

Wm1631

Dr. William Mooney
34567 SW Bald Peak Rd.
Hillsboro, OR 97123
Phone: (503) 720-5661

RECEIVED
JUN 18 2013

Public Utility Commission of Oregon
Administrative Hearings Division

June 14, 2013

Public Utility Commission of Oregon
550 Capitol St NE, Suite 215
PO Box 2148
Salem, OR 97308-2148

Re: Net Metering OAR 860-039- 0010 (1) - Net Metering Kilowatt Limit

To Whom It May Concern:

I am filing a request for a waiver due to a PGE denial based on rule # OAR 860-039-0010(1) for Net Metering Kilowatt Limit. I find myself in a situation that appears unique.

My wife and I live on a 38-acre private residence zoned for agriculture and forestry. We have a single PGE service that powers all our operations through a single meter. In 2012, I averaged between 135 kWh/day and 210 kWh/day, or roughly 61,500 kWh for the year. My power bills average about \$700 per month, and we have since then built and will soon be operating a horse arena and barn with stalls. We recently planted grapes to start our own vineyard and subsequently will be producing our own wine.

When making a decision to go solar, I wanted to offset a majority of my utility usage by generating my own power but wanted to do so without needing to modify my current service or ever produce more than what I expect to use in any year for the next 30 years. Part of this process was confirming with PGE that my existing service was appropriately sized for the 55 kilowatt DC ground mount system that has been permitted and built. I submitted a Level 2 Application with the interconnection fee. PGE acknowledged receipt on 4/16/13 and approved on 5/1/2103. Construction began on 6/3/2103.

Due to one manufacturer's module shortage and desiring to keep to the construction schedule that would have my system installed before the start of summer, we substituted a different manufacturer's 250W modules, keeping the same basic design and to the same approved size of 55 kW DC. After informing the utility of this change in equipment, PGE emailed me on 6/12/13 that the system they had previously approved was out of compliance with state rules. If I had known there would be issues, I could have explored other options, but by 6/12/13 my ground mounted system was two days from expected completion with all materials purchased and delivered and trenching and structure already built with panels being tightened down and significant majority of construction and electrical work completed.

Throughout the entire process of submitting for and receiving approval from Washington County, Energy Trust, and PGE interconnection application, no issue was raised. The system is designed to produce less than my yearly usage before my new construction projects and to require no upgrades from PGE. Instead, it will power all the operations on my property, which includes my home as well as my commercial ventures served by this PGE service meter.

Pursuant to OAR 860-039-0005 (2), I am requesting a waiver of the capacity sizing limitations for residential installs on the grounds that PGE has suggested, namely, that the protections intending by this rule are not applicable in my particular case as my electrical facilities are not oversized.

Sincerely,

A handwritten signature in cursive script that reads "Bill Mooney". The signature is written in dark ink and extends across the width of the page.

Bill Mooney
Home and Business Owner

Attachment(s)

Thomas Farringer

From: Jennifer Somerville <Jennifer.Somerville@pgn.com> on behalf of Netmetering <Netmetering@pgn.com>
Sent: Wednesday, June 12, 2013 12:30 PM
To: william.mooney@moonvilla.net
Cc: Thomas Farringer; Netmetering
Subject: PGE Net Metering Level 2 Application

Dear William,

Thank you for your recent Net Metering Application to add on to your existing Net Metering system located at 34567 SW Bald Peak Rd., in Hillsboro, Oregon.


Unfortunately, there is an issue with your request. The Oregon Public Utilities Commission (OPUC) has placed a limit on the size of Net Metering system that can be installed and connected to a residential electric utility service. The size limitation is 25 kilowatts and the related rule is Oregon Administrative Rule (OAR) 860-039-0010 (1). It is PGE's understanding that the intent of the size limitation rule was to prevent the oversizing of electric facilities on residential homes unnecessarily. Plainly put, the vast majority of homes do not use as much power as yours and the facilities in place to deliver electricity to other homes are sized considerably smaller. Your situation is one that is unique to PGE.

Compliance with the rules is both the requirement of PGE and customer-generators. As such, PGE advises that if you wish to proceed that you seek a waiver from this Administrative Rule. The OPUC, when petitioned, can grant a waiver for good cause to any of the Net Metering rules. OAR 860-039-0005 (2) allows them to do so. From an engineering standpoint, there are no issues that would cause concern with this request as your proposed system will interconnect with PGE's system using existing facilities. It should also be noted that PGE would not oppose this request in this unique case.

Please let me know if you have any questions.

Thank you,

Jennifer Somerville
Customer Interconnection Group | Net Metering
Portland General Electric
503-464-8100 | netmetering@pgn.com

 Go Green! Print this email only when necessary.

Thomas Farringer

From: Jennifer Somerville <Jennifer.Somerville@pgn.com> on behalf of Netmetering <Netmetering@pgn.com>
Sent: Wednesday, May 01, 2013 9:24 AM
To: william.mooney@moonvilla.net; Thomas Farringer
Cc: Netmetering
Subject: PGE Net Metering - Level 2 Interconnection Application Approved

Dear William,

I am pleased to inform you that PGE has **approved** the recent Level 2 Application for Interconnection filed for the **55.00 kW photovoltaic (solar) system at 34567 SW Bald Peak Rd., Hillsboro, OR 97123.**

The Net Metering process will be concluded upon:


- PGE's receipt of passed municipal (city or county) inspection permit,
- PGE's inspection of the system and replacement of your existing meter with one designed for Net Metering customers.
 - **Please be advised:** PGE will need regular access to the new meter once installed. Please let us know if there are any access issues we should be aware of such as locked gates or guard dogs.

We are in receipt of this system's Agreement for Net Metering and Interconnection Services and will soon enter into this contract and return a copy of it and your approved Application.

Per Oregon Public Utility Commission rules, do not operate the system prior to receiving a written or e-mailed "permission to operate" letter from PGE.

Thank you,

Jennifer Somerville
Customer Interconnection Group | Net Metering
Portland General Electric
503-464-8100 | netmetering@pgn.com

 Go Green! Print this email only when necessary.

RECEIVED

2013 JUN 18 A 9:23

P.U.C.

RECEIVED

JUN 18 2013

Public Utility Commission of Oregon
Administrative Hearing Division