



**Portland General Electric**  
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March 7, 2025

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High Street, S.E.  
P.O. Box 1088  
Salem, OR 97308-1088

**RE: AR 659 – In the matter of Rulemaking to Update Division 82 Small Generator Interconnection Rules, and Division 39 Net Metering Rules**  
**UM 2111 – In the matter of Public Utility Commission of Oregon, Investigation into Interconnection Process and Policies**

In Commission Order No. 24-068, the Commission ordered Portland General Electric Company (PGE) to complete the update to its legacy data no later than one year from the date of the order and directed that *“[t]he utilities should prioritize congested feeders, use and share updated information as it becomes available, and provide Staff with progress updates every six months.”* In compliance with the Commission’s directive, PGE provides the following final update.

PGE completed updating the nameplate capacity values of legacy projects on February 19, 2025. PGE has completed updating the value in all current systems that leverage and track the nameplate capacity of net metering facilities. ETO data was leveraged to ascertain the most accurate value for legacy NEM systems where available. At this point engineering review for new projects seeking to interconnect will leverage the new capacity values to analyze the impacts of the new project.

Please direct any questions regarding this filing to Chris Pleasant at the following email address [Christopher.pleasant@pqn.com](mailto:Christopher.pleasant@pqn.com) Please direct all formal correspondence and requests to the following email address [pge.opuc.filings@pqn.com](mailto:pge.opuc.filings@pqn.com)

Sincerely,

*\s\ Jaki Ferchland*

Jaki Ferchland  
Sr. Manager, Rates and Regulatory Affairs  
Pricing, Tariffs and Power Costs

cc: Service List – AR 659 and UM 2111