Request for Waiver – Meter Aggregation

Earlier this year, I applied to the PGE Netmetering program to install a solar PV system at my residence. In the application I indicated that I wanted to aggregate two meters on the property so that the solar generation would offset the consumption of both meters. PGE approved the application and the system was sized and installed with the capacity required.

After the project was completed and on-line, PGE refused to consolidate the meters because they are fed by separate feeder circuits. They cited OAR 860-039-0065 (1)(c), indicating that one meter is on the North Plains -13kv feeder and the other is on the North Plains-Mason Hill feeder. PGE's failure to give me timely notification that they would not aggregate the meters caused me to significantly over-invest in the solar PV system.

My request is that you grant a waiver of OAR 860-039-0065 (1)(c) and direct PGE to aggregate the two meters. If you are unable to grant that waiver, I request that you direct PGE to compensate me for the over-investment in my system.

For your reference, the project number is PGENM-17313. Please contact me if you need further information or if I need to take any additional steps to resolve this issue.

Thank you,

/s/ Daniel Benua 32236 NW Redhaven St. Hillsboro, OR 97124 503-702-5387