipated benefits of the investment. While projects have been cancelled due to sudden financial infeasibility, installers reported customers wanting to cancel and/or cancelling due to frustration with unknown timelines and delays. In one project, PGE took more than two months to respond to the customer and installer for an assessment of what upgrades the customer would need, and the customer grew so frustrated that they cancelled the project entirely.

Third, the uncertainty and project-specificness of PGE's requirements and timelines compounds the problem. When the full scope and cost of a project is unpredictable, installers cannot confidently establish project budgets or completion dates, undermining customer satisfaction with the installer and process. Even when an installer flags a potential need for the upgrade, the cost and timeline would remain unknown until PGE determines the necessary work. As one reported project illustrates, PGE's need for additional time to calculate the cost of a required meter base upgrade created a delay of seven to eight weeks, during which the parties did not know the ultimate cost. For installers , the project-specific nature and uncertainty of PGE's new upgrade requirements undermines installers' ability to deliver projects on predictable terms. Additionally, installers now have to manage the risk that customers will abandon projects when the full scope and expense of the required work becomes clear. Installers have reported a confusing process with PGE, with some installers trying to proactively get ahead of a potential upgrade by calling PGE service coordination to review a customer's premises, only to be told to reach out to the Net Metering Department instead if the project is solar.

In one particularly noteworthy example, an installer donated a solar system to a low-income household. After installing the system, the installer and donee learned that PGE was going to require a meter base upgrade and service upgrade, with an estimated cost of approximately $6,000. The donee could not afford the cost of upgrades, and the installer had not anticipated this extra cost when compiling funds for donating the project. The installer requested an exception from PGE, explaining that the system was already installed and that the system was donated to a low-income household and that the donee could not afford the upgrades. PGE rejected this request. However, PGE implemented the pause on requirements before the installer had to cover the cost of upgrades themselves, and the project was completed. This example illustrates how PGE's requirements threaten projects designed to expand access to clean energy.

III. Discussion

A. The Tariff Language is Too Broad

PGE's definitions of "Service Equipment" and "Service Upgrade" are overly broad and fail to provide any meaningful standard governing when PGE may require a customer to upgrade or replace their own electrical equipment. PGE's definitions give PGE substantial discretion to determine when a customer project constitutes a "service upgrade". The definitions contain no establishing or technical criteria tied to the customer's load, amperage, safety, reliability, or the technical requirements of the proposed interconnection.

Again, the definition in PGE's tariff for "Service Equipment" is: "Any and all electrical equipment included in the delivery of electrical power to a customer's premises."[40] The Joint Advocates find the phrase "any and all" particularly problematic. Read literally, the definition sweeps broadly across electrical equipment located on the customer's premises. Although PGE owns the electric meter, the customer generally owns the meter base and other customer-side electrical equipment. The Joint Advocates assert that the tariff should not define "Service Equipment" so broadly that it effectively gives PGE authority over equipment that is owned by the customer.

The definition of "Service Upgrade" is similarly expansive: "Anytime a service is being altered, modified, replaced or updated, including in instances of service failures."[41] This definition contains no limited principles. The definition does not distinguish between changes that actually affect the capacity or characteristics of the utility service and changes to customer premises that have no material effect on the service PGE provides. The definition does not identify any threshold or technical criteria, such as an increase in load, an increase in service ampacity, a change in the point of interconnection, or a demonstrated safety or reliability concern, that must be met before PGE may require an upgrade.

The absence of a load-based standard is significant. Under PGE's new definitions, the addition, modification, or replacement of electrical equipment associated with a solar or storage installation can apparently be sufficient for PGE to characterize the project as a "Service Upgrade" even where a customer's service capacity and load requirements remain unchanged. The tariff language permits PGE to impose substantial upgrade requirements without establishing that the underlying customer project creates a corresponding need for those upgrades.

Further, the absence of any reference to the service point is notable. The service point is "the point of connection between the facilities of the serving utility and the premises wiring" as defined in the National Electric Codes ("NEC").[42] The NEC further notes that "the service point can be described as the point of demarcation between where the serving utility ends and the premises wiring begins."[43] PGE defines service point as "The point where PGE's circuit connects to the customer's system," in the ESR. The Joint Advocates are concerned that the tariff definition's expansiveness lacks a reference to the service point, and therefore gives the utility far-reaching control over customer electric equipment. The tariff definitions would benefit from some reference to the service point to clearly delineate between utility and customer ownership.

The practical effect of PGE's new definitions is that PGE has developed a mechanism through which it can require customers to incur thousands of dollars in costs to modify their own electrical equipment at PGE's sole discretion. Customers and installers have little ability to anticipate whether a customer's existing equipment will be accepted or whether PGE will impose substantial new requirements in the project-development process. The lack of standardization creates a great deal of uncertainty for installers and customers alike.

[40] ADV 1786, PGE Advice No. 25-27.
[41] *Id.*
[42] NEC 2026 Article 100 Definitions.
[43] *Id.*

The Joint Advocates request that the Commission reevaluate the tariff language that resulted in giving PGE such broad discretion over customer-owned equipment without clear standards governing the exercise of that authority. At the minimum, the definitions should be revised to at least include the following four components:

(1) Distinguish utility-owned service equipment from customer-owned electrical equipment using the service point;
(2) Establish that a "Service Upgrade" requires a demonstrated technical need proven through a load study or similar process;
(3) Establish clear boundaries regarding PGE's authority over equipment located on the customer side of the service point.

Without such limitations, the tariff language provides insufficient protection against the very outcome now taking place: customers undertaking ordinary solar and storage projects being required to make costly modifications to customer-owned electrical equipment despite no demonstrated change in the utility service being provided to the customer and no resulting benefits to the customer.

B. Adding Solar and Storage Does Not Always Result in an Upgrade to Service

Given PGE's overly broad definition of "service upgrade", The Joint Advocates must fill in the gaps. Many members of the Joint Advocates are electrical engineers that understand a solar installation does not actually modify the electrical service in most cases. The installation of solar or storage to an existing property does not, by itself, automatically increase the property's electric load, increase the amperage of the customer's service, or otherwise change the capacity of the electric service being provided by PGE. Accordingly, a customer adding solar or storage to their premises should not, standing alone, trigger requirements to upgrade or modify the customer's existing electrical service equipment.

In most cases, the Joint Advocates maintain that solar installations do not modify the electrical service itself. Rather, installers install projects on the customer side of the meter and interconnect with the customer's existing electrical infrastructure. The work necessary to accommodate the installation is often limited in scope, such as the addition of a backfeed breaker or connection through existing distribution equipment. Some solar installations are sufficiently small that they do not even require a disconnect. In other cases, installation of solar may involve replacement of a main panel. Such work has historically been allowed under the NEC and PGE's ESR without amounting to what PGE is now defining as a service upgrade.

Functionally, the addition of customer-owned solar is not inherently different from the installation of other common end-use equipment. Customers routinely install electric ranges, heat pumps, or electric vehicle chargers without PGE treating those installations as a change to the electrical service, if the addition of these loads does not change amperage of the service. The Joint Advocates assert the driving question should instead be whether a customer is actually requesting or requiring a capacity increase or other modification to the utility service, rather than whether or not a customer is installing new electrical equipment. To date, PGE has not provided the Joint Advocates a sufficiently detailed technical justification for PGE's new requirements. The requirements appear to flow from PGE's characterization of the solar or storage installations

as a change to the customer's service, rather than from an actual change in the customer's service.

The infeasible increased costs resulting from PGE's new requirements discussed throughout this letter do not appear to correspond to a customer benefit when these costs are imposed absent a demonstrated technical need. As the factual record in IIB demonstrates, these unexpected costs have caused customers to cancel otherwise viable solar and storage projects. The Joint Advocates ask that the Commission require PGE to establish a clear, technical nexus to require upgrades to customer electrical equipment.

C. The Tariff Change is Having a Discriminatory Impact on Solar

The tariff language and the ESR language differ in their treatment of solar and storage. The tariff language is facially neutral because it does not explicitly reference solar or storage. However, PGE's interconnection application process allows PGE to identify when a customer is adding solar and/or storage to their property. By contrast, other technologies, such as electric ranges, heat pumps, and electric vehicle chargers, generally do not go through the interconnection application process. As a result, customers typically do not notify PGE when installing these other technologies. The interconnection application process therefore provides PGE a means to single out solar and storage projects and apply the new upgrade requirements to solar and storage. To the Joint Advocates' knowledge, PGE has applied the new upgrade requirements to solar and storage projects without similarly identifying and imposing the new requirements on other types of changes. This practice raises significant concerns about the discriminatory impact of the new requirements on solar and storage.

The proposed interconnection handbook and ESR language makes this disparate treatment more explicit. Section 9.1 of the proposed interconnection handbook language states: "PGE's ESR provides interconnection and recruitment requirements for relocated, rewired, and new services. PGE considers the installation of new generating or storage equipment as rewiring of existing services."[44] Further, Section 3.6 of the ESR states: "Increasing the amperage of a service like for a renovation, add-on, solar system, etc…."[45] Although this language does not expressly exclude other technologies from the requirements, it specifically identifies solar system installation as circumstances that would trigger PGE's new upgrade requirements. This language makes it easier for PGE personnel to flag solar and storage projects as requiring additional upgrades, reinforcing the disparate impact of the requirements. The Joint Advocates oppose language that specifically identifies solar and storage installations in this manner without establishing a clear technical basis for requiring an upgrade.

[44] UM 2111, PGE's Distribution Interconnection Handbook Update, at 48.
[45] 2026 PGE, Electric Service Requirements ESR, 27 (Jan. 2026); accessible at https://downloads.ctfassets.net/416ywc1laqmd/2PmrU1CptipEQUJAD1Ooyb/28ecb369c6b9fad5a6c38cefb52e3c46/ESR_January_2026_Book.pdf

In theory, PGE's broad definitions could allow it to impose the new upgrade requirements in connection with a wide range of changes to a customer's electrical equipment. If a customer were to replace an electrical panel, install a new heat pump, or upgrade their existing electric stove, PGE can, at its discretion, characterize these as service upgrades and require customers to unnecessarily upgrade their meter base. In practice, customers do not routinely notify PGE of these types of changes when they do not involve an increase in service capacity. Because solar and storage installers must submit interconnection applications through PowerClerk, PGE is uniquely notified of solar and storage projects and has the opportunity to impose additional requirements.

The Joint Advocates are concerned that this process, combined with PGE's broad tariff definitions and proposed ESR language, has and will result in solar and storage customers bearing upgrade costs that are not consistently imposed on other customers. The Joint Advocates ask that the Commission address this disparate impact so that customers are not subjected to additional costs solely because their project involves solar or storage.

D. The Tariff Change Threatens Low-Income Energy Programs and Energy Equity

The broad tariff language creates risks that extend beyond individual solar and storage customers. Because the language gives PGE full discretion, PGE could impose these expensive upgrades on projects serving low-income communities for both solar and storage programs and even other technology programs, like heat pumps. Projects funded in part or wholly through programs benefiting low-income communities are particularly vulnerable to unexpected equipment upgrade costs. For these projects, increased costs could make an otherwise viable installation financially infeasible, undermining public and ratepayer investments intended to expand access to clean energy and cooling technologies. The final example in the factual background section above, where PGE required costly upgrades from a customer receiving a donated solar project, illustrates how the tariff changes threaten projects aimed at low-income communities.

The tariff changes could threaten multiple low-income programs, such as the Portland Clean Energy Community Benefits Fund ("PCEF"), which supports clean energy investments in Portland communities, including solar, storage, heat pumps, and electrification projects intended to benefit low-income households. Without standardized language from PGE, PCEF partners that allocate funds to individual projects do not have certainty when it comes to budgeting for projects to include funds for meter base replacements or meter relocations. Every dollar diverted to an unnecessary electrical upgrade is a dollar that cannot be used to serve another household. Energy Trust of Oregon ("ETO") is currently funded by PCEF to install free or low-cost solar to low-income Portland residents and the Joint Advocates anticipate that PGE's requirement would have significant negative impacts on the program and number of households that can be served. Similarly, solar projects that would benefit across PGE service territory from the anticipated

federal income-qualified Solar for All ("SFA") funding would be affected. If the SFA funding does not cover electrical equipment upgrades, customers would be forced to take on the upgrade costs themselves. As a result, a project that was believed to be financially viable can quickly become economically infeasible. The same concerns apply to projects supported by ETO incentives and other grant-funded, subsidized, or donated installations for low-income households. PGE's upgrade requirements impose substantial unanticipated costs on these projects and program administrators and installers may be forced to reduce households served or abandon some projects altogether.

The consequences are not limited to only solar and storage. PGE's broad definitions could also affect other electrification incentives, such as ETO's heat pump programs and other programs designed to help buildings decarbonize and transition to electric technologies. Although the immediate concerns raised by the Joint Advocates involve solar and storage, the Joint Advocates's analysis of PGE's language shows much wider implications.

The resulting impacts are cumulative. Unexpected upgrade costs increase the cost of individual projects, reduce the number of installations that available program funding can support, and potentially prevent the households most in need of assistance from accessing the benefits of clean energy and electrification. Such outcomes undermine the various programs' objectives to advance energy affordability, expand access to clean energy, and improve energy equity. Program administrators would be placed in the position of having to account for potentially thousands of dollars in additional costs that are difficult to predict.

If PGE continues to impose costly upgrades without a clear, technically justified basis, these essential programs will be significantly impacted. The Joint Advocates ask the Commission to clarify the applicable tariff and ESR provisions to ensure that upgrade requirements are tied to demonstrated technical needs rather than triggered simply by installing solar, storage, or other electrical equipment. Without such standards, the consequences of PGE's new requirements could extend well beyond individual customers and limit the reach of publicly funded programs, slowing Oregon's progress toward a more equitable clean energy transition.

IV. Requested Commission Action

The Joint Advocates request the Commission take two actions: (1) Open a docket to investigate and resolve this meter upgrade issue; and (2) extend PGE's pause on upgrade requirements for the duration of the PUC's investigation into this matter.

Thank you for your assistance.

Respectfully Submitted,

/s/ Alyssa Forest

Alyssa Forest
Policy and Regulatory Affairs Director
Oregon Solar + Storage Industries Association
PO Box 14927
Portland, OR 97293
P: 916.960.8884
E:alyssa@orssia.org

/s/ Brian Stewart

Brian Stewart
Co-Founder
Electrify Now

Linda Ganzini MD, MPH

Linda Ganzini
Co-Executive Director
Electrify Oregon

/s/ Daegan Palermo

Daegan Palermo
Program Coordinator
Solar Oregon

/s/ Avery McClure

Avery McClure
Policy Committee President
Solar Oregon

/s/ Pat DeLaquil

Pat DeLaquil
Steering Committee
Mobilizing Climate Action Together

/s/ Thor Hinckley

Thor Hinckley
Coordinating Committee
Third Act Oregon

/s/ Joshua Baker, PhD

Josh Baker, PhD
Interim Executive Director
Oregon Physicians for Social Responsibility