

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**AR 558**

In the Matter of Revisions to the Solar  
Photovoltaic Pilot Program Rules.

STAFF'S CLOSING COMMENTS

On July 22, 2011, Staff filed with the Commission its proposed changes to OAR 860-084-0010 et. seq. On September 12, 2011, PacifiCorp d/b/a Pacific Power (Pacific Power) and Portland General Electric Company (PGE), collectively (Joint Utilities) filed their comments on Staff's proposed changes. In their comments, Joint Utilities propose the following two changes (emphasized in bold) to Staff's proposed rule changes:

1. OAR 860-084-0130(2)(b): Eligible systems with capacity reserved under the competitive bidding option must connect to the distribution feeder that services the customer's property. The point of common coupling may be located on the load side of the retail customer's existing electric service **subject to utility approval and to the extent authorized by law.**

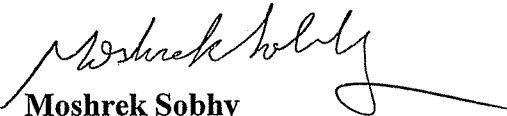
Joint Utilities state that adding this language will allow the flexibility to evaluate individual projects to gain efficiencies, while still ensuring that the bulk of interconnections be handled consistent with standard utility practice.

2. OAR 860-084-0430(2): Each electric company must provide the data collected pursuant to OAR 860-084-0400 and 860-084-0420, in a format established by the Commission, upon request. Reports that include this raw data and a summary of this data for the pilot program to date, must be provided to the Oregon Department of Energy, the Energy Trust of Oregon, the Oregon Department of Revenue, and to the Commission, **bi-annually** on the 15th day in **February and August.**

Joint Utilities state that this change will lessen the administrative burdens and corresponding costs of the program, while still meeting the goals of sharing the information with the entities that receive the data.

Staff agrees with Joint Utilities' proposed rule changes. This concludes Staff's closing comments in Docket No. AR 558.

Dated at Salem, Oregon, this 23<sup>rd</sup> day of September, 2011

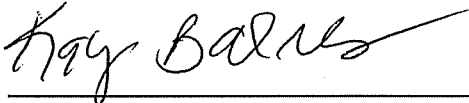
  
**Moshrek Sobhy**  
**Senior Utility Analyst**  
**Electric and Natural Gas Division**

## CERTIFICATE OF SERVICE

**AR 558**

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 23rd day of September, 2011 at Salem, Oregon.



---

Kay Barnes  
Public Utility Commission  
Regulatory Operations  
550 Capitol St NE Ste 215  
Salem, Oregon 97301-2551  
Telephone: (503) 378-5763

AR 558  
Service List (Parties)

<b>ADVANCED ENERGY SYSTEMS</b>  TIM COWART	65 CENTENNIAL LOOP EUGENE OR 97401 tim@aesrenew.com
<b>MCDOWELL RACKNER &amp; GIBSON PC</b>  ADAM LOWNEY	419 SW 11TH AVE, STE 400 PORTLAND OR 97205 adam@mcd-law.com
<b>NATURAL CAPITAL PARTNERS LLC</b>  PETER BLOOD MANAGING PARTNER	  peter@naturalcapitalpartners.us
<b>NEXTERA ENERGY RESOURCES</b>  RJ JOHNSON DIRECTOR-ORIGINATION	505 14TH ST STE 310 OAK OAKLAND CA 94612 rj.johnson@nexteraenergy.com
<b>PACIFICORP</b>  RYAN FLYNN LEGAL COUNSEL	825 NE MULTNOMAH, SUITE 1800 PORTLAND OR 97232 ryan.flynn@pacificorp.com
<b>PORTLAND GENERAL ELECTRIC</b>  JAY TINKER PROJECT MANAGER	PORTLAND GENERAL ELECTRIC COMPANY 121 SW SALMON ST 1WTC-0702 PORTLAND OR 97204 pge.opuc.filings@pgn.com
<b>PORTLAND GENERAL ELECTRIC COMPANY</b>  J RICHARD GEORGE ASST GENERAL COUNSEL	121 SW SALMON ST 1WTC1301 PORTLAND OR 97204 richard.george@pgn.com
<b>RENEWABLE NORTHWEST PROJECT</b>  ADAM SCHUMAKER POLICY ASSOCIATE	  adam@rnp.org
<b>SUN STORAGE</b>  JOSH HARMAN	PO BOX 1050 JOSEPH OR 97846 josh@sunstorage.org