

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**AR 659**

In the Matter of

Rulemaking to Update Division 82 Small  
Generator Interconnection Rules, and  
Division 39 Net Metering Rules.

COMMENTS OF THE  
COMMUNITY RENEWABLE  
ENERGY ASSOCIATION,  
RENEWABLE ENERGY  
COALITION, AND THE OREGON  
SOLAR + STORAGE INDUSTRIES  
ASSOCIATION

The Community Renewable Energy Association (“CREA”), the Renewable Energy Coalition (the “Coalition”), and the Oregon Solar + Storage Industries Association (“OSSIA”) (collectively the “Interconnection Trade Groups”) respectfully submit these reply comments on Portland General Electric Company (“PGE”), Idaho Power Company (“Idaho Power”), and PacifiCorp’s (collectively the “Joint Utilities”) comments and the Oregon Public Utility Commission (“OPUC” or the “Commission”) Staff’s comments related to interconnection handbooks in response to the Ruling to extend the comment deadline filed on November 20, 2023, for the Commission’s review. The Interconnection Trade Groups are not substantively responding to the Joint Utilities or Staff, but instead clarifying their proposal.

The Joint Utilities and Staff raise concerns that the Interconnection Trade Groups’ proposal on the notice requirements for interconnection handbooks would be too onerous as it would require the utilities to notify all interconnection customers including net-

metering customers.<sup>1</sup> The Interconnection Trade Groups agree that notice should not be as broad.

It was not clear from the Interconnection Trade Groups' comments filed on October 12, 2023, but the Interconnection Trade Groups are not proposing that the utilities should be required to provide notice to all interconnection customers, including net-metering customers. The Interconnection Trade Groups only propose the utilities provide notice to Tier 4 small generation interconnection customers.

The Interconnection Trade Groups still support the recommendations from the October 12, 2023 comments with this clarification.

Dated this 29th day of November 2023.

Respectfully submitted,

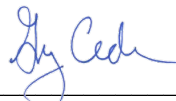
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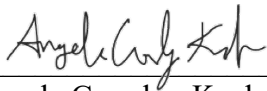


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<sup>1</sup> Staff's Comments at 5 (Nov. 7, 2023) ("Staff is concerned that the ITA language that covers 'developers with operating projects and projects in development' may require the utility to notify thousands of residential net-metering customers of Handbook changes.") (citations omitted); Joint Utilities' Response Comments at 9-10 (Nov. 7, 2023).



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