



Oregon

Theodore R. Kulongoski, Governor



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DEPARTMENT OF
ENERGY

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Lisa Schwartz
Senior Analyst
Oregon Department of Energy
625 Marion Street NE, Salem OR 97301

Re: Net Metering Rules

Dear Lisa,

The Oregon Department of Energy would like to commend the Oregon Public Utility Commission for developing what appears to be a set of rules that are supportive of consumer scale renewable energy generation. All the primary elements our office sought were adopted and review criteria, time schedules, and fees all appear to be reasonable.

The one issue that ODOE recommends for future consideration is allowing a utility to require an external disconnect switch for inverter based residential systems between 7.2kW and 25kW. The need for this switch is dubious as safety is provided by the inverter and several other means of disconnecting service are available to the utility.

ODOE recommends that the rules be adopted as written, and that a follow-up review of how these rules are working should be conducted in 24 months. As with any new set of rules, an opportunity should be provided to stake holders to discuss how the process is working and if changes are warranted to keep Oregon as one of the best places in the nation for small scale renewable energy generation.

Sincerely,

Christopher Dymond
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