

Ms. Diane Davis:

The Oregon Army National Guard is just completing construction on a new facility located in Ontario, OR. Per HB 2758 we are required to develop solar generating capacity equal in cost to 1 ½ % of the construction costs. Because the quality of the solar resource in Ontario is better than for most of our locations, we transferred the 1 ½% allotment from two other projects to produce funding for a larger array at Ontario. Per Idaho law we are limited on reverse metering to 25 KW systems and will be paid for energy produced at the 'avoided energy cost rate.' The result is a dramatic reduction in the value of our investment.

We would like to participate in the new pilot Feed in Tariff passed with HB 3039 and for which Administration Rulemaking 538 (AR 538) is writing Rule 8600840000. As currently written we would be excluded from entering the program because our array will be larger than 10 KW.

Currently Idaho Power is only allowed to permit small generators with less than 10 KW systems into the pilot Feed in Tariff with a total allotment of 400 KW.

Rule 8600840190 (5): I would like to propose a change to the rules so it reads: "An electric company with less than one megawatt of total allocation must allocate 100 percent of its solar photovoltaic capacity limit to retail electric consumers installing smaller & medium systems less than or equal to 100 KW, unless otherwise directed by the Commission." This would also require a change of UM 1452 Table 3 to require some allotment in the medium category.

It is noted that Idaho Power, in their comments of October 19, 2009, under Size of Small Projects, recommends smaller-scale capacity be defined as less than or equal to 100 KW.

Thank you!

Wayne Graham  
Energy Manager  
Oregon Army National Guard AGI-0