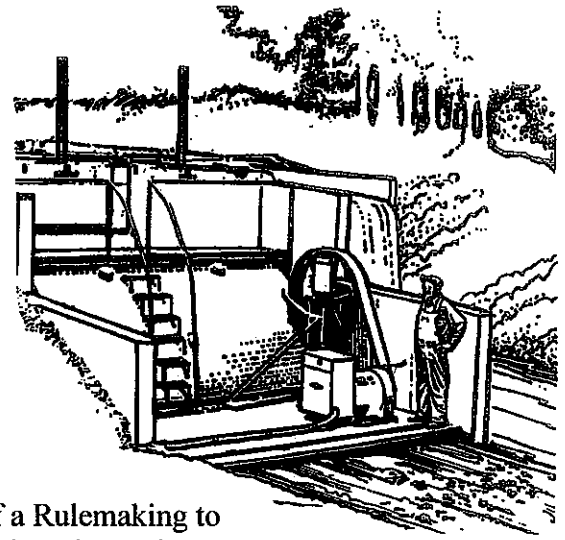


Loyd Fery Farms

HYDRO ELECTRIC, BEANS, CORN, SQUASH

11022 Rainwater Lane, S.E.
Aumsville, Oregon 97325
(503) 769-6110



OPUC AR 521

INTRODUCTION

I have put together some thoughts and comments in the Matter of a Rulemaking to Adopt Rules Related to Small Generator Interconnection. These thoughts and comments are based on PacifiCorp's third set of comments.

COMMENTS

Comments Re: PacificCorp's third Set of Comments OPUC AR 521

1. **Insurance.** The Utility company is back at trying to run the small power producers out of business. UM 1129 took the insurance out of the contract, now the power company wants it back in. We had to put up \$1,000 for the study that was done 28 years ago. If our facility meets their requirements they change the requirements every time we talk to a different person.

2. **Our Electrical Engineer Report.** We challenge them with our Electric Engineer Report and they feel that we are only trying to cause them trouble. They seem to have no field experience, only knowledge from books.

3. **Metering.** They installed the meter and accessories for Santiam Water Control District at the utility's expense and turn around and expect us to pay for the same thing. Their "reasonable rate" to us is just giving them a blank check because there is no standard set for them. If they think that the pole fell over down the road, we could be charged for it along with all the expenses.

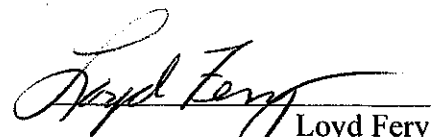
3. **Isolation Devices.** We have 28 years of experience and a certified electrician to help us do the right thing. We don't want anyone hurt from a malfunction. We have all cut out breakers next to our OUTPUT meter for cutting power from the plant or called Lock out.

4. **Green Power.** I feel that the Governor of Oregon wants GREEN POWER and the Utility Company doesn't want to bother with it. Now is the time to stop the utility company from taking advantage of the people and contradicting the Governor's request for GREEN POWER. There are new and better ways being developed every day for the inter connect systems.

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Administrative Hearings Division


Loyd Fery
CEO Loyd Fery Farms, LLC.