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May 24, 2011

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

Oregon Public Utility Commission
550 Capitol Street NE, Ste 215
Salem, OR 97301-2551

Attn: Filing Center

RE: AR 548 – Comments of Pacific Power

PacifiCorp d/b/a Pacific Power encloses for filing its comments on the proposed net metering rules regarding aggregation the above-referenced docket.

Please contact Joelle Steward, Regulatory Manager, at (503) 813-5542 for questions on this matter.

Sincerely,

Andrea L. Kelly
Vice President, Regulation

Enclosure

cc: Service List – AR 548

CERTIFICATE OF SERVICE

I hereby certify that on this 24th of May, 2011, I caused to be served, via E-Mail and/or first class mail, a true and correct copy of the foregoing document on the following named person(s) at his or her last-known address(es) indicated below.

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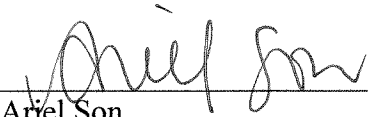
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Ariel Son
Coordinator, Regulatory Operations

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

AR 548

In the Matter of Revising Net Metering Rules
Regarding Aggregation on Meters with
Different Rate Schedules.

Comments of Pacific Power

1 PacifiCorp d/b/a Pacific Power (“Pacific Power” or “Company”) submits the
2 following Comments in the above-referenced docket in response to issues discussed in
3 Commission Staff’s Comments filed May 3, 2011, and at the May 16, 2011 hearing. Pacific
4 Power was an active participant in this proceeding and commends Staff and other interested
5 parties for their work in considering a variety of issues. For the reasons stated herein, Pacific
6 Power supports the amended rules as proposed by Staff in their May 3, 2011 comments.
7 Pacific Power respectfully requests that the Commission not perceive the absence of
8 comments on any particular issue or other matter as a conclusive indication of Pacific
9 Power’s lack of interest with respect thereto.

10 **I. DISCUSSION**

11 Pacific Power supports the proposed rules as described in Staff’s May 3 comments.
12 The proposed rules are appropriately tailored to address the specific issue of aggregating
13 across different rate schedules, as described in the Notice of Proposed Rulemaking. Pacific
14 Power agrees with Staff that changes to the rules to remove or revise the 2 MW cap (by the
15 City of Portland and the Interstate Renewable Energy Council (“IREC”)) and to allow virtual
16 net metering through multiple tenant meter aggregation (by IREC) are beyond the limited
17 scope of this proceeding. Substantial changes to the overall structure of net metering
18 programs in Oregon, to the extent interested parties seek to accomplish this objective, should

1 be evaluated independently to ensure that any impacts are considered and unintended
2 consequences are mitigated.

3 Pacific Power supports Staff's recommendation to include a definition in the
4 proposed rules for the term "contiguous". The inclusion of the definition will mitigate any
5 unintended consequences for net metering applicants in the event the definition is amended
6 in an unrelated docket. The definition of "contiguous" as recommended by IREC provides
7 clarity to the rule and should be adopted.

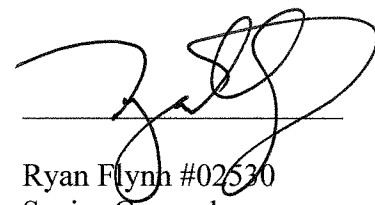
8 Pacific Power also agrees with Staff and Portland General Electric that the system
9 size limitations currently included in the net metering rules should be retained. Removing the
10 25 kW cap on residential systems that aggregate meters could lead to oversized systems
11 being placed in residential neighborhoods. The continuation of the limitation will reduce the
12 likelihood of excessive flow negatively impacting the residential distribution network.

13 **II. CONCLUSION**

14 In conclusion, Pacific Power supports the proposed rules as described in Staff's May
15 3, 2011 comments. The Company appreciates the Commission's consideration of these
16 comments.

DATED, this 24th day of May, 2011.

Respectfully submitted,



Ryan Flynn #02530
Senior Counsel
PacifiCorp