

JOHN R. KROGER
Attorney General



MARY H. WILLIAMS
Deputy Attorney General

DEPARTMENT OF JUSTICE
GENERAL COUNSEL DIVISION

May 24, 2011

Attention: Filing Center
Oregon Public Utility Commission
550 Capitol Street N.E., Suite 215
P.O. Box 2148
Salem, Oregon 97308-2148
Puc.filingcenter@state.or.us

Re: *In the Matter of Revising Net Metering Rules Regarding Aggregation of Meters on
Different Rate Schedules*
Docket No. AR 548

Enclosed are an original and five copies of Oregon Department of Energy's
RULEMAKING COMMENTS in the above-captioned matter for filing with the PUC today.

Sincerely,

Janet L. Prewitt
Senior Assistant Attorney General
Natural Resources Section

Enclosures
JLP:jrs/#2817952
c: AR 548 Service List

1 businesses. The addition of this language will help to ensure that aggregation of meters does not
2 take place for those customer-generators who have BETC funded projects, whose meters need to
3 be tracked distinctly.

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5 DATED this 24th day of May 2011.

6 Respectfully submitted,

7 JOHN R. KROGER
8 Attorney General

9  for OSB # 043944
10 Janet L. Prewitt, #85307
11 Assistant Attorney General
12 Of Attorneys for Oregon Department of Energy
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AR 548 Service List/E-Mail Addresses

W=Waive Paper service

<p>W Oregon Dockets Pacificorp, dba Pacific Power 825 NE Multnomah St, Ste 2000 Portland OR 97232 oregondockets@pacificorp.com</p>	<p>W Erik Anderson Pacific Power & Light 825 NE Multnomah St Ste 1800 Portland OR 97232 erik.anderson@pacificorp.com</p>	<p>W Stephanie S. Andrus PUC Staff--Department of Justice Business Activities Section 1162 Court St NE Salem OR 97301-4096 stephanie.andrus@state.or.us</p>
<p>W Christa Beary Idaho Power Company PO Box 70 Boise ID 83707-0070 cbeary@idahopower.com</p>	<p>W Gordon Feighner Citizens' Utility Board of Oregon 610 SW Broadway, Ste 400 Portland OR 97205 gordon@oregoncub.org</p>	<p>W Ryan Flynn PacifiCorp 825 NE Multnomah, Ste 1800 Portland OR 97232 ryan.flynn@pacificorp.com</p>
<p>W J. Richard George Portland General Electric Company 121 SW Salmon St 1WTC1301 Portland OR 97204 richard.george@pgn.com</p>	<p>W Jennifer Hall Synchrosolar 1111 E Burnside Ste 308 Portland OR 97214 jeni@synchrosolarnw.com</p>	<p>W Harold Hartman 35243 Malin Loop Rd Malin OR 97632 lynhartconsult@hotmail.com</p>
<p>W Heath Kearns Lite Solar Corp 1001 SE Division St. Ste 2 Portland OR 97202 heath@litesolar.com</p>	<p>W G. Catriona Mccracken Citizens' Utility Board Of Oregon 610 SW Broadway, Ste 400 Portland OR 97205 catriona@oregoncub.org</p>	<p>W Glenn Montgomery Oregon Solar Energy Industries Association PO Box 14927 Portland OR 97293 glenn@oseia.org</p>
<p>W Raymond Myers Citizens' Utility Board Of Oregon 610 Sw Broadway, Ste 400 Portland OR 97205 ray@oregoncub.org</p>	<p>Vijay A. Satyal Oregon Department Of Energy 625 Marion St NE Salem OR 97301 vijay.a.satyal@state.or.us</p>	<p>W Patrick Schellerup Lite Solar Corp 1001 SE Division St. Ste 2 Portland OR 97202 patrick@litesolar.com</p>
<p>Jay Tinker Portland General Electric Portland General Electric Company 121 SW Salmon St. 1WTC-0702 Portland OR 97204 jay.tinker@pgn.com</p>	<p>W David Tooze City Of Portland - Planning & Sustainability 1900 SW 4th Ste 7100 Portland OR 97201 david.tooze@portlandoregon.gov</p>	<p>W Sandra Walden 621 SW Alder St #300 Portland OR 97205 swalden@r-e-s.us</p>
<p>W Joseph F. Wiedman Interstate Renewable Energy Council 436 14th St Ste 1305 Oakland CA 94612 jwiedman@irecusa.org</p>		

CERTIFICATE OF SERVICE

I hereby certify that on May 24, 2011, I served the foregoing OREGON DEPARTMENT OF ENERGY'S RULEMAKING COMMENTS upon the persons named on the service list, by mailing a full, true and correct copy thereof and to such persons waiving such service by mail who were served at their e-mail address as listed on the service list.

DATED: May 24, 2011.

Janet L. Pre Witt OSB #043944
Janet L. Pre Witt, OSB #853070
Senior Assistant Attorney General