



Oregon Solar Energy Industries Association

April 11, 2007

Oregon Public Utilities Commission
550 Capitol ST NE, Suite 215
Salem, OR 97301

Subject: OSEIA Feedback on OPUC net metering draft rules (AR 515)

Thank you for the opportunity to comment on the proposed net metering rules. We look forward to the final rulemaking and establishing Oregon as a leader in net metering policy in the United States. We strongly believe this is possible from the well written base policy provided by OPUC staff and implementing the recommendations below.

Our suggested improvements to the draft include the following points:

Section 860-039-0030 – Level 1 Net Metering Interconnection Review comments:

- 860-039-0030 (4) states 14 days. This is four days longer than the previously agreed to 10 days. It should be changed back to the previously agreed upon 10 days providing the utility essentially two weeks from the receipt of the application. If the utility needs additional time they can file as required to under section 860-039-0005 (2) (a).
- Formatting number error in 860-039-0030 (4). It should be number (3) and the following numbers changed accordingly as well.

Section 860-039-0050 – Requirements After Approval of a Net Metering Interconnection comments:

- 860-039-0050 (4) states that a customer generator must retain records for seven years. That is unreasonable for level one customers. For level one customers we should revert to the previously agreed upon no record keeping required. For level two customers it should be two years and up to five years for a level 3 customers.

Section 860-039-0060 – Excess Energy from Net Metering Facilities comments:

- Annual excess energy should be credited back to the customer at the avoided cost rates.
- This is necessary to continue to provide the customer incentive to implement conservation measures along with renewable energy generation. Customers that implement conservation measures after installing renewable energy systems will be penalized by forfeiting any gains made.
- The legality of taking kwh's and providing no compensation for them is question. Kwh's have value and they should be compensated for.
- Business customers face business cycles that could result in a year with extra kwh's. These cycles are normal and the businesses should not be penalized for doing the right thing – installing renewable energy systems.



Sincerely,
Jon Miller
Executive Director
Oregon Solar Energy Industries Association
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