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September 12, 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 558 – Closing Comments of Pacific Power and Portland General Electric

PacifiCorp d/b/a Pacific Power (“Pacific Power”) encloses for filing the Closing Comments of Pacific Power and Portland General Electric Company in 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 558

CERTIFICATE OF SERVICE

I hereby certify that on this 12th of September, 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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AR-558

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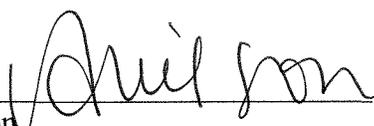
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Ariel Son
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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

AR 558

In the Matter of
PUBLIC UTILITY COMMISSION OF
OREGON

**Closing Comments of Pacific Power and
Portland General Electric**

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

Introduction

PacifiCorp d/b/a/ Pacific Power (“Pacific Power”) and Portland General Electric Company (“PGE”) (together “Joint Utilities”) appreciate the opportunity to provide comments on the pilot programs rule changes in Docket AR 558.

In Order No. 11-339 (“Order”), the Commission addressed issues for the upcoming enrollment period in the Solar Photovoltaic Pilot Program. The rule changes proposed by Staff accurately reflect the decision of the Commission, while still allowing sufficient flexibility for the implementation of the program. The Joint Utilities are generally supportive of the proposed rule changes, believing that they were drafted in an open and cooperative dialogue between the staff, the utilities and other interested parties. With that said, there are a few specific issues with the proposed rules that the Joint Utilities would like to address.

Interconnection Flexibility

In 860-084-0130(2), the Staff proposed rules that will provide more flexibility in the method of interconnection for customers who secure a reservation through the competitive bidding portion of the program. Specifically, the proposed rules would allow that “the point of common coupling may be located on the load side of the retail customer’s electric service” (860-

084-0130(2)(b)) and that “eligible systems may be connected at other distribution feeders on the utility grid” (860-084-0130(2)(c)). The Joint Utilities are supportive of allowing this flexibility since in some cases it will be more cost-effective for both the participant and the utility, especially with the size limits for competitive bidding projects being lowered to 10 kW. However, the Joint Utilities request that the language included within -0130(2)(c) – “subject to utility approval and to the extent authorized by law” – be added to -0130(2)(b). 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.

The proposed change to the proposed rules is as follows:

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.**

Quarterly Reports

The Joint Utilities reiterate the proposal made in the Joint Utility Opening Comments in UM 1452, filed July 29, 2011, to modify 860-084-0430(2) to change the reporting requirements from quarterly to bi-annual. The Joint Utilities propose to modify the reporting requirements to correspond with the bi-annual capacity enrollment windows. 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. The proposed change to the existing rules is as follows:

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 quarterly, on the 15th day in February and August of the first month of each calendar quarter.**

Conclusion

The Joint Utilities are generally supportive of the proposed rules, with the limited exceptions identified in these comments. The Joint Utilities appreciate the work done by Staff to modify these rules and believe that these rules will allow the utilities to manage the program as directed by the Commission.

DATED the 12th day of September, 2011

Respectfully Submitted,



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