

UM 1631 – Request for Waiver of Rule OPUC 860-039-0065 1C

To the PUC Review Board,

I am writing to make a formal request for waiver of rule OPUC 860-039-0065 1C.

We are requesting to allow for meter aggregation for an existing solar array installed at 17715 NE Sandy Blvd, Portland, OR, 97230. The account # is 5089450000 and the meter # is 31039231AB. The goal is to aggregate the excess generation on this account to account # 4868150000 and meter # 31039231AB which is located directly across the street at address 17949 NE Sandy Blvd, Portland, OR, 97230.

Below is a timeline and explanation of what was installed on these properties and why an aggregation issue exists currently.

1. A legacy system was installed (not by Sunbridge Solar) at the office building of ASAP Logistics located at 17949 NE Sandy Blvd. Account # 6413880000. Meter # 11023308AB. Note: There is a second meter at the above address with no solar. Account # 4868150000. Meter # 31039231AB.
2. In 2016 Sunbridge installed an approximate 50kw system across the street at 17715 NE Sandy Blvd. Account # 5089450000. Meter # 31039231AB.
3. In 2020 Sunbridge installed an approximate 12kw system at 17715 NE Sandy Blvd Account # 5089450000. Meter # 31039231AB.

The excess generation from the 12kw system listed above was supposed to be aggregated to Account # 4868150000. Meter # 31039231AB- the account and meter at the office with no solar. The net metering application was submitted along with the aggregation request for the 12kw system. The application # for reference was **13596**.

It was recently discovered that the net metering application for the additional 12kw system mistakenly listed Account # 6413880000. Meter # 11023308AB (the office meter with solar). The aggregation was also requested to go to Account # 4868150000. Meter # 31039231AB (which is correct). So, essentially, the incorrect account number was listed for interconnection and the correct aggregation meter was listed. The aggregation was approved. When we saw the approval we assumed we were good to go not realizing at the time we listed the incorrect account number for interconnection.

After reviewing the accounts with PGE it was determined that account 5089450000 cannot aggregate its excess generation to account 4868150000. The state rules on aggregation state that aggregated accounts must be served by the same primary feeder (OPUC 860-039-0065 1 C).

Account 5089450000 is served by the Hemlock-13kv feeder while account 4868150000 is serviced by the Rockwood-Industrial feeder. It is very rare when this occurs but it seems that the two accounts, while they are neighboring, do not share the same PGE feeder.

We are formally requesting the PUC to consider giving an exception in this particular case. The properties are both owned by ASAP Logistics and they are directly across the street from one another. It was an honest mistake that was made at the time of filing for interconnection due to the complication of existing solar on multiple buildings with multiple meter and account numbers.

Thank you for your consideration.

Sincerely,

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