

From: [GIBBENS Scott * PUC](#)
To: [PUC PUC.FilingCenter * PUC](#)
Subject: FW: ADV 1391/PAC Advice No. 22-005
Date: Monday, August 8, 2022 5:12:54 PM
Attachments: [image004.png](#)
[image005.png](#)
[Screenshot 2022-07-29 153952 \(002\).png](#)
[image001.png](#)

I received these comments, I realize it's short notice but might be helpful if these could be posted to the ADV 1391 docket which is going to the public meeting tomorrow.

From: Chris Larson <CLarson@sazan.com>
Sent: Monday, August 8, 2022 3:36 PM
To: PUC puc.publicmeetings * PUC <PUC.PUBLICMEETINGS@puc.oregon.gov>
Cc: GIBBENS Scott * PUC <Scott.GIBBENS@puc.oregon.gov>; Rafe Vaughn <RVaughn@sazan.com>
Subject: RE: ADV 1391/PAC Advice No. 22-005

With attachment...

To whom it may concern,

We respectfully submit the following items for discussion regarding the above subject.

1. Attached is a copy of the language Pacific Power has submitted regarding their tariff change the following items are respectfully submitted for discussion and review
 - a. C.
 - i. Section indirectly references PURPA standards for Master Metering. It is our understanding under PURPA Section 2623 (a) (1), each state has the right to, but is not required to, adopt PURPA standards. As we understand it, these standards have not been adopted by Oregon. Instead, Oregon has created ORS 455.420 which allows for a single master meter if it reduces overall energy use.
 - b. C. 1.
 - i. It states; exemptions to individual metering must be sought with the Oregon State Building Code. We suggest this be removed this is already a requirement under ORS 455.420.
 - ii. We suggest that, ORS 455.420 be referenced in the tariff as an acceptable means in obtaining a Single Master Meter.
 - c. C. 2. It states; the tenant units shall not be sub-metered, as we understand it, this is in direct conflict with ORS 90.572, which allows for Owner sub-metering of tenants with pass through billing at the utility rate with no added charges allowed. We propose this language be changed to state the units shall not be sub-metered by the utility.
 - d. C.4. It states; the projected electric load within each unit that is controlled by the tenant shall not exceed 250 kWh per month. This is a value which can only be obtain from an Energy Model during design, it is a subjective value based upon assumptions

and places an undue burden on the property Owner. Additionally, the utility should not be the arbiter of deeming the validity of this value, therefore we propose this language be stricken. Furthermore, it is unclear why there needs to be an imposed limit to the monthly kWh usage of any unit. We are unaware of any requirement of this nature for a unit being sub-metered by the utility directly and there are no limits identified in either PURPA or ORS.

1. It is our understanding some of the proposed language in discussions regarding these changes have been centered around low income housing. It should be noted we are recommending and seeking the revisions to this tariff to cover all multi-family construction.

Chris Larson, PE, LEED AP
LEAD ELECTRICAL ENGINEER
Pronouns: He/Him



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From: GIBBENS Scott * PUC <Scott.GIBBENS@puc.oregon.gov>
Sent: Friday, August 5, 2022 10:21 AM
To: Chris Larson <CLarson@sazan.com>
Cc: Rafe Vaughn <RVaughn@sazan.com>; MOORE Caroline * PUC <Caroline.F.Moore@puc.oregon.gov>
Subject: RE: ADV 1391/PAC Advice No. 22-005

Hey Chris,

The information for attending the public meeting located at this link:

https://oregonpuc.granicus.com/GeneratedAgendaViewer.php?view_id=2&event_id=705

The meeting time, zoom link/phone number, and process for comments is outlined at the topic of the document.

If you plan to make comments at the meeting, it is preferred that you email puc.publicmeetings@puc.oregon.gov and let them know you would like to make comments regarding RA1 ADV 1391, although this step is not required.

Written comments are also accepted, however in order to ensure the Commissioners have sufficient

time to review them, it is preferred if you can email those in at your earliest convenience today or Monday.

Please let me know if you have any questions.

Thanks,
Scott

From: Chris Larson <CLarson@sazan.com>
Sent: Friday, August 5, 2022 9:58 AM
To: GIBBENS Scott * PUC <Scott.GIBBENS@puc.oregon.gov>
Cc: Rafe Vaughn <RVaughn@sazan.com>; caroline.MOORE@puc.oreg
Subject: RE: ADV 1391/PAC Advice No. 22-005

Hi Scott,

Yes, we definitely want to attend this meeting. Please forward the specifics of the meeting time and how to access the meeting remotely.

Thank you,
Chris

Chris Larson, PE, LEED AP
LEAD ELECTRICAL ENGINEER
Pronouns: He/Him



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From: GIBBENS Scott * PUC <Scott.GIBBENS@puc.oregon.gov>
Sent: Tuesday, August 2, 2022 9:41 PM
To: Chris Larson <CLarson@sazan.com>
Subject: ADV 1391/PAC Advice No. 22-005

Hey Chris,

I wanted to reach out again and thank you for participating in our workshop two weeks ago. I thought I might also provide you with a copy of Staff's report for the upcoming public meeting as I

know the results of that filing are of interest to you. Staff's memo is still going through approvals and thus cannot be considered final at this time, however, I have rarely seen Staff's recommendation substantially change at this point in the process. The official memo should post on Thursday or Friday.

Please let me know if you have any questions or concerns about Staff's recommendation or about participating in the public meeting on August 9.

Scott Gibbens
Strategy & Integration
Policy and Economic Analysis Manager
503-881-5657



...not allow for single metering of an apartment building per our current tariff policy. Submetering is also not allowed. We have a proposal under review with the PUC that will allow for single metering under certain conditions. I'm providing the language for that below (Part "C" is mostly all new language) if you want to look into going that direction. We can't approve the proposal until the PUC has approved the language, I don't have a good timeframe on that but lead to believe sometime in the next few months. I certainly understand the issue with metering in these situations but unfortunately we are bound by our tariff policy and must follow it.

Individual Metering

(N)

Separate premises, even though owned by the same Customer, will not be supplied through the same meter, except as may be specifically provided for in the applicable rate schedule.

(T)

Other than the exemptions in Section C, service to multi-unit residential buildings where residency is permanent in nature and constructed subsequent to January 1, 1979, shall be provided only if it is possible for the Company to directly meter and bill the occupant of each dwelling unit.

(C)

(T)

(D)

Residential Use Exemptions to Individual Metering (criteria for Master-Metering)

(N)

Multiple residential units where the units do not have permanent facilities for sleeping, bathing and cooking, which are supplied through a common meter, may not be sub-metered and will be classified as nonresidential service.

Multiple residential units where residency is permanent in nature and constructed subsequent to January 1, 1979, and have facilities for sleeping, bathing and cooking in each unit, may be supplied through a common meter if the units meet all of the following numbered criteria. The service will be classified as residential and billed on the applicable general service rate schedule.

(N)

1. Documentation that the multiple residential units have received the necessary exemptions to individual metering as required by the Oregon State Building Code,
2. The units are not sub-metered,
3. Space heating, ventilation, and cooling (HVAC) is provided through central systems to each individual residential unit, or if an all-electric building HVAC may be provided by individual or shared heat pumps supplying both heating and cooling to each individual residential unit, and
4. The electric load within each unit that is controlled by the tenant, excluding any individual load from item 3., is projected to be 250 kWh or less per month and the Company has been provided reasonable substantiation of the load projection.

(N)

you,

readway

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