

Paul Rossow
Oregon Public Utility Commission
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RE: Aggregation of PGE meters / Division 039 waiver request

Hi Paul,

We are respectfully requesting a waiver of Rule 869-039-0065 (c) of the Net Metering Rules for a solar project being installed for the Home Owners Association of West Hayden Island Moorage, located at 2630 N. Hayden Island Drive, Portland, OR 97217. This project is being installed under the standard net metering program using the Energy Trust of Oregon's commercial solar incentive (i.e. not the Feed in Tariff program).

The West Hayden Island Moorage HOA was looking for a way to offset 100% of the energy use for three PGE meters that are paid monthly from their HOA dues. These meters provide power to the parking structures, the security gate at the entrance to the parking areas, and the water pumping station for the floating home community.

The solar project will be commissioned soon, and is interconnected at the PGE meter that serves the parking structure, which has the highest electricity use of the three meters. The security gate meter is served by the same PGE feeder and therefore already qualifies for aggregated metering. However, the pumping station is fed by a different PGE feeder and is not currently eligible for meter aggregation. The pump station meter is on the same contiguous property as the other two meters.

As it currently stands, the output from the 49.68 kilowatt solar array will exceed the annual usage of the two qualifying meters. We are requesting a waiver of Rule 869-039-0065 (c), so that the third meter (pump meter) can be aggregated for the purpose of applying excess solar generation to all three of their electricity bills.

The HOA is a non-profit entity and is receiving the Energy Trust of Oregon commercial solar incentive for this project. The HOA has paid additional costs to upgrade an existing 15 kVA PGE transformer to a 50 kVA transformer in order to install the 49.68 kilowatt system. In short, the HOA members are dedicated to powering the HOA's electricity use with renewable energy. Including the third meter would insure that the full monetary value of the solar generation will benefit the HOA with reduced dues for the power that is consumed.

Here are the details about the solar project, and the corresponding meter numbers.

Powerclerk Application # 14016

Meter #1: Interconnection Point for Solar Array

Account 0003 23347-708400 0

Meter # IN25030234

Meter #2: Security Gate Meter (qualifies for meter aggregation)

Account 0003 23347-719938 6

Meter # AB31013989

Meter #3: Pump Station (currently not eligible for meter aggregation)

Account 0003 23347-734109 5

Meter # IN25030003

Please let me know if there is any additional information you need, or if there any specific forms that need to be filled out to complete this waiver request. We appreciate your consideration.

Best Regards,

Cheston Zimmer

Representing the interest of West Hayden Island Moorage

Project Manager, Energy Solutions

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For reference, we are including the Net Metering Rule, highlighted in yellow, that we are seeking a waiver on for the third meter. The pump meter already meets conditions (a) and (b) of the Net Metering Rules for solar – we are seeking a waiver of condition (c).

DIVISION 039 - NET METERING RULES

860-039-0065

Aggregation of Meters for Net Metering

(1) For the purpose of measuring electricity usage under the net metering program, a public utility must, upon request from a customer-generator, aggregate for billing purposes the meter that is physically attached to the net metering facility ("designated meter") with one or more meters ("aggregated meter") in the manner set out in this rule. This rule is mandatory upon the public utility only when:

(a) The aggregated meters are located on the customer-generator's premises or property that is contiguous to such premises;

(b) The electricity recorded by the designated meter and any aggregated meters is for the customer-generator's requirements, and;

(c) The designated meter and the aggregated meters are served by the same primary feeder at the time of application. (Waiver request applies to this rule)