



Portland General Electric Company
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December 14, 2021

Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
P.O. Box 1088
Salem, OR 97308-1088

RE: UM 2099 PGE Agreement of Net Metering and Interconnection Services

Portland General Electric (PGE) hereby submits this filing to the Commission requesting an extension to continue to include Exhibit 1 in the Company's Net Metering Interconnection Agreement that an Applicant is required to sign prior to participating in PGE's Net Metering Program. Exhibit 1 is applicable to Net Metering Applicants on generation-limited feeders and requires the applicant to install a second meter base upstream of the inverter to allow temporary remote disconnection of the Net Metering Facility during periods of high generation and low customer demand. In previous conversations and workshops between Staff, Stakeholders and PGE this is commonly referred to as the "Two-Meter-Solution" (TMS). In Order No. 20-402, the Commission approved PGE's request to implement the TMS in its net metering agreement until December 31, 2021. PGE is now requesting to extend the TMS until December 31, 2022.

In recent conversations Staff and Stakeholders expressed concern about PGE abandoning the TMS without a viable alternative for net metering customers seeking to interconnect to a generation-limited feeder. In the coming months PGE plans to engage with Staff and Stakeholders to explore possible technical and/or other long-term solutions that would allow net metering applicants to safely interconnect new Net Metering Facilities to PGE's distribution system to generation-limited feeders without requiring the applicant to install a second meter base or pay for costly system upgrades. Under the current technology, interconnections processes, and Commission rules, PGE has concluded that, in order to safely interconnect to PGE's distribution system, net metering applicants on generation-limited feeders must either pay for the required system upgrades or install a second meter base to allow for temporary remote disconnection. PGE looks forward to engaging with Staff and Stakeholders in early 2022 (in both UM 2111 and UM 2099) to come up with a permanent solution that allows customers on generation-limited feeders to interconnect to PGE's distribution system without the need to pay for system upgrades or to install a second meter base that allows for temporary remote disconnection. If a viable alternative to the TMS is determined in 2022, PGE will work with Staff and Stakeholders to seek regulatory approval to implement the alternative expeditiously and no longer require these customers to install a second meter base or curtail customers that have already installed a second meter.

There are currently 41 Net Metering Customers that are required to utilize the TMS on eight generation limited feeders. Throughout 2021 PGE monitored the implementation of the TMS and sought to limit TMS installation and curtailment events. Twice in 2021 PGE conducted a

systemwide review of all distribution feeders and transformers to determine if they have the potential to be listed or delisted as a generation-limited feeder.

In the first year the TMS was in operation PGE had two curtailment events, which occurred in the Spring. These curtailments affected a total of four customers. In 2021 PGE received no customer complaints regarding the requirement that customers on generation-limited feeders install a second meter base or customer complaints when PGE disconnected the Net Metering Facility during curtailment events. Although, there are very few Net Metering Customers affected by the TMS and very few curtailment events, PGE continues to believe that TMS is a temporary solution given the unique circumstances and the current interconnection practices, technology, and rules. Accordingly, PGE will expeditiously work with Staff and Stakeholders in early 2022 to develop a long-term solution that allows Net Metering Applicants on generation-limited feeders to safely connect to PGE's distribution system without the need for customers to install a second meter base or curtailments of net metering customers with two meters. Granting this requested extension of the TMS for 2022 will allow net metering customers to safely interconnect new Net Metering facilities while PGE works with Staff and Stakeholders on a long-term solution.

Please direct any questions regarding this filing to Chris Pleasant at (503) 464-2555.

Please direct your communications related to this filing to the following email address:
pge.opuc.filings@pgn.com.

Sincerely,

\s\ Robert Macfarlane

Robert Macfarlane
Manager, Pricing & Tariffs