



Oregon

John A. Kitzhaber, MD, Governor

Public Utility Commission

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AR 548

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

STAFF COMMENTS

Based on the Public Hearing held on May 16, 2011, Staff reiterates its comments filed on May 3, 2011.

At the hearing several participants raised concerns that the 2 MW limit on non-residential net metering facilities might be too restrictive.

Staff continues to support the 2 MW limit for non-residential customers based on the nameplate capacity of the generation. If a non-residential customer has several meters, under current rules the customer could net meter up to 2 MW of generation on each meter. Also, a customer could apply for an exemption to the rule.

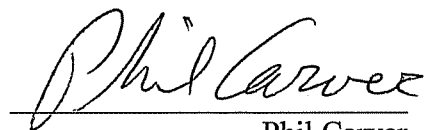
Staff notes that for self-generation that is not net metered, customers with nameplate capacity of less than 2 MW are not required to purchase replacement power under Portland General Electric's (PGE's) Schedule 75 (Partial Requirements Service). If nameplate capacity is 2 MW or more, then replacement power for the self-generation must be purchased under Schedule 75. Schedule 75 customers must notify the utility concerning changes in self-generation. The impacts on utility operations and the considerations for notification are similar for generation by net-metered and partial-requirements customers. This indicates that, at least for PGE, the 2 MW limit for net metering is consistent with its Schedule 75.

Staff also notes that PGE has about 15 MW of net metering installed (PGE comments of April 8, 2011 at 4). ORS 757.300(6) allows the Commission to limit net metering if the capacity of net metered generation exceeds one-half of one percent of a utility's single hour peak load. For PGE this threshold is about 20 MW.

A good time to examine the overall impacts of net metering on PGE's customers and possible changes to the 2 MW limit for PGE and PacifiCorp might be when PGE's net metering nears or passes the 20 MW threshold. Now is not a good time to increase the limit of 2 MW for net metered non-residential customers.

This concludes Staff's Final Comments.

Dated at Salem, Oregon, this 24th day of May, 2011.

A handwritten signature in cursive script that reads "Phil Carver". The signature is written in black ink and is positioned above a horizontal line.

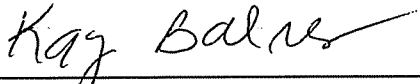
Phil Carver
Sr. Utility Analyst
Electric Rates & Planning

CERTIFICATE OF SERVICE

AR 548

I certify that I have this day served the foregoing document upon all parties of record in this proceeding by delivering a copy in person or by mailing a copy properly addressed with first class postage prepaid, or by electronic mail pursuant to OAR 860-001-0180, to the following parties or attorneys of parties.

Dated this 24th day of May, 2011 at Salem, Oregon.



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AR 548
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