

**Sustainable Solutions Unlimited, LLC, Response to PacifiCorp Comments on  
Proposed Net Metering Rules  
May 9, 2007**

The following is a response to a possibly inadvertent misstatement in PacifiCorp's comments on the proposed rules under Docket AR 515, Net Metering.

In PacifiCorp's final comments filed May 9, 2007, the following statement was made:

“Regardless of the option under discussion, all stakeholders agreed that utilities should not pay customer-generators for excess credits because such payment would promote oversized net metering facilities. Customers who want to construct generation in excess of their load and sell such excess to the utilities can do so either as a qualifying facility or as a wholesale generator. However, the net metering regulations should not encourage qualifying facilities or wholesale generators to masquerade as net metering facilities.”

This statement is not fully accurate. While the discussions in the informal process did not focus on options to allow payment for generation in excess of annual use, this is because this matter was not seen as an area of potential agreement during that process. Several stakeholders have consistently stated a preference for compensation of excess annual generation at avoided cost rates, in a manner similar to PGE's current handling of excess monthly generation on net-metered systems, but we choose not to focus on an area of fundamental disagreement during this highly positive and effective collaborative process. Other jurisdictions allow such compensation and do not appear to treat the blurring between net metering and QFs as a problem in need of solution, and we would like the commission to remain open to this option.

Sustainable Solutions Unlimited, LLC, stands by its support of a rule that does not penalize the customer-generator for generation in excess of load, and in particular of a rule that is simple to explain and model.

Thank you for the opportunity to respond to these comments.

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