

February 28, 2013

Public Utility Commission
Attn: Filing Center
550 Capitol Street NE #215
P. O. Box 2148
Salem, OR 97308

Re: **UM1538, Request for Waiver of OAR 860-084 Installation Requirements,
Ronald G. and Joanna H. Stout, February 28, 2013**

Dear Sir:

We are writing to request an extension for the installation of solar panels on our residence. Our PGE confirmation number is 87A9M0. The original date was April 2, 2013. We are requesting a four month extension to July 31, 2013.

Description of project

A portion of our 10kW solar array is to be installed on the roof of our existing house. The remainder is to be installed on the roof of a new, two-bay, attached garage that will house our electric vehicle. Note that this is our second solar project. The first was a 10kW installation accomplished in September, 2011, on time with no delays. (*Installer for both projects: RS Energy*)

Reasons for extension request:

- **Unusual length of building permit process:** In June, 2012, we applied to the City of Salem for the building permit for the new garage. The building permit was not issued until February 15, 2013. The delay was due to City of Salem requirements that emerged one-at-a-time during that period. The requirements discovered and met are as follows:
 1. Contract an architectural engineer to create building plans for City of Salem review and approval. (*Selected Tornberg Consulting, LLC*)
 2. Select and contract a special testing and inspection engineering firm for foundation connections. (*Selected Carlson Testing, Inc.*)
 3. Submit a property boundary verification; this required title searches and a property survey. (*Selected Boatwright Engineering, Inc.*)
 4. Join with our neighbor to submit a property line adjustment (to rectify a missed step in a property sale of five feet on the southern boundary of our double-lot that occurred about 1970); this entailed a second property survey and installation of new survey monuments.
 5. As part of the property line adjustment resolution, the City of Salem also required the property descriptions in both deeds be updated from lot-based descriptions to "metes and bounds" descriptions; this involved our mortgage holder as a party in the process.

- **New information regarding PGE specifications** (discovered this week and still in process): In March, 2012, we initiated communication with PGE and received approval to proceed with the second solar installation, understanding our electrician would need to coordinate with PGE. During the following weeks and months, we talked with electricians who are experienced with solar implementations. They provided estimates outlining the work to be done. Some rewiring would be needed, and a second meter base would need to be installed.

Then, on February 26, 2013, a PGE representative and our electrician (*Code Electric*) met with us to finalize electrical plans. In that meeting, the PGE representative informed us that, because this is a second solar installation with a different feed-in tariff program than the first, the new meter base must be a *commercial* "schedule 32" unit rather than one like the meter base supporting the first solar implementation. This information was a surprise, so the next day we called the PGE employee who oversees the feed-in tariff program. He confirmed that the information we were given is correct.

This means:

1. There is a requirement for a two-hour firewall between the "buildings" in which the two meter bases are mounted; the garage design will have to be modified to accommodate this.
2. Since the second unit is "commercial," there may be City of Salem building codes that will apply. We have asked our architectural engineer to perform the research and modify the garage plans to meet all PGE requirements and applicable City of Salem building codes.
3. We don't know yet whether the plan modifications will need to be resubmitted to the City of Salem.
4. Our contractor may need to halt work on the garage addition until the above questions are resolved. (*Contractor: VF One; he is currently excavating for the foundation.*)

The building permit and PGE electrical requirements listed above were unexpected and were not in our control. At this point, we do not know whether the garage plan changes will be simple and quickly managed or require longer time for the architect and City of Salem to complete their processes. Therefore, we respectfully submit this request for a four-month extension.

Thank you for your consideration.

Sincerely,

Ronald G. and Joanna H. Stout