



Portland General Electric Company
Legal Department
121 SW Salmon Street • Portland, Oregon 97204
(503) 464-7611 • Facsimile (503) 464-2200

Richard George
Assistant General Counsel

March 2, 2011

Via Electronic Filing and U.S. Mail

Oregon Public Utility Commission
Attention: Filing Center
550 Capitol Street NE, #215
PO Box 2148
Salem OR 97308-2148

Re: AR 548

Attention Filing Center:

Enclosed for filing today in Docket AR 548 are an original and two copies of:

- **REQUEST TO POSTPONE HEARING AND EXTEND THE COMMENT PERIOD**

This document is being filed by electronic mail with the Filing Center. An extra copy of the cover letter is enclosed. Please date stamp the extra copy and return to me in the envelope provided.

This document is being served upon the AR 548 service list.

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Richard George", written over a horizontal line.

J. RICHARD GEORGE
Assistant General Counsel

JRG:cbm
Enclosures
cc: AR 548 Service List

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

DOCKET NO. AR 548

In the Matter of Revising Net Metering Regarding Aggregation of Meters on Different Rate Schedules		PGE REQUEST TO POSTPONE HEARING AND EXTEND THE COMMENT PERIOD
--	--	--

Portland General Electric Company (“PGE”) hereby requests that Administrative Law Judge (“ALJ”) Patrick Power postpone the hearing in the above-captioned docket and extend the period for public comment. The hearing is currently scheduled for March 9, 2011, and comments are due on that date as well. The proposed rule changes bring up complex issues with broad ramifications for both utilities and customers. PGE has reviewed the proposed rules and believes several issues remain and changes in the rule’s proposed wording are necessary. These issues would be best addressed through additional discussions among stakeholders preceding a hearing. Additional discussions will allow parties additional opportunity to collaborate on rule changes and review changes we anticipate proposing. At this time, we have not had an opportunity to discuss with other parties the potential impacts of the proposed rule changes on net metering aggregation by customers, including consideration of application to a variety of generating technologies, special or unique customer circumstances, updated estimates about how many aggregation requests we may receive in the future, and what the most efficient billing method would be. In order to conduct a meaningful, productive discussion of the proposed rule changes, PGE believes it would be prudent to formulate a better understanding of such issues before a

PAGE 1 – PGE REQUEST TO POSTPONE HEARING & EXTEND COMMENT PERIOD

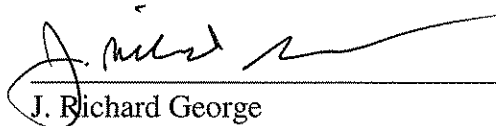
formal hearing is held and the rules are finalized.

We also are concerned that the proposed rules, as drafted, may have unintended consequences, and impacts to PGE's non-net metering customers are not known. We ask for greater time to evaluate such potential impacts. Moreover, the proposed rules touch on challenging topics such as plug-in vehicles and Oregon Business Energy Tax Credits (BETCs) for net metering aggregation, and we suggest a more in-depth consideration of the interplay between these areas is necessary. PGE recognizes that some potential applications of net metering aggregation from multiple rate schedules as allowed under the proposed rules are waiting for a resolution. We, however, believe that the rules must be drafted to provide an appropriate basis for implementing the change in rules.

Accordingly, PGE respectfully requests that the ALJ postpone the hearing and extend the time for comments to approximately April 15, 2011. This postponement would allow sufficient time for further review of the proposed rule changes and alternatives.

DATED this 2nd day of March, 2011.

Respectfully submitted,

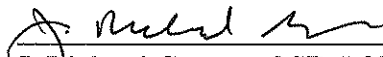


J. Richard George
Assistant General Counsel
Portland General Electric Company
121 SW Salmon Street, 1WTC1301
Portland, OR 97204
(503) 464-7611 (telephone)
(503) 464-2200 (telecopier)
richard.george@pgn.com

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **REQUEST TO POSTPONE HEARING & EXTEND THE COMMENT PERIOD** to be served by electronic mail to those parties whose email addresses appear on the attached service list, and by First Class US Mail, postage prepaid and properly addressed, to those parties on the attached service list who have not waived paper service from OPUC Docket No. AR 548.

Dated at Portland, Oregon, this 2nd day of March, 2011.



J. Richard George, OSB # 974691
Portland General Electric Company
121 SW Salmon St., 1WTC1301
Portland, OR 97204
(503) 464-7611 Telephone
(503) 464-2200 Fax
richard.george@pgn.com

SERVICE LIST
DOCKET NO. AR 548

<p>David Tooze, Sr Energy Specialist CITY OF PORTLAND – PLANNING & SUSTAINABILITY 1900 SW 4th Ste 7100 Portland, OR 97201 david.tooze@portlandoregon.gov</p>	<p>Stephanie S. Andrus, Assistant AG DEPARTMENT OF JUSTICE Business Activities Section 1162 Court St NE Salem, OR 97301-4096 stephanie.andrus@state.or.us</p>
---	---