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May 24th, 2011

VIA ELECTRONIC FILING

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

Attn: Filing Center

RE: AR 548- Comments of LiteSolar Corp

LiteSolar Corp is submitting the following filing as comments on the proposed Net-Metering rule changes being considered in Docket AR 548.

Please contact Patrick Schellerup with any questions.

Sincerely,

Patrick Schellerup
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**BEFORE THE PUBLIC UTILITY COMMISSION
OF THE STATE OF OREGON
AR 548**

Final Comments From Lite Solar Corp

LiteSolar Corp agrees with the proposal to lift the current Net-Metering caps on residential and commercial systems. It has been stated by the utilities that removing the cap is not needed because no one has requested to install a system larger than the caps. The caps serve as an arbitrary barrier to installing larger systems. It is expensive for solar contractors to design large systems, and we will not encourage our customers to pursue the idea of installing systems larger than the current caps, as long as those caps are in place. In short, we will not waste money designing a system that breaks the rules.

Another point brought up by the utilities is that by removing these caps we will be encouraging people to install systems that are oversized and may cause issues with excess generation feeding back into the distribution system. The current Net-Metering rules already state that a customer cannot feed back more than they consume on an annual basis, and it is very unlikely consumers will spend money on expensive PV equipment that will generate in excess of their load and ultimately not be compensated for.

The Net-Metering caps are arbitrary and prohibit consumers that use large amounts of energy from realizing the benefits of Net-Metering as the rules were originally intended. The purpose of Net-Metering is to allow a customer to offset their electric load. The current system size caps have the effect of limiting this ability beyond a certain range.

LiteSolar supports IREC's proposal to allow Meter aggregation, or Virtual Net-Metering on MDU Residences. Currently 28% of the population in Oregon lives in a MDU that cannot have PV systems installed on them because of a lack of an efficient metering mechanism. Virtual Net-Metering would provide a mechanism to allow for PV Systems to be installed on these properties.

Staff has stated that this request is beyond the scope of the current rule making process. It is difficult to understand how this issue, which revolves around Net-Metering and aggregation, does not belong in a docket about aggregation and Net-Metering rules.

LiteSolar also supports the City of Portland's proposed rules that the amount of electricity a distributed generation facility backfeeds into the distribution system be the basis that determines the maximum system size that is allowed to be installed. Currently, the nameplate capacity determines that maximum system size. The amount of electricity a system generates is always below the nameplate capacity, which prohibits consumers from installing a system that actually covers 100% of their load.