



July 15th, 2024

Via Electronic Filing

Public Utility Commission  
Attn: Filing Center  
PO Box 1088  
Salem, OR 97308-1088

**RE: UM 2111/AR 659 Comments from the Oregon Solar + Storage Industries Association on Portland General Electric's Interconnection Handbook**

The Oregon Solar + Storage Industries Association (“OSSIA”) respectfully submits these comments on Portland General Electric’s (“PGE”) Interconnection Handbook. OSSIA urges PGE to make some minor corrections and changes to their handbook.

On page 5, under Section 1.5.1.1, PGE lists net metering as allowing customers to install up to 25 kW of generation. This phrase is confusing when read with the Tiers, OSSIA recommends replacing this language with the language from the Tier 1 interconnection language that includes reference to export capacity and nameplate rating.

On page 7, PGE describes the tiers for net metering interconnection. In Tier 1, it states, “Inverter-based and with an export capacity less than or equal to 25 kWac and a nameplate rating less than or equal to 50 kWdc.” The reference to kWdc is the only reference to kWdc in the list, is there a reason it is being used instead of kWac?

Additionally, on page 7, under Net Metering Tier 2, the statement includes of export capacity after 25 kWac but omits the phrase after 2,000 kWac. OSSIA recommends that the phrase be incorporated after 2,000 kWac.

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Lastly, on page 7, under Net Metering Tier 4, the statement does not include “of export capacity” after any of the statements. It should add the phrase to ensure continuity with the above listed tiers.

Thank you for your attention to these comments.

Dated this 15th day of July 2024.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jack Watson", is written over a light blue horizontal line.

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