



May 24, 2011

**Via Electronic Filing and U.S. Mail**

Oregon Public Utility Commission  
Attention: Filing Center  
550 Capitol Street NE, #215  
PO B ox 2148  
Salem, Oregon 97308-2148

RE: AR 548

Attention Filing Center:

Enclosed for filing in the abovep0referenced docket are an original and five copies of:

Final Comments of Real Energy Solutions

This document is being filed by electronic mail with the Filing Center.

Thank you,

*Sandra Walden*

Sincerely,  
Sandra Walden  
President /Owner  
OSEIA Chair

BEFORE THE PUBLIC UTILITY COMMISSION  
OF THE STATE OF OREGON

AR 548

|                               |   |                |
|-------------------------------|---|----------------|
| In the Matter of Revising Net | ) | FINAL COMMENTS |
| Metering Rules Regarding      | ) | REAL ENERGY    |
| Aggregation on Meters with    | ) | SOLUTIONS      |
| Different Rate Schedules      | ) |                |

Real Energy Solutions (RES) appreciates the Oregon Public Utility Commissions staff (“Staff”) and stake holders efforts in this rulemaking docket to develop a proposed rule that sufficiently addresses aggregation issues.

This written testimony is presented to confirm verbal testimony given at the May 16, 2011 AR 548 rulemaking hearing. Real Energy Solutions is a solar Developer and Consulting company based in Portland for the last 4 ½ years.

A question was posed by Staff at the hearing regarding the name plate capacity limits that have been set for Net Metered facilities and if the Utilities had seen evidence that the limits were appropriate. The response by both PacifiCorp and PGE representatives present indicated that they had not encountered customer situations that would indicate that the current 2 Megawatt and 25kW limits presented a problem. From an industry perspective, for the record, it is important to understand that as renewable designers/installers look to size a system, particularly a solar facility, there are generally three considerations prior to making a recommendation to the client regarding the size of the system to be installed. First is to determine if all energy efficiency work had been accomplished. If not, an estimate of such energy savings would be subtracted from the annual client power usage. Second, the premises are examined and a solar survey completed to determine the maximum size system that could be installed considering the limitations of shading, roof area and/or orientation restrictions. Given the Net Metering regulations allow only a leveling of production to usage annually, a solar design is provided that off-sets as much of the client load as possible given the physical constraints of the location but, third, no more than the allowed limits. Therefore, the limits that are currently in place become the maximum size of systems installed BECAUSE the limits are mandated. There are many utility customers that would consider larger installations, especially with the clarification of aggregate metering rules, if the current limits were increased.

For example an Oregon farmer or nursery may have irrigation pumping meters, a barn meter, a storage facility meter, production facilities, green houses with large fans and lighting all of which could have separate meters and schedules. Together the load for all the commercial meters could exceed the 2MW limit. They have plenty of space to install solar above plants that grow well in shaded areas where a system could be installed to off-set up to 99% of their expected annual usage. Currently, the solar designer/installer will only DESIGN a system of up to 2MW since that is the limit allowed. As more and

more power is consumed by residential customers for electronics, home offices, air conditioning etc it is easily possible that the limits that now exist will reduce the potential amount of solar designed. Since distributed generation is a benefit for the utility in many ways; off-setting peak loading, delaying construction of distribution and potentially transmission lines and allowing power rates to remain lower as utilities are not required to purchase more expensive power to meet demand on an hour by hour basis, it seems that these limits should be reconsidered at such time that the Staff believes is fitting.

The Staff is to be commended on their handling of the aggregation issues and for providing guidelines for prioritizing what meters can and should be 'assigned' to a generating facility. It is important to note that any benefit that accrues to the client/rate-payer because of aggregation could easily be negated if aggregation fees were to be excessive. It is to that end we strongly suggest that any fees charged by the utility for aggregation, now or in the future, be supported by true cost of service verification. There should be little or no cost recovery necessary.

Additionally, the Department of Energy testified on May 16 that the Department would have difficulties if residential and commercial meters were aggregated, since the incentives provided to customers have contractual promises for each separate program. It is proposed that these contractual reporting requirements can be addressed by rulemaking and should not eliminate the possibility of aggregation of meters that include commercial/business and residential usage from one generating facility. Using the previous farm example it would be a false and unnecessary limitation to have a solar system installed at a farm that could provide power for the commercial use as well as the home but not be allowed to do so.

Thank you for the opportunity.

Dated this 24<sup>th</sup> day of May, 2011

Respectfully submitted,

*Sandra Walden*

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