

## MEMO

Date: June 9, 2016  
Project: Multnomah County Central Courthouse  
Project No. 12-1648  
To: PUC of Oregon Filing Center  
From: Aric Goe, PE (PAE Consulting Engineers)  
Subject: Photovoltaic Net Metering Rules Waiver Request

Distribution: JD Deschamps, PE (Multnomah County), Bjorn Clouten, AIA (SRG Partnership)

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In accordance with OAR 860-039-0005 (2), this is a request for a waiver of Division 093 Net Metering Rules, specifically 860-039-0056 (1)(c) which states, "The designated meter and the aggregated meters are served by the same primary feeder at the time of application."

For context, the following is a description of the proposed PV interconnection for the new Multnomah County Central Courthouse building, to be located near 1200 SW 1st Ave, Portland, OR 97204.

PGE has determined that this new building's load should be served by a PGE spot network, which due to the nature of the PGE's network protection system, will not allow for the back-feed of power from an on-site generation facility. PGE has indicated that if any generation facility is placed on the property, a PGE approved relay protection system will need to be provided by the applicant to prevent the back-feed of power onto the PGE spot network.

Alternatively, PGE indicated that a separate PGE radial network circuit across from the new building along Naito Pkwy could be utilized for PV interconnection, and that power generated by the building's PV system could be fed onto this circuit without the need for relay protection.

PGE has indicated that in order to meet the intent of a net metering agreement, we would need to aggregate the service for PV generation with the service that has load in the building. They would be served by different circuits, which the aggregation rules don't currently allow, hence a Waiver is required. PGE has informed the applicant they must pursue this waiver, and that if approved by the PUC, PGE would then be able to implement a net metering agreement in which the building service and PV service meters could be aggregated, even though these services would have separate primary feeders connected to separate circuits.

Please contact me if any additional information is needed to process this request, and if there are any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Aric Goe", written in a cursive style.

Aric Goe

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