



**Energy Solutions**

May 19, 2011

Oregon Public Utilities Commission  
550 Capitol St. NE #215  
PO Box 2148  
Salem, OR 97308-2148

RE: UM 1538

To Whom It May Concern:

**RE: Waiver request from 90 percent of the rolling average usage. (OAR 860-084-0100 (2)(e))**

History: RHT Energy Solutions, along with the Homebuilders Association of Jackson County, are constructing a 2,300 sq. ft. Showcase Home in the White Oak Subdivision in Shady Cove Oregon. The home will be Earth Advantage Platinum certified and will feature state-of-art LED lighting, heat recovery, conditioned space ductwork, a 94% efficient tankless water heater, resource management and an integrated photovoltaic system. The home is under construction and will be completed at the end of July with tours starting in August 2011.



Framing photo taken 5-15-11

It was our intent to participate in the October 2010 Feed-In-Tariff Pilot, but I was informed by Travis Tanner that we needed a meter set and a Pacific Power account number. We were unprepared at that time and had to wait until the April 1<sup>st</sup> 2011 offering, in which we were successful. However, later on April 11, 2011, I received a rejection notice, with the reason given that the new meter currently shows no kWh consumption.

**OAR 860-084-0100(2)(e) is unclear if the intent is to deny applicants with estimated annual power consumption.**

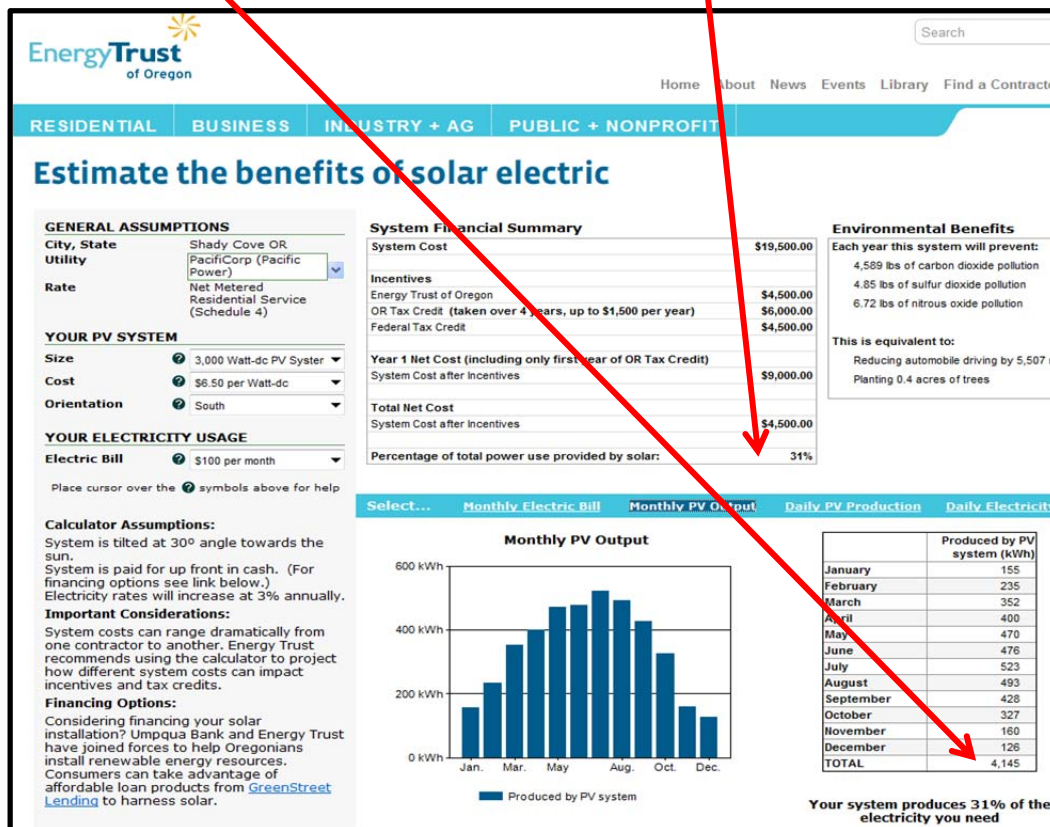
*(e) capacity of qualifying systems sized to provide an estimated energy generation equal to 90 percent of the rolling average of the usage at the premises at which the qualifying system will be installed. If this average cannot be determined, the nameplate capacity can be no more than 90 percent of a rolling average of three year's usage by a similarly-situated customer, as determined by the electric company. The methodology used to calculate this energy generation will be consistent with the methodologies used by the Energy Trust of Oregon and Oregon Department of Energy.*

At no point in the rule does it state 90% of historical kWh consumption. Instead, the rule explains “estimated energy generation... can be no more than 90% of a rolling average of a three year's usage by a similarly-situated customer...” The existing language clearly allows for the estimation of production and consumption.

**Our Solar Capacity Reservation (#29A3B9) easily meets the 90% requirement based upon established solar and home usage calculators.**

Based upon the Energy Trust Solar Electric Calculator, the 3 kW PV system would provide only 31% of the home's annual kWh use. Based upon Consumers Power's Online usage calculator, which is more specific than the Energy Trust tool, the PV production of 4,145 kWhs/yr. is only 28.6 % of the 14,496 kWhs consumed annually. By either evaluation, the kWh production falls well within the 90% requirement.

Using the current May 17, 2011 Energy Trust Solar Estimator, the PV system would produce 4,145 kWhs/yr. which is no more than 31% of the Showcase Home's annual consumption.



Bill Estimator  
 Line Extension Estimator  
 Payment Services

### Welcome to Online Usage Calculator

To calculate an estimated monthly electrical bill for your home, please select a QUANTITY in the applicable Electrically Powered Items field. Once you've filled out the fields that are relevant to your home, click the "Calculate" button at the bottom of this form. This will give you both an estimated monthly KWh usage and bill for your home (for an average family of four).

Search

#### KITCHEN

Electrically Powered Items	Quantity	Average monthly KWh	KWh/month	\$/month
Refrigerator	1	182	182	13.72
Freezer	1	190	190	14.33
Dishwasher	1	60	60	4.52
Range / Oven	1	104	104	7.84
Microwave	1	16	16	1.21
Hot Water Dispenser	1	49	49	3.69
Coffee Maker	1	19	19	1.43

#### DOMESTIC WELL PUMPS

Electrically Powered Items	Quantity	Average monthly KWh	KWh/month	\$/month
Well Pump 1/2 HP	0	90		
Well Pump 3/4 HP	0	135		
Well Pump 1 HP	0	180		
Well Pump 1.5 HP	0	270		
Well Pump 5 HP	0	900		

#### ENTERTAINMENT

Electrically Powered Items	Quantity	Average monthly KWh	KWh/month	\$/month
Stereo	1	5	5	0.38
TV 19"	0	18		
TV 25"	0	26.6		
TV 35"	1	39.4	39	2.94

#### LAUNDRY

Electrically Powered Items	loads/week	KWh/load	KWh/month	\$/month
Dryer	10	3.12	125	9.42
Washing cold / cold	5	0.33	2	0.15
Washing warm / cold	5	3.0	15	1.13
Washing hot / cold	0	5.0		
Washing warm / warm	0	6.0		
Washing hot / warm	0	7.0		

#### LIGHTING

Electrically Powered Items	Quantity	Average monthly KWh	KWh/month	\$/month
Lighting # of Rooms	8	10	80	6.03
Outdoor Light 175 w	0	60		
Outdoor Light 250 w	0	87		

#### HEATING EQUIPMENT 4 HRS / DAY

Supplemental/alternate heat	Quantity	Units
Wood Stove	0	Cords per heating season
Pellet Stove	0	Bags per heating season
Propane Heater / Furnace	0	Gallons per heating season
Oil Furnace	0	Gallons per heating season

*Estimate is based on a 6-month heating season*

Electrically Powered Items	Quantity	Average monthly KWh	KWh/month	\$/month
Furnace Fan	1	90	90	6.79
Furn 15 KW ~ 1100 sq. ft.	0	1824		
Furn 20 KW ~ 2000 sq. ft.	0	2434		
Furn 25 KW ~ 3000 sq. ft.	0	3040		
Baseboard Lin. Feet	0	45.6		
Wall Heaters @ 2000 w	0	365		
1500 w Portable	0	274		
Heat pump fan	0	90		
Heat pump 800-1100 sq. ft.	0	1094		
Heat pump 1100-2000 sq. ft.	0	1460		
Heat pump 2000-3000 sq. ft.	0	1824		

Estimated monthly heating usage: 90 kWh  
 Estimated monthly heating bill: \$ 6.79

ESTIMATED MONTHLY KWH USAGE: 1298

ESTIMATED MONTHLY BILL\*\$ 105.87

MISC. EQUIPMENT				
Electrically Powered Items	Quantity	Average monthly KWh	KWh/month	\$/month
Hot Tub	0	600		
Window Air Conditioner	1	134	134	10.10
Ceiling Fan	2	85	170	12.82
Electric Blanket	0	22		
24" Box Fan	0	30.6		
Computer	1	17.5	18	1.36
Water Bed Heater	0	175		
# of Water Heaters	0	220		
Water Heater (# of People)	0	110		

Estimated monthly household\* usage: 1208 kWh;  
 Estimated monthly household\* bill: \$ 91.07  
 \*Heating usage not included in household totals

Energy Estimator from Consumer's Power. 1,208 kWh/month or 14,496 kWh/year.  $4,145\text{kWh}/14,496 = 28.6\%$

**Future Rule Making:**

I realize that Pacific Power's Feed-In-Tariff is a pilot and I appreciated the innovative approach to bring a renewable energy form to the market. However, in future rule making, I highly recommend that the issue of PV production/kWh consumption be clearly defined. Also, special attention is given to new homes, such as our Earth Advantage Platinum home, that is specifically designed to accommodate PV and change the residential marketplace and utilization of all resources.

**Request for Waiver:**

On behalf of RHT Energy Solutions and the Homebuilders Association of Jackson County, owners of the Showcase Home in Shady Cove Oregon, we formally request an expedited waiver of the 90% rule because we feel we have met the requirements of the language by the most conservative estimation. We feel that the language is unclear if the intent is to exclude an applicant that has based PV performance and usage on established industry standards.

Because this home is under construction with public tours starting in August 2011, your earliest attention to this request would be appreciated.

Sincerely,

  
 Buzz Thielemann  
 President

Attachment: Pacific Power rejection letter

## **RHT Energy - Buzz Thielemann**

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**From:** Oregon Solar <oregonsolar@PacifiCorp.com>  
**Sent:** Monday, April 11, 2011 9:00 AM  
**To:** RHT Energy - Buzz Thielemann  
**Subject:** Pacific Power - Oregon Solar Incentive Program

April 11, 2011

Showcase Homes, LLC  
203 White Oak Way  
Shady Cove, OR 97539

Re: Pacific Power Oregon Solar Incentive Program

Thank you for your interest in the Pacific Power Oregon Solar Incentive Program. Unfortunately, at this time your application to participate in the program has been rejected for the following reason:

Under OAR 860-084-0100 of the program rules, a qualifying system cannot exceed 90 percent of the rolling average usage at the premises. The usage at the premises is so low a system of any size would fail to meet the 90 percent.

If you have any questions, please call 1-503-813-5951 or email us at [oregonsolar@pacificcorp.com](mailto:oregonsolar@pacificcorp.com)

Thank you for your interest,

**Jason Zappe**  
**Program Manager**  
**Pacific Power Oregon Solar Incentive Program**  
**503-813-5951**  
[oregonsolar@pacificcorp.com](mailto:oregonsolar@pacificcorp.com)