



Bureau of Planning and Sustainability

Innovation. Collaboration. Practical Solutions.

March 1, 2011

Phil Carver
Sr. Utility Analyst
Public Utility Commission
550 Capitol St NE, Suite 215
Salem, OR 97308

Dear Mr. Carver,

Thank you for providing the City of Portland with the opportunity to submit comments on the Commission's Docket AR 548, related to revising Net Metering Rules regarding Aggregation of Meters.

The comments below represent the collective recommendations of three City of Portland Bureaus - Environmental Services, Water Works and Planning and Sustainability. We address three topics.

1. Portland bureaus support the Rule revisions proposed by Staff which would allow multiple meters on different rate schedules to net meter electricity generated by the customer. If adopted, this practical and helpful step will make it easier for on site generation (including renewables) to be constructed.

The inability to mix meters on different rate schedules was an inhibiting problem encountered by the Water Bureau's Ground Water Pump Station where a 267 KW solar electric facility was constructed. Due to the presence of multiple meters on two different rate schedules, and wide variations in year to year pump use, we found the process of declaring which accounts to net meter to be troublesome and restrictive. Yet meeting those requirements had little or no apparent benefit to the utility system operation or utility customers.

2. Portland proposes a Rule revision that defines contiguous customer locations from the perspective of connection to the utility company's feeder, not from the perspective of the customer's property ownership or definition of a customer site.

The distribution feeder is the point of operational concern. We understand that this was the driving reason for limiting sites to be on the same distribution feeder when the Net Metering Rules were first developed. During this revision, the Rules should be re-written to reflect the feeder's operating concern as the location qualifier for net metering service - not the customer's meter location, property ownership or contiguous nature. From our perspective, as long as a customer owned net metering facility is on the same feeder, there should be no



new impacts on utility operations. Further, to be bound by property ownership is counter productive to the development of local solar electric and micro hydro facilities build by the customer and the underlying purpose for net metering. Furthermore, inserting property ownership issues drives a secondary inquiry into this process that creates administrative burdens for everyone. Turning the focus back to contiguity to the utility's distribution feeder is a logical, simplifying approach.

3. Portland requests a Rule revision to remove the 2 megawatt (MW) limit on installed generator size at non-residential meters, so long as the customer complies with a 2 megawatt limit on the amount of electricity that is net metered into the utility's grid.

Portland requests this Rule revision only for waste water treatment facilities/customers as it is our understanding that this situation is particular to Portland's Columbia Boulevard Wastewater Treatment Plant (CBWTP). CBWTP has peak monthly demand, seasonally ranging from 3.5 MW up to 6 MW. The Plant's baseload energy use occurs during periods of dry weather and drops to a low of approximately 2 MW. Even during times of our lowest power requirement, all of CBWTP's existing generation - 1.87 MW - is used on the customer side of the meter and no electricity is net metered into PGE's grid.

The Plant's engineers/operators desire to fully utilize surplus biogas (it is presently being flared) and foresee a 1.0 to 1.5 MW expansion of biogas generation. They are also considering up to 400 kW of solar electric generation. If completed, our on-site generation installed capacity could rise from 1.87 MW to as much as 3.8 MW. Recognizing the baseline power requirement of 2 MW, CBWTP's proposed generation expansion to 3.8 MW can stay under a 2 MW net metering cap.

Unfortunately, as the rules are currently written, to expand Portland could not elect Net Metering service, but instead would be required to be a Small Power Producer or enter into a Partial Requirements Agreement. We believe this is inappropriate and burdensome. As long as CBWTP net meters 2 MWs or less into the utility system, we should be allowed to expand our installed generation capacity.

Portland's proposal to remove the Rule's reference to customer generator size, yet retain the 2 megawatt limit on the power actually net metered into the utility distribution system is a practical solution that preserves the intent of the present Rule and allows the city to expand the use of on-site renewable energy resources.

Thank you for the opportunity to comment.

Sincerely,

David Tooze
Sr. Energy Specialist
Portland's Bureau of Planning and Sustainability



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