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**Oregon Public Utility Commission**  
Consumer Services Section  
550 Capitol Street N.E. Suite 215  
Salem, Oregon 97301-2551



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Public Utility Commission of Oregon  
Administrative Hearings Division

To the Oregon Public Utility Commission,

I am filing a request for a waiver due to a PGE denial based on rule # OAR 860-039-0065, SCH 203 for aggregation and accreditation through the Net Metering Program and the Energy Trust of Oregon program. I have encountered a situation which appears to be one of a kind.

I live on a 22 acre private residence. I intended to put solar panels on my house, but the location was not suitable for solar electric production; thus, the roof of my shop was recommended. Both the shop and the house have their own meters which attach to different feeders. Since the shop uses very little electricity and my purpose for the panels was to credit the house electric bill, I told the solar company that I was concerned. If the credit were to apply only to the shop, the most I could ever receive in credit would be \$15 to \$17 a month; thus, spending all this time and money would not be a wise investment (See utilities billings for shop versus house). However, throughout the entire process of PGE application and solar panel installation, I was told that the balance of the solar credit would be applied to the house billing, not the shop. I was told that I met the following criteria for aggregation: both "accounts are in the same name, have the same service address and are on contiguous property" (See PGE letter 8- 6-12). In the end, now that the panels are installed and running, I have been denied aggregation and told my credit cannot be applied to my house electric bill because the two meters run off separate feeder lines.

I called my installer, Steve, from Energy Unlimited and he had never heard of this rule. He proceeded to call PGE. Jerry from Energy Trust of Oregon came out for a final inspection and I showed him my denial letter. He had never heard of this rule. He also proceeded to call PGE. I felt that the departments of PGE had no knowledge of this rule until my request reached the case department. PGE was aware that both meters were on separate feeder lines and understood that I wanted to credit the house bill. I received a letter of congratulations, applauding me for joining the green grid. Even when PGE came out and installed a net meter for the Net Metering Program, I felt assured aggregation would not be a problem.

Initially, before the solar panels had been installed, I went to the Clackamas County Solar workshop and received 2 bids from solar companies. I talked with three other companies and visited with Energy Trust of Oregon, yet I never learned of this rule or why it is a rule. It appears that not only I, but many others who are experts in this field are not aware of this rule because it has rarely if ever applied to any private residential customer.

I have come to the conclusion that I have a very very unique situation in that I have two feeders on my property about 250 feet apart. Both the Solar Unlimited Company and Energy Trust of Oregon said that they have never seen this before and will never see it again. They said

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that I am the only person in this situation. I believe that back in the 1970's the owners had built a horse barn and had a trailer house. They brought in an electric line from Oregon City down a private road to the barn. I am the last meter on the Oregon City line. Later, they built a home. By that time, an electric line had come up Leland Road from Beavercreek. The house was connected to that line because the line was on a public road. I am also the last meter on the Beavercreek line. Unfortunately, it is not possible to connect the barn meter to the house meter due to the distance of the 250 feet, which consists of a metal building, concrete driveway, large rocks, trees and the concrete slab of the house.

With the solar panels now producing more excess power than what can be credited to my shop, the credits will accumulate into thousands of dollars that PGE will owe me. I am requesting an exception to this rule, so that these credits may be attributed to my house billing which is on the same property as my shop. I believe that my situation is uncommon and it is not likely that it will ever occur again anywhere. For this reason, I would also like to offer a possible solution. I have tried to investigate the purpose of the 2-feeder-rule and while I am still not sure of the reasoning behind it, I believe it relates to the complexity of monthly billings of two meters. I would be happy to accept a net credit billing once or twice a year instead of the 12 month billing cycle. I understand the inconvenience to the billing department and I am willing to work with them.

Thank you for hearing this case. I hope you can help me with a resolution on this matter of aggregation as I feel it is not fair that I have invested a lot of time, effort and capital into this solar energy system and have subsequently been denied full accreditation by PGE. I hope that my situation will prove to be a good example of a privately owned solar power system working in tandem with PGE, and that it will encourage future investors to join the green grid. Thus, I hope that I can receive the full credit that the solar panels produce and prove this to be a wise investment for myself and other Oregonians in the future.

Sincerely,

A handwritten signature in cursive script, appearing to read "John M. Fox". The signature is written in black ink on a white background.