

Public Utility Commission of Oregon
Administrative Hearings Division



FORMAL CONSUMER COMPLAINT

Instructions: Complete this form to file a formal complaint against a utility. Complete all relevant parts and provide as much information as possible. Please attach additional pages if necessary. To assist you, we have provided a copy of rules on dispute resolution. We will serve your complaint on the utility and notify you of future events. Your complaint will be assigned a docket number and will be a public record. **If your service is disconnected or you received a notice of disconnection, you may be entitled to restored or continued service while we review your complaint. See Section 3.**

Section 1: Complainant and Utility Information

Name:		
Address:		
City:	State:	Zip Code:
Home phone:	Cell Phone:	Work Phone:
Email Address:		
Utility:	Account # (if known)	

Section 2: Complaint

1. What is your complaint? What did the utility do or not do that caused the problem? Be specific. (Attach additional pages if necessary.)

(Please continue on next page)

Mailing Address:
PO Box 1088
Salem, OR 97308-1088

Street Address:
201 High Street SE Suite 100
Salem, OR 97301-3612

Telephone: (503) 378-6678

Web Site: <http://www.oregon.gov/puc>

Filing Center Email Address: puc.filingcenter@puc.oregon.gov

Section 2: Complaint (continued)

2. If you know, please list the statutes, rules, or tariffs that you believe the utility violated.

3. What do you want the utility or the PUC to do to resolve your complaint? *(We have authority to order refunds where appropriate, but cannot grant money damages.)*

4. Consumer Services provided you with a copy of your informal case record. Do you want us to consider this case record in resolving your formal complaint?

Yes

No

Please see next page

Section 3: Continued or Restored Service

Has your utility service been disconnected, or have you received a disconnection notice? If so, you may be entitled to restored or continued service while we review your complaint. You may also be eligible for an expedited process to determine this eligibility. **If you have not been disconnected or have not received a disconnection notice, please skip to Section 4.**

Please answer all questions below completely. If you meet certain criteria, we will schedule a telephone hearing within three business days to determine whether you are entitled to continued or restored service. You and the utility will both be invited to participate.

1. Please check one:

- a. I have been refused an application for new service.
- b. I was disconnected.
- c. I received a notice that my service will be disconnected, but I have not yet been disconnected.

If you checked b. or c., fill in disconnection date here:

2. The utility claims that it is disconnecting/refusing service because:

I did not pay my bill.

I did not establish credit.

Other (Please explain):

3. Have you provided the utility with a deposit?

Yes No

If so, what is the amount of the deposit? _____

4. Is the utility disconnecting your service or refusing to serve you for failure to pay your bill?

Yes No

If you answered yes, you may be entitled to continued service if you make financial arrangements to protect the utility from future losses. This is usually done by paying all undisputed charges while your complaint is being resolved.

- a. Are you willing to pay all undisputed charges while your complaint is being resolved?

Yes No

Please see next page

Section 3: Continued or Restored Service (continued)

- b. Have you made, or are you willing to make, other financial arrangements with the utility, such as prepaying estimated monthly utility charges? If so, please describe the financial arrangements. Be specific.

Section 4: Additional Documents

To help us review your complaint, please attach a copy of your utility bill(s) and any disconnection notice(s) you received. Also include any additional documents that may be helpful in resolving your complaint.

Please black out any drivers' license numbers, social security numbers, bank routing numbers and bank account numbers before sending us your documents.

Please see next page

Section 5: Filing Options

Are you able to put your complaint into Word or text-searchable .pdf format and scan your other documents to .pdf format to email them to us?

Yes. **I am able to file my documents using email (Electronic Filing).**

Attach your complaint (and any additional documents you wish to add) as an attachment to an email addressed to: puc.filingcenter@puc.oregon.gov.

The *subject line* of the email must read: "Formal Complaint, [your name], [date]".

Please note: Our electronic filing system can accept only the attachments to the email. Do not include information about your complaint in the body of the email itself.

No. **I request a waiver of PUC electronic filing rules because I cannot prepare and submit documents electronically. I request permission to send copies of my documents by U. S. Mail to the Filing Center.**

Please mail the signed and dated original paper documents to the following mailing address:

**Public Utility Commission of Oregon
Formal Complaint
PO Box 1088
Salem, OR 97308-1088**

Section 6: Signature and Date

Complainant Signature (Your typewritten name represents
your signature)

Date

Oregon Public Utility Commission - Dispute Resolution - OAR 860-021-0015

Public Utility Commission

Chapter 860

Division 21

UTILITY REGULATION

860-021-0015

Dispute Resolution

(1) When a dispute occurs between a customer or applicant and a utility about any charge or service, the utility must:

- (a) Thoroughly investigate the matter;
- (b) Promptly report the results of its investigation to the complainant;
- (c) Inform the complainant of the right to have a utility supervisor review any dispute;
- (d) Prepare a written record of the dispute including the name and address of the complainant involved, the date the complaint was received, the issues in dispute, and the disposition of the matter; and
- (e) Retain records of the dispute for at least 36 months after the investigation is closed.

(2) If the utility and complainant cannot resolve the dispute, the utility must inform the complainant of the right to contact the Consumer Services Section and request assistance in resolving the dispute. The utility must provide the following contact information for the Consumer Services Section:

- (a) Telephone: 503-378-6600; 1-800-522-2404; TTY 711;
- (b) Mailing address: Public Utility Commission of Oregon, Consumer Services Section, PO Box 1088, Salem, Oregon 97308;
- (c) Physical address: Public Utility Commission of Oregon, 201 High Street SE, Suite 100, Salem, Oregon 97301;
- (d) Electronic mail address: puc.consumer@state.or.us; and
- (e) Website: <http://www.puc.state.or.us/consumer/customer%20complaint%20process.pdf>.

(3) The Consumer Services Section will investigate any dispute upon request to determine whether it can be resolved as an informal complaint.

(4) If the Consumer Services Section cannot resolve the dispute the complainant may file a formal written complaint with the Commission under ORS 756.500. The formal complaint must be submitted on an approved form available from the Consumer Services Section.

(a) The complaint must be filed electronically with the Filing Center at PUC.FilingCenter@state.or.us.

(b) If complainant does not have access to electronic mail,

(A) The complaint may be mailed, faxed, or delivered to the Filing Center at the address set out in OAR 860-001-0140; and

(B) The complaint must include a request for waiver of electronic service and filing requirements. This request is included on the form available from the Commission's Consumer Services Division.

(c) The Commission will serve the complaint on the utility. The Commission may electronically serve the utility with the complaint if the electronic mail address is verified prior to service of the complaint and the delivery receipt is maintained in the official file.

(d) The utility must answer the complaint within 15 days of service of the complaint by the Commission.

(e) The Commission will determine a procedural schedule after the utility's answer is filed. The utility must serve a copy of its answer on the complainant.

(A) If the utility files a motion to dismiss, the complainant may file a response within 15 days of the motion. If the complainant responds, the complainant must file the response with the Filing Center and send a copy to the utility. The Commission may make a decision on the formal complaint based on the information in the complaint, the utility's response and motion to dismiss, and the complainant's response to the utility's motion; or

(B) The Commission may set a procedural schedule for the complaint proceedings, including but not limited to, scheduling dates for receiving additional information from the parties, telephone conferences, or a hearing. A hearing may be held on less than 10 days' notice when good cause is shown.

(5) Upon filing a formal complaint, the complainant may request a hearing to determine whether the complainant is entitled to continued or restored service pending the resolution of the complaint. Unless extraordinary circumstances exist, the Commission will conduct the hearing by telephone within 3 business days. Notice of the hearing will be provided to the complainant and the utility at least 12 hours before the date and time of the hearing. Pending resolution of the dispute, the complainant's obligation to pay undisputed amounts continues.

(6) A complainant who has a registered dispute or formal complaint pending with the Commission is entitled to continued or restored service provided:

(a) Service was not terminated for tampering with utility property, stealing, diverting, or using unauthorized service, or failure to establish credit;

(b) A bona fide dispute exists in which the facts asserted entitle the complainant to service;

(c) When termination is based on nonpayment, the customer agrees to pay undisputed charges; and

(d) The complainant diligently pursues conflict resolution under the Commission's rules.

(7) If the conditions in section (6) of this rule are not satisfied, the utility has no obligation to provide continued service. A utility discontinuing service because of a failure to meet the conditions of subsections (6)(c) or (6)(d) of this rule must give the customer five-day notice served in the same manner as provided by OAR 860-021-0405 or 860-021-0505, whichever applies, except the notice need only describe the defect in performance, the date and time when utility service will terminate, and the toll-free number of the Commission's Consumer Services Division.

Statutory/Other Authority: ORS 183, 756, 757 & 759

Statutes/Other Implemented: ORS 756.040, 756.500 & 756.512

History:

PUC 1-2015, f. & cert. ef. 3-3-15

PUC 164, f. 4-18-74. ef. 5-11-74 (Order No. 74-307); PUC 5-1983, f. 5-31-83, ef. 6-1-83 (Order No. 83-284); PUC 12-1983, f. & ef. 10-7-83 (Order No. 83-623); PUC 1-1985, f. & ef. 2-1-85 (Order No. 85-075); PUC 4-1985, f. & ef. 4-22-85 (Order No. 85-350); PUC 5-1987, f. & ef. 7-2-87 (Order No. 87-723); PUC 16-1990, f. 9-28-90, cert. ef. 10-1-90 (Order No. 90-1105); PUC 11-1998, f. & ef. 5-7-98 (Order No. 98-188); PUC 8-1999, f. & cert. ef. 10-18-99; PUC 19-2001, f. & cert. ef. 6-21-01; PUC 11-2003, f. & cert. ef. 7-3-03; PUC 6-2013, f. & cert. ef. 8-7-13

Oregon Revised Statutes - Hearing Procedure – Public Utility Commission

756.518 Procedures applicable to all matters before commission; oral hearing; rules.

(1) Except as otherwise provided the provisions of ORS 756.500 to 756.610 apply to and govern all hearings upon any matter or issue coming before the Public Utility Commission under any statute administered by the commission, whether instituted on the application, petition or complaint of others or initiated by the commission, together with the orders of the commission therein and the review thereof in the courts.

(2) Upon request of any party in a major proceeding before the commission, the commission shall afford the parties an opportunity for oral argument before a final order is issued. There must be a quorum of the commission present at the time the oral argument is made. The commission shall adopt rules that establish criteria for determining which proceedings give rise to a right to oral argument under this subsection. In addition, the commission may adopt rules governing participation in oral arguments, cross-examination of witnesses, draft or proposed orders or such other matters as the commission deems appropriate. [Formerly 756.510; 2001 c.558 §3]

756.521 Public hearings; record required; furnishing transcripts.

All hearings shall be open to the public and may be had before the Public Utility Commission, an examiner or any other person authorized to hold such hearing. A full record thereof shall be kept. However, it shall not be necessary to transcribe testimony unless requested. For purposes of rehearing or reconsideration under ORS 756.561, a transcription shall be made at the commission's expense, and copies of such transcription shall be supplied to the parties, at cost. A copy of the transcript shall be supplied to a party without cost upon the filing with the commission of a satisfactory affidavit of indigency. [1971 c.655 §41; 2005 c.638 §3]

756.525 Parties to proceedings.

(1) The Public Utility Commission may permit any person to become a party who might, on the institution of the proceeding, have been such a party, if application therefor is made before the final taking of evidence in the proceeding.

(2) At any time before the final taking of evidence in a proceeding, any person may apply to the commission for permission to appear and participate in the proceeding. The commission shall determine the interest of the applicant in the proceeding and shall grant the application, subject to appropriate conditions, if the commission determines that such appearance and participation will not unreasonably broaden the issues or burden the record, and otherwise may deny the application.

(3) This section does not apply to any person who might have been an original party in a proceeding before the commission if that person is required by statute to file a pleading or other response in the proceeding within a specified time. [1971 c.655 §42]

756.528 Segregation of issues.

At any time before the conclusion of the taking of evidence in a proceeding, the Public Utility Commission may segregate the issues involved and order separate hearings thereon at such times and places as the commission may prescribe. [1971 c.655 §43; 2005 c.638 §4]

756.534 Place of hearings; continuation.

Except as provided in ORS 756.040 (4), the hearing may be held at any place designated by the Public Utility Commission within this state, or different parts of the hearing may be held at different places in this state, as shall be designated by the commission. The hearing may be continued from time to time and place to place as ordered and fixed by the commission. [Formerly 756.560]

- (1) In any investigation, the Public Utility Commission may take the testimony of any person by deposition upon oral examination or written interrogatories for the purpose of discovery or for use in the investigation.
- (2) In any proceeding requiring a hearing, the commission or any party to the proceeding may take the testimony of any person by deposition upon oral examination or written interrogatories for the purpose of discovery or for use as evidence in the proceeding, or for both purposes.
- (3) Depositions may be taken within or without the State of Oregon by the commission, or any other person authorized to administer oaths, in accordance with procedures prescribed by the rules of the commission.
- (4) The commission shall promulgate rules concerning the manner of applying for and taking depositions and the use thereof. Such rules shall provide reasonable provisions against abuse of such procedure and for protection of the rights of all persons affected. [1971 c.655 §45]

756.543 Issuance of subpoenas; failure to comply.

- (1) The Public Utility Commission shall issue subpoenas to any party to a proceeding before the commission upon request and proper showing of the general relevance and reasonable scope of the evidence sought. Witnesses appearing pursuant to subpoena, other than the parties or their officers or employees, or employees of the commission, shall receive fees and mileage as prescribed by law for witnesses in ORS 44.415 (2). If the commission certifies that the testimony of a witness was relevant and material, any person who paid fees and mileage to that witness shall be reimbursed by the commission and from moneys referred to in ORS 756.360, subject to the limitations provided in ORS 756.360.
- (2) If any person fails to comply with any subpoena so issued or any party or witness refuses to testify on any matters on which the person may be lawfully interrogated, the judge of the circuit court of any county, on the application of the commission, or of the party requesting the issuance of the subpoena, shall compel obedience by proceedings for contempt as in the case of disobedience of the requirements of a subpoena issued from such court or a refusal to testify therein. [1971 c.655 §46; 1983 c.540 §2; 1987 c.980 §23; 1997 c.249 §221]

756.549 Self-incrimination of witnesses in commission proceedings.

- (1) No person shall be excused from testifying or from producing evidence in any proceeding held by the Public Utility Commission on the ground that the testimony or evidence required of the person may tend to incriminate the person or subject the person to prosecution, penalty or forfeiture if:
 - (a) The person has been directed by the commission to testify or produce evidence under oath;

(b) The person claims, at the time the person is directed by the commission to testify or produce evidence, that the testimony or evidence required of the person may tend to incriminate the person or subject the person to prosecution, penalty or forfeiture; and

(c) The commission specifically grants the person immunity from prosecution, penalty or forfeiture regarding those matters about which the person testifies or produces evidence as directed.

(2) Except for prosecution and punishment for perjury, no person who testifies or produces evidence in accordance with subsection (1) of this section shall be prosecuted or subjected to any penalty or forfeiture concerning any matter about which the person so testified or produced evidence. [1971 c.655 §47]

756.552 Self-incrimination of witnesses in court proceedings.

No person shall be excused from testifying or from producing books and papers in any court proceeding based upon or growing out of any violation of the provisions of ORS chapter 756, 757, 758, 759 or 825 or ORS 824.020 to 824.042, 824.050 to 824.110, 824.200 to 824.256 or 824.300 to 824.310 on the ground or for the reason that the testimony or evidence, documentary or otherwise,

required of the person may tend to incriminate the person or subject the person to penalty or forfeiture; but no person having so testified shall be prosecuted or subjected to any penalty or forfeiture for, or on account of, any transaction, matter or thing concerning which the person may have testified or produced any documentary evidence. However, no person shall be exempted from prosecution or punishment for perjury while so testifying. The immunity conferred by this section shall extend only to a natural person who, in obedience to a subpoena, gives testimony under oath or produces evidence, documentary or otherwise, under oath. [Formerly 757.590; 1989 c.827 §2]

756.555 Powers of commission at hearings.

The Public Utility Commission may administer oaths, certify to official acts, issue notices in the name of the commission, issue subpoenas, compel the attendance of witnesses and the production of books, accounts, papers, records, documents and testimony, and take and receive testimony, conduct hearings and investigations, whether upon complaint or upon the commission's own motion. [Formerly 757.555]

756.558 Taking of evidence; findings; issuance of orders; providing copies of orders.

(1) At the conclusion of the taking of evidence, the Public Utility Commission shall declare the taking of evidence concluded. Thereafter no additional evidence shall be received except upon the order of the commission and a reasonable opportunity of the parties to examine any witnesses with reference to the additional evidence and otherwise rebut and meet such additional evidence.

(2) After the completion of the taking of evidence, and within a reasonable time, the commission shall prepare and enter findings of fact and conclusions of law upon the evidence received in the matter and shall make and enter the order of the commission thereon. The findings of fact and conclusions of law may be embodied in the same instrument with the order or may be embodied in a separate instrument. The findings of fact, conclusions of law and order thereon shall be signed by the commission. The order shall state the date it becomes effective. A copy of the findings of fact and conclusions of law and a copy of the order shall, forthwith upon the entry of the same, be served upon each of the parties to the proceeding.

(3) Upon application of any person, the commission shall furnish certified copies, under the seal of any order made by the commission. [Formerly 756.550]

756.561 Rehearing; reconsideration.

(1) After an order has been made by the Public Utility Commission in any proceeding, any party thereto may apply for rehearing or reconsideration thereof within 60 days from the date of service of such order. The commission may grant such a rehearing or reconsideration if sufficient reason therefor is made to appear.

(2) No such application shall excuse any party against whom an order has been made by the commission from complying therewith, nor operate in any manner to stay or postpone the enforcement thereof without the special order of the commission.

(3) If a rehearing is granted, the proceedings thereupon shall conform as nearly as possible to the proceedings in an original hearing, except as the commission otherwise may direct. If in the judgment of the commission, after such rehearing and the consideration of all facts, including those arising since the former hearing, the original order is in any respect unjust or unwarranted, the commission may reverse, change or modify the same accordingly. Any order made after such rehearing, reversing, changing or modifying the original determination is subject to the same provisions as an original order. [Formerly 756.570]

Oregon Public Utility Commission

Specialist: RIOS, DEANNA

Name: GRAND PRAIRIE TOWNHOMES Commercial:
Language:

Addresses: 2710 GRAND PRAIRIE RD SE, ALBANY OR 97321 (LOC) (INVOLVED)

E-mail: mikep@emconstructors.com DOCKET #

Phones: (503) 577-5801 (CONT) (MIKE PURCELL - PROJECT MGR) (INVOLVED)
(541) 231-2828 (CELL) (PAUL SPIES - MANAGING MEMBER)
(541) 602-6793 (CONT) (MIKE HELMS/ALPH ASSOC/ELEC CONTRACTOR)

Contacts: MIKE PURCELL (OTHR) (CONTRACTOR - E&M CONTRACTORS)
PAUL SPIES (OTHR) (MANAGING PARTNER)
SPIES CORP (OTHR)
ED STANTON (OTHR) (OWNER/E&M CONTRACTORS)

Subject:

Comments:

COMPANY	CATEGORY	STAFF	SAVINGS	CLASS	TYPE	SUBTYPE	FORMAL
REVERSAL	COMPLX	UNRS	DET.	OPEN/MODE	BY	CLOSE/MODE	BY
0003 E PACIFI No ADV 1391	REGU No	No		RCOM 9/1/2022/TELE	RCSE drios	RSBL	

Call Taken (date): 8/26/2022 By: drharris
Open Date: 9/1/2022 Opened By: drios

Disconnect Notice Due: Disconnected: Out of Service:

8/26/2022 CODE DETAIL
REGULATED - COMPLAINT - SERVICE

Mike Purcell, contractor for Grand Prairie Town Homes, is trying to work with Pacific Power to set a temporary 400 amp panel on each of the three buildings with a master meter until the delayed service equipment arrives to provide permanent submetered service. He states PAC told him they cannot do this due to PUC rules. He is seeking a waiver of PAC's Rule 8.

8/26/2022 11:00:00 AM CALL TAKEN BY DANIELLE
Mike Purcell is a contractor and has just finished construction on the Grand Prairie Townhomes in Albany. The only thing left to do is provide power to the three buildings, but they are unable to get the service equipment due to shipping delays and equipment shortages. Mike just found out the equipment needed for electrical service will not arrive until February 2023. He is trying to find a

Analyst: drios

Open Date: 9/1/2022

temporary solution to get power to the buildings so the owner can start renting them out and making money since they are done.

Mike states his electrician proposed installing temporarily a 200 amp meter to each of the three buildings. Pacific Power is stating they are not able to do this per PUC rules. Mike is asking for a temporary waiver of the rules based on the shipping backlog of the parts needed.

I advised we can take his information and look into his concerns, but make no guarantees on the outcome. Once we have information back from the company, the investigator will follow up with him on the resolution.

9/6/2022 11:40:00 AM CALL TAKEN BY CARISSA

Mike called to speak to Deanna. I let him know she is out of the office on Mondays but she could call him back tomorrow. He said that would be great.

9/8/2022 2:45:00 PM EMAIL FROM SARAH MEANS/OBIE COMPANIES TO NATE STICE/GOV BROWN'S OFC - SEEKING STATE CONTACT

From: Sarah Means <Sarah@obie.com>
Sent: Thursday, September 8, 2022 2:45 PM
To: STICE Nate * GOV <Nate.STICE@oregon.gov>
Subject: PUC Contact?

Hi Nate,

I had one of our partners reach out to me regarding a challenge they are having with a housing development in Albany. The challenge is with Pacific Power and a requirement PP says comes from an agreement they have with the state. It involves metering for the housing units (this is a multi-family housing project) and a significant delay that is occurring as a direct result of the requirement because the supplier for the meters (custom meters to meet the requirement) can't deliver until mid-2023.

My contact was hoping to identify who at the state they could contact about a potential temporary exception to simply get the units in market rather than have them sit. It sounds like this is one of the final things to resolve for occupancy. My guess is that this is something the PUC may engage with, but I don't know that for sure. Any guidance is appreciated.

Thanks,
Sarah

obiecompanies.com
Sarah Means
Director of Government & Community Relations
Address 296 E. 5th Ave, Suite 300
Eugene, Oregon 97401
Direct 541.743.0750 | Cell 503.784.3915

Analyst: drios

Open Date: 9/1/2022

9/8/2022 3:58:00 PM EMAIL TO PAUL SPIES FROM BRYAN CONWAY - WILL RTN CALL SOON
On Thu, Sep 8, 2022 at 3:58 PM CONWAY Bryan * PUC <Bryan.CONWAY@puc.oregon.gov> wrote:

Hi Paul - I got your message and will get back to you soon. Feel free to reply to this message with any important details (dates and requests of PAC) and it will help me narrow down the issue.

Thanks!
Bryan

9/8/2022 4:45:00 PM CALL TAKEN BY KIM

Mike called to speak with his investigator. I let him know Deanna is in charge of his case and she is on another call right now. I explained that I will send her a message requesting she call him back today.

9/9/2022 9:51:00 AM CALL FROM CUSTOMER - MIKE PURCELL/PROJECT MANAGER

Mike called regarding the complaint. I told him I needed to gather some additional information from him, so I was glad he called. He said he is the project manager for this development. His client is virtually done with the development construction except for getting permanent power to the site.

His client was just informed there is a further delay. The service equipment isn't expected to be received until May 2023, it was February 2023. They were proposing to PAC installing a series of 400 amp panels on each building served by one meter with the billing being paid by the developer as a temporary measure. His client is concerned about defaulting on the construction loan if they are unable to get tenants into the building until May 2023.

Mike said he will email me the name of the contact person his client has been working with at PAC if needed. I provided him with my direct email address.

I asked if PAC had cited the rule reference that wasn't allowing his client to do what they wanted? As we continued the conversation, he stated he wanted to temporarily master meter until the parts arrive and are installed for permanent service. His client wants to know if they can request a waiver of the rule that doesn't allow for master metering. (I did not learn until later there was a recent docket allowing master metering if certain conditions are met - ADV 1391.)

I informed Mike I would be reaching out to PAC and our rules coordinator regarding this situation and a waiver, respectively. I will be in contact with him when I have more information to provide.

9/9/2022 10:10:00 AM EMAIL FROM PAUL TO TUCKER/PAC - REQ TARIFF REFERENCE

From: Paul Spies <spiespaul@gmail.com>
Sent: Friday, September 9, 2022 10:10 AM
To: Hill, Tucker (PacifiCorp) <Tucker.hill@pacifcorp.com>
Subject: [INTERNET] Tariff Section of Rules that prohibit single meter on apartments

Analyst: drios

Open Date: 9/1/2022

Can you send me a PDF or screenshot of this rule? We are working with Bryan Conway, who is the head of the Utility Division at the PUC.

Thanks

--

Paul Spies
Managing Member
Spies Corporation/8020 Property LLC
Cell: 541.231.2828
PO Box 548 Corvallis OR 97339

9/9/2022 10:15:00 AM EMAIL TO PAUL FROM TUCKER - RULE 8

From: Hill, Tucker (PacifiCorp) <Tucker.Hill@pacificcorp.com>
Sent: Friday, September 9, 2022 10:15 AM
To: Paul Spies <spiespaul@gmail.com>
Subject: RE: [INTERNET] Tariff Section of Rules that prohibit single meter on apartments

Hey Paul,

Its in Rule 8. 08_Metering.pdf (pacificpower.net)

Thank you,

Tucker Hill
Journeyman Estimator
541-967-6161
Electrical Service Requirements
Underground Manual

9/9/2022 10:38:00 AM EMAIL FROM MIKE/PM - PAC CONTACT INFO

From: Mike Purcell <mikep@emconstructors.com>
Sent: Friday, September 9, 2022 10:38 AM
To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>
Subject: Grand Prairie Townhomes

Deanna, thank you for discussing with me our Grand Prairie Apts. located in Albany. We have a serious supply chain problem with getting electrical service equipment that could result in our client defaulting on his construction loan for these 35 affordable apts. We are requesting a temporary waiver of the requirement for individual electrical metering until we receive the service equipment ordered almost a year ago. Our contact with the electrical utility is:

Pacific Power, Area engineer: Tucker Hill
Phone 541-967-6161
Email: tucker.hill@pacificcorp.com

Analyst: drios

Open Date: 9/1/2022

Your early response to your investigation would be greatly appreciated.

9/9/2022 10:46:00 AM EMAIL FROM MIKE/PM - PAC RULE 8 (WANTS WAIVER)

From: Mike Purcell <mikep@emconstructors.com>
Sent: Friday, September 9, 2022 10:46 AM
To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>
Subject: Grand Prairie Apts, Albany

Deanna, attached is Rule No. 08 with the requirement for individual metering for apts. We are requesting a temporary waiver due to supply chain problems delaying production of the multi-meter service equipment.

9/9/2022 11:35:00 AM EMAIL FROM NATE STICE TO MIKE G - CONTACT PERSON?

From: STICE Nate * GOV <Nate.STICE@oregon.gov>
Sent: Friday, September 9, 2022 11:35 AM
To: GRANT Michael * PUC <Michael.GRANT@puc.oregon.gov>
Cc: Sarah Means <Sarah@obie.com>
Subject: RE: PUC Contact?

Hi Michael,

Who is the right contact on your teams for Sarah to connect with?

Best,

Nate

Nate Stice
Regional Solutions Director and Economy and Jobs Policy Advisor
Regional Solutions Coordinator: North Central Oregon, Central Oregon, South Willamette Valley/Mid-Coast
Office of Governor Kate Brown
Mobile: 971-283-8817

9/9/2022 11:55:00 AM EMAIL TO MIKE/PM - THANK YOU

From: RIOS Deanna * PUC
Sent: Friday, September 9, 2022 11:55 AM
To: Mike Purcell <mikep@emconstructors.com>
Subject: RE: Grand Prairie Townhomes

Mike,

Thank you for this information. I will be in touch as soon as I have the necessary information for you about the waiver or any other alternative for temporary power.

Analyst: drios

Open Date: 9/1/2022

Deanna Rios
Senior Compliance Specialist (Lead)
Hours: Tuesday-Friday 7:00-5:30
Oregon Public Utility Commission
Consumer Services Section
Tel: 503.378.6600 Toll free: 1.800.522.2404
deanna.rios@puc.oregon.gov

9/9/2022 1:36:00 PM EMAIL TO MIKE - REQ ADD'L INFO RE CURRENT SET UP

From: RIOS Deanna * PUC
Sent: Friday, September 9, 2022 1:36 PM
To: Mike Purcell <mikep@emconstructors.com>
Subject: FW: Grand Prairie Townhomes

Mike,

After discussing this situation with my manager, can you please provide the following information?

- 1)What is currently in place for power?
 - a. Is it a single phase pedestal?
- 2) What has Pacific Power (PAC) advised is needed for permanent service?

I am working on questions to send over to PAC about this situation. If you can provide the information above, I will have a better understanding of what information I need to request.

Thank you,
Deanna

9/9/2022 2:36:00 PM QUESTIONS TO PAC

Q: What is currently in place providing power to this development?

A:

Q: What is PAC requiring for permanent service to this development?

A:

Q: What is causing the delay in providing permanent power to this location? Please elaborate.

Q: What do the account notes show regarding contact from the customer/agents about permanent service to this development?

A:

Q: The customer is requesting one meter, which I understand is allowed under a recent docket if certain conditions are met. Has it been determined these conditions are not met? Please elaborate.

A:

Analyst: drios

Open Date: 9/1/2022

Q: If he installs one meter to serve each building is that okay? If not, why?

A:

Q: Please provide any other relevant information that would be helpful addressing this complaint.

A:

9/9/2022 3:02:00 PM EMAIL TO PAUL FROM BRYAN - REQ DETAILS

On Fri, Sep 9, 2022 at 3:02 PM CONWAY Bryan * PUC <Bryan.CONWAY@puc.oregon.gov> wrote:

Great! Can you give me the details again? I want to route you to the right person or section.

9/9/2022 3:06:00 PM EMAIL FROM MIKE/PM - CURRENT SET UP

From: Mike Purcell <mikep@emconstructors.com>

Sent: Friday, September 9, 2022 3:06 PM

To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>

Subject: RE: Grand Prairie Townhomes

Deanna, in answer to your questions:

1. Currently we have a 200amp single phase panel that supplies temporary power to the various construction trades and our construction office trailer
2. Pacific Power is providing 3 phase permanent power to the site. We have on order one 1,200 amp and two 800 amp services for each of the three building we have constructed.

9/9/2022 3:31:00 PM EMAIL TO PAC - CASE RECORD

From: RIOS Deanna * PUC

Sent: Friday, September 9, 2022 3:31 PM

To: Pacific Power Complaints <customeradvocacyteam@pacificorp.com>

Subject: OREGON PUC NEW COMPLAINT - GRAND PRAIRIE TOWNHOMES

Good afternoon,

Please review the attached complaint and respond to the questions addressed to PAC. Additionally, we received a request from the Governor's office for assistance with the developer and this project. I wanted to get this out due to the delay in sending it over, so I did not wait for the additional information requested from the project manager for Grand Prairie Townhomes. I will forward once received. Thanks!

Deanna Rios

Hours: Tuesday-Friday 7:00-5:30

Sr Compliance Specialist (Lead)

Consumer Services Section

Oregon Public Utility Commission

Cell: 971.375.5100

deanna.rios@puc.oregon.gov

Analyst: drios

Open Date: 9/1/2022

9/9/2022 3:38:00 PM EMAIL FROM PAUL TO BRYAN CONWAY - FOUND IT

From: Paul Spies <spiespaul@gmail.com>
Sent: Friday, September 9, 2022 3:38:08 PM
To: CONWAY Bryan * PUC <Bryan.CONWAY@puc.oregon.gov>
Subject: Re: Message and meters.

Found it thanks

9/9/2022 5:24:00 PM EMAIL TO PAC - AMENDED RECORD

From: RIOS Deanna * PUC
Sent: Friday, September 9, 2022 5:24 PM
To: Pacific Power Complaints <customeradvocacyteam@pacificorp.com>
Subject: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - AMENDED CASE RECORD

Hello,

I haven't received who will be assigned to this complaint at PAC yet. I realized the prior case did not include my conversation with Mike Purcell this morning. I have also added the PAC contact information - see email of 9/9 at 10:38 and the additional information I requested about the current set up - see email of 9/8 at 3:06.

Thank you and hope you have a good weekend!

Deanna

9/10/2022 8:49:00 AM ASSIGNED TO RISA @ PAC

From: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>
Sent: Saturday, September 10, 2022 8:49 AM
To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>; Customer Advocacy Team <CustomerAdvocacyTeam@PacifiCorp.com>
Subject: RE: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - AMENDED CASE RECORD

Good Morning Deanna,

We received this complaint and I will investigate and respond.

Thanks,

Risa Talo
Customer Advocacy and Customer Service
801-955-2435

9/12/2022 1:28:00 PM EMAIL FROM PAUL/MM TO BRYAN - REQ ASSISTANCE

Analyst: drios

Open Date: 9/1/2022

From: Paul Spies <spiespaul@gmail.com>
Sent: Monday, September 12, 2022 1:28 PM
To: CONWAY Bryan * PUC <Bryan.CONWAY@puc.oregon.gov>
Subject: Re: Message and meters.

We ordered our power meter packs for the apartments we are building in Feb 2022. They told us 90 days originally. Due to supply chain issues, we are now told the metering packs won't be ready until 5/1/2023 (this is still a moving date). The apartment will be done at the end of October and could sit vacant for seven-plus months. This is going to cost us upwards of \$250K. Additionally, we will have these vacant apartments while many people need housing options.

Pacific Power has told us we can not do a single temporary meter due to a contract with the state of Oregon under a Tariff Agreement. It is my understanding this is happening to other developers in Oregon. A simple rule change, I believe, can get this resolved. We need to be granted temporary approval to use a single meter per building. This is safe and allowable use. But this issue comes from Pacific Power not having a mechanism that would allow us to do this change while we wait for the rest of our gear to arrive.

Can you guys please help point me in the right direction? Thanks again for any help you can provide me.

9/12/2022 1:44:00 PM EMAIL FROM MIKE - SPOKE W/COMMISSIONER ON 9/9(?)

From: Mike Purcell <mikep@emconstructors.com>
Sent: Monday, September 12, 2022 1:44 PM
To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>
Subject: GHrand Priairie Apts, Albany

Deanna, Our client was able to speak to one of the PUC commissioners on Friday. He was informed that on August 9th of this year, it was approved for utilities to offer a temporary variance to the multi-meter rule. Is that correct?

9/13/2022 12:18:00 PM EMAIL TO MIKE - RULE 8/ARE CONDITIONS MET?

From: RIOS Deanna * PUC
Sent: Tuesday, September 13, 2022 12:18 PM
To: Mike Purcell <mikep@emconstructors.com>
Subject: RE: GHrand Priairie Apts, Albany

Hi Mike,

I learned after we spoke last week there is a provision in Pacific Power's (PAC's) Rule 8 that allows for master metering if certain conditions are met. Please see 1.C in the attached tariff.

Questions were sent to PAC last week and I am waiting on their response. In the meantime, if you can check into the whether the conditions are met, that will be helpful.

Analyst: drios

Open Date: 9/1/2022

Deanna

9/13/2022 3:55:00 PM EMAIL TO MIKE - NEED CLIENT'S NAME ETC/WHO SPOKE WITH?

From: RIOS Deanna * PUC
Sent: Tuesday, September 13, 2022 3:55 PM
To: Mike Purcell <mikep@emconstructors.com>
Subject: FW: GHrand Priairie Apts, Albany
Importance: High

Hello again,

I attempted to find out who your client spoke with on Friday. I found they did not speak with one of our commissioners. Please provide your client's name (and contact information - phone and mailing address) and who they spoke with on Friday, as I would like to obtain a synopsis from our staff person about the conversation.

Thank you,
Deanna

9/14/2022 8:34:00 AM EMAIL FROM MIKE TO PAUL - WHO AT THE COMMISSION?

On Wed, Sep 14, 2022 at 8:34 AM Mike Purcell <mikep@emconstructors.com> wrote:

Paul, do you have the info Deanna Rios, investigator for PUC, has requested below?

9/14/2022 12:02:00 PM EMAIL FROM PAUL TO MIKE - SPOKE W/BRYAN CONWAY

From: Paul Spies <spiespaul@gmail.com>
Sent: Wednesday, September 14, 2022 12:02 PM
To: Mike Purcell <mikep@emconstructors.com>; RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>
Cc: Ed Stanton <eds@emconstructors.com>
Subject: Re: FW: GHrand Priairie Apts, Albany

Hi guys,

This is who I spoke with. Thanks.

bryan.CONWAY@puc.oregon.gov 971-239-9875

9/14/2022 3:38:00 PM EMAIL FROM RISA - REQ EXT TO 9/16

From: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>
Sent: Wednesday, September 14, 2022 3:38 PM
To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>; Customer Advocacy Team <CustomerAdvocacyTeam@PacifiCorp.com>

Analyst: drios

Open Date: 9/1/2022

Subject: RE: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - AMENDED CASE RECORD

Good Afternoon Deanna,

I apologize but may we please have an extension until end of business day on Friday, September 16, 2022 to provide a response? We are still working on getting all of the information you have requested.

Please let me know.

Thank you,

Risa Talo
Customer Advocacy and Customer Service
801-955-2435

9/14/2022 3:50:00 PM EMAIL TO RISA - EXT GRANTED

From: RIOS Deanna * PUC
Sent: Wednesday, September 14, 2022 3:50 PM
To: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>; Customer Advocacy Team <CustomerAdvocacyTeam@PacifiCorp.com>
Subject: RE: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - AMENDED CASE RECORD

Absolutely - extension granted.

9/16/2022 11:11:00 AM EMAIL FROM RISA - RESPONSE

From: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>
Sent: Friday, September 16, 2022 11:11 AM
To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>
Cc: Customer Advocacy Team <CustomerAdvocacyTeam@PacifiCorp.com>
Subject: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - AMENDED CASE RECORD

Good Afternoon Deanna,

Grand Prairie Townhomes
2710 GRAND PRAIRIE RD SE
ALBANY OR, 97321

Q1. What is currently in place providing power to this development?

A1. The development is currently being provided temporary power for construction.

Q2. What is PAC requiring for permanent service to this development?

Analyst: drios

Open Date: 9/1/2022

A2. The customer is going to be installing 2-800amp pull sections and 1-1200amp pull sections that will provide the service to the three buildings with meter packs. There are to be a total of 35 units between the three buildings. Attached is the power design that was sent to the customer. The markup outlines metering requirements, the vault installation, trench and conduit installations, and clearance requirements. I have also attached the Pacific Power construction map that points to the requirements web site. The 225kva 3 phase transformer needed for the job was ordered in January and was received on August 18, 2022.

Q3. What is causing the delay in providing permanent power to this location? Please elaborate.

A3. The developer called our estimator on August 28, 2022 and advised him that their metering gear has been delayed until February and May of 2023. They asked at that time if Pacific Power was willing to make exceptions to the metering and allow one master meter. I explained that Rule 8 had just changed, but that they do not meet the criteria because the projected usage was too great to allow the single meter. Our Estimator discussed the issue with our metering Foreman and he said depending on what part of their equipment is delayed there may be some exceptions we could make, but they would not fit the criteria for a single meter. The exceptions that were discussed would be the height of the meters on the building. If the developer is having issues getting 3 pack meters, but could find 5 packs that would be an area the metering Foreman was willing to make the exception for. Our estimator contacted their electrician and asked what equipment was delayed and he confirmed that it was more than just the meter packs.

Q4 What do the account notes show regarding contact from the customer/agents about permanent service to this development?

A4. Pacific Power was waiting to receive payment to be able to schedule a pole installation so the customer can finish their conduit to the pole for the primary installation to the transformer vault. The customer was emailed the contract, costs, and easement on July 9, 2022 and the contract and easement were returned August 8, 2022 but the payment wasn't received until August 13, 2022. The communication with the customer about the metering took place over the phone (per A3) and an email was sent with a link to Rule 8 on September 9, 2022 after the customer requested the location of the rule (see attached email).

Q5. The customer is requesting one meter, which I understand is allowed under a recent docket if certain conditions are met. Has it been determined these conditions are not met? Please elaborate.

A5. Please refer to A3.

Q6. If he installs one meter to serve each building is that okay? If not, why?

A6. The change to rule 8 does allow for a single meter if certain criteria are met and the loading for each unit is more than the maximum allowable usage of 250 kWh per month. These will be single bed room units that are 661 sq. ft. per unit and two bed room units that are 960 sq. ft. per unit. Each unit has its own washer, dryer and water heater and all of the units will be all electric. According to the electrician there are no gas appliances. According to Pacific Powers loading standard, the units are projected to use 5kva per unit. This number is diversified for winter loading. With this load if the customer was home for 8hrs a day for 5 days a week they would use 823 kWh.

Q: Please provide any other relevant information that would be helpful addressing this complaint.

Analyst: drios

Open Date: 9/1/2022

This change to the rule is very new and our Estimator has not yet told the customer what they would need to provide to see if they meet any of the other requirements to for a single meter. The below criteria is what the customer must meet -

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

The burden of meeting the criteria in Oregon Rule 8. Section C, items 1-4, falls upon the developer. The developer needs to meet the criteria, which means providing documentation for each criterion before we will move ahead with master-metering.

If the developer wants to master-meter the individual apartments when construction is completed, for the interim before the ordered metering equipment arrives, they have to qualify for master-metering, even though they may choose to individually meter later on. If they qualify and want to master-meter now and convert to individual metering later on, we will have to address this in the special provisions section of the contract. In this case since they already have a contract, we will have to address the master metering in an amendment or a separate contract addressing just the metering. But the first step is the documentation of meeting the master-metering criteria.

Please let me know if you have any questions or concerns.

Thank you,

Risa Talo
Customer Advocacy and Customer Service
801-955-2435

9/19/2022 12:20:00 PM EMAIL FROM JULIAN/GP - SUGGESTED SPECS

From: Alpha Associates <alpha.associatesoffice@gmail.com>
Sent: Monday, September 19, 2022 12:20 PM
To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>; Mike Helms <michaelhelms810@gmail.com>; Paul Spies <spiespaul@gmail.com>; Ed Stanton <eds@emconstructors.com>; Mike Purcell <mikep@emconstructors.com>; jennifer@oregoncub.org; tucker.hill@pacificorp.com; CONWAY Bryan * PUC <Bryan.CONWAY@puc.oregon.gov>
Subject: assistance request on electrical service (file name 'Mike Purcell')

Hi Deanna;

Thanks for looking into this issue for us. Attached is a letter, along with

Analyst: drios

Open Date: 9/1/2022

layout drawings and specification sheets for equipment suggested. Our intention is to build the electrical system exactly as approved by Pacific Power, but supply chain issues for that gear is holding up 35 families from moving into this complex. We have designed and proposed a temporary solution that Pacific Power, so far, is not accepting. We're hoping to change that.. But it's a temporary solution only.. We're hoping, with your help, to move forward with this. I've copied all of the parties having a stake in this, so you have a way to communicate with any or all of us. Thanks

Regards;
Julian Johnson
General Partner

ALPHA ASSOCIATES OFFICE
2813 PACIFIC BLVD SW
ALBANY, OR 97321
(541) 928-7561 office
(541) 231-5744 cell
alpha.associatesoffice@gmail.com

9/19/2022 12:27:00 PM EMAIL FROM JULIAN - ATTACHMENTS

From: Alpha Associates <alpha.associatesoffice@gmail.com>
Sent: Monday, September 19, 2022 12:27 PM
To: jennifer@oregoncub.org; CONWAY Bryan * PUC <Bryan.CONWAY@puc.oregon.gov>; Mike Purcell <mikep@emconstructors.com>; Ed Stanton <eds@emconstructors.com>; tucker.hill@pacificorp.com; Paul Spies <spiespaul@gmail.com>; Mike Helms <michaelhelms810@gmail.com>; RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>
Subject: Back up to previous email

Deanna;
Sorry, I forgot the other attachments. Here they are.

Regards;
Julian Johnson
General Partner

9/23/2022 4:10:00 PM EMAIL TO RISA - UPDATED CASE & ATTACHMENTS

From: RIOS Deanna * PUC
Sent: Friday, September 23, 2022 4:10 PM
To: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>; Customer Advocacy Team <CustomerAdvocacyTeam@PacifiCorp.com>
Subject: RE: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - UPDATED CASE RECORD & ATTACHMENTS

Analyst: drios

Open Date: 9/1/2022

Hi Risa,

I am forwarding you the entire case and all the attachment so you have the latest information received the customer for your records and response. I am out of the office after I push send - hope you have a good weekend!

Deanna

9/26/2022 7:27:00 AM EMAIL FROM RISA - RESPONSE SENT 9/16, RECEIVED?

From: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>

Sent: Monday, September 26, 2022 7:27 AM

To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>

Cc: Customer Advocacy Team <CustomerAdvocacyTeam@PacifiCorp.com>

Subject: FW: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - AMENDED CASE RECORD

Good Morning Deanna,

This was sent to you September 16, 2022. Please let me know that you received it, you did not include it in the information you sent over.

Please let me know.

Thank you!

Risa Talo

Customer Advocacy and Customer Service

801-955-2435

9/27/2022 7:40:00 AM EMAIL FROM CUSTOMER - REQ STATUS

From: Mike Purcell <mikep@emconstructors.com>

Sent: Tuesday, September 27, 2022 7:40 AM

To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>

Subject: Grand Prairie Apts

Deanna, it has been several days since I last heard about the progress on your investigation about a temporary variance to the multi-meter rule for our apartment building. Can you give me an update so I can broadcast to our owner and other stake-holders?

9/29/2022 3:50:00 PM EMAIL TO RISA - LOCATED RESPONSE

From: RIOS Deanna * PUC

Sent: Thursday, September 29, 2022 3:50 PM

To: 'Talo, Florisa (PacifiCorp)' <Florisa.Talo@pacificorp.com>

Subject: RE: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - AMENDED CASE RECORD

Analyst: drios

Open Date: 9/1/2022

Hi Risa,

Cleaning out email and found it in my junk email. I have added it to the record and will let you know if I have any additional questions.

Thank you,
Deanna

9/30/2022 11:47:00 AM EMAIL TO MIKE P RE STATUS - RESPONSE TO GO OUT BY 10/4

From: RIOS Deanna * PUC
Sent: Friday, September 30, 2022 11:47 AM
To: Mike Purcell <mikep@emconstructors.com>
Subject: RE: Grand Prairie Apts

Hi Mike,

I received a response from Pacific Power and have circulated it internally to those who you contacted within the agency for any further comments. I will have a response to you no later than Tuesday afternoon.

Deanna Rios
Senior Compliance Specialist (Lead)
Hours: Tuesday-Friday 7:00-5:30
Oregon Public Utility Commission
Consumer Services Section
Tel: 503.378.6600 Toll free: 1.800.522.2404
deanna.rios@puc.oregon.gov

10/5/2022 3:31:00 PM EMAIL TO MIKE P - PAC'S REPOSE INC ATTACHMENTS(X3)

From: RIOS Deanna * PUC
Sent: Wednesday, October 5, 2022 3:31 PM
To: Mike Purcell <mikep@emconstructors.com>
Cc: WOLF Charla * PUC <Charla.WOLF@puc.oregon.gov>
Subject: Grand Prairie Apts - PACIFIC POWER'S RESPONSE
Importance: High

Hi Mike,

Below is the response I received from Pacific Power (PAC). Please share the information with the owner and other stakeholders for review and consideration. If there is additional information that PAC is unaware of, please provide that to me and I will forward it to their executive office.

I will be out of the office 10/6 - 10/18. If you have questions related to your case, my co-worker, Charla Wolf, will be monitoring your complaint for me. I have copied her in the event you need to

Analyst: drios

Open Date: 9/1/2022

reach me or have additional questions. I will touch base with you upon my return to the office in the event there are still unresolved issues.

Pacific Power Response:

"Grand Prairie Townhomes
2710 GRAND PRAIRIE RD SE
ALBANY OR, 97321

Q1. What is currently in place providing power to this development?

A1. The development is currently being provided temporary power for construction.

Q2. What is PAC requiring for permanent service to this development?

A2. The customer is going to be installing 2-800amp pull sections and 1-1200amp pull sections that will provide the service to the three buildings with meter packs. There are to be a total of 35 units between the three buildings. Attached is the power design that was sent to the customer. The markup outlines metering requirements, the vault installation, trench and conduit installations, and clearance requirements. I have also attached the Pacific Power construction map that points to the requirements web site. The 225kva 3 phase transformer needed for the job was ordered in January and was received on August 18, 2022.

Q3. What is causing the delay in providing permanent power to this location? Please elaborate.

A3. The developer called our estimator on August 28, 2022 and advised him that their metering gear has been delayed until February and May of 2023. They asked at that time if Pacific Power was willing to make exceptions to the metering and allow one master meter. I explained that Rule 8 had just changed, but that they do not meet the criteria because the projected usage was too great to allow the single meter. Our Estimator discussed the issue with our metering Foreman and he said depending on what part of their equipment is delayed there may be some exceptions we could make, but they would not fit the criteria for a single meter. The exceptions that were discussed would be the height of the meters on the building. If the developer is having issues getting 3 pack meters, but could find 5 packs that would be an area the metering Foreman was willing to make the exception for. Our estimator contacted their electrician and asked what equipment was delayed and he confirmed that it was more than just the meter packs.

Q4 What do the account notes show regarding contact from the customer/agents about permanent service to this development?

A4. Pacific Power was waiting to receive payment to be able to schedule a pole installation so the customer can finish their conduit to the pole for the primary installation to the transformer vault. The customer was emailed the contract, costs, and easement on July 9, 2022 and the contract and easement were returned August 8, 2022 but the payment wasn't received until August 13, 2022. The communication with the customer about the metering took place over the phone (per A3) and an email was sent with a link to Rule 8 on September 9, 2022 after the customer requested the location of the rule (see attached email).

Q5. The customer is requesting one meter, which I understand is allowed under a recent docket if certain conditions are met. Has it been determined these conditions are not met? Please elaborate.

Analyst: drios

Open Date: 9/1/2022

A5. Please refer to A3.

Q6. If he installs one meter to serve each building is that okay? If not, why?

A6. The change to rule 8 does allow for a single meter if certain criteria are met and the loading for each unit is more than the maximum allowable usage of 250 kWh per month. These will be single bed room units that are 661 sq. ft. per unit and two bed room units that are 960 sq. ft. per unit. Each unit has its own washer, dryer and water heater and all of the units will be all electric. According to the electrician there are no gas appliances. According to Pacific Powers loading standard, the units are projected to use 5kva per unit. This number is diversified for winter loading. With this load if the customer was home for 8hrs a day for 5 days a week they would use 823 kWh.

Q: Please provide any other relevant information that would be helpful addressing this complaint. This change to the rule is very new and our Estimator has not yet told the customer what they would need to provide to see if they meet any of the other requirements to for a single meter. The below criteria is what the customer must meet -

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

The burden of meeting the criteria in Oregon Rule 8. Section C, items 1-4, falls upon the developer. The developer needs to meet the criteria, which means providing documentation for each criterion before we will move ahead with master-metering.

If the developer wants to master-meter the individual apartments when construction is completed, for the interim before the ordered metering equipment arrives, they have to qualify for master-metering, even though they may choose to individually meter later on. If they qualify and want to master-meter now and convert to individual metering later on, we will have to address this in the special provisions section of the contract. In this case since they already have a contract, we will have to address the master metering in an amendment or a separate contract addressing just the metering. But the first step is the documentation of meeting the master-metering criteria."

Kind regards,

Deanna Rios
Senior Compliance Specialist (Lead)
Hours: Tuesday-Friday 7:00-5:30
Oregon Public Utility Commission
Consumer Services Section

Analyst: drios

Open Date: 9/1/2022

Tel: 503.378.6600 Toll free: 1.800.522.2404
deanna.rios@puc.oregon.gov

10/17/2022 9:48:00 AM EMAIL TO RISA - NEED UPDATE

From: WOLF Charla * PUC
Sent: Monday, October 17, 2022 9:48 AM
To: 'Talo, Florisa (PacifiCorp)' <Florisa.Talo@pacificorp.com>
Cc: 'Customer Advocacy (PUC)' <uswpuc@centurylink.com>
Subject: Grand Prairie Townhouses

Risa:

While Deanna is still out, can I get an update on this complaint. On 10/5, PAC was requiring the contractor to provide a few things. Has the contractor provided the documentation that you requested?

Has there been any other movement since 10/5?

Thank you.

Charla Wolf
Sr. Compliance Specialist
Consumer Services
Oregon Public Utility Commission
503-378-6600
1-800-522-2404
Charla.wolf@puc.oregon.gov

10/17/2022 10:23:00 AM EMAIL FROM RISA (PAC) - NO RECENT COMMUNICATION WITH CUSTOMER (BY CHARLA)

From: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>
Sent: Monday, October 17, 2022 10:23 AM
To: WOLF Charla * PUC <Charla.WOLF@puc.oregon.gov>
Cc: Customer Advocacy (PUC) <uswpuc@centurylink.com>
Subject: RE: Grand Prairie Townhouses

Good Morning Charla,

I have attached the last email I received from Deanna regarding this complaint. Our estimator went out to the location recently just to stake a pole, but otherwise Pacific Power has not heard anything back or received anything from the customers since their complaint was filed.

Please let me know if you have any additional questions or concerns.

Thank you,

Analyst: drios

Open Date: 9/1/2022

Risa Talo
Customer Advocacy and Customer Service
801-955-2435

10/17/2022 1:44:00 PM EMAIL TO MIKE P - CRITERIA MET? (BY CHARLA)

From: WOLF Charla * PUC <Charla.WOLF@puc.oregon.gov>
Sent: Monday, October 17, 2022 10:39:03 AM
To: mikep@emconstructors.com <mikep@emconstructors.com>
Cc: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>
Subject: Grand Prairie Apartments/OPUC

Hi Mike:

I'm unsure if you responded to Deanna while she is out. If you did, can you please forward the response to me.

Can the criteria below that PAC listed be met? If yes, what actions are you taking to respond to PAC?

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.

I look forward to an update from you.

Kind regards,

Charla Wolf
Sr. Compliance Specialist
Consumer Services
Oregon Public Utility Commission
503-378-6600
1-800-522-2404
Charla.wolf@puc.oregon.gov

10/17/2022 1:44:00 PM EMAIL FROM MIKE - WANT TEMP SINGLE METER APPROVAL (BY CHARLA)

From: Mike Purcell <mikep@emconstructors.com>

Analyst: drios

Open Date: 9/1/2022

Sent: Monday, October 17, 2022 1:44 PM
To: WOLF Charla * PUC <Charla.WOLF@puc.oregon.gov>; Mike Purcell <mikep@emconstructors.com>
Cc: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>
Subject: Re: Grand Prairie Apartments/OPUC

How can we get a temp approval for a single meter on these apts?

Sent from my Verizon, Samsung Galaxy smartphone
Get Outlook for Android

10/18/2022 11:17:00 AM EMAIL FROM MIKE HELMS/ALPHA ASSOC - PLZ CALL

-----Original Message-----

From: Michael Helms <michaelhelms810@gmail.com>
Sent: Tuesday, October 18, 2022 11:17 AM
To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>
Subject: Grand Prairie project Albany or

Hi Deanna

This is Mike with Alpha Associates in Albany, OR. I'm contacting in regards to the Grand Prairie project that we are on with Pacific Power. I was hoping to ask you some questions about their response and how to proceed. My number is 541-602-6793. Ty

10/18/2022 11:36:00 AM EMAIL TO MIKE P - NO RESPONSE TO 10/5 EMAIL/PLZ ADVISE

From: RIOS Deanna * PUC
Sent: Tuesday, October 18, 2022 11:36 AM
To: Mike Purcell <mikep@emconstructors.com>
Subject: OREGON PUC: Grand Prairie Apts - REQUEST FOR INFORMATION
Importance: High

Hi Mike,

I am aware you reached out to Senator Gelsler who in turn reached out to Senator Beyer and Senator Jama regarding this situation. Your contact with them was referred back to our agency. Have you had an opportunity to review the information I provided on 10/5 below, as I have not received a response from you?

Is the developer able to meet the required criteria below? If so, what actions have been taken? Please provide specific details.

If the developer is unable to meet the requirements, a waiver can be requested. However, the developer would still need to meet #1 below. Please advise.

Kind regards,

Analyst: drios

Open Date: 9/1/2022

Deanna Rios
Senior Compliance Specialist (Lead)

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.

10/18/2022 11:39:00 AM VOICE MAIL TO MIKE H - RETURNED CALL

I attempted to return Mike Helms' call. I left a detailed vm message advising I was aware of the Senator contacts and had just sent an email to Mike Purcell requesting some information. I advised the criteria in my email must be met by the developer. If that is not possible, a waiver may be filed, but the requirements of #1 must still be met. I provided my contact information for him to return my call.

10/18/2022 12:19:00 PM VOICE MAIL TO MIKE H TO CALL ME

I left a brief message asking Mike Helms at Alpha Associates to return my call.

10/18/2022 12:19:00 PM CALL FROM MIKE H @ ALPHA ASSOC - ELECTRICIAN

Mike returned my call to provide some additional information about the electrical load.

He said there is no central air; everything has already been built. He said they will not be able to overcome the 5 KW load. There is no way to lower the load given the set up in each unit. Based on the response from PAC, they are nearly double the allowed load. In order to qualify with a zero lot line, would require a full redo. They are looking for a temporary exception.

Mike said they are not looking to fall permanently under the waiver; the temp solution is only needed until the right parts come in. He said they are willing to work any angles, as they have the parts for the temporary installation.

We discussed the issue with Building Codes. Mike was wondering if anyone is able to overcome the Building Codes issue. I told him I did not know since it is not something our agency has control over.

I thanked him for this information and let him know I would be providing it to my manager for further review.

10/19/2022 7:34:00 AM EMAIL FROM MIKE P - BACK TO ORIGINAL QUESTION/WAIVER?

From: Mike Purcell <mikep@emconstructors.com>

Sent: Wednesday, October 19, 2022 7:34 AM

Analyst: drios

Open Date: 9/1/2022

To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>

Subject: RE: OREGON PUC: Grand Prairie Apts - REQUEST FOR INFORMATION

Deanna, I know you had conversations with our electrical contractor concerning this. This project does not qualify under the strict terms of the master meter rules. I am back to my original question. Is it possible to get a temporary exemption to the rule given the difficult times with supply chain issues currently being experienced in the industry? What needs to happen to get this change? This project is affordable housing at a time when there is a critical lack of housing on the market. Would going to the media and press be a way to highlight the issue so that the PUC would create a temporary rule change until the marketplace changes?

10/19/2022 8:55:00 AM EMAIL TO MIKE P & MIKE H - BUILDING CODES INFO/REQ MEETING

From: RIOS Deanna * PUC

Sent: Wednesday, October 19, 2022 8:55 AM

To: mikep@emconstructors.com; michaelhelms810@gmail.com

Subject: FW: OREGON PUC: Grand Prairie Apts - REQUEST FOR INFORMATION

Importance: High

Good morning,

I did speak with Mike Helms yesterday right after I sent the email to you. Mike advised the conditions stated below in #1 and #4 could not be met. He stated they would not be able to overcome the Oregon Building Codes criteria; however, we did not have further discussion of why this could not be overcome. Has anyone on this project contacted Oregon Building Codes to discuss the documentation requested? (1. Documentation that the multiple residential units have received the necessary exemptions to individual metering as required by the Oregon State Building Code,) Who are they working with there and what was the outcome? I ask because the PUC cannot grant a waiver for another agency's rules or code requirements.

That being said, once I have the information about Building Codes for review and possible further contact, I would like to set up a meeting with PUC (myself, my manager, safety staff), Pacific Power (district manager, estimator, regulatory liaison), and whomever you would like to have as a representative(s) on the Teams or Zoom call. If you would also provide the names of those you would like in attendance and their contact information, I can schedule a meeting. I will also need dates and times of availability over the next two weeks. My goal is to meet next week if schedules allow. The meeting will be informal with the intent to mediate or talk through any other options.

There is nothing that prevents a party from seeking a waiver; however, if the required criterion are not met, it is unlikely the waiver would be granted. Approval would require a temporary waiver, but we would have to know the status of PAC's four requirements, especially the Oregon Building Code issue. Any request would be analyzed by staff, which would include information requests, and ultimately bringing it to a public meeting with a recommendation to the Commission.

I look forward to receiving this information to see if we can work towards either a mediated solution or a waiver.

Analyst: drios

Open Date: 9/1/2022

Thank you,

Deanna Rios
Senior Compliance Specialist (Lead)

10/19/2022 3:02:00 PM EMAIL FROM MIKE P - CHECKING W/BLDG CODES & WANTS TO MEET

From: Mike Purcell <mikep@emconstructors.com>
Sent: Wednesday, October 19, 2022 3:02 PM
To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>
Subject: RE: OREGON PUC: Grand Prairie Apts - REQUEST FOR INFORMATION

Deanna, thank you for the response. We are seeing if there is any appeal on the building code issue. Yes we will make ourselves available for a zoom meeting any time you select next week. Please send the invite to: mikep@emconstructors.com, eds@emconstructors.com, spiespaul@gmail.com, Helms at michaelhelms810@gmail.com,

10/20/2022 9:45:00 AM EMAIL TO RISA - REQ INFORMAL MTG

From: RIOS Deanna * PUC
Sent: Thursday, October 20, 2022 9:45 AM
To: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>
Cc: NOTTINGHAM Melissa * PUC <melissa.nottingham@puc.oregon.gov>
Subject: RE: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - REQUEST INFORMAL MEETING W/PARTIES

Hi Risa,

I have been talking internally with PUC staff, Melissa and various people working on the Grand Prairie Townhomes development. After much back and forth, it has been decided it would be best if we can set up a Teams meeting for all parties.

PUC would include: myself, Melissa and possibly one of our safety staff.
PAC we would like: you, the district manager and the estimator (any others you deem necessary).
From Grand Prairie they have asked the following people be invited - mikep@emconstructors.com (Mike Purcell/contractor), eds@emconstructors.com, spiespaul@gmail.com (Paul Spies/managing partner), michaelhelms810@gmail.com (Michael Helms/Alpha Associates/electrical contractor).

If possible, I would like to set this meeting for next week if schedules will allow. Tuesday, Thursday or Friday work best for me. Wednesdays are filled with weekly meetings. Please reach out to PAC staff to see what days/times they have available over the next two weeks. Let me know and I will set up the meeting if PAC is agreeable to meet.

Thanks,
Deanna

Analyst: drios

Open Date: 9/1/2022

10/26/2022 11:02:00 AM EMAIL TO RISA - FLUP MTG REQUEST

From: RIOS Deanna * PUC
Sent: Wednesday, October 26, 2022 11:02 AM
To: 'CustomerAdvocacy@PacifiCorp.com' <CustomerAdvocacy@PacifiCorp.com>
Cc: 'Talo, Florisa (PacifiCorp)' <Florisa.Talo@pacificorp.com>; NOTTINGHAM Melissa * PUC <melissa.nottingham@puc.oregon.gov>; CASWELL Heide * PUC <Heide.CASWELL@puc.oregon.gov>
Subject: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - REQUEST INFORMAL MEETING W/PARTIES (2nd REQUEST)
Importance: High

Good morning Risa,

I have been out of the office, so I apologize for the delayed follow up. I have not received a response to my email request below. Please advise as soon as possible.

Thank you,
Deanna

10/26/2022 11:41:00 AM EMAIL FROM RISA - MEDIATION?

From: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>
Sent: Wednesday, October 26, 2022 11:41 AM
To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>; Customer Advocacy Team <CustomerAdvocacyTeam@PacifiCorp.com>; _Tariff Policy <TariffPolicy@PacifiCorp.com>
Cc: NOTTINGHAM Melissa * PUC <Melissa.NOTTINGHAM@puc.oregon.gov>; CASWELL Heide * PUC <Heide.CASWELL@puc.oregon.gov>; Hoskins, Amy (PacifiCorp) <Amy.Hoskins@pacificorp.com>
Subject: RE: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - REQUEST INFORMAL MEETING W/PARTIES (2nd REQUEST)
Importance: High

Good Afternoon Deanna,

I also apologize, I've been out of the office since October 19, 2022, and just returned today. Customeradvocacyteam@pacificorp.com is the email every request should be sent to so nothing is missed.

I will check with my group and our field personnel to see if and when they are available for a meeting. Please provide us with an agenda for the meeting that you are requesting and confirm whether or not this is will be a mediation.

Thank you,

Risa Talo
Customer Advocacy and Customer Service

Analyst: drios

Open Date: 9/1/2022

801-955-2435

10/26/2022 11:58:00 AM EMAIL TO RISA BY MELISSA - VOLUNTARY DISCUSSION

From: NOTTINGHAM Melissa * PUC

Sent: Wednesday, October 26, 2022 11:58 AM

To: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>; RIOS Deanna * PUC

<Deanna.RIOS@puc.oregon.gov>; Customer Advocacy Team

<CustomerAdvocacyTeam@PacifiCorp.com>; _Tariff Policy <TariffPolicy@PacifiCorp.com>

Cc: CASWELL Heide * PUC <Heide.CASWELL@puc.oregon.gov>; Hoskins, Amy (PacifiCorp)

<Amy.Hoskins@pacificorp.com>

Subject: RE: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - REQUEST INFORMAL MEETING W/PARTIES (2nd REQUEST)

Risa,

This is not mediation. The customer will not be in attendance.

To level set, this is informal voluntary discussion. I thought a conversation would expedite the process.

The other option would be to email questions back and forth.

Let me know how the company would like to proceed.

Thanks,
Melissa

10/26/2022 11:59:00 AM EMAIL TO RISA - YES, MEDIATION

From: RIOS Deanna * PUC

Sent: Wednesday, October 26, 2022 11:59 AM

To: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>; Customer Advocacy Team

<CustomerAdvocacyTeam@PacifiCorp.com>; _Tariff Policy <TariffPolicy@PacifiCorp.com>

Cc: NOTTINGHAM Melissa * PUC <melissa.nottingham@puc.oregon.gov>; CASWELL Heide * PUC

<Heide.CASWELL@puc.oregon.gov>; Hoskins, Amy (PacifiCorp) <Amy.Hoskins@pacificorp.com>

Subject: RE: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - REQUEST INFORMAL MEETING W/PARTIES (2nd REQUEST)

Oh dang, I'm sorry to hear that. Hope you are feeling better! I understand there was some back and forth with the email address for customer advocacy and it was all corrected prior to today. We would like to facilitate an informal conversation with the company and customer. It is a mediation to get all parties involved at the table to see if there are any alternatives available and what those would look like.

Thank you,
Deanna

Analyst: drios

Open Date: 9/1/2022

10/26/2022 12:02:00 PM EMAIL TO RISA - FLUP TO 10/20 REQUEST

From: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>

Sent: Wednesday, October 26, 2022 12:02 PM

To: CustomerAdvocacy@PacifiCorp.com

Cc: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>; NOTTINGHAM Melissa * PUC <Melissa.NOTTINGHAM@puc.oregon.gov>; CASWELL Heide * PUC

<Heide.CASWELL@puc.oregon.gov>

Subject: [INTERNET] OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - REQUEST INFORMAL MEETING W/PARTIES (2nd REQUEST)

Importance: High

Good morning Risa,

I have been out of the office, so I apologize for the delayed follow up. I have not received a response to my email request below. Please advise as soon as possible.

Thank you,
Deanna

10/26/2022 12:03:00 PM EMAIL TO RISA - DISREGARD PREV EMAIL

From: NOTTINGHAM Melissa * PUC <Melissa.NOTTINGHAM@puc.oregon.gov>

Sent: Wednesday, October 26, 2022 12:03 PM

To: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>; RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>; Customer Advocacy Team

<CustomerAdvocacyTeam@PacifiCorp.com>; _Tariff Policy <TariffPolicy@PacifiCorp.com>

Cc: CASWELL Heide * PUC <Heide.CASWELL@puc.oregon.gov>; Hoskins, Amy (PacifiCorp) <Amy.Hoskins@pacificorp.com>

Subject: RE: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - REQUEST INFORMAL MEETING W/PARTIES (2nd REQUEST)

Risa,

Completely disregard this email. I am sorry!

I was thinking this was another complaint.

The meeting for Grand Prairie will include the customers. It is a voluntary meeting of the parties to see if any options are available to bring service to the townhomes.

The commission understands the company is following its tariff on the master metering requirements.

Our hope is a conversation with all parties might produce a creative solution or close the issue.

Please let me know if you have any questions.

Analyst: drios

Open Date: 9/1/2022

I apologize for the confusion. At first, I thought it was related to the Heim complaint.

Melissa

10/28/2022 8:27:00 AM EMAIL FROM CUSTOMER - SAME ?/PROCESS FOR TEMP RULE REVISION

From: Mike Purcell <mikep@emconstructors.com>
Sent: Friday, October 28, 2022 8:27 AM
To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>
Subject: RE: OREGON PUC: Grand Prairie Apts - REQUEST FOR INFORMATION

Is there a process where we can request a temporary rule revision for our situation?

10/28/2022 10:37:00 AM EMAIL TO RISA BY MELISSA - ANY UPDATES

From: NOTTINGHAM Melissa * PUC <Melissa.NOTTINGHAM@puc.oregon.gov>
Sent: Friday, October 28, 2022 10:37 AM
To: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>; RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>; Customer Advocacy Team <CustomerAdvocacyTeam@PacifiCorp.com>; _Tariff Policy <TariffPolicy@PacifiCorp.com>
Cc: CASWELL Heide * PUC <Heide.CASWELL@puc.oregon.gov>; Hoskins, Amy (PacifiCorp) <Amy.Hoskins@pacificorp.com>
Subject: RE: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - REQUEST INFORMAL MEETING W/PARTIES (2nd REQUEST)

Risa

We would like to get this set up as soon as possible.

Any updates?

Thank you,
Melissa

10/28/2022 1:33:00 PM EMAIL TO MIKE P - STATUS OF MTG/BLDG CODES STATUS?

From: RIOS Deanna * PUC
Sent: Friday, October 28, 2022 1:33 PM
To: Mike Purcell <mikep@emconstructors.com>
Cc: NOTTINGHAM Melissa * PUC <melissa.nottingham@puc.oregon.gov>
Subject: RE: OREGON PUC: Grand Prairie Apts - REQUEST FOR INFORMATION

Mike,

Analyst: drios

Open Date: 9/1/2022

I understand your frustration. I was hoping to have the meeting scheduled this week. I have all PUC members and your folks on board to schedule. I am currently waiting on Pacific Power (PAC) to get me available dates for their team who will be attending. It's looking like it will be next week now. I have also discussed your situation at length with my manager regarding any alternatives. This is the best path given this project does not meet PAC's requirements for a master meter situation.

For clarification, is the master meter base already inspected and approved by the county?

If not, what discussions have you had with the county about approving a "temporary" master meter for a building originally designed for multiple meters.

Are you requesting a waiver to Pacific Power's master metering rule, or a waiver of building codes?

This additional information will help guide us to the proper jurisdiction and how we can or cannot be able to help.

Please let me know if you no longer wish to have an informal meeting. Otherwise, I will push for the meeting to be scheduled next week.

Kind regards,

Deanna

10/28/2022 2:40:00 PM EMAIL FROM RISA TO MELISSA - CHECKING ON UNEXPLORED ALTERNATIVES W/FIELD

From: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>

Sent: Friday, October 28, 2022 2:40 PM

To: NOTTINGHAM Melissa * PUC <Melissa.NOTTINGHAM@puc.oregon.gov>; RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>; Customer Advocacy Team

<CustomerAdvocacyTeam@PacifiCorp.com>; _Tariff Policy <TariffPolicy@PacifiCorp.com>

Cc: CASWELL Heide * PUC <Heide.CASWELL@puc.oregon.gov>; Hoskins, Amy (PacifiCorp) <Amy.Hoskins@pacificorp.com>

Subject: RE: RE: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - REQUEST INFORMAL MEETING W/PARTIES (2nd REQUEST)

Good Afternoon Melissa,

We truly appreciate your request for an informal meeting to try to find a resolution for this customer. I will speak with our local field office and management to see if there are any other alternatives we have not looked at or provided already and I will get back to you as soon as possible.

Are there any other questions or concerns that you may have that I can pass along for you in the mean time?

Please let me know.

Analyst: drios

Open Date: 9/1/2022

Thank you,

Risa Talo
Customer Advocacy and Customer Service
801-955-2435

11/1/2022 1:07:00 PM EMAIL FROM RISA TO MELISSA - OK TO CONTACT CUSTOMER?

From: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>
Sent: Tuesday, November 1, 2022 1:07 PM
To: NOTTINGHAM Melissa * PUC <Melissa.NOTTINGHAM@puc.oregon.gov>; RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>; Customer Advocacy Team <CustomerAdvocacyTeam@PacifiCorp.com>; _Tariff Policy <TariffPolicy@PacifiCorp.com>
Cc: CASWELL Heide * PUC <Heide.CASWELL@puc.oregon.gov>; Hoskins, Amy (PacifiCorp) <Amy.Hoskins@pacificorp.com>
Subject: RE: RE: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - REQUEST INFORMAL MEETING W/PARTIES (2nd REQUEST)
Importance: High

Good Afternoon Melissa,

May we reach out to the customer directly to get clarification on what specific equipment they are still waiting on/missing please?

Please let me know.

Thank you,

Risa Talo
Customer Advocacy and Customer Service
801-955-2435

11/1/2022 4:21:00 PM EMAIL TO RISA BY MELISSA - REQ FLUP W/CARY & ADDL LOAD ?S

From: NOTTINGHAM Melissa * PUC <Melissa.NOTTINGHAM@puc.oregon.gov>
Sent: Tuesday, November 1, 2022 4:21 PM
To: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>
Cc: _Tariff Policy <TariffPolicy@PacifiCorp.com>; PUC_GR-CONSUMER <PUC_consumer@puc.oregon.gov>
Subject: Grand Prairie Townhomes

Risa,

Thank you for the call today.

Analyst: drios

Open Date: 9/1/2022

Please let me know about Cary's conversation with the developer as soon as you can. Hopefully, they can work out a compromise.

If we could get some recommended times for meeting by tomorrow?

Could you also check on the forecasted load information provided in your prior response?

The 250 kwh per unit is after heating and cooling and I am not sure if the estimator's calculation took that into consideration.

Thank you,

Melissa Nottingham (She, Her, Hers)
Manager, Consumer Services & RSPF Program
Oregon Public Utility Commission
201 High Street SE, Salem, OR 97301
(503) 689-7646

11/2/2022 11:19:00 AM EMAIL FROM RISA - LOAD INFO/MORE EQUIP ISSUES

From: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>
Sent: Wednesday, November 2, 2022 11:19 AM
To: NOTTINGHAM Melissa * PUC <Melissa.NOTTINGHAM@puc.oregon.gov>
Cc: _Tariff Policy <TariffPolicy@PacifiCorp.com>; PUC_GR-CONSUMER <PUC_consumer@puc.oregon.gov>; Customer Advocacy Team <CustomerAdvocacyTeam@PacifiCorp.com>
Subject: RE: Grand Prairie Townhomes
Importance: High

Good Afternoon Melissa,

Cary Ann had our Estimator reach out to the developer's electrician. The first section below is the response to your question from our Estimator about the load calculation and the italicized section is a summary of the conversation he had with their electrician this morning -

Pacific Powers loading standard doesn't have an option for loading without taking into account heating and cooling. The calculation I showed in my previous email was as good of a guess as I could with the information from the customer and using Pacific Powers standard.

The customers units are all electric and for the square footage Pacific Powers standard shows a demand of 8-9kw. I used 5kw as a guess because each unit has a washer and dryer and a water heater. Below is the table from Pacific Powers standard that I used for my example.

[See attached email, which includes the table.]

Analyst: drios

Open Date: 9/1/2022

For the customer to meet the 250 kwh criteria they would have to provide reasonable substantiation of the load projection. One more example, if the projected load to each unit is 1kw and each unit has that amount of load for 8hrs a day for 30 days, the kwh would be 240. I don't believe these units with electric range, electric water heater, and washers/dryers are going to be able to stay under the 250 kwh to meet the criteria of Master Metering.

The language in Rule 8, Section I.C. requires the applicant to provide reasonable substantiation of the load projection of their units. The Company's responsibility is to review the information submitted for its reasonableness.

I called the electrician and he said he is missing components for the main disconnect. He said he has some meter stacks but not anywhere close to the amount he needs for the project. He says he cant get any 3 or 4 stack meter bases. I discussed this with the Metering Foreman and his stance is each unit needs to be individually metered per the Tariff and single metering points as a "temporary" solution has already been vetted and denied in multiple locations for other customers. He also said as long as each unit is individually metered we are open to make exceptions to the ESR metering install spec. If the customer can come up with a solution that shows all units individually metered we will review it and see what exceptions can be made. I called the electrician to see if he could source any other metering configuration for the meter bases and he said he cant. He explained the gear is rated for the fault current and the busing in the meter stacks gets the AIC down to below 10k at each meter to coordinate with the disconnect at each meter. He said some of the gear is now scheduled to arrive in February but the largest buildings gear is still scheduled to arrive in May.

I am happy to schedule the TEAMS meeting for everyone for tomorrow morning - what time works best for your group and who would you like us to add to the meeting?

Please let me know.

Thank you so much,

Risa Talo
Customer Advocacy and Customer Service
801-955-2435

11/2/2022 3:29:00 PM CALL TO MIKE P FOR ADD'L INFORMATION

I called Mike to follow up on the email I sent him. I asked if they have had any contact with Building Codes and whether they have requested an inspection with the county/city? They have not contacted the City of Albany for an inspection.

He said a request was put in with the energy expert of Building Codes; she has not responded to him yet.

He said PAC spoke with his electrician and wanted particulars that Mike P did not have available.

Analyst: drios

Open Date: 9/1/2022

He said the project is 94% complete. They are currently installing appliances, hardware, and the landscaping.

11/2/2022 3:50:00 PM CALL TO CARY ANN/PAC BY MELISSA - DISCUSSED REQUIREMENTS

From: NOTTINGHAM Melissa * PUC <Melissa.NOTTINGHAM@puc.oregon.gov>

Sent: Thursday, November 10, 2022 11:48 AM

To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>

Cc: WOLF Charla * PUC <Charla.WOLF@puc.oregon.gov>

Subject: RE: Grand Prairie Townhomes - Call to Mike Purcell

11/2/2022 @ 3:50 pm

Spoke with Pacific Power distribution manager Cary Ann Bailey. We discussed the metering requirements for Grand Prairie.

Cary Ann reiterated the estimator contact the electrician for the development and reported back to her the customer was missing gears for the disconnect switch in addition to the multi-meter bases and was told the disconnect switch was required regardless of the type of metering. We discussed the load per unit calculation and how the load exceeded the tariff. The company strives to have consistent application for the tariffs. To many variances are contrary to having tariffs and standards in place. Also, she was concerned about a "temporary" installation as the company would have no leverage to request the builder to convert back to a multi-meter base after the "temporary" option becomes permanent. I encouraged her to continue to work with the customer to find a resolution.

11/3/2022 9:03:00 AM EMAIL FROM ED/E&M - CONTACTS WITH BLDG CODES & CITY OF ALBANY

From: Ed Stanton <eds@emconstructors.com>

Sent: Thursday, November 3, 2022 9:03 AM

To: John Balkema (johnathan.balkema@cityofalbany.net) <johnathan.balkema@cityofalbany.net>

Cc: Michael Helms (michaelhelms810@gmail.com) <michaelhelms810@gmail.com>; Paul Spies (spiespaul@gmail.com) <spiespaul@gmail.com>; Derek Dustman (derekdustman@gmail.com) <derekdustman@gmail.com>; RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>; Tucker Hill (Tucker.hill@pacificcorp.com) <Tucker.hill@pacificcorp.com>; ANDERSON William K * DCBS <William.K.ANDERSON@dcbs.oregon.gov>; Mike Purcell <mikep@emconstructors.com>

Subject: FW: Grand Prairie Apts, Albany

Mr. Johnathan Balkema,
City Of Albany Building Official,

We have received a temporary variance from Keith Anderson (Electrical Program Chief) regarding temporary Master metering condition for the Grand Prairie project.

The Developer Mr. Paul Spies is anticipating this variance can be approved by your department so that the project can move forward with the variance until the Approved Submitted switch gear can be installed.

Analyst: drios

Open Date: 9/1/2022

Note our Electrical contractor is Michael Helms of Alpha & Associates (541-602-6793)

Please contact me and Mr. Helms regarding any question regarding this issue.
Thank you for your assistance in this matter.

Ed Stanton
Superintendent
E & M Constructors, LLC. | PO Box 80638 | Portland, OR 97280
Phone: 503.445.6340 | cell: 503.577.5806 | fax: 503.445.6347 | CCB

From: Mike Purcell <mikep@emconstructors.com>
Sent: Thursday, November 3, 2022 8:42 AM
To: Paul Spies <spiespaul@gmail.com>; Ed Stanton <eds@emconstructors.com>; Michael Helms <mike.helms@alpha-associates-svcs.com>
Subject: Fwd: Grand Prairie Apts, Albany

From: ANDERSON William K * DCBS <William.K.ANDERSON@dcbs.oregon.gov>
Sent: Thursday, November 3, 2022 8:36:14 AM
To: 'mikep@emconstructors.com' <mikep@emconstructors.com>
Cc: MCMULLEN Eric T * DCBS <Eric.T.MCMULLEN@dcbs.oregon.gov>; THOMAS Kelly I * DCBS <Kelly.I.THOMAS@dcbs.oregon.gov>; 'johnathan.balkema@cityofalbany.net' <johnathan.balkema@cityofalbany.net>; 'eric@emeriodesign.com' <eric@emeriodesign.com>
Subject: RE: Grand Prairie Apts, Albany

Mike, any variance would come from the local building department. Under current supply chain issues, it is not unreasonable to ask for or grant a temporary variance until the equipment is available. I have attached some docs that address a similar issue on a more permanent basis.

Keith Anderson
Electrical Program Chief
503-798-7350 cell
William.K.Anderson@dcbs.oregon.gov

From: Mike Purcell <mikep@emconstructors.com>
Sent: Wednesday, November 2, 2022 3:51 PM
To: Eric Evans <eric@emeriodesign.com>; MCMULLEN Eric T * DCBS <Eric.T.MCMULLEN@dcbs.oregon.gov>
Subject: Grand Prairie Apts, Albany

Eric, I am the general contractor for a 35 unit apartment building located in Albany, OR. This 3-building complex consists of smaller 1 & 2 bedroom units that will be affordable for working people. The project is 90% complete and our electrical service equipment will not be available to us until April of next year due to supply chain issues. We can use a single meter to immediately provide power as

Analyst: drios

Open Date: 9/1/2022

an emergency temporary measure. Is there a process to obtain a temporary variance for the individual metering requirement in the building code while waiting for the equipment to be manufactured and delivered? We have been in contact with Pacific Power, our utility, who say they are bound by PUC rules. The PUC may be open to a variance for this situation if allowed by the building division.

Mike Purcell
Project Manager
E & M Constructors, LLC. | PO Box 80638 | Portland, OR 97280
Phone: 503.445.6340 | cell: 503.577.5801 | fax: 503.445.6347 | CCB#: 187780

11/3/2022 9:38:00 AM EMAIL TO RISA FROM MELISSA - CALL W/CARY ANN(PAC ESTIMATOR)-NO D/C SWITCH

From: NOTTINGHAM Melissa * PUC <Melissa.NOTTINGHAM@puc.oregon.gov>
Sent: Thursday, November 3, 2022 9:38 AM
To: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>; RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>
Cc: _Tariff Policy <TariffPolicy@PacifiCorp.com>; Customer Advocacy Team <CustomerAdvocacyTeam@PacifiCorp.com>
Subject: RE: RE: Grand Prairie Townhomes

Risa,

I spoke with Cary Ann yesterday and it was a very helpful conversation.

As stated below, the electrician reports the gears for the disconnect switches is also unavailable. Disconnect switches are required regardless of the type of metering.

Mr. Purcell continues to request a waiver to Tariff 8 (l) c , the commission staff cannot request a waiver to a company tariff unless it is tied to a proceeding like a rate case or a public meeting hearing.

Since the lack of customer equipment expands beyond the type of metering and no proceeding currently exists for commission staff to request the commission to review a waiver, I would recommend waiting on a meeting.

Please continue to communicate with the electrician and the developer to move towards connecting service.

Deanna will be communicating this information to Mr. Purcell.

Thank you,
Melissa

11/3/2022 9:51:00 AM EMAIL FROM RISA TO MELISSA - WILL RELAY INFO

Analyst: drios

Open Date: 9/1/2022

From: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>
Sent: Thursday, November 3, 2022 9:51 AM
To: NOTTINGHAM Melissa * PUC <Melissa.NOTTINGHAM@puc.oregon.gov>; RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>
Cc: _Tariff Policy <TariffPolicy@PacifiCorp.com>; Customer Advocacy Team <CustomerAdvocacyTeam@PacifiCorp.com>
Subject: RE: RE: RE: Grand Prairie Townhomes

Good Morning Melissa,

Thank you so much - I will pass this information along to everyone and keep you all updated on this project.

Have a great day!

Risa Talo
Customer Advocacy and Customer Service
801-955-2435

11/4/2022 10:36:00 AM CALL TO MIKE P - NO D/C SWITCHES & NO CURRENT PROCEEDING

I called Mike to let him know I learned they do not have the disconnect switches. I explained d/c switches are required regardless of the type of meter. Without those, nothing is going to get approved, as safety is always priority.

Mike said this was not correct information. I told him I was informed PACs's regulatory liaison spoke with the electrician who advised they don't have the d/c switches. He said this was incorrect and wanted to speak with Mike Helms. I offered to read to him what was said, but he declined and said he wanted to speak with Mike H first.

11/4/2022 11:03:00 AM CALL FROM MIKE H RE SWITCHES

Mike called to let me know there is some miscommunication about the d/c switches. He said they have the main gear, but they don't have all the main breakers and meter stacks. Because his call kept cutting in/out, I asked him to send me an email regarding what they have and I will forward it to my manager.

He said he also spoke with Tucker at PAC today to relay the same information. I asked if Tucker was going to relay that information to Risa; he said Tucker would but it takes a bit to go through the various channels before his information will reach Risa, so he wanted Mike to call me.

I explained without the d/c switches the tariff would not be waived and PAC has the final say. Mike said Tucker has told them that from the beginning; however, Mike said they have to do whatever they can in an attempt to not let their client lose their money on this investment.

11/4/2022 11:22:00 AM EMAIL FROM MIKE H - MISSING MAIN SWITCHES & METER SECTIONS

From: Michael Helms <mike.helms@alpha-associates-svcs.com>

Analyst: drios

Open Date: 9/1/2022

Sent: Friday, November 4, 2022 11:22 AM

To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>; Mike Purcell <mikep@emconstructors.com>; Ed Stanton <eds@emconstructors.com>; Tucker Hill (Tucker.hill@pacificorp.com) <tucker.hill@pacificorp.com>
Subject: Grand Prairie

Hi Deanna

Mike from alpha associates here. To clear up the conversation we had today. We are missing the main switches and meter sections for the permanent metering equipment. Those are delayed till mid next year from the manufacturer. We do have all the parts secured for the temporary solution. We are still seeking the waiver from BCD, and PUC in hopes that pacific power can allow the temporary metering.

11/4/2022 1:18:00 PM EMAIL TO RISA - RE FLUP W/TUCKER

From: RIOS Deanna * PUC
Sent: Friday, November 4, 2022 1:18 PM
To: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>; NOTTINGHAM Melissa * PUC <melissa.nottingham@puc.oregon.gov>
Cc: _Tariff Policy <TariffPolicy@PacifiCorp.com>; Customer Advocacy Team <CustomerAdvocacyTeam@PacifiCorp.com>
Subject: RE: RE: RE: Grand Prairie Townhomes - Discussion w/Tucker

Hi Risa,

I spoke with both Mike Purcell and Mike Helms this morning. They stated there is a misunderstanding regarding the disconnect switches. Mike H informed me he spoke with Tucker this morning just prior to calling me to straighten out some miscommunication regarding the disconnect switches. I understand this information is supposed to be relayed to you. If you could follow up with Tucker, I would appreciate it.

Deanna Rios
Hours: Tuesday-Friday 7:00-5:30
Sr Compliance Specialist (Lead)
Consumer Services Section
Oregon Public Utility Commission
Cell: 971.375.5100
deanna.rios@puc.oregon.gov

11/7/2022 9:33:00 AM EMAIL FROM J. BALKEMA/CITY OF ALBANY - NO CONCERNS/MUST MEET OESC & PASS INSPECTION

From: Balkema, Johnathan <Johnathan.Balkema@cityofalbany.net>
Sent: Monday, November 7, 2022 9:33 AM
To: Ed Stanton <eds@emconstructors.com>

Analyst: drios

Open Date: 9/1/2022

Cc: Michael Helms (michaelhelms810@gmail.com) <michaelhelms810@gmail.com>; Paul Spies (spiespaul@gmail.com) <spiespaul@gmail.com>; Derek Dustman (derekdustman@gmail.com) <derekdustman@gmail.com>; RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>; Tucker Hill (Tucker.hill@pacificorp.com) <Tucker.hill@pacificorp.com>; ANDERSON William K * DCBS <William.K.ANDERSON@dcbs.oregon.gov>; Mike Purcell <mikep@emconstructors.com>; Godsey, Philip <Philip.Godsey@cityofalbany.net>
Subject: RE: Grand Prairie Apts, Albany

Good morning, Ed-

I spoke with our commercial electrical inspector and we would not have any concerns about allowing a common master meter in this project due to supply restraints, with the caveat any alterations needed to achieve such installation meets the OESC and is inspected by our office.

Please let us know if we can be of any further assistance.

Thank you,

Johnathan Balkema
Building Official Manager
541-791-0199 phone | 541-917-7598 fax
Community Development
City of Albany, Oregon
333 Broadalbin St SW, Albany, Oregon 97321
www.cityofalbany.net

11/7/2022 1:14:00 PM EMAIL FROM MIKE P - CITY CLEARANCE - MTG NOW?

From: Mike Purcell <mikep@emconstructors.com>
Sent: Monday, November 7, 2022 1:14 PM
To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>
Subject: FW: Grand Prairie Apts, Albany

Deanna, per the below email from the City of Albany, we now have approval of the Building Codes division and the Building department for the location of our project, will you be scheduling the conference call now?

Mike Purcell
Project Manager
E & M Constructors, LLC. | PO Box 80638 | Portland, OR 97280
Phone: 503.445.6340 | cell: 503.577.5801 | fax: 503.445.6347 | CCB#: 187780

11/9/2022 2:52:00 PM VOICE MAIL TO MIKE P TO CALL ME - EXHAUSTED INFORMAL LEVEL

Analyst: drios

Open Date: 9/1/2022

I called Mike to let him know I have exhausted the informal level of his complaint. I have worked with my manager and PAC regarding the situation. If the goal of the meeting was to obtain the waiver, that will not happen because the tariff conditions are not being met with regard to the load.

I asked him to return my call so we can touch base on the complaint. I provide my hours of availability and our contact information.

11/9/2022 4:23:00 PM CALL FROM MIKE P - WANTS FORMAL

Mike returned my call and I let him know the informal process has been exhausted. There is nothing more I can do at the informal level. PAC is not going to agree to the waiver because they cannot meet the conditions of the tariff for the load. It is possible the set up would pass city inspection but not PAC's final inspection.

He asked if there was an appeal process with PAC. I advised they can file a formal complaint with the Commission. The issue will be reviewed by our administrative hearings division by one of our judges.

Mike asked if the form was available online. He also asked for a copy of the tariff. I advised he will receive a copy of his complaint to go along with the formal packet. I will send the forms to him tomorrow.

Attachments to Case:

- 9/9/2022 10:46:00 AM - PAC Rule 8 Metering
- 9/16/2022 11:11:00 AM - Emails between PAC & Customer
- 9/16/2022 11:11:00 AM - Grand Prairie Civil - Mark up power conduit & vault
- 9/16/2022 11:11:00 AM - 008011128_Print NA - 1 of 1 WITH STAMP
- 9/19/2022 12:20:00 PM - Mail from Julian Johnson (GP) - suggested specs
- 9/19/2022 12:20:00 PM - METER CT BASE
- 9/19/2022 12:20:00 PM - METER CT BASE PG 2
- 9/19/2022 12:20:00 PM - METER CT BASE PG 3 LUG KIT
- 9/19/2022 12:20:00 PM - CT CAN 800A
- 9/19/2022 12:20:00 PM - TEMP SWITCHGEAR BILL OF MATERIALS
- 9/19/2022 12:20:00 PM - BUILDING A & B TEMP SWITCHGEAR LAYOUT
- 9/19/2022 12:20:00 PM - BUILDING C TEMP SWITCHGEAR LAYOUT
- 9/19/2022 12:20:00 PM - ADV-1391 LETTER OR-PUC
- 11/2/2022 11:19:00 AM - Email from Risa with Load Table
- 11/3/2022 9:03:00 AM - MLK Master Meter - BCD example ltr
- 11/3/2022 9:03:00 AM - Fleet Development Master Meter

I. Metering – General**A. Installation, Maintenance and Registration**

The Company will install and maintain all meters and other equipment necessary for measuring the electric power and energy used by the Customer and will inspect such installations to maintain a high standard of accuracy.

The Company will, without charge, make a test of the accuracy of registration of a meter upon the request of the Customer or their ESS, provided that the Customer does not request such a test more frequently than once in twelve (12) months. If more than one requested test is made in twelve (12) months, the Company may charge the Customer a meter test charge as specified in Schedule 300. If results of the test show that such meter is outside the 2% accepted tolerance standard under normal operating conditions, the Company may not charge the Customer for the subsequent test(s).

An accurate record will be kept by the Company of all meter readings, and such record shall be the basis for determination of all bills rendered for metered service.

If any meter shall fail to register correctly the amount of electric power or energy used by the Customer, the amount of such use will be estimated by the Company from the best available information.

B. Individual Metering

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.

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

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.

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.

(continued)

I. Metering – General (continued)**D. Meter Verification Fee and Meter Labeling**

When multiple meters are installed at a location with multiple units, it is the developer/owner's responsibility to permanently, and correctly, label each meter base for the associated service address. The Company may check such meter installations to verify they are correctly labeled. The Company will charge the Meter Verification Fee, set forth in Schedule 300, to the developer/owner for each meter installation checked. In the event all meters are labeled correctly for each unit, the Company will waive the Meter Verification Fee for that building.

When a complaint is received from a Customer, landlord or governmental agency of possible switched meters, the Company will check such meter installations to verify that they are correctly labeled. The Company will charge the Meter Verification Fee, as set forth in Schedule 300 to the developer/owner for each meter installation checked. If all meters at a building are correctly labeled for each unit, the Company will waive the Meter Verification Fees for that building. If a Customer or landlord requests more than one meter installation verification within any 12-month period, the Company will require the requesting party to pay the Meter Verification Fee as set forth in Schedule 300, in advance. If the Company determines that the meter is switched or mislabeled, it will refund the deposit to the Customer and the Company will charge the Meter Verification Fee set forth in Schedule 300, to the developer/owner for each meter installation checked.

If a developer/owner or landlord requests the Company to verify or certify that each meter base is labeled correctly, including when locations with multiple units are sold, the Company will charge the party requesting such verification or certification the Meter Verification Fee, as set forth in Schedule 300.

II. Metering – Direct Access**A. Direct Access Meter Requirement**

The Company's metering standard for Direct Access and Standard Offer Consumers is for remotely interrogated interval metering equipment. Direct Access and Standard Offer Consumers that do not have installed remotely interrogated interval meters may be metered using other approved Company metering equipment. In the absence of a meter installation backlog, the Company will endeavor to install standard meter equipment within 30 days of acceptance of a DASR or receipt of written or electronic authorization for Standard Offer Service. In the event of a backlog, the Company will notify the Consumer or Consumer's ESS and provide an estimate of the installation date. The Company will provide metering equipment for all Consumers.

B. Meter Charge

Direct Access and Standard Offer Consumers taking Company-specified metering services are obligated to pay the direct access metering charges stated in Schedule 300. Consumers taking non-standard metering services as described in Section II.E of this Rule are obligated to pay the metering charges specified in the applicable contract.

C. Standard Services

The Company will provide Standard Metering Services without charge to Large Nonresidential Consumers and will provide Standard Metering Services at a charge stated in Schedule 300 to Small Nonresidential Consumers. Standard Metering Services provided in conjunction with Direct Access and Standard Offer Service include:

(continued)

II. Metering – Direct Access (continued)**C. Standard Services (continued)**

1. An interval meter equipped with a communication modem.
2. Installation, removal, testing and maintenance of the meter.
3. Remote communication equipment. Calling fees will be passed through to the Consumer.
4. The meter readings and the results provided to ESS' will be the same as those used as the basis for the Company's charges.
5. The standard method of communicating results of meter reading is specified in the standard form of the Company's ESS Service Agreement.

D. Standard Meter Capabilities

These include interval and remote communication functions.

E. Non-Standard Services

An ESS may request that the Company provide non-standard metering capabilities, functions or services.

1. Requests must be submitted to the Company in writing.
2. The Company will consider and approve or deny the request within ten (10) business days.
3. The Company will file with the Commission rates and charges for non-standard metering capabilities, functions or services within thirty (30) days of approving a request.

Terms and conditions for approved non-standard metering capabilities, functions or services will be incorporated into the Company's ESS Service Agreement.

III. Non-Radio Frequency Metering Accommodation

A Customer may request an alternative to the Company's standard radio frequency meter installation from the following:

- a. Relocation of the Customer's meter base to a different location approved by the Company and the installation of a standard meter;
- b. Relocation of the Customer's meter base to a different location approved by the Company and the installation of a Company approved non-radio frequency meter;
- c. Exchanging a standard meter for a Company approved non-radio frequency meter.

A Customer selecting the option to relocate the meter base will be subject to the meter installation requirements of this regulation as well as Electric Service Rule 13. If the relocation requires a change in the existing service the Customer is responsible for charges to relocate the service including but not limited to the installation of conduit, trenching, obtaining easements, and any additional costs of removing and installing new facilities. If an acceptable meter location cannot be provided on the premises, the Customer's request will not be granted. The Customer must provide written permission of the owner stating the Customer has obtained the owner's permission to proceed with relocating the meter base.

(continued)

III. Non-Radio Frequency Metering Accommodation (continued)

Customers who elect to have a non-radio frequency meter will be subject to installation of the non-radio frequency meter as set forth in Schedule 300. All applicable fees will be paid prior to the installation of the non-radio frequency meter. The Schedule 300 charges for the installation is in addition to any aforementioned costs to relocate the Customer's service.

If a radio frequency meter is installed at the Customer's premise prior to January 1, 2018 and the Customer requests a non-radio frequency meter, the Customer will not be required to pay the installation charge in Schedule 300.

Only non-radio frequency meters approved, obtained, installed, and owned by the Company will be allowed. The Customer's request to replace a radio frequency meter with a non-radio frequency meter cannot be accommodated until an approved non-radio frequency meter can be obtained by the Company.

All Customers with a non-radio frequency meter shall be responsible to pay the monthly meter reading fee in Schedule 300, which will be included in the Customer's monthly service billing.

Customers with non-radio frequency meters may be excluded from participating in Company offered programs for which a standard radio frequency meter is required.

The Company may revoke the meter exchange accommodation of a non-radio frequency meter by reinstalling the Company's standard radio frequency meter for any of the following conditions:

- a. Meter tampering;
- b. Impeding Company access to the meter to obtain monthly meter readings, perform maintenance or to disconnect meter for non-payment of electric service; or
- c. Service has been disconnected for non-payment of electric service twice within a 12-month period.

Customers opting-out of the Company's standard metering and are metered by a non-standard meter and are otherwise eligible for service under Schedule 4 Residential Service or have a meter without a demand register and are eligible for service under Schedule 23 General Service, Small Non-Residential may contract with the Company for a triannual meter reading schedule. Meter readings will be three times a year and monthly billings between meter readings will be based on estimated usage assumptions. At the discretion of the Company, meter readings may be more frequent without any additional charge to the Customers. Customers are required to pay the triannual meter reading fee as stated in Schedule 300, and enroll in the Company's Equal Payment Plan as described in Rule 10 of this tariff.

The Company reserves the right to remove a Customer from the triannual read program for any of the following reasons:

The Customer is disconnected for nonpayment of bills,
The Customer fails to abide by the terms of the Equal Payment Plan, or
Safe and unobstructed access is not provided to the Company.


This option is not available for service in conjunction with net metering or time-of-use schedules.

From: [Hill, Tucker \(PacifiCorp\)](#)
To: [Paul Spies](#)
Subject: RE: [INTERNET] Tariff Section of Rules that prohibit single meter on apartments
Attachments: [image001.png](#)

Hey Paul,

Its in Rule 8. [08_Metering.pdf \(pacificpower.net\)](#)

Thank you,

Tucker Hill
Journeyman Estimator
541-967-6161
[Electrical Service Requirements](#)
[Underground Manual](#)


From: Paul Spies <spiespaul@gmail.com>
Sent: Friday, September 9, 2022 10:10 AM
To: Hill, Tucker (PacifiCorp) <Tucker.hill@pacificorp.com>
Subject: [INTERNET] Tariff Section of Rules that prohibit single meter on apartments

THIS MESSAGE IS FROM AN EXTERNAL SENDER.

Look closely at the **SENDER** address. Do not open **ATTACHMENTS** unless expected. Check for **INDICATORS** of phishing. Hover over **LINKS** before clicking. [Learn to spot a phishing message](#)

Can you send me a PDF or screenshot of this rule? We are working with Bryan Conway, who is the head of the Utility Division at the PUC.

Thanks

--

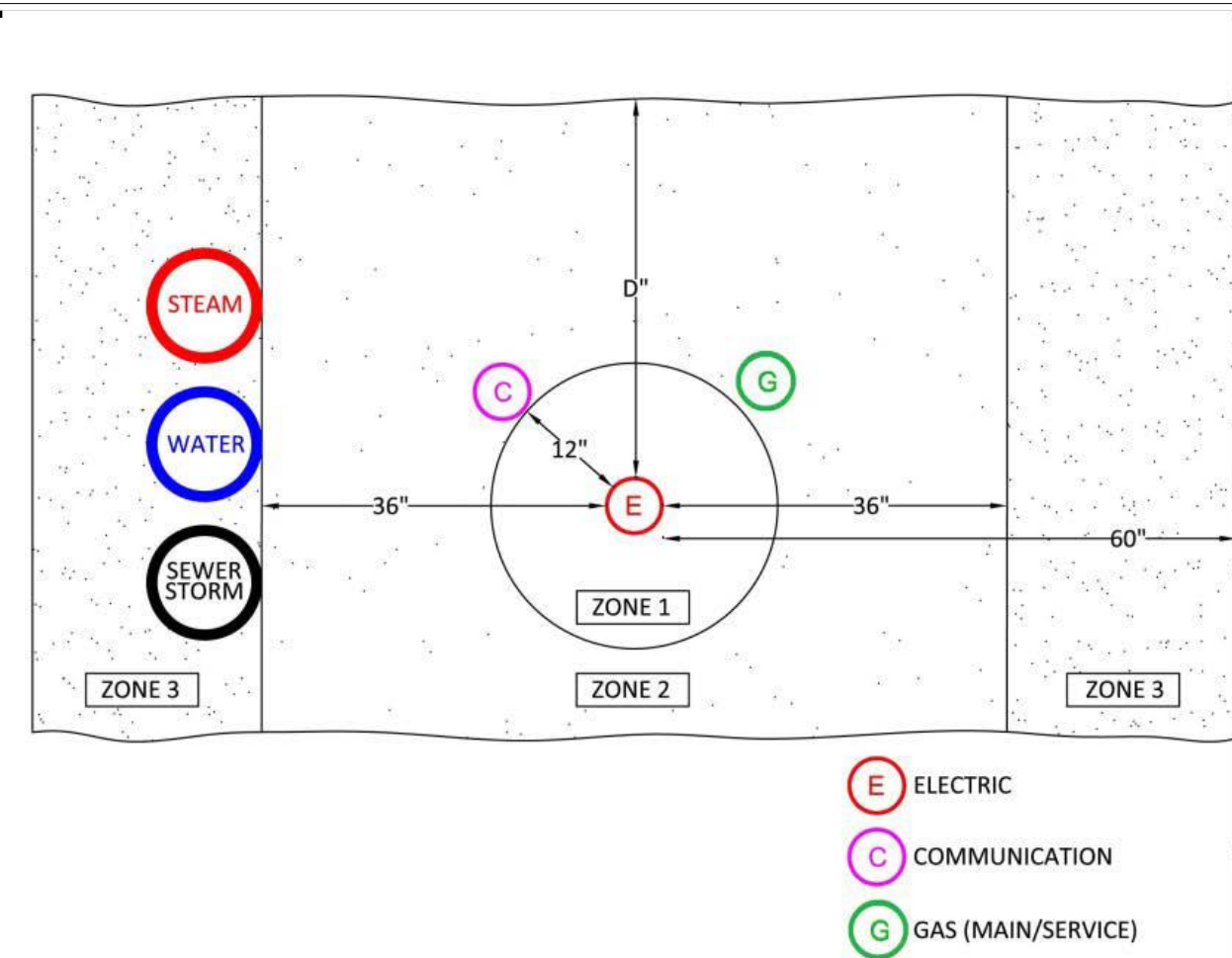
Paul Spies

Managing Member

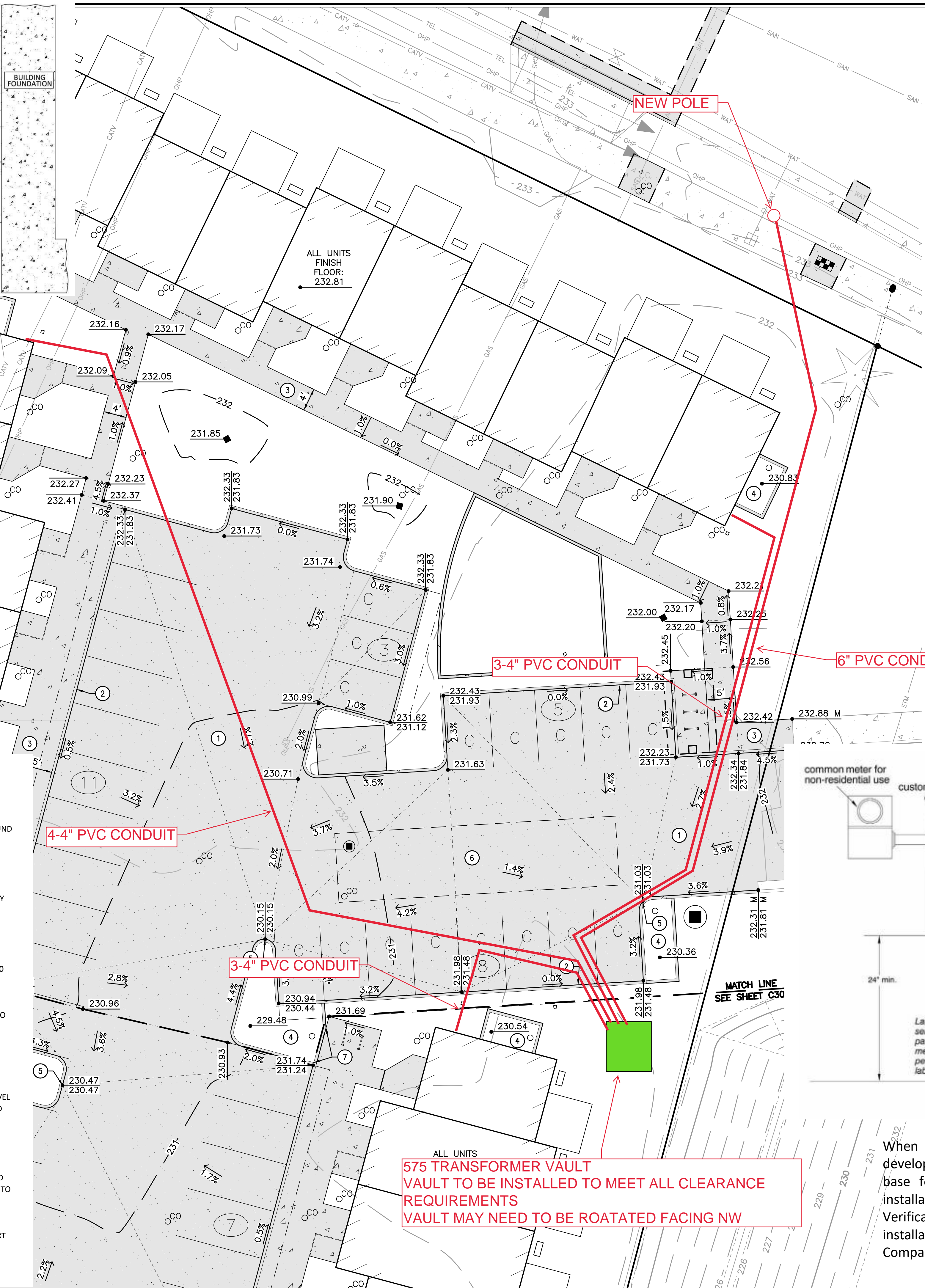
Spies Corporation/8020 Property LLC

Cell: [541.231.2828](#)

PO Box 548 Corvallis OR 97339



- DEVELOPER NOTES:**
- TRENCH**
- TRENCH AND CONDUIT WORK NOT BE PERFORMED UNTIL A GRADE HAS BEEN ESTABLISHED WITHIN 6" OF FINAL GRADE.
 - ADJUST TRENCH TO MAINTAIN 1' VERTICAL SEPERATION WHEN CROSSING ANY UNDERGROUND CONFLICTS. IT IS PREFERRED THAT POWER PASS UNDERNEATH OTHER UTILITIES WHERE POSSIBLE.
 - MAINTAIN A MINIMUM 3' HORIZONTAL SEPERATION WHEN TRENCHING PARALLEL TO NON-ELECTRIC FACILITIES (IE. WATER, SEWER, GAS, ETC.).
 - TELEPHONE AND CABLE TV CONDUCTORS MAY BE IN A JOINT TRENCH WITH ELCTRIC. THEY MUST HAVE 12" HORIZONTAL CLEARANCE FROM APPROPRIATE COMMUNICATION COMPANY FOR THEIR SPECIFICATIONS AND DESIGN.
 - DO NOT TRENCH CLOSER THAN 2' TO ENERGIZED FACILITIES WITHOUT A COMPANY REPRESENTATIVE PRESENT.
- CONDUIT**
- PVC SWEEPS MAY BE USED WHERE CONDUIT RUNS ARE LESS THAN 150'. NO MORE THAN 270 DEGREES IN BENDS ARE ALLOWED.
 - ALL PRIMARY AND SECONDARY SWEEPS MUST HAVE A MINIMUM BEN RADIUS OF 36". 6" CONDUIT SWEEPS SHALL BE 48" RADIUS.
 - ALL CONDUIT STUBS SHOULD BE CAPPED AND MARKED SUFFICIENTLY FOR THE CUSTOMER TO LOCATE IN THE FUTURE WHEN COMPLETING THE RUN. USE ELECTRONIC MARKERS IN CASE PACIFIC POWER MUST LOCATE LATER.
 - THE CUSTOMER SHALL PROVIDE A FLAT PULL LINE (PREFERRED) OR POLY ROPE RATED AT 1000LBS.
- VAULTS**
- TOP OF VAULT TO BE 2" ABOVE GRADE. LID THEN ON TOP OF VAULT. EXCAVATION TO BE LEVEL AND FIRMLY COMPACTED, 6" OF COMPACTED GRAVEL BELOW VAULT BASE FOR LEVELING AND DRAINAGE.
 - TRANSFORMER VAULTS SHOULD BE LOCATED WITHIN THE PUE.
 - CONDUITS SHOULD ENTER VAULT AT LOWEST POSSIBLE LOCATION. HOWEVER, CONDUITS ENTERING ADJACENT VAULT OPENINGS IN THE CORNERS SHOULD ENTER AT DIFFERENT ELEVATIONS.
 - PVC BELL ENDS SHOULD BE INSTALLED ON ALL CONDUITS INSIDE VAULTS. BELL ENDS SHOULD BE FLUSH WITH THE INSIDE WALL OF THE VAULT-THIS WOULD BE REQUIRED WHEN TYING INTO AN EXISTING VAULT THAT DOES NOT HAVE TERM-A-DUCTS. GROUTING REQUIRED AROUND HOLES MADE INTO THESE VAULTS.
 - THREE PHASE TRANSFORMER THAT HAVE A LID WITH AN OVERHANG SHALL HAVE 6" COMPACTED GRAVEL UNDER THE LID LEVEL WITH THE TOP OF THE VAULT BASE FOR SUPPORT OF THE TRANSFORMER WEIGHT. THIS GRAVEL SHALL EXTEND A MINIMUM OF 12" OUT AND ROUND THE LID.



PACIFIC POWER
A DIVISION OF INTERCOMP

13.3 Customer Installs Padvault
The customer will install the pad box and conduits as shown in Figures 13.3.1 – 13.3.5. Note that the number of conduits may vary depending on the infrastructure design.
The top of the padvault lid must be three inches above final grade, unless installed in a traffic area, where it must be flush with grade.

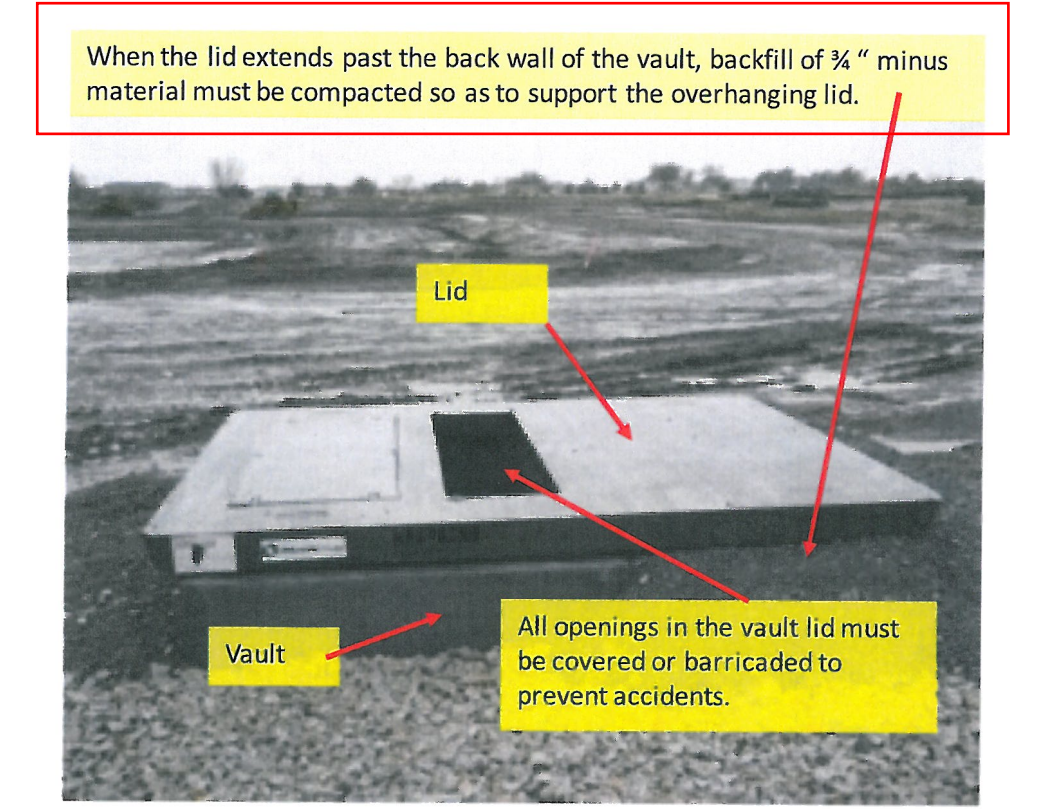
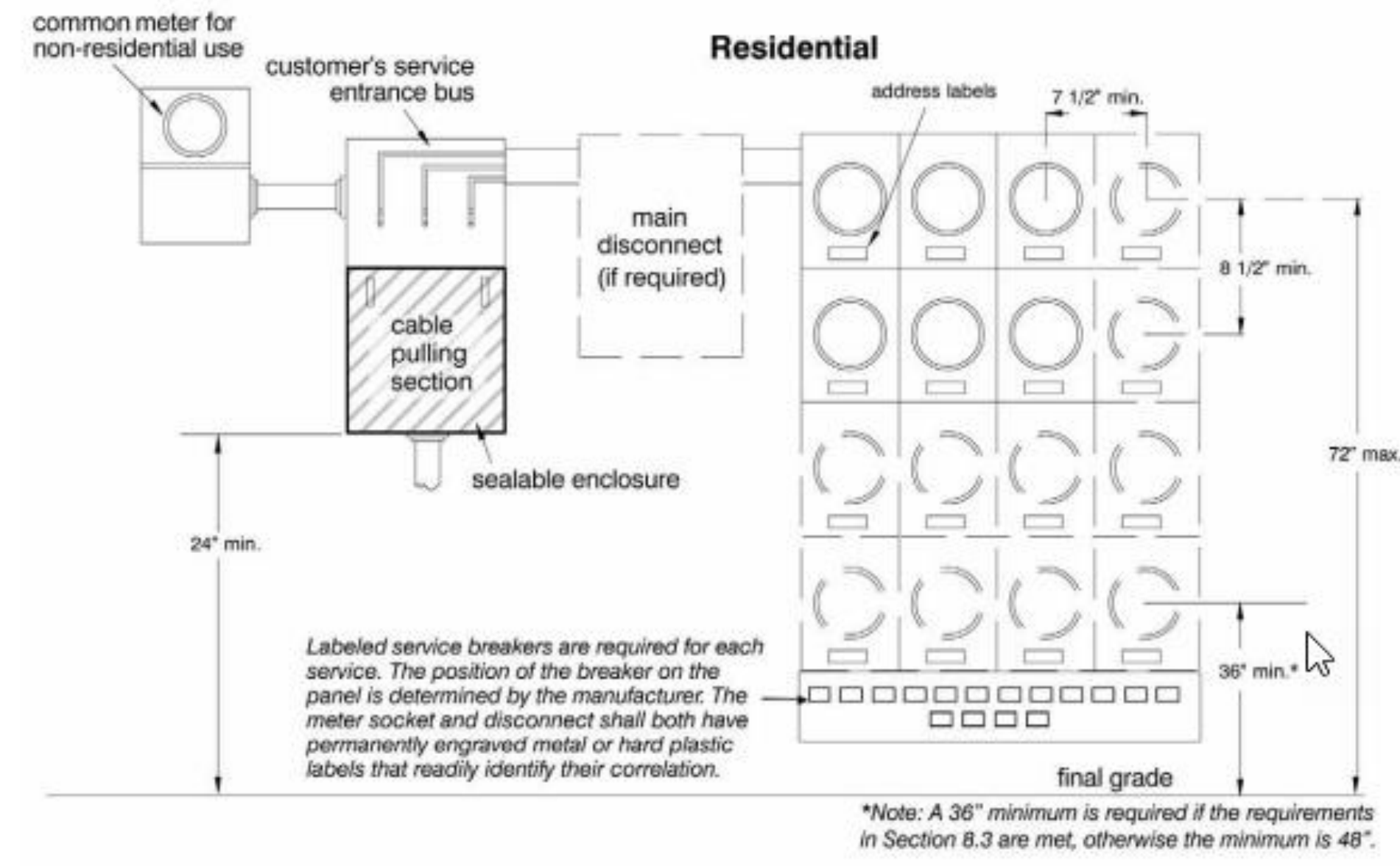


Figure 13.3.1 - Padvault Lid

J:\Publications\FPP\DIS\PRO 242-EMP Underground Conduit Systems.docx, R6, 5/13/11
This document is posted online at rockmountainpower.net, and all engineering is intrinsic site for distribution procedures.
Modification of this document must be authorized by PacificCorp engineering publications, (503) 813-5293.



When multiple meters are installed at a location with multiple units, it is the developer/owner's responsibility to permanently, and correctly, label each meter base for the associated service address. Company may check such meter installations to verify they are correctly labeled. Company will charge the Meter Verification Fee, set forth in Schedule 300, to the developer/owner for each meter installation checked. In the event all meters are labeled correctly for each unit, Company will waive the Meter Verification Fee for that building.

575 TRANSFORMER VAULT VAULT TO BE INSTALLED TO MEET ALL CLEARANCE REQUIREMENTS VAULT MAY NEED TO BE ROATATED FACING NW

5/27/2021 9:44:47 AM X:\2019\19032\CIVIL\GRADE.DWG SAVED ON 5/27/2021

SPIES REAL ESTATE GROUP
P.O. BOX 548
CORVALLIS, OREGON
541-231-2828

GRAND PRAIRIE TOWNHOMES
ALBANY, OREGON
GRADING PLAN
2710 GRAND PRAIRIE RD SE

REGISTERED PROFESSIONAL ENGINEER
60183PE
PETER J. SEADERS
RENEWAL: 6/30/2022

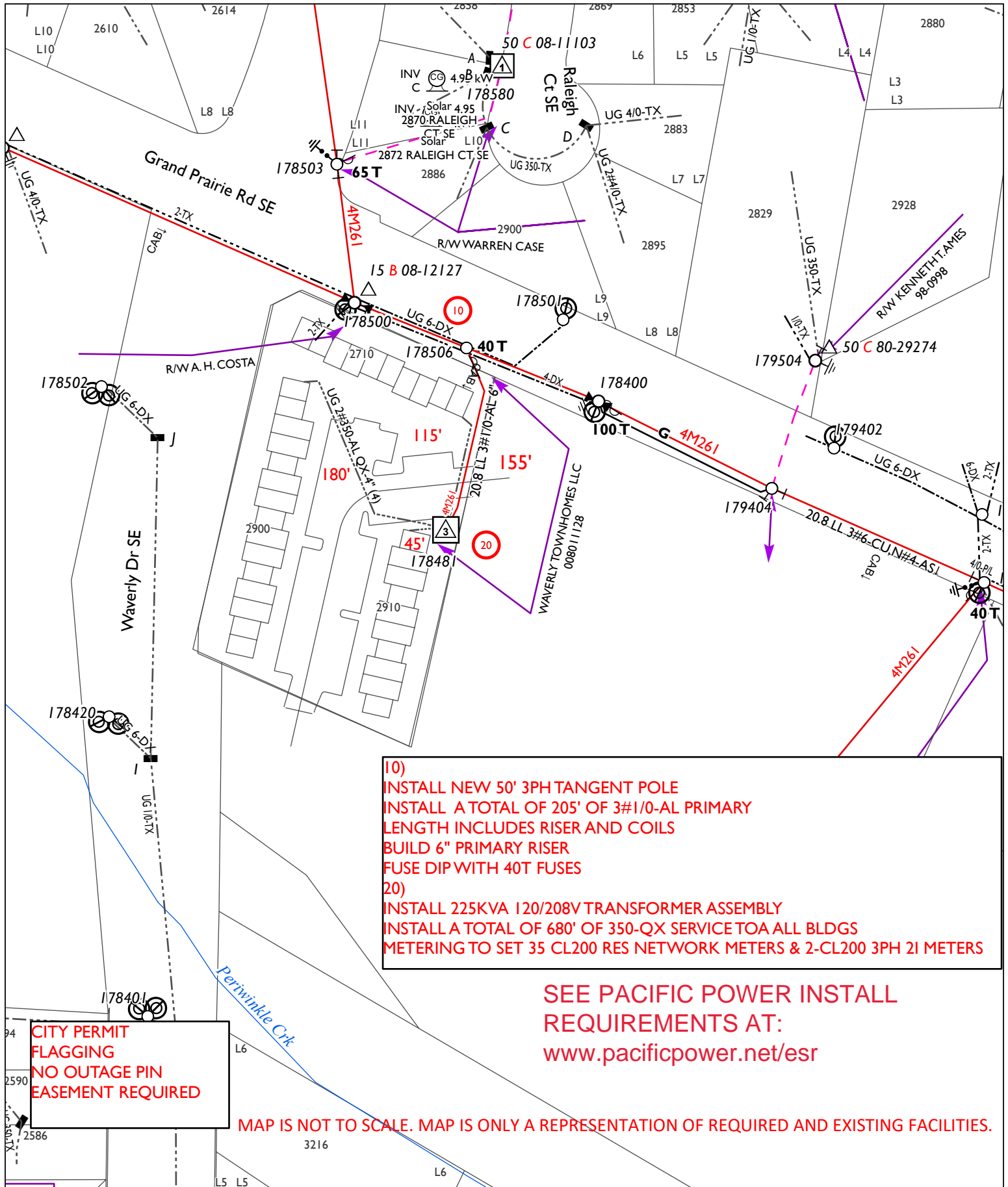
MSS INC
ENGINEERING CONSULTANTS AND PLANNERS
215 NW 4TH STREET
CORVALLIS, OR 97330
(541) 753-1320 FAX: (541) 753-5956

JOB # 19032 FILE GRADE DRAW NMT
SCALE AS SHOWN DATE 05/25/2021

C301
6 OF 16 SHEETS

PERMIT NO.

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(10)
 INSTALL NEW 50' 3PH TANGENT POLE
 INSTALL A TOTAL OF 205' OF 3#1/0-AL PRIMARY
 LENGTH INCLUDES RISER AND COILS
 BUILD 6" PRIMARY RISER
 FUSE DIP WITH 40T FUSES
 (20)
 INSTALL 225KVA 120/208V TRANSFORMER ASSEMBLY
 INSTALL A TOTAL OF 680' OF 350-QX SERVICE TOA ALL BLDGS
 METERING TO SET 35 CL200 RES NETWORK METERS & 2-CL200 3PH 2I METERS

SEE PACIFIC POWER INSTALL
 REQUIREMENTS AT:
www.pacificpower.net/esr

CITY PERMIT
 FLAGGING
 NO OUTAGE PIN
 EASEMENT REQUIRED

MAP IS NOT TO SCALE. MAP IS ONLY A REPRESENTATION OF REQUIRED AND EXISTING FACILITIES.

Foreman		Emp #	Job Start Date		
CC# 11256	WO# / REQ# 008011128	Map String 01311003.0	Job Comp Date		
Customer: SPIES REAL ESTATE Address: 2710 GRAND PRAIRIE RD SE, ALBANY			Circuit 4M261	Post Jobs RQII Posted <input type="checkbox"/>	EST ID# P33949
				Print Date 5/9/2022	Scale 1 in = 100'



Alpha Associates Services LLP
2813 Pacific Blvd. SW
Albany, OR 97321
CCB: 206955 / BCD: C1138 (electrical)

Tel: (541) 928-7561
Tel: (541) 602-6793
www.alpha-associates-svcs.com
alpha.associatesoffice@gmail.com

9/19/2022

TO:

Deanna Rios
Investigator; Oregon P.U.C.
201 High St. SE, Ste: 100
Salem, OR 97301-3398

PROJECT:

Grand Prairie Townhomes
File: 'Mike Purcell'

Dear Deanna;

Alpha Associates Services LLP is the electrical contractor for the Grand Prairie Townhomes project at 2710 Grand Prairie Rd SW in Albany. I'm Mike Helms, a general partner in the company.

Due to horrendous supply-chain issues we are unable to provide the electrical metering and switchgear that was approved by Pacific Power. The manufacturer says that there is now a 1-year delay. (Current ETA is now May 30th, 2023)

We're asking for a slight variance in a recently-adopted rule ADV-1391. We have designed a temporary solution for the metering equipment problem that meets the standards of ADV-1390 except for the following: ADV-1390 says 'low-income housing'. These residential units will be certainly affordable, but were not designated that way when we got our permits. ADV-1390 also says 'apartments'. These units were described as 'townhomes', but are essentially apartments. ADV-1390 says that the units must have central heating and air conditioning. These units do not. So, two of the issues are just language, and the variance would be for the central HVAC.

The way we've designed this will require no additional labor or costs to Pacific Power. Each of the 3 buildings will have one meter the way we've designed it. (spec sheets for the meter bases, current transformer panels, and lug kits are attached, as well as a copy of ADV-1390, and drawings of the layout of the temporary equipment)

I need to also state that our solution is temporary only. The equipment *will* eventually get here, and we *will* install it just as approved by Pacific Power. Pacific Power will still, temporarily, be able to charge for electricity; just 3 meters initially, then 37 meters once the approved equipment shows up.



Alpha Associates Services LLP
2813 Pacific Blvd. SW
Albany, OR 97321
CCB: 206955 / BCD: C1138 (electrical)

Tel: (541) 928-7561
Tel: (541) 602-6793
www.alpha-associates-svcs.com
alpha.associatesoffice@gmail.com

With regards to the financial losses that will be incurred if we're not able to provide electricity to the buildings, not only will the owners be losing more than \$53,000 per month, in addition to penalties on the bank loan, but there will be *35 families* who will not be able to move in. The housing shortage here in Albany is extreme. We know, personally, some of the tenants lined up to move in by November with their families.

We hope that you will see fit to help us with this issue and allow us to temporarily provide electrical service to these buildings.

Sincerely,

Michael L. Helms

Cc List:

Paul Spies- Spies Corporation /8020 Property LLC
Bryan Conway-PUC
Ed Stanton-E & M Constructors
Mike Purcell- E & M Constructors
Michael Helms-Alpha Associates Services LLP
Jennifer Hill Hart- OR-CUB
Tucker Hill- Pacific Power



121413

APPLICATION

- Single meter position
- Designed to receive wathour positions that meet ANSI C12.10
- For use with separate CT enclosure
- Overhead or underground feed

CONSTRUCTION

- Type 3R construction
- Test switch provisions
- Available with installed pre-wired test switches – add prefix “W” to catalog number
- AW hub provision
- Snap type sealing ring included
- Ring style

STANDARDS

- UL 414 listed, complies with ANSI C12.7

FINISH

- ANSI 61 gray acrylic electrocoat finish

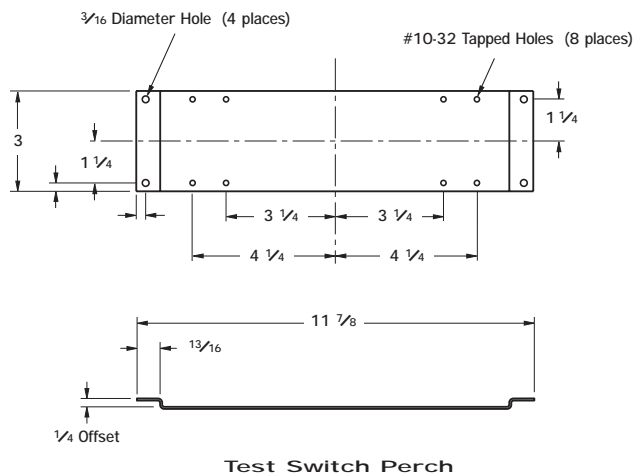
ACCESSORIES

- Screw type sealing ring — catalog #25016D
- AW hubs
- Steel or clear lexan covers for socket openings

Overhead/Underground–Surface Mount

CATALOG* NUMBER	MAIN DISCONNECT	AMPACITY		VOLTAGE	SERVICE TYPE	NUMBER OF JAWS	HUB PROV.	CONDUCTOR LUG RANGE		DIMENSIONS (INCHES)			
		MAX.	CONT.					ALL TERMINALS	GROUNDING TERMINAL	FIGURE NUMBER	HEIGHT (H)	WIDTH (W)	DEPTH (D)
12144	NONE	20	20	600	1Ø	4	AW	14 AWG - 10 AWG	14 AWG - 2/0 AWG	Fig. 1	20	12	4 5/8
12145	NONE	20	20	600	1Ø	5	AW	14 AWG - 10 AWG	14 AWG - 2/0 AWG	Fig. 1	20	12	4 5/8
12146	NONE	20	20	600	1Ø	6	AW	14 AWG - 10 AWG	14 AWG - 2/0 AWG	Fig. 1	20	12	4 5/8
12148	NONE	20	20	600	1Ø or 3Ø	8	AW	14 AWG - 10 AWG	14 AWG - 2/0 AWG	Fig. 1	20	12	4 5/8
121413	NONE	20	20	600	3Ø	13	AW	14 AWG - 10 AWG	14 AWG - 2/0 AWG	Fig. 1	20	12	4 5/8
121415	NONE	20	20	600	3Ø	15	AW	14 AWG - 10 AWG	14 AWG - 2/0 AWG	Fig. 1	20	12	4 5/8

* New reversible test switch perch allows test switch installation at two heights



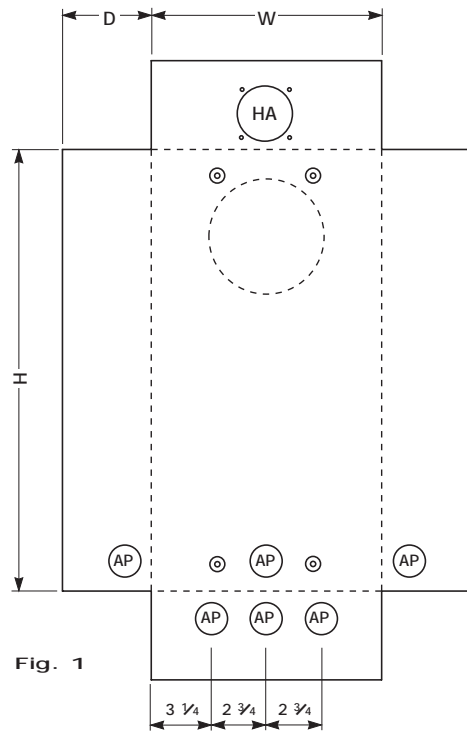
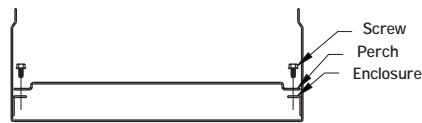


Fig. 1

Knockouts — Conduit Sizes

AP = 1 1/4" - 1" - 3/4" - 1/2"
 HA = AW HUB

Test Switch Perch Instructions



Drawing 1



Drawing 2



Drawing 3

To offset test switch perch so that additional space is available for the use of a test switch cover, see instructions below.

1. Remove (4) screws that hold the perch to the enclosure (see Drawing 1)
2. Flip perch over as shown (see Drawing 2)
3. Now use the screws you removed in step one and screw the perch to the enclosure, torque screws to 35 in/lbs. (see Drawing 3)

Single Meter Sockets

CT Rated With Test Switch Bypass Provision



121413 (closed)



121413 (open)

Application

- Test switch section under separate cover
- Test switch perch included
- Receive ANSI C12.10 watt-hour meters
- Overhead and underground feed (see chart)
- Surface mount

Construction

- Ring type
- NEMA Type 3R
- ANSI 61 gray E-coat finish
- Aluminum snap ring included



Standards

- UL 414 Listed
- ANSI C12.7
- EUSERC 339

Accessories

- AW Hub
- Screw Type Ring - 25016D

Part/UPC Number	Catalog Number	Amp Rating	Jaws	Service Type	Access	Connections		
						Line	Load	Neutral
78205146000	12144	20	4	1Ø	OH/UG	#14 - #10	#14 - #10	#14 - #10
78205146010	12145	20	5	1Ø	OH/UG	#14 - #10	#14 - #10	#14 - #10
78205146020	12146	20	6	1Ø	OH/UG	#14 - #10	#14 - #10	#14 - #10
78205144640	12148	20	8	1Ø or 3Ø	OH/UG	#14 - #10	#14 - #10	#14 - #10
78205144650	121413	20	13	3Ø	OH/UG	#14 - #10	#14 - #10	#14 - #10
78205144065	121415	20	15	3Ø	OH/UG	#14 - #10	#14 - #10	#14 - #10
78205146070	1214208 *	20	8	1Ø or 3Ø	OH/UG	#14 - #10	#14 - #10	#14 - #10
78205146060	1214213 *	20	13	3Ø	OH/UG	#14 - #10	#14 - #10	#14 - #10
78205180265	1214215 *	20	13	3Ø	OH/UG	#14 - #10	#14 - #10	#14 - #10

Part/UPC Number	Catalog Number	Overall Dimensions			Top Provision	Knockout Layout
		Height	Width	Depth		
78205146000	12144	20"	12"	4 ⁵ / ₈ "	AW Hub	Fig. 1
78205146010	12145	20"	12"	4 ⁵ / ₈ "	AW Hub	Fig. 1
78205146020	12146	20"	12"	4 ⁵ / ₈ "	AW Hub	Fig. 1
78205144640	12148	20"	12"	4 ⁵ / ₈ "	AW Hub	Fig. 1
78205144650	121413	20"	12"	4 ⁵ / ₈ "	AW Hub	Fig. 1
78205144065	121415	20"	12"	4 ⁵ / ₈ "	AW Hub	Fig. 1
78205146070	1214208 *	20"	24 ³ / ₈ "	4 ⁵ / ₈ "	AW Hub	Fig. 2
78205146060	1214213 *	20"	24 ³ / ₈ "	4 ⁵ / ₈ "	AW Hub	Fig. 2
78205180265	1214215 *	20"	24 ³ / ₈ "	4 ⁵ / ₈ "	AW Hub	Fig. 2

* Not EUSERC 339 compliant.

Utility/Current Transformer Metering

800 Amp/50K AIC/Bussed Current Transformer Enclosure



803 HEE

APPLICATION

- For remote metering when main service is 201-800 amps
- For use with utility supplied bar type current transformers that meet ANSI C12.11

CONSTRUCTION

- Type 3R construction
- Removable hinged door with sealing provision
- Cover has newly designed fixed handles (not shown)

STANDARDS

- UL 414 listed, complies with ANSI C12.7

FINISH

- ANSI 61 gray acrylic electrocoat finish

Overhead/Underground-Surface Mount

CATALOG NUMBER	AIC RATING	AMPACITY		VOLTAGE	CONDUCTOR LUG RANGE			DIMENSIONS (INCHES)		
		MAX.	CONT.		SERVICE TYPE	PHASE CONDUCTOR LINE/LOAD	NEUTRAL CONDUCTOR	HEIGHT (H)	WIDTH (W)	DEPTH (D)
803 HEE	50K	800	800	600	3Ø 4W	STUDS	STUDS	48	30	12

Utility/Current Transformer Metering

400-800 Amp/10K & 50K AIC/Bussed Current Transformer Mounting Base



6019A



6019HA

APPLICATION

- For use with CT rated metering enclosures
- For use with bar type CT that meet ANSI C12.11
- 1/2" studs on 1 3/4" centers - line & load

STANDARDS

- UL 414 listed, complies with ANSI C12.7

FINISH

- ANSI 61 gray acrylic electrocoat finish (mounting plate only)

Overhead/Underground-Surface Mount

CATALOG NUMBER	AIC RATING	# OF C.T. PROVISIONS	AMPACITY CONT.	VOLTAGE MAX.	CONDUCTOR LUG RANGE			NEUTRAL CONDUCTOR	MIN. SIZE ENCLOSURE
					SERVICE TYPE	PHASE CONDUCTOR LINE	CONDUCTOR LOAD		
6019A	10K	2	400	600	1Ø or 3Ø 3W	STUDS	STUDS	STUDS	24"
6019HA	50K	2	400	600	1Ø or 3Ø 3W	STUDS	STUDS	STUDS	24"
6019E	10K	2	800	600	1Ø or 3Ø 3W	STUDS	STUDS	STUDS	24"
6019HE	50K	2	800	600	1Ø or 3Ø 3W	STUDS	STUDS	STUDS	24"
6067A	10K	3	400	600	3Ø 3W or 4W	STUDS	STUDS	STUDS	30"
6067HA	50K	3	400	600	3Ø 3W or 4W	STUDS	STUDS	STUDS	30"
6067EE	10K	3	800	600	3Ø 3W or 4W	STUDS	STUDS	STUDS	30"
6067HEE	50K	3	800	600	3Ø 3W or 4W	STUDS	STUDS	STUDS	30"



6067 HEEL

APPLICATION

- For use with CT rated metering enclosures
- For use with bar type CT that meet ANSI C12.11
- Integral mechanical lugs - line & load

STANDARDS

- UL 414 listed, complies with ANSI C12.7

FINISH

- ANSI 61 gray acrylic electrocoat finish (mounting plate only)

Overhead/Underground-Surface Mount

CATALOG NUMBER	AIC RATING	# OF C.T. PROVISIONS	AMPACITY MAX.	CONT.	VOLTAGE	SERVICE TYPE	CONDUCTOR LUG RANGE	
							LINE	LUG WIRE RANGE LINE & LOAD
6019 HAL	50K	2	400	400	600	1Ø or 3Ø/3W		(1) 4 AWG - 600kcmil or (2) 1/0 - 250kcmil
6019 HEL	50K	2	800	800	600	1Ø or 3Ø/3W		(3) 4 AWG - 600kcmil or (6) 1/0 - 250kcmil
6067 HAL	50K	3	400	400	600	3Ø 4W		(1) 4 AWG - 600kcmil or (2) 1/0 - 250kcmil
6067 HEEL	50K	3	800	800	600	3Ø 4W		(3) 4 AWG - 600kcmil or (6) 1/0 - 250kcmil



6067 HEELS

APPLICATION

- For use with CT rated metering enclosures
- For use with bar type CT that meet ANSI C12.11
- Studs line side - lugs load side
- 1/2" studs on 1 3/4" centers

STANDARDS

- UL 414 listed, complies with ANSI C12.7

FINISH

- ANSI 61 gray acrylic electrocoat finish (mounting plate only)

Overhead/Underground-Surface Mount

CATALOG NUMBER	AIC RATING	# OF C.T. PROVISIONS	AMPACITY MAX.	CONT.	VOLTAGE	SERVICE TYPE	CONDUCTOR LUG RANGE	
							LINE	LUG WIRE RANGE LOAD
6019 HALS	50K	2	400	400	600	1Ø or 3Ø/3W	STUDS	(1) 4 AWG - 600kcmil or (2) 1/0 - 250kcmil
6019 HELS	50K	2	800	800	600	1Ø or 3Ø/3W	STUDS	(3) 4 AWG - 600kcmil or (6) 1/0 - 250kcmil
6067 HALS	50K	3	400	400	600	3Ø 4W	STUDS	(1) 4 AWG - 600kcmil or (2) 1/0 - 250kcmil
6067 HELS	50K	3	800	800	600	3Ø 4W	STUDS	(3) 4 AWG - 600kcmil or (6) 1/0 - 250kcmil

CURRENT TRANSFORMER, SCREW COVER, TYPE 3R



INDUSTRY STANDARDS

UL 50, 50E Listed; Type 3R; File No. E27525
 cUL Listed per CSA C22.2 No 94; Type 3R; File No. E27525

NEMA Type 3R
 IEC 60529, IP32

APPLICATION

Current Transformer Cabinets provide outdoor protection and security for instrument current transformers, which are frequently required for transformer-rated watt-hour metering. Cabinets can also be used as junction or service boxes and house meter, transformer, relay or terminal assemblies.

FEATURES

- Dripshield top and seam-free sides, front and back
- Slip-on removable cover fastened with captivated plated steel screws along bottom edge
- Mounting studs on enclosure body
- Mounting holes on back of enclosure
- Door handles provided
- Provisions for padlocking
- No gasketing or knockouts
- Ground lug

SPECIFICATIONS

- 16, 14 or 12 gauge plated steel

FINISH

ANSI 61 gray polyester powder paint finish inside and out over plated surfaces.

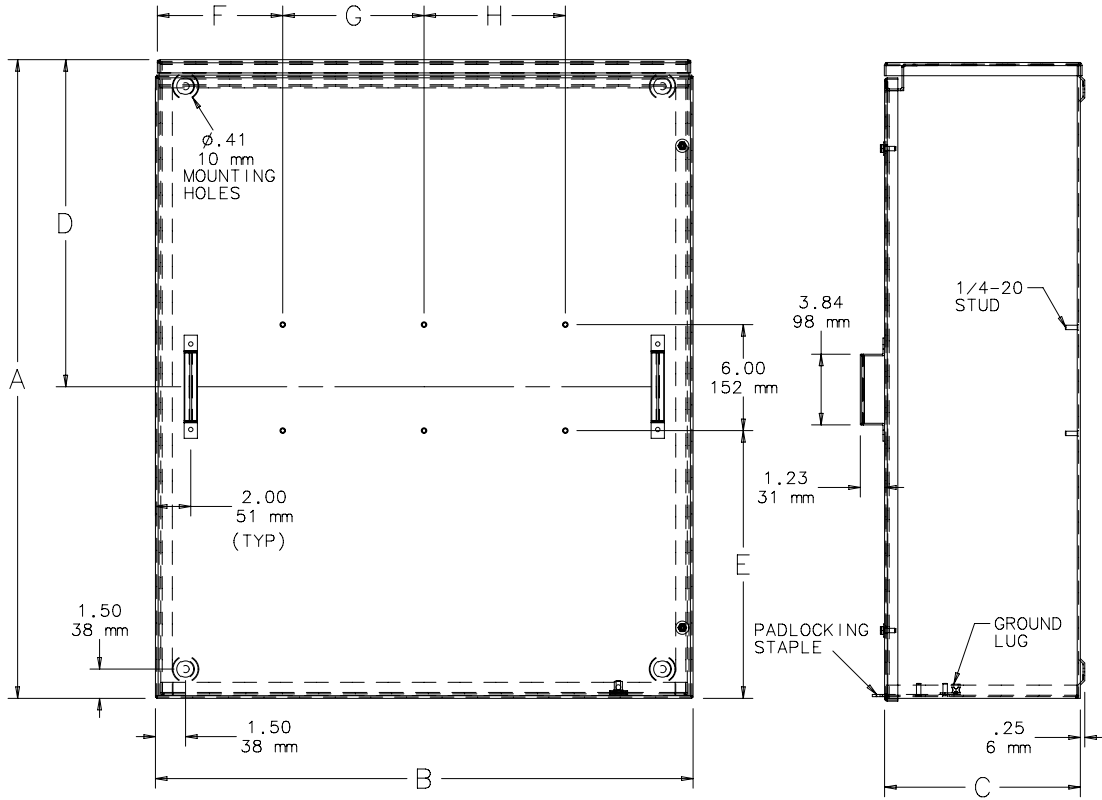
ACCESSORIES

See also Accessories.
 Industrial Corrosion Inhibitors
 Grounding Device
 Touch-Up Paint

BULLETIN: A90CT

Standard Product

Catalog Number	AxBxC in./mm	D in./mm	E in./mm	F in./mm	G in./mm	H in./mm
A242411CT	24.00 x 24.00 x 11.00 610 x 610 x 279	12.19 310	9.00 229	8.00 203	8.00 203	— —
A303011CT	30.00 x 30.00 x 11.00 762 x 762 x 279	15.19 386	12.00 305	7.00 178	8.00 203	8.00 203
A363011CT	36.00 x 30.00 x 11.00 914 x 762 x 279	18.19 462	15.00 381	7.00 178	8.00 203	8.00 203
A363611CT	36.00 x 36.00 x 11.00 914 x 914 x 279	18.19 462	15.00 381	10.00 254	8.00 203	8.00 203
A483611CT	48.00 x 36.00 x 11.00 1219 x 914 x 279	24.19 614	21.00 533	10.00 254	8.00 203	8.00 203



87925196



Detail Bill of Material

Project Name: Alpha
General Order No:

Negotiation No: DAGV0817X2K1
Alternate No: 0000

Item No.	Qty	Product	Description
	1	Loadcenters	CH PON LOADCENTER, 200A, MAIN BREAKER, 32 SPACE, N

Catalog No CHP32B200R

Catalog No	Qty	List of Materials
CHP32B200R	1	CH PON LOADCENTER, 200A, MAIN BREAKER, 32 SPACE, N
CH2100	16	Type CH Breaker 100A/2 Pole 120/240V 10K

Eaton Selling Policy 25-000 applies.

All orders must be released for manufacture within 90 days of date of order entry. If approval drawings are required, drawings must be returned approved for release within 60 days of mailing. If drawings are not returned accordingly, and/or if shipment is delayed for any reason, the price of the order will increase by 1.0% per month or fraction thereof for the time the shipment is delayed.

Seller shall not be responsible for any failure to perform, or delay in performance of, its obligations resulting from the COVID-19 pandemic or any future epidemic, and Buyer shall not be entitled to any damages resulting thereof.



TYPE CH LOADCENTER RATINGS:

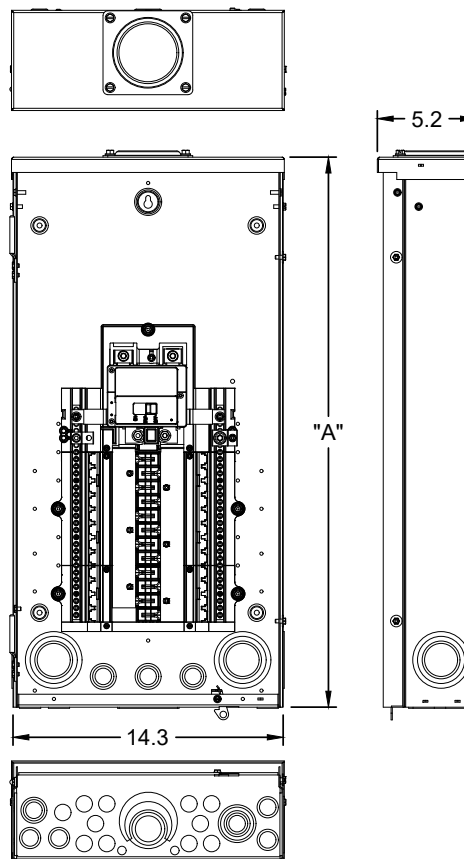
Enclosure: Outdoor NEMA 3R
 Incoming Main: Type CSR Main Breaker
 Loadcenter Electrical Rating: 120/240 VAC, Single Phase
 Loadcenter Ampere: 225 Amps Max
 Number of Spaces & Circuits: See Table on Page 2
 Incoming Wire Range: See Table on Page 2
 Bus Bar Material: Copper
 Enclosure Paint: ANSI 61 Light Gray
 Short Circuit Rating: See Branch Breaker Ratings
 Box Dimensions: 14.3"W x 5.2"D x "A" (See Table on page 2)

FEATURES:

- Warranty** - Lifetime warranty on all CH Loadcenters and Breakers.
- Silver Flashed Copper Bus** - Provides superior conductivity, corrosion resistance and durability.
- Mechanical Trip Flag** - Trip indication on type CH Breakers (CHF).
- Diagnostic LED** - CH AFCI Breakers include a diagnostic LED indication 1 of 7 trip codes.
- Plastic Backpan** - For Plug-On Neutral Branch Breakers.
- Inboard Neutral Bar Assembly** - For better management of load wires.

OPTIONAL ACCESSORIES:

Catalog Number	Description
GBKP5	5 POS #14-4 Ground Bar
GBKP10	10 POS #14-4 Ground Bar
GBKP14	14 POS #14-4 Ground Bar
GBKP21	21 POS #14-4 Ground Bar
NL20	Neutral/Ground Lug #2/0 max
NLP20	Neutral/Ground Lug #2/0 max w/Bonding Tab
NL300	Neutral/Ground Lug #300MCM max
NLP300	Neutral/Ground Lug #300MCM max w/Bonding Tab
CHPFP	3/4" Filler Plate
CHPHD	Hold-down kit for Type CH breaker
CHPMKCSR	Generator Interlock Kit



TITLE: CH 3/4" LOADCENTER, CSR MAIN BREAKER, OUTDOOR NEMA 3R, 120/240 VAC, 1 PH | DRAFTER/DESIGNER: M.S. | DATE (YYYYMMDD): 2018/07/27

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	UNLESS OTHERWISE SPECIFIED DIMENSIONS IN INCHES		
	SCALE 1=6	SHEET 1 OF 2	

GO/NEG-Alt-Date: DAGV0817X2K1-0000-8/17/2022		Job Name: Alpha
Item Number:	Catalog Number: CHP32B200R	Designation:



Powering Business Worldwide

LOADCENTER DETAILS

Catalog #	Dim "A"	Main Brkr Amps	Spaces / Circuits	Bus Bar Amps Max.	Wire Size Range Cu/Al 60°C or 75°C	Notes
CHP08B200RF	29.12	200	8/16	225	#2-300 kcmil	Sub-Feed Lugs Installed
CHP08B200RFP	29.12	200	8/16	225	#2-300 kcmil	Sub-Feed Lugs Installed
CHP24B150R	29.12	150	24/48	225	#2-300 kcmil	
CHP24B200R	29.12	200	24/48	225	#2-300 kcmil	
CHP32B150R	34.12	150	32/64	225	#2-300 kcmil	
CHP32B200R	34.12	200	32/64	225	#2-300 kcmil	
CHP32B225R	34.12	225	32/64	225	#2-300 kcmil	
CHP42B200R	37	200	42/84	225	#2-300 kcmil	
CHP42B225R	37	225	42/84	225	#2-300 kcmil	
CHP42H225R	39	225	42/84	225	#2-300 kcmil	CSH 35k Main Breaker

HUB ACCESSORIES:

Catalog Number	Description
DS075H1	3/4" HUB
DS100H1	1" HUB
DS125H1	1-1/4" HUB
DS150H1	1-1/2" HUB
DS200H1	2" HUB
DS200H2	2" HUB
DS250H2	2-1/2" HUB
DS300H2	3" HUB

Note: Catalog Numbers may have additional characters at the end which describe alternate details, including but not limited to the following: F, W, G, K, M, N, Q, P and #s, DG, V and #s. Contact sales for those specific details when necessary.

TITLE CH 3/4" LOADCENTER, CSR MAIN BREAKER, OUTDOOR NEMA 3R, 120/240 VAC, 1 PH	DRAFTER/DESIGNER M.S.	DATE (YYYYMMDD) 2018/07/27
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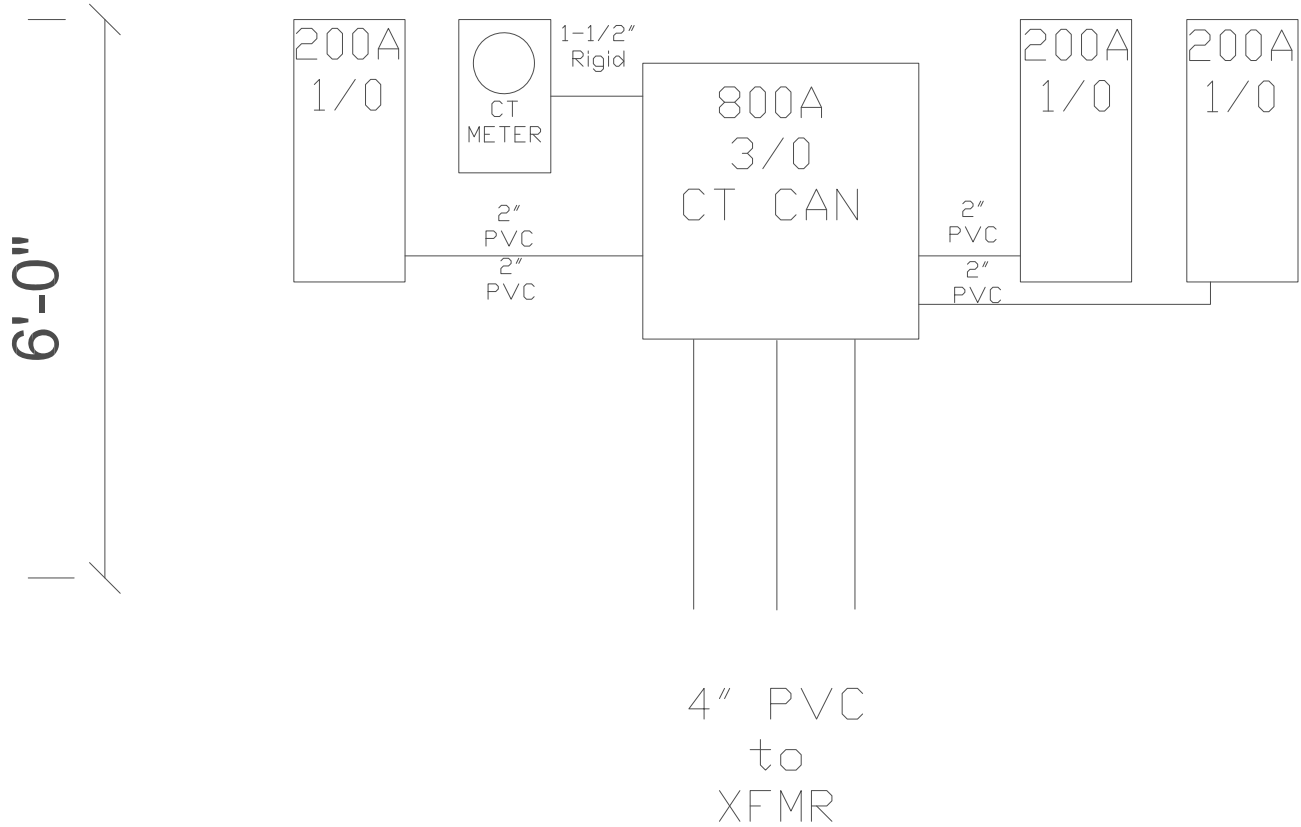
EATON CORPORATION - CONFIDENTIAL AND PROPRIETARY NOTICE TO PERSONS RECEIVING THIS DOCUMENT AND/OR TECHNICAL INFORMATION THIS DOCUMENT, INCLUDING THE DRAWING AND INFORMATION CONTAINED THEREON, IS CONFIDENTIAL AND IS THE EXCLUSIVE PROPERTY OF EATON CORPORATION, AND IS MERELY ON LOAN AND SUBJECT TO RECALL BY EATON AT ANY TIME. BY TAKING POSSESSION OF THIS DOCUMENT, THE RECIPIENT ACKNOWLEDGES AND AGREES THAT THIS DOCUMENT CANNOT BE USED IN ANY MANNER ADVERSE TO THE INTERESTS OF EATON AND THAT NO PORTION OF THIS DOCUMENT MAY BE COPIED OR OTHERWISE REPRODUCED WITHOUT THE PRIOR WRITTEN CONSENT OF EATON. IN THE CASE OF CONFLICTING CONTRACTUAL PROVISIONS, THIS NOTICE SHALL GOVERN THE STATUS OF THIS DOCUMENT. © 2018 Eaton Corporation. All Rights Reserved	SIZE A	DRAWING NUMBER 98-1221	REVISION 01
	UNLESS OTHERWISE SPECIFIED DIMENSIONS IN INCHES SCALE 1=6		SHEET 2 OF 2

DSD_AFM_PORT_ACAD_CUSTOMER.DWG

GO/NEG-Alt-Date: DAGV0817X2K1-0000-8/17/2022		Job Name: Alpha
Item Number:	Catalog Number: CHP32B200R	Designation:

BUILDINGS "A"&"B"

Temporary SWITCH GEAR



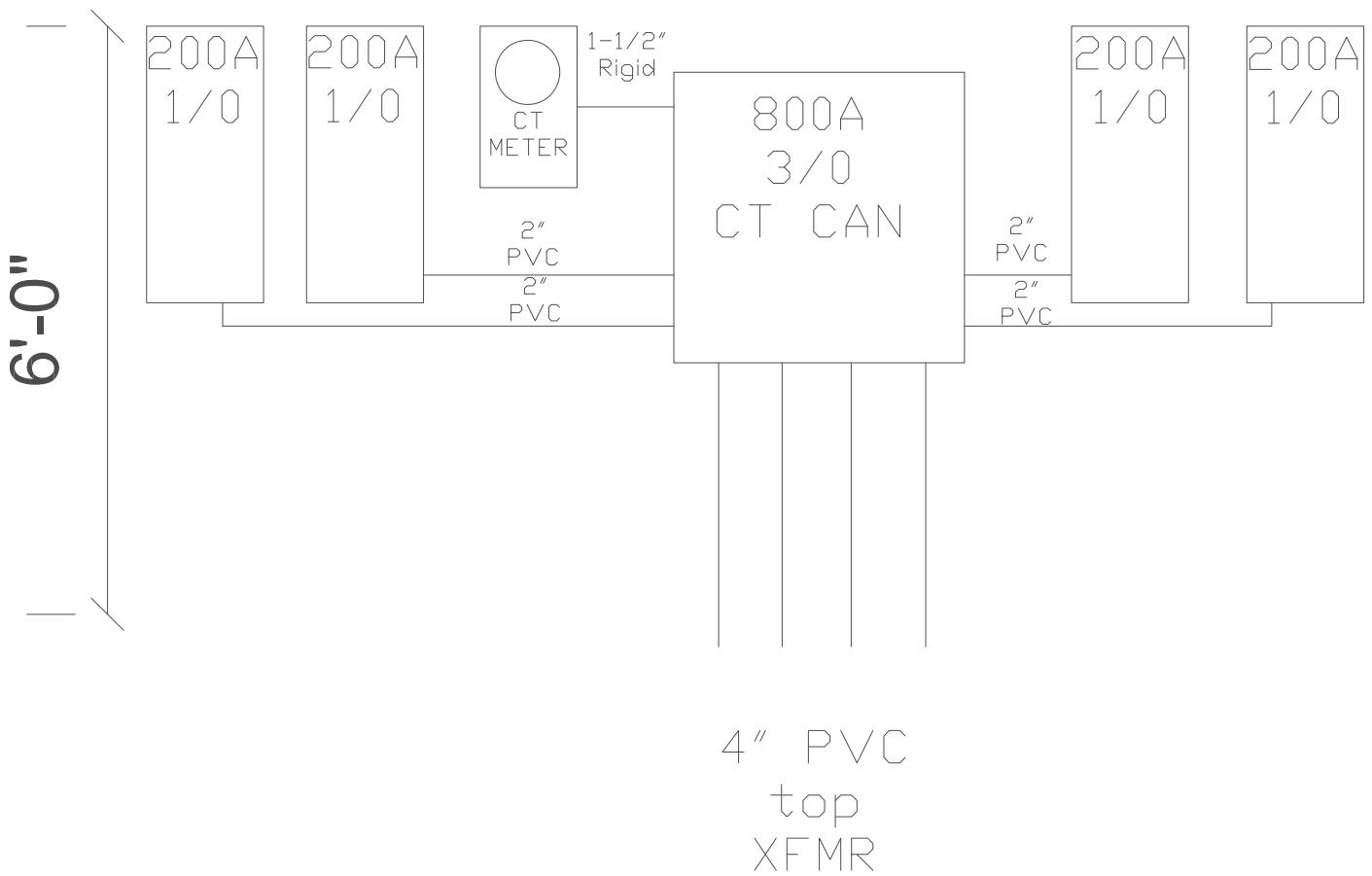
JOBNAME GRAND PRAIRIE TOWNHOMES
 ADDRESS 2915 Waverly Dr SE & 2710 Grand Prairie Rd.
 CITYSTATE Albany, Oregon 97322

9/13/2022
DATE
 206-2021
PROJ. NO.

SHEETNAME TEMP Electrical Switch gear

BLD-B-A
SHEET NO

BUILDING "C" Temporary SWITCH GEAR



JOBNAME GRAND PRAIRIE TOWNHOMES
 ADDRESS 2901 Waverly Dr SE
 CITYSTATE Albany, Oregon 97322

9/13/2022
DATE

206-2021
PROJ. NO.

SHEETNAME TEMP Electrical Switch gear

BLDG-C
SHEET NO



Oregon

Kate Brown, Governor

Public Utility Commission

201 High St SE Suite 100

Salem, OR 97301-3398

Mailing Address: PO Box 1088

Salem, OR 97308-1088

503-373-7394

August 9, 2022



BY EMAIL

PacifiCorp

oregondockets@pacificorp.com

RE: Advice No. 22-005

At the public meeting on August 9, 2022, the Commission adopted Staff's recommendation in this matter docketed as ADV 1391, with one change, in stipulation 1, the forty-five-day timeline is changed to a sixty-day timeline. The Staff Report and a receipted copy of the sheets in your advice filing are attached.

A handwritten signature in blue ink, reading "Nolan Moser".

Nolan Moser

Chief Administrative Law Judge

Public Utility Commission of Oregon

(503) 378-3098

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: August 9, 2022**

REGULAR X **CONSENT** _____ **EFFECTIVE DATE** August 10, 2022

DATE: August 1, 2022

TO: Public Utility Commission

FROM: Scott Gibbens and Melissa Nottingham

THROUGH: Bryan Conway and Caroline Moore **SIGNED**

SUBJECT: PACIFIC POWER:
(Docket No. ADV 1391/Advice No. 22-005)
Amends Rule 8, Metering to include an Exemption for Master Metering.

STAFF RECOMMENDATION:

Approve Pacific Power’s (PacifiCorp or Company) Advice No. 22-005 which amends Rule 8 with the following stipulations, effective with service on and after August 10, 2022.

1. The Company must use good-faith efforts to discuss and propose any viable solution for allowing qualifying tenants residing in any unit that is subject to this exemption access to the proposed Schedule 7 energy prices on the same forty-five-day timeline directed by the Commission in regards to ADV 1412.
2. The Company must provide the Commission with a report of the number of buildings utilizing this exemption by August 2024.

DISCUSSION:

Issue

Whether the Oregon Public Utility Commission (Commission) should approve an exemption process to the master meter prohibition currently in place in the Company’s Rule 8 Tariff.

Applicable Rule or Law

PacifiCorp makes this filing pursuant to ORS 757.205, OAR 860-022-0025, and OAR 860-022-0030.

- ORS 757.205 requires public utilities file to all rates, rules, and charges with the Commission.
- ORS 757.220 requires utilities to file changes to any rates, tolls, charges, rules, or regulations with at least 30 days before the effective date of the changes. The Commission may approve tariff changes on less than 30 days' notice for good cause shown.
- OAR 860-022-0025 requires that revised tariff filings include statements showing the change in rates, the number of customers affected and resulting change in annual revenue, and the reasons for the tariff revision.
- OAR 860-022-0030 requires that tariff filings which result in increased rate include statements showing the number of customers affected, the annual revenue under existing schedules, the annual revenue under proposed schedules, the average monthly bills under existing and proposed schedules, and the reasons supporting the proposed tariff.

Analysis

Background

PacifiCorp's Rule 8, Metering, currently requires an individually metered service for each unit in an apartment building. This requirement for each resident to be individually metered is a requirement in PacifiCorp's tariffs in all states the Company operates in. The origin of this requirement was the passage of Public Utility Regulatory Policies Act (PURPA) in 1978. PURPA 16 USC §2625(b) identifies policy goals that master metering be prohibited or restricted to promote energy conservation. In Oregon, ORS 455.420 implements this metering recommendation by requiring "[an] individual electrical meter for each dwelling unit" except "where a building inspector...determines that...installation of a single electrical meter for all dwelling units in such building would facilitate an overall reduction in electrical consumption by such units."

On April 27, 2022, PacifiCorp filed Advice No. 22-005 requesting amendments to Rule 8, Metering, which would allow for master metering of apartments in certain situations. In its application, the Company states that it has had several requests from affordable housing developers in the last twelve months to approve master meter installations for new apartment buildings.

After discussions with the Company regarding concerns and potential outreach to stakeholders, the Company filed replacement sheets on May 12, 2022, to extend the effective date to August 10, 2022.

On July 20, 2022, Staff held a stakeholder workshop to elicit input from other parties regarding the issues related to the Company's proposal. Along with Staff and the Company, representatives from the Community Energy Project and Sazan Group were in attendance.

Company Proposal

As previously mentioned, the Company proposed to allow for the installation of master metering in apartment buildings if the project meets certain criteria. These criteria are:

1. The required exemption to individual metering as required by the Oregon State building code has been obtained by the builder.
2. The units are not sub-metered.
3. 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.
4. Electric load within each unit that is controlled by the tenant, excluding any individual load from item three, will be less than 250 kWh per month.

Support for Proposal

The Company has provided several reasons in its application, through discovery, and during the stakeholder workshop as to why Commission approval of the tariff change is in the public interest.

The first is that the Oregon State building codes allow for such an exemption to the individual metering requirement. This creates a mismatch between the Company's tariff and the state building codes.

Second, PacifiCorp states in its initial application that much of the interest from Oregon developers is in the affordable housing market. The reduced costs of installing and wiring separate meters for each unit would presumably make low-income housing projects more viable economically, thus promoting development that may not otherwise take place. Further, PacifiCorp believes that there is value to the tenants who may be on fixed incomes or have tight budgets in the assurance that comes from having a fixed cost for energy built into their monthly rent.

Third, the Company states that central heating or high efficiency heat pumps can promote energy efficiency, lower costs overall, and limit the potential for cross-subsidization amongst residents in a building.

The Company also notes that the 250 kWh limit ensures the developer builds energy efficient units with more eco-conscious appliances, which limits the risk the proposal will result in excessive energy consumption when the direct price signal is lost.

The Company currently has a similar exemption process in place in Utah. In discussions with the Company, they further explained that in addition to affordable housing, the Company sees interest from developers to build residential units for employee housing close to a large facility, and for student housing close to colleges and universities. During the workshop, the representative from Sazan group further stated that this exemption would be desirable for net-zero or other apartment complexes designed with behind the meter solar installations sized to offset the power consumption of the residence. Without being able to aggregate the load of the entire building, the net-zero mandate can only be achieved through individual and more costly smaller solar installations.

Risks and Concerns of Proposal

A primary risk from Staff's perspective is the loss of the direct relationship between the utility and the consumer. If an energy-burdened consumer is no longer a customer of the utility, the Company and the Commission lose some of their ability to directly apply solutions and programs to mitigate the difficulty of paying for energy. Low-Income Rate Assistance Program (LIRAP), Low-Income Home Energy Assistance Program (LIHEAP), differential rates borne by House Bill (HB) 2475, arrearage management programs, etc. would seemingly be unavailable options for tenants of master metered buildings. Disconnection notices, Energy Trust of Oregon (ETO) offerings, and other important information also become more difficult and convoluted to deliver.

In the net-metering space, this exemption could open up an avenue that was not previously considered when net-metering and other distributed generation programs were designed. Staff has not identified any particular concerns with this, but notes that unintended consequences may exist.

The PURPA standard regarding master metering is designed to promote energy usage awareness, providing a direct price signal for the energy used and incentivizing conservation. The Company's proposal would break the connection between energy usage and cost. The Company's proposal attempts to mitigate abuse of this disconnection but does not guarantee it. Energy usage is only based on estimates of

each unit's energy consumption; there is no mechanism for identifying compliance with the 250 kWh limit.

Staff Analysis

Staff generally understands and supports the arguments in support of the Company's proposal. Staff believes that there are potential circumstances that could warrant a master metered service and that finding an appropriate solution to allow these situations is likely in the public interest. However, Staff does have concerns, noted above, that the Commission should consider prior to approval of the Company's tariff change. Staff issued 17 information requests to the Company in order to attempt to better quantify and understand the potential risks associated with the Company's proposal.

Staff reviewed Portland General Electric's (PGE) tariff to identify if it had an exemption process in place for master metered service. Staff found that an exemption does exist with no stipulations. The tariff states:

Individual dwelling units in newly constructed multi-family residential buildings will be individually metered and billed as Residential Customers... In the case where service is supplied through one meter to two or more new dwelling units, or to three or more existing dwelling units, service will be classified as nonresidential service.¹

Staff then reached out to PGE for clarification on its tariff and found that the Company generally works with any developer who has obtained a waiver of the state building codes to put a master metered residential building on nonresidential service.

Staff then worked to understand the potential scale of the issue. In response to Staff Information Request (IR) No. 14, the Company noted that it has approved one exemption request each year from 2018-2022, with the exception of 2021, for a total of four in the last five years in Utah. The Company further states that it has received four requests in the last 12 months in Oregon, with one requestor electing to individually meter and the other three awaiting the result of this filing. In a separate information response, the Company noted that at least two of the requests in Oregon were for affordable housing projects.

In an interview airing on July 6, 2022, Oregon State Economist Josh Lehner provided some brief thoughts on the housing and rental market in Oregon. In the interview, Lehner summarily noted the impact that high interest rates are having on the affordability of home ownership. He notes that there is not an over-supply of housing in the state, so although demand has likely decreased, prices are not declining. This has

¹ PGE Tariff No. E-18, Rule B, Sheet B-6 and B-7.

a cascading effect on rents in the state, as certain individuals are priced out of purchasing a home, and they must choose instead to rent. This increases demand for rentals. In response to a caller who was having difficulty finding a place to rent, Lehner goes on to explain the impact of the rental market on prospective renters.

Caller: This is Barbara Bullard from Milwaukee. I am a senior looking for another house to move into and unfortunately the rents are all the same amount of money as I get with my Social Security and my small retirement fund. The answer is a tent on the side of the road. I don't know what the answer is, but I don't think I'm going to be able to ever pay as much as I actually get in Social Security. Thank you.

Interviewer: *Both Barbara there and Tyler, earlier, talked about renting, which we haven't focused on so far, but I want to just turn briefly to that at least. What does everything we've been talking about in the housing market mean for renters?*

Lehner: It means the rental market will just get even tighter, if people are being priced out of the ownership market. It means you have to have a roof over your head as she was alluding to, or not. Unfortunately too many of us, too many of our neighbors, don't. That, at a base level, owning a home is a choice. It's a choice for the privilege to have the ability to have the down payment and finance and things like that. But the same people could take their strong finances and choose to rent as well. So that's going to just increase the demand in the rental market and vacancy rates and the amount of time on the market for apartments or just all rental units in the Portland area is back to where it was pre-COVID. So it's just gonna continue to see increases in rents statewide and in the Portland market in the years ahead.²

Staff notes that while the scale of risks is potentially growing, the potential usefulness and necessity of the exemption is also growing. This underscores the importance of the risks and merits of the proposal.

Consumer/Utility Relationship

In relation to the loss of the direct connection between the Utility and the consumer, Staff finds that some of the concerns have or could be mitigated. For disconnection notices, OAR 860-021-0326 states that:

² Think Out Loud, OPB Broadcast July 6, 2022, <https://www.opb.org/article/2022/07/05/think-out-loud-oregon-housing-rental-markets-oregon-very-tight/>.

When an energy utility's records show that a residence is a master-metered multi-family dwelling (including rooming houses), the utility must notify the Commission's Consumer Services Division at least five business days before disconnecting the service. The utility will use reasonable efforts to notify occupants of the impending disconnection and alternatives available to them.

While ETO offerings and federally mandated programs like LIRAP and LIHEAP may be difficult to address in this context, Staff does believe there is potential for additional mitigation for some of the state level programs currently being implemented by the Commission. Staff asked the Company about the potential for tenants in affordable housing to access targeted programs for energy burdened customers. The Company states in response to IR No. 15:

The Company has concerns with any program that it would be asked to administer that is not directly linked and calculated from the actual metered usage of the benefiting customer each month. In a master-metered apartment complex, the tenant pays rent and the utilities are included. As the tenant is not a customer of the Company, the Company would not have an account to track when the tenant is in a unit, which unit they are in, if or when the tenant moves, etc. The usage of the tenant is not known, and an average per unit would be distorted by any non-unit electrical usage under the master meter, such as laundry room, common areas, hall and exterior lighting, and potentially electric vehicle charging. The Company is, however, open to further dialog and collaboration with stakeholders on this issue to see if there may be an acceptable solution for incorporating a bill discount with master-metering.

Staff notes that the Commission recently elected to suspend and investigate PacifiCorp's Advice No. 22-008, which sought to establish Schedule 7, Low-Income Discount at the July 26, 2022, public meeting, and thus conversations around how to potentially allow for residents of master-metered buildings could occur with all the relevant parties in a timely manner.

Thus, Staff recommends that the Commission's approval require the Company to analyze, discuss, and propose any viable solution to this issue on the same forty-five-day timeline directed by the Commission in regards to ADV 1412. Staff also encourages the Company to continue to work to identify ways in which tenants of these dwellings could have access to additional programs like ETO, demand response, etc.

Net Metering

Staff first notes that it has not identified any specific risks that would warrant rejection of this filing based on concerns around net metering. Staff understands the challenges that having to individually net meter solar in a multi-unit dwelling pose. Staff further notes that it supports future discussions around these issues which might seek to promote the applicability of this exemption for net metering. Staff examines this risk in light of any potentially unforeseen or unintended consequences.

One mitigation strategy already proposed by the Company is to require that the units not be sub-metered. While sub-metering would potentially allow for reduced cross-subsidization risk, it also removes a large portion of the potential cost savings of master metering. The proposal effectively prohibits a situation where the dwelling unit could be individually metered but for a desire to aggregate load. While Staff notes that this does not prohibit net metering for this application, it does somewhat limit it.

Conservation Risks

Staff notes that the Company's proposed exemption requirements do address this risk in some way.

The requirement to obtain a state building code exemption ensures that a state building inspector has looked at the building plans and determined that a master meter will likely result in reduced energy consumption.

The prohibition on sub metering also promotes conservation in a more indirect manner. The landlord is ultimately responsible for setting a price for utilities in an accurate manner in accordance with state law. If consumption is above the estimated amount, the landlord could be short of full recovery for at least some time. It requires the landlord to take on a certain level of risk, and pushes the design of the apartments towards ensuring that energy abuse is not a major issue. This results in aligning the owner's incentives with the goals of PURPA to promote conservation.

Finally, the requirement that each unit have expected non-heating loads of less than 250 kWh is meant to limit the potential risk that tenants will use large amounts of electricity. In order to examine the level of restriction a 250 kWh requirement is, Staff analyzed individual level data for every multi-family customer within PacifiCorp Oregon service territory from 2017-2022. Staff found that roughly 42 percent of all apartments currently taking service from PacifiCorp average 250 kWh or less non-heating/cooling energy consumption in a given month.³ However, this metric does not account for any apartments or condos that may have had reduced consumption over a six-month period

³ Staff assumed that 50 percent of energy usage was for heating/cooling so Staff utilized 500 kWh as the relevant metric during winter months.

due to vacancy.⁴ Staff also looked at the number of multi-family residents that had not surpassed 250 kWh non-heating consumption in any month, and found that about 20 percent had not eclipsed 250 kWh in each six-month interval. Staff finds that the exemption is targeting housing developments that are more efficient or use less energy than 50-80 percent of the existing rental units that the Company currently serves. This somewhat supports the Company, which stated in response to Staff IR No. 13 that, “the specific requirements that the Company proposes for individual metering exemption eligibility in this filing will mitigate against excessive usage by only applying to residential developments that are likely to have very low per resident usage levels.”

However, Staff does note that the data analyzed was of individually metered customers, who presumably have to pay for every watt of electricity they use. Further Staff notes that the usage included heating/cooling, and which required assumptions to be made to estimate the non-heating/cooling load. Thus, Staff proposes that the Company provide the Commission with a report of the number of buildings utilizing this exemption by August 2024.

The report should identify the number of applications received and approved, and the estimated demand associated with each application. If utilization is determined to warrant further analysis of risk, Staff believes one possible solution could be to have the Company then provide a report with estimated per unit consumption for any building utilizing this exemption. This follow-up report should be timed to provide sufficient time for actual consumption data to be collected and provide the Commission with assurance that the limitation is functioning as intended.

Conclusion

Staff finds that Pacific Power’s proposed amendments to Rule 8 are in the public interest with its proposed additional stipulations. Staff believes that an exemption process is warranted given the direction from the state building codes. Staff notes that the Company’s proposal addresses and mitigates many of the concerns. Staff believes that the two additional recommendations, to address low-income rate application and a report to ensure risks have not grown out of proportion, further help to ensure the proposal is in the public interest. Finally, Staff encourages the Company to continue to monitor and bring forward ideas to provide further safeguards as identified.

⁴ Staff examined all data in 6-month intervals (Jan-June, July-Dec) and aggregated data together due to computer limitations and to reduce calculation times. Staff did remove months with no energy demand for average calculations but made no other adjustments to the data.

PROPOSED COMMISSION MOTION:

Approve Pacific Power's (PacifiCorp or Company) Advice No. 22-005, which amends Rule 8 with the following stipulations, effective with service on and after August 10, 2022.

1. The Company must use good-faith efforts to discuss and propose any viable solution for allowing qualifying tenants residing in any unit that is subject to this exemption access to the proposed Schedule 7 energy prices on the same forty-five-day timeline directed by the Commission in regards to ADV 1412.
2. The Company must provide the Commission with a report of the number of buildings utilizing this exemption by August 2024.

GENERAL RULES AND REGULATIONS
METERING
I. Metering – General
A. Installation, Maintenance and Registration

The Company will install and maintain all meters and other equipment necessary for measuring the electric power and energy used by the Customer and will inspect such installations to maintain a high standard of accuracy. (N)

The Company will, without charge, make a test of the accuracy of registration of a meter upon the request of the Customer or their ESS, provided that the Customer does not request such a test more frequently than once in twelve (12) months. If more than one requested test is made in twelve (12) months, the Company may charge the Customer a meter test charge as specified in Schedule 300. If results of the test show that such meter is outside the 2% accepted tolerance standard under normal operating conditions, the Company may not charge the Customer for the subsequent test(s). (T)

An accurate record will be kept by the Company of all meter readings, and such record shall be the basis for determination of all bills rendered for metered service. (T)

If any meter shall fail to register correctly the amount of electric power or energy used by the Customer, the amount of such use will be estimated by the Company from the best available information. (T)

B. Individual Metering

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. (N)

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)

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

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. (T)

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)

(continued)

GENERAL RULES AND REGULATIONS
METERING
I. Metering – General (continued)
D. Meter Verification Fee and Meter Labeling

When multiple meters are installed at a location with multiple units, it is the developer/owner's responsibility to permanently, and correctly, label each meter base for the associated service address. The Company may check such meter installations to verify they are correctly labeled. The Company will charge the Meter Verification Fee, set forth in Schedule 300, to the developer/owner for each meter installation checked. In the event all meters are labeled correctly for each unit, the Company will waive the Meter Verification Fee for that building.

When a complaint is received from a Customer, landlord or governmental agency of possible switched meters, the Company will check such meter installations to verify that they are correctly labeled. The Company will charge the Meter Verification Fee, as set forth in Schedule 300 to the developer/owner for each meter installation checked. If all meters at a building are correctly labeled for each unit, the Company will waive the Meter Verification Fees for that building. If a Customer or landlord requests more than one meter installation verification within any 12-month period, the Company will require the requesting party to pay the Meter Verification Fee as set forth in Schedule 300, in advance. If the Company determines that the meter is switched or mislabeled, it will refund the deposit to the Customer and the Company will charge the Meter Verification Fee set forth in Schedule 300, to the developer/owner for each meter installation checked.

If a developer/owner or landlord requests the Company to verify or certify that each meter base is labeled correctly, including when locations with multiple units are sold, the Company will charge the party requesting such verification or certification the Meter Verification Fee, as set forth in Schedule 300.

(N)
 (M)
 (T)
 (T)
 (T)
 (T)
 (T)
 (T)
 (T)
 (T)
 (T)
 (M)

II. Metering – Direct Access
A. Direct Access Meter Requirement

The Company's metering standard for Direct Access and Standard Offer Consumers is for remotely interrogated interval metering equipment. Direct Access and Standard Offer Consumers that do not have installed remotely interrogated interval meters may be metered using other approved Company metering equipment. In the absence of a meter installation backlog, the Company will endeavor to install standard meter equipment within 30 days of acceptance of a DASR or receipt of written or electronic authorization for Standard Offer Service. In the event of a backlog, the Company will notify the Consumer or Consumer's ESS and provide an estimate of the installation date. The Company will provide metering equipment for all Consumers.

B. Meter Charge

Direct Access and Standard Offer Consumers taking Company-specified metering services are obligated to pay the direct access metering charges stated in Schedule 300. Consumers taking non-standard metering services as described in Section II.E of this Rule are obligated to pay the metering charges specified in the applicable contract.

C. Standard Services

The Company will provide Standard Metering Services without charge to Large Nonresidential Consumers and will provide Standard Metering Services at a charge stated in Schedule 300 to Small Nonresidential Consumers. Standard Metering Services provided in conjunction with Direct Access and Standard Offer Service include:

(continued)

(M)

GENERAL RULES AND REGULATIONS
METERING

II. Metering – Direct Access (continued)

C. Standard Services (continued)

1. An interval meter equipped with a communication modem.
2. Installation, removal, testing and maintenance of the meter.
3. Remote communication equipment. Calling fees will be passed through to the Consumer.
4. The meter readings and the results provided to ESS' will be the same as those used as the basis for the Company's charges.
5. The standard method of communicating results of meter reading is specified in the standard form of the Company's ESS Service Agreement.

D. Standard Meter Capabilities

These include interval and remote communication functions.

E. Non-Standard Services

An ESS may request that the Company provide non-standard metering capabilities, functions or services.

1. Requests must be submitted to the Company in writing.
2. The Company will consider and approve or deny the request within ten (10) business days.
3. The Company will file with the Commission rates and charges for non-standard metering capabilities, functions or services within thirty (30) days of approving a request.

Terms and conditions for approved non-standard metering capabilities, functions or services will be incorporated into the Company's ESS Service Agreement.

III. Non-Radio Frequency Metering Accommodation

A Customer may request an alternative to the Company's standard radio frequency meter installation from the following:

- a. Relocation of the Customer's meter base to a different location approved by the Company and the installation of a standard meter;
- b. Relocation of the Customer's meter base to a different location approved by the Company and the installation of a Company approved non-radio frequency meter;
- c. Exchanging a standard meter for a Company approved non-radio frequency meter.

A Customer selecting the option to relocate the meter base will be subject to the meter installation requirements of this regulation as well as Electric Service Rule 13. If the relocation requires a change in the existing service the Customer is responsible for charges to relocate the service including but not limited to the installation of conduit, trenching, obtaining easements, and any additional costs of removing and installing new facilities. If an acceptable meter location cannot be provided on the premises, the Customer's request will not be granted. The Customer must provide written permission of the owner stating the Customer has obtained the owner's permission to proceed with relocating the meter base.

(continued)

(M)

(M)

(M)

III. Non-Radio Frequency Metering Accommodation (continued)

Customers who elect to have a non-radio frequency meter will be subject to installation of the non-radio frequency meter as set forth in Schedule 300. All applicable fees will be paid prior to the installation of the non-radio frequency meter. The Schedule 300 charges for the installation is in addition to any aforementioned costs to relocate the Customer's service.

If a radio frequency meter is installed at the Customer's premise prior to January 1, 2018 and the Customer requests a non-radio frequency meter, the Customer will not be required to pay the installation charge in Schedule 300.

Only non-radio frequency meters approved, obtained, installed, and owned by the Company will be allowed. The Customer's request to replace a radio frequency meter with a non-radio frequency meter cannot be accommodated until an approved non-radio frequency meter can be obtained by the Company.

All Customers with a non-radio frequency meter shall be responsible to pay the monthly meter reading fee in Schedule 300, which will be included in the Customer's monthly service billing.

Customers with non-radio frequency meters may be excluded from participating in Company offered programs for which a standard radio frequency meter is required.

The Company may revoke the meter exchange accommodation of a non-radio frequency meter by reinstalling the Company's standard radio frequency meter for any of the following conditions:

- a. Meter tampering;
- b. Impeding Company access to the meter to obtain monthly meter readings, perform maintenance or to disconnect meter for non-payment of electric service; or
- c. Service has been disconnected for non-payment of electric service twice within a 12-month period.

Customers opting-out of the Company's standard metering and are metered by a non-standard meter and are otherwise eligible for service under Schedule 4 Residential Service or have a meter without a demand register and are eligible for service under Schedule 23 General Service, Small Non-Residential may contract with the Company for a triannual meter reading schedule. Meter readings will be three times a year and monthly billings between meter readings will be based on estimated usage assumptions. At the discretion of the Company, meter readings may be more frequent without any additional charge to the Customers. Customers are required to pay the triannual meter reading fee as stated in Schedule 300, and enroll in the Company's Equal Payment Plan as described in Rule 10 of this tariff.

The Company reserves the right to remove a Customer from the triannual read program for any of the following reasons:

The Customer is disconnected for nonpayment of bills,
The Customer fails to abide by the terms of the Equal Payment Plan, or
Safe and unobstructed access is not provided to the Company.

This option is not available for service in conjunction with net metering or time-of-use schedules.

(M)
|
(M)

RIOS Deanna * PUC

From: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>
Sent: Wednesday, November 2, 2022 11:19 AM
To: NOTTINGHAM Melissa * PUC
Cc: _Tariff Policy; PUC_GR-CONSUMER; Customer Advocacy Team
Subject: RE: Grand Prairie Townhomes

Importance: High

Follow Up Flag: Follow up

Flag Status: Flagged

Good Afternoon Melissa,

Cary Ann had our Estimator reach out to the developer's electrician. The first section below is the response to your question from our Estimator about the load calculation and the italicized section is a summary of the conversation he had with their electrician this morning -

Pacific Powers loading standard doesn't have an option for loading without taking into account heating and cooling. The calculation I showed in my previous email was as good of a guess as I could with the information from the customer and using Pacific Powers standard.

The customers units are all electric and for the square footage Pacific Powers standard shows a demand of 8-9kw. I used 5kw as a guess because each unit has a washer and dryer and a water heater. Below is the table from Pacific Powers standard that I used for my example.

**Table 3—Multi-Family / Apartment
Estimated Peak Demand (kVA) Per Residence**

DEMAND SHOWN IN EXAMPLE

Ducted Heat Source	< 800 ft. ²	801 - 1000 ft. ²	1001 - 1500 ft. ²
Gas, Heat Pump, Other	5	6	7
Resistive ← CUSTOMERS HEATING	8	9	11

For the customer to meet the 250 kwh criteria they would have to provide reasonable substantiation of the load projection. One more example, if the projected load to each unit is 1kw and each unit has that amount of load for 8hrs a day for 30 days, the kwh would be 240. I don't believe these units with electric range, electric water heater, and washers/dryers are going to be able to stay under the 250 kwh to meet the criteria of Master Metering.

The language in Rule 8, Section I.C. requires the applicant to provide reasonable substantiation of the load projection of their units. The Company's responsibility is to review the information submitted for its reasonableness.

I called the electrician and he said he is missing components for the main disconnect. He said he has some meter stacks but not anywhere close to the amount he needs for the project. He says he cant get any 3 or 4 stack meter bases. I discussed this with the Metering Foreman and his stance is each unit needs to be individually metered per the Tariff and single metering points as a "temporary" solution has already been vetted and denied in multiple locations for other customers. He also said as long as each unit is individually metered we are open to make exceptions to the ESR metering install spec. If the customer can come up with a solution that shows all units individually metered we will review it and

see what exceptions can be made. I called the electrician to see if he could source any other metering configuration for the meter bases and he said he cant. He explained the gear is rated for the fault current and the busing in the meter stacks gets the AIC down to below 10k at each meter to coordinate with the disconnect at each meter. He said some of the gear is now scheduled to arrive in February but the largest buildings gear is still scheduled to arrive in May.

I am happy to schedule the TEAMS meeting for everyone for tomorrow morning – what time works best for your group and who would you like us to add to the meeting?

Please let me know.

Thank you so much,

Risa Talo

Customer Advocacy and Customer Service
801-955-2435



Oregon

Kate Brown, Governor

Department of Consumer and Business Services
Building Codes Division
1535 Edgewater Street NW
P.O. Box 14470
Salem, OR 97309-0404
503-378-4133
Fax: 503-378-2322
bcd.oregon.gov

October 22, 2020

J. Daniel Steffey
jdanielsteffey@jdscobiz.com

Re: Electrical Meter Requirements

Mr. Steffey:

Director Stolfi forwarded your question regarding electrical meters in multifamily residential buildings to me. As you have pointed out, Oregon statute allows multifamily residential buildings to be served by a centralized meter in specific circumstances. This determination is project and site specific, and the local building department is authorized to make this determination.

Questions:

- Are individual meters required for each dwelling unit in a multifamily residential building built in the State of Oregon?
- May an electrical provider use a centralized meter for all dwelling units in a multifamily residential building?

Answer:

Oregon Revised Statute (ORS) 455.420(1) requires each individual dwelling unit in a multifamily residential building to have a separate, individual electrical meter for each unit. However, at the discretion of the local building official or building inspector, an exception may be made if the installation of a single, central electrical meter would facilitate an overall reduction in electrical consumption.

ORS 455.420(1) states the following:

“Each individual dwelling unit in a multifamily residential building constructed after October 4, 1977, shall have installed a separate, individual electrical meter for each such dwelling unit except where a building inspector certified under ORS 455.715 to 455.740 determines that pursuant to standards adopted by the Director of the Department of Consumer and Business Services the installation of a single, central electrical meter for all the dwelling units in such building would facilitate an overall reduction in electrical consumption by such units.”

These issues are project and site specific, but with the way you have described your project, where the development provides all utilities to the residents and the project will include a photovoltaic (PV) installation to reduce energy demand from the utility, it appears that the

Letter to Mr. Steffey

Page 2

utilization of a master meter would meet the standard of facilitating an overall reduction in electrical consumption of the individual dwelling units.

Please consult with your local building department on any electrical meter installations to determine if your project qualifies for the exception listed in ORS 455.420(1).

If you have any further questions or concerns, please contact me.

Sincerely,

Keith Anderson
Chief Electrical Inspector, State of Oregon
503-378-4459
william.k.anderson@oregon.gov



Oregon

Kate Brown, Governor

Department of Consumer and Business Services

Building Codes Division

1535 Edgewater Street NW

P.O. Box 14470

Salem, OR 97309-0404

503-378-4133

Fax: 503-378-2322

bcd.oregon.gov

April 7, 2020

Ryan Sheehy
Fleet Development
200 E. Main St
Enterprise OR 97828

Re: Electrical Meter Requirements

Mr. Sheehy:

You have requested clarification regarding the application of Oregon electrical rules and statutes as they apply to the installation of electrical meters in multifamily residential buildings.

Questions:

- Are individual meters required for each dwelling unit in a multifamily residential building built in the State of Oregon?
- May an electrical provider use a centralized meter for all dwelling units in a multifamily residential building?

Answer:

Oregon Revised Statute (ORS) 455.420(1) requires each individual dwelling unit in a multifamily residential to have a separate, individual electrical meter for each unit. However, at the discretion of the local building official or building inspector, an exception may be made if the installation of a single, central electrical meter would facilitate an overall reduction in electrical consumption.

ORS 455.420(1) states the following:

“Each individual dwelling unit in a multifamily residential building constructed after October 4, 1977, shall have installed a separate, individual electrical meter for each such dwelling unit except where a building inspector certified under ORS 455.715 to 455.740 determines that pursuant to standards adopted by the Director of the Department of Consumer and Business Services the installation of a single, central electrical meter for all the dwelling units in such building would facilitate an overall reduction in electrical consumption by such units.”

These issues are project and site specific, but the way you have described your project it appears that the utilization of a master meter to enable the solar project would meet the standard of facilitating an overall reduction in electrical consumption of the individual dwelling units.

Letter to Mr. Del Vecchio

Page 2

Please consult with your local building department on any electrical meter installations to determine if your project qualifies for the exception listed in ORS 455.420(1).

If you have any further questions or concerns, please contact me.

Sincerely,

Keith Anderson
Chief Electrical Inspector, State of Oregon
503-378-4459
william.k.anderson@oregon.gov

Oregon Public Utility Commission

Specialist: RIOS, DEANNA

Name: GRAND PRAIRIE TOWNHOMES Commercial:
Language:

Addresses: 2710 GRAND PRAIRIE RD SE, ALBANY OR 97321 (LOC) (INVOLVED)

E-mail: mikep@emconstructors.com DOCKET #

Phones: (503) 577-5801 (CONT) (MIKE PURCELL - PROJECT MGR) (INVOLVED)
(541) 231-2828 (CELL) (PAUL SPIES - MANAGING MEMBER)
(541) 602-6793 (CONT) (MIKE HELMS/ALPH ASSOC/ELEC CONTRACTOR)

Contacts: MIKE PURCELL (OTHR) (CONTRACTOR - E&M CONTRACTORS)
PAUL SPIES (OTHR) (MANAGING PARTNER)
SPIES CORP (OTHR)
ED STANTON (OTHR) (OWNER/E&M CONTRACTORS)

Subject:

Comments:

COMPANY	CATEGORY	STAFF	SAVINGS	CLASS	TYPE	SUBTYPE	FORMAL
REVERSAL	COMPLX	UNRS	DET.	OPEN/MODE	BY	CLOSE/MODE	BY
0003 E PACIFI No ADV 1391	REGU No	No		RCOM 9/1/2022/TELE	RCSE drios	RSBL	

Call Taken (date): 8/26/2022 By: drharris
Open Date: 9/1/2022 Opened By: drios

Disconnect Notice Due: Disconnected: Out of Service:

8/26/2022 CODE DETAIL
REGULATED - COMPLAINT - SERVICE

Mike Purcell, contractor for Grand Prairie Town Homes, is trying to work with Pacific Power to set a temporary 400 amp panel on each of the three buildings with a master meter until the delayed service equipment arrives to provide permanent submetered service. He states PAC told him they cannot do this due to PUC rules. He is seeking a waiver of PAC's Rule 8.

8/26/2022 11:00:00 AM CALL TAKEN BY DANIELLE
Mike Purcell is a contractor and has just finished construction on the Grand Prairie Townhomes in Albany. The only thing left to do is provide power to the three buildings, but they are unable to get the service equipment due to shipping delays and equipment shortages. Mike just found out the equipment needed for electrical service will not arrive until February 2023. He is trying to find a

Analyst: drios

Open Date: 9/1/2022

temporary solution to get power to the buildings so the owner can start renting them out and making money since they are done.

Mike states his electrician proposed installing temporarily a 200 amp meter to each of the three buildings. Pacific Power is stating they are not able to do this per PUC rules. Mike is asking for a temporary waiver of the rules based on the shipping backlog of the parts needed.

I advised we can take his information and look into his concerns, but make no guarantees on the outcome. Once we have information back from the company, the investigator will follow up with him on the resolution.

9/6/2022 11:40:00 AM CALL TAKEN BY CARISSA

Mike called to speak to Deanna. I let him know she is out of the office on Mondays but she could call him back tomorrow. He said that would be great.

9/8/2022 2:45:00 PM EMAIL FROM SARAH MEANS/OBIE COMPANIES TO NATE STICE/GOV BROWN'S OFC - SEEKING STATE CONTACT

From: Sarah Means <Sarah@obie.com>
Sent: Thursday, September 8, 2022 2:45 PM
To: STICE Nate * GOV <Nate.STICE@oregon.gov>
Subject: PUC Contact?

Hi Nate,

I had one of our partners reach out to me regarding a challenge they are having with a housing development in Albany. The challenge is with Pacific Power and a requirement PP says comes from an agreement they have with the state. It involves metering for the housing units (this is a multi-family housing project) and a significant delay that is occurring as a direct result of the requirement because the supplier for the meters (custom meters to meet the requirement) can't deliver until mid-2023.

My contact was hoping to identify who at the state they could contact about a potential temporary exception to simply get the units in market rather than have them sit. It sounds like this is one of the final things to resolve for occupancy. My guess is that this is something the PUC may engage with, but I don't know that for sure. Any guidance is appreciated.

Thanks,
Sarah

obiecompanies.com
Sarah Means
Director of Government & Community Relations
Address 296 E. 5th Ave, Suite 300
Eugene, Oregon 97401
Direct 541.743.0750 | Cell 503.784.3915

Analyst: drios

Open Date: 9/1/2022

9/8/2022 3:58:00 PM EMAIL TO PAUL SPIES FROM BRYAN CONWAY - WILL RTN CALL SOON
On Thu, Sep 8, 2022 at 3:58 PM CONWAY Bryan * PUC <Bryan.CONWAY@puc.oregon.gov> wrote:

Hi Paul - I got your message and will get back to you soon. Feel free to reply to this message with any important details (dates and requests of PAC) and it will help me narrow down the issue.

Thanks!
Bryan

9/8/2022 4:45:00 PM CALL TAKEN BY KIM

Mike called to speak with his investigator. I let him know Deanna is in charge of his case and she is on another call right now. I explained that I will send her a message requesting she call him back today.

9/9/2022 9:51:00 AM CALL FROM CUSTOMER - MIKE PURCELL/PROJECT MANAGER

Mike called regarding the complaint. I told him I needed to gather some additional information from him, so I was glad he called. He said he is the project manager for this development. His client is virtually done with the development construction except for getting permanent power to the site.

His client was just informed there is a further delay. The service equipment isn't expected to be received until May 2023, it was February 2023. They were proposing to PAC installing a series of 400 amp panels on each building served by one meter with the billing being paid by the developer as a temporary measure. His client is concerned about defaulting on the construction loan if they are unable to get tenants into the building until May 2023.

Mike said he will email me the name of the contact person his client has been working with at PAC if needed. I provided him with my direct email address.

I asked if PAC had cited the rule reference that wasn't allowing his client to do what they wanted? As we continued the conversation, he stated he wanted to temporarily master meter until the parts arrive and are installed for permanent service. His client wants to know if they can request a waiver of the rule that doesn't allow for master metering. (I did not learn until later there was a recent docket allowing master metering if certain conditions are met - ADV 1391.)

I informed Mike I would be reaching out to PAC and our rules coordinator regarding this situation and a waiver, respectively. I will be in contact with him when I have more information to provide.

9/9/2022 10:10:00 AM EMAIL FROM PAUL TO TUCKER/PAC - REQ TARIFF REFERENCE

From: Paul Spies <spiespaul@gmail.com>
Sent: Friday, September 9, 2022 10:10 AM
To: Hill, Tucker (PacifiCorp) <Tucker.hill@pacifcorp.com>
Subject: [INTERNET] Tariff Section of Rules that prohibit single meter on apartments

Analyst: drios

Open Date: 9/1/2022

Can you send me a PDF or screenshot of this rule? We are working with Bryan Conway, who is the head of the Utility Division at the PUC.

Thanks

--

Paul Spies
Managing Member
Spies Corporation/8020 Property LLC
Cell: 541.231.2828
PO Box 548 Corvallis OR 97339

9/9/2022 10:15:00 AM EMAIL TO PAUL FROM TUCKER - RULE 8

From: Hill, Tucker (PacifiCorp) <Tucker.Hill@pacificcorp.com>
Sent: Friday, September 9, 2022 10:15 AM
To: Paul Spies <spiespaul@gmail.com>
Subject: RE: [INTERNET] Tariff Section of Rules that prohibit single meter on apartments

Hey Paul,

Its in Rule 8. 08_Metering.pdf (pacificpower.net)

Thank you,

Tucker Hill
Journeyman Estimator
541-967-6161
Electrical Service Requirements
Underground Manual

9/9/2022 10:38:00 AM EMAIL FROM MIKE/PM - PAC CONTACT INFO

From: Mike Purcell <mikep@emconstructors.com>
Sent: Friday, September 9, 2022 10:38 AM
To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>
Subject: Grand Prairie Townhomes

Deanna, thank you for discussing with me our Grand Prairie Apts. located in Albany. We have a serious supply chain problem with getting electrical service equipment that could result in our client defaulting on his construction loan for these 35 affordable apts. We are requesting a temporary waiver of the requirement for individual electrical metering until we receive the service equipment ordered almost a year ago. Our contact with the electrical utility is:

Pacific Power, Area engineer: Tucker Hill
Phone 541-967-6161
Email: tucker.hill@pacificcorp.com

Analyst: drios

Open Date: 9/1/2022

Your early response to your investigation would be greatly appreciated.

9/9/2022 10:46:00 AM EMAIL FROM MIKE/PM - PAC RULE 8 (WANTS WAIVER)

From: Mike Purcell <mikep@emconstructors.com>
Sent: Friday, September 9, 2022 10:46 AM
To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>
Subject: Grand Prairie Apts, Albany

Deanna, attached is Rule No. 08 with the requirement for individual metering for apts. We are requesting a temporary waiver due to supply chain problems delaying production of the multi-meter service equipment.

9/9/2022 11:35:00 AM EMAIL FROM NATE STICE TO MIKE G - CONTACT PERSON?

From: STICE Nate * GOV <Nate.STICE@oregon.gov>
Sent: Friday, September 9, 2022 11:35 AM
To: GRANT Michael * PUC <Michael.GRANT@puc.oregon.gov>
Cc: Sarah Means <Sarah@obie.com>
Subject: RE: PUC Contact?

Hi Michael,

Who is the right contact on your teams for Sarah to connect with?

Best,

Nate

Nate Stice
Regional Solutions Director and Economy and Jobs Policy Advisor
Regional Solutions Coordinator: North Central Oregon, Central Oregon, South Willamette Valley/Mid-Coast
Office of Governor Kate Brown
Mobile: 971-283-8817

9/9/2022 11:55:00 AM EMAIL TO MIKE/PM - THANK YOU

From: RIOS Deanna * PUC
Sent: Friday, September 9, 2022 11:55 AM
To: Mike Purcell <mikep@emconstructors.com>
Subject: RE: Grand Prairie Townhomes

Mike,

Thank you for this information. I will be in touch as soon as I have the necessary information for you about the waiver or any other alternative for temporary power.

Analyst: drios

Open Date: 9/1/2022

Deanna Rios
Senior Compliance Specialist (Lead)
Hours: Tuesday-Friday 7:00-5:30
Oregon Public Utility Commission
Consumer Services Section
Tel: 503.378.6600 Toll free: 1.800.522.2404
deanna.rios@puc.oregon.gov

9/9/2022 1:36:00 PM EMAIL TO MIKE - REQ ADD'L INFO RE CURRENT SET UP

From: RIOS Deanna * PUC
Sent: Friday, September 9, 2022 1:36 PM
To: Mike Purcell <mikep@emconstructors.com>
Subject: FW: Grand Prairie Townhomes

Mike,

After discussing this situation with my manager, can you please provide the following information?

- 1)What is currently in place for power?
 - a. Is it a single phase pedestal?
- 2) What has Pacific Power (PAC) advised is needed for permanent service?

I am working on questions to send over to PAC about this situation. If you can provide the information above, I will have a better understanding of what information I need to request.

Thank you,
Deanna

9/9/2022 2:36:00 PM QUESTIONS TO PAC

Q: What is currently in place providing power to this development?

A:

Q: What is PAC requiring for permanent service to this development?

A:

Q: What is causing the delay in providing permanent power to this location? Please elaborate.

Q: What do the account notes show regarding contact from the customer/agents about permanent service to this development?

A:

Q: The customer is requesting one meter, which I understand is allowed under a recent docket if certain conditions are met. Has it been determined these conditions are not met? Please elaborate.

A:

Analyst: drios

Open Date: 9/1/2022

Q: If he installs one meter to serve each building is that okay? If not, why?

A:

Q: Please provide any other relevant information that would be helpful addressing this complaint.

A:

9/9/2022 3:02:00 PM EMAIL TO PAUL FROM BRYAN - REQ DETAILS

On Fri, Sep 9, 2022 at 3:02 PM CONWAY Bryan * PUC <Bryan.CONWAY@puc.oregon.gov> wrote:

Great! Can you give me the details again? I want to route you to the right person or section.

9/9/2022 3:06:00 PM EMAIL FROM MIKE/PM - CURRENT SET UP

From: Mike Purcell <mikep@emconstructors.com>

Sent: Friday, September 9, 2022 3:06 PM

To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>

Subject: RE: Grand Prairie Townhomes

Deanna, in answer to your questions:

1. Currently we have a 200amp single phase panel that supplies temporary power to the various construction trades and our construction office trailer
2. Pacific Power is providing 3 phase permanent power to the site. We have on order one 1,200 amp and two 800 amp services for each of the three building we have constructed.

9/9/2022 3:31:00 PM EMAIL TO PAC - CASE RECORD

From: RIOS Deanna * PUC

Sent: Friday, September 9, 2022 3:31 PM

To: Pacific Power Complaints <customeradvocacyteam@pacificorp.com>

Subject: OREGON PUC NEW COMPLAINT - GRAND PRAIRIE TOWNHOMES

Good afternoon,

Please review the attached complaint and respond to the questions addressed to PAC. Additionally, we received a request from the Governor's office for assistance with the developer and this project. I wanted to get this out due to the delay in sending it over, so I did not wait for the additional information requested from the project manager for Grand Prairie Townhomes. I will forward once received. Thanks!

Deanna Rios

Hours: Tuesday-Friday 7:00-5:30

Sr Compliance Specialist (Lead)

Consumer Services Section

Oregon Public Utility Commission

Cell: 971.375.5100

deanna.rios@puc.oregon.gov

Analyst: drios

Open Date: 9/1/2022

9/9/2022 3:38:00 PM EMAIL FROM PAUL TO BRYAN CONWAY - FOUND IT

From: Paul Spies <spiespaul@gmail.com>
Sent: Friday, September 9, 2022 3:38:08 PM
To: CONWAY Bryan * PUC <Bryan.CONWAY@puc.oregon.gov>
Subject: Re: Message and meters.

Found it thanks

9/9/2022 5:24:00 PM EMAIL TO PAC - AMENDED RECORD

From: RIOS Deanna * PUC
Sent: Friday, September 9, 2022 5:24 PM
To: Pacific Power Complaints <customeradvocacyteam@pacificcorp.com>
Subject: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - AMENDED CASE RECORD

Hello,

I haven't received who will be assigned to this complaint at PAC yet. I realized the prior case did not include my conversation with Mike Purcell this morning. I have also added the PAC contact information - see email of 9/9 at 10:38 and the additional information I requested about the current set up - see email of 9/8 at 3:06.

Thank you and hope you have a good weekend!

Deanna

9/10/2022 8:49:00 AM ASSIGNED TO RISA @ PAC

From: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificcorp.com>
Sent: Saturday, September 10, 2022 8:49 AM
To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>; Customer Advocacy Team <CustomerAdvocacyTeam@PacifiCorp.com>
Subject: RE: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - AMENDED CASE RECORD

Good Morning Deanna,

We received this complaint and I will investigate and respond.

Thanks,

Risa Talo
Customer Advocacy and Customer Service
801-955-2435

9/12/2022 1:28:00 PM EMAIL FROM PAUL/MM TO BRYAN - REQ ASSISTANCE

Analyst: drios

Open Date: 9/1/2022

From: Paul Spies <spiespaul@gmail.com>
Sent: Monday, September 12, 2022 1:28 PM
To: CONWAY Bryan * PUC <Bryan.CONWAY@puc.oregon.gov>
Subject: Re: Message and meters.

We ordered our power meter packs for the apartments we are building in Feb 2022. They told us 90 days originally. Due to supply chain issues, we are now told the metering packs won't be ready until 5/1/2023 (this is still a moving date). The apartment will be done at the end of October and could sit vacant for seven-plus months. This is going to cost us upwards of \$250K. Additionally, we will have these vacant apartments while many people need housing options.

Pacific Power has told us we can not do a single temporary meter due to a contract with the state of Oregon under a Tariff Agreement. It is my understanding this is happening to other developers in Oregon. A simple rule change, I believe, can get this resolved. We need to be granted temporary approval to use a single meter per building. This is safe and allowable use. But this issue comes from Pacific Power not having a mechanism that would allow us to do this change while we wait for the rest of our gear to arrive.

Can you guys please help point me in the right direction? Thanks again for any help you can provide me.

9/12/2022 1:44:00 PM EMAIL FROM MIKE - SPOKE W/COMMISSIONER ON 9/9(?)

From: Mike Purcell <mikep@emconstructors.com>
Sent: Monday, September 12, 2022 1:44 PM
To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>
Subject: GHrand Priairie Apts, Albany

Deanna, Our client was able to speak to one of the PUC commissioners on Friday. He was informed that on August 9th of this year, it was approved for utilities to offer a temporary variance to the multi-meter rule. Is that correct?

9/13/2022 12:18:00 PM EMAIL TO MIKE - RULE 8/ARE CONDITIONS MET?

From: RIOS Deanna * PUC
Sent: Tuesday, September 13, 2022 12:18 PM
To: Mike Purcell <mikep@emconstructors.com>
Subject: RE: GHrand Priairie Apts, Albany

Hi Mike,

I learned after we spoke last week there is a provision in Pacific Power's (PAC's) Rule 8 that allows for master metering if certain conditions are met. Please see 1.C in the attached tariff.

Questions were sent to PAC last week and I am waiting on their response. In the meantime, if you can check into the whether the conditions are met, that will be helpful.

Analyst: drios

Open Date: 9/1/2022

Deanna

9/13/2022 3:55:00 PM EMAIL TO MIKE - NEED CLIENT'S NAME ETC/WHO SPOKE WITH?

From: RIOS Deanna * PUC
Sent: Tuesday, September 13, 2022 3:55 PM
To: Mike Purcell <mikep@emconstructors.com>
Subject: FW: GHrand Priairie Apts, Albany
Importance: High

Hello again,

I attempted to find out who your client spoke with on Friday. I found they did not speak with one of our commissioners. Please provide your client's name (and contact information - phone and mailing address) and who they spoke with on Friday, as I would like to obtain a synopsis from our staff person about the conversation.

Thank you,
Deanna

9/14/2022 8:34:00 AM EMAIL FROM MIKE TO PAUL - WHO AT THE COMMISSION?

On Wed, Sep 14, 2022 at 8:34 AM Mike Purcell <mikep@emconstructors.com> wrote:

Paul, do you have the info Deanna Rios, investigator for PUC, has requested below?

9/14/2022 12:02:00 PM EMAIL FROM PAUL TO MIKE - SPOKE W/BRYAN CONWAY

From: Paul Spies <spiespaul@gmail.com>
Sent: Wednesday, September 14, 2022 12:02 PM
To: Mike Purcell <mikep@emconstructors.com>; RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>
Cc: Ed Stanton <eds@emconstructors.com>
Subject: Re: FW: GHrand Priairie Apts, Albany

Hi guys,

This is who I spoke with. Thanks.

bryan.CONWAY@puc.oregon.gov 971-239-9875

9/14/2022 3:38:00 PM EMAIL FROM RISA - REQ EXT TO 9/16

From: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>
Sent: Wednesday, September 14, 2022 3:38 PM
To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>; Customer Advocacy Team <CustomerAdvocacyTeam@PacifiCorp.com>

Analyst: drios

Open Date: 9/1/2022

Subject: RE: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - AMENDED CASE RECORD

Good Afternoon Deanna,

I apologize but may we please have an extension until end of business day on Friday, September 16, 2022 to provide a response? We are still working on getting all of the information you have requested.

Please let me know.

Thank you,

Risa Talo
Customer Advocacy and Customer Service
801-955-2435

9/14/2022 3:50:00 PM EMAIL TO RISA - EXT GRANTED

From: RIOS Deanna * PUC
Sent: Wednesday, September 14, 2022 3:50 PM
To: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>; Customer Advocacy Team <CustomerAdvocacyTeam@PacifiCorp.com>
Subject: RE: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - AMENDED CASE RECORD

Absolutely - extension granted.

9/16/2022 11:11:00 AM EMAIL FROM RISA - RESPONSE

From: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>
Sent: Friday, September 16, 2022 11:11 AM
To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>
Cc: Customer Advocacy Team <CustomerAdvocacyTeam@PacifiCorp.com>
Subject: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - AMENDED CASE RECORD

Good Afternoon Deanna,

Grand Prairie Townhomes
2710 GRAND PRAIRIE RD SE
ALBANY OR, 97321

Q1. What is currently in place providing power to this development?

A1. The development is currently being provided temporary power for construction.

Q2. What is PAC requiring for permanent service to this development?

Analyst: drios

Open Date: 9/1/2022

A2. The customer is going to be installing 2-800amp pull sections and 1-1200amp pull sections that will provide the service to the three buildings with meter packs. There are to be a total of 35 units between the three buildings. Attached is the power design that was sent to the customer. The markup outlines metering requirements, the vault installation, trench and conduit installations, and clearance requirements. I have also attached the Pacific Power construction map that points to the requirements web site. The 225kva 3 phase transformer needed for the job was ordered in January and was received on August 18, 2022.

Q3. What is causing the delay in providing permanent power to this location? Please elaborate.

A3. The developer called our estimator on August 28, 2022 and advised him that their metering gear has been delayed until February and May of 2023. They asked at that time if Pacific Power was willing to make exceptions to the metering and allow one master meter. I explained that Rule 8 had just changed, but that they do not meet the criteria because the projected usage was too great to allow the single meter. Our Estimator discussed the issue with our metering Foreman and he said depending on what part of their equipment is delayed there may be some exceptions we could make, but they would not fit the criteria for a single meter. The exceptions that were discussed would be the height of the meters on the building. If the developer is having issues getting 3 pack meters, but could find 5 packs that would be an area the metering Foreman was willing to make the exception for. Our estimator contacted their electrician and asked what equipment was delayed and he confirmed that it was more than just the meter packs.

Q4 What do the account notes show regarding contact from the customer/agents about permanent service to this development?

A4. Pacific Power was waiting to receive payment to be able to schedule a pole installation so the customer can finish their conduit to the pole for the primary installation to the transformer vault. The customer was emailed the contract, costs, and easement on July 9, 2022 and the contract and easement were returned August 8, 2022 but the payment wasn't received until August 13, 2022. The communication with the customer about the metering took place over the phone (per A3) and an email was sent with a link to Rule 8 on September 9, 2022 after the customer requested the location of the rule (see attached email).

Q5. The customer is requesting one meter, which I understand is allowed under a recent docket if certain conditions are met. Has it been determined these conditions are not met? Please elaborate.

A5. Please refer to A3.

Q6. If he installs one meter to serve each building is that okay? If not, why?

A6. The change to rule 8 does allow for a single meter if certain criteria are met and the loading for each unit is more than the maximum allowable usage of 250 kWh per month. These will be single bed room units that are 661 sq. ft. per unit and two bed room units that are 960 sq. ft. per unit. Each unit has its own washer, dryer and water heater and all of the units will be all electric. According to the electrician there are no gas appliances. According to Pacific Powers loading standard, the units are projected to use 5kva per unit. This number is diversified for winter loading. With this load if the customer was home for 8hrs a day for 5 days a week they would use 823 kWh.

Q: Please provide any other relevant information that would be helpful addressing this complaint.

Analyst: drios

Open Date: 9/1/2022

This change to the rule is very new and our Estimator has not yet told the customer what they would need to provide to see if they meet any of the other requirements to for a single meter. The below criteria is what the customer must meet -

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

The burden of meeting the criteria in Oregon Rule 8. Section C, items 1-4, falls upon the developer. The developer needs to meet the criteria, which means providing documentation for each criterion before we will move ahead with master-metering.

If the developer wants to master-meter the individual apartments when construction is completed, for the interim before the ordered metering equipment arrives, they have to qualify for master-metering, even though they may choose to individually meter later on. If they qualify and want to master-meter now and convert to individual metering later on, we will have to address this in the special provisions section of the contract. In this case since they already have a contract, we will have to address the master metering in an amendment or a separate contract addressing just the metering. But the first step is the documentation of meeting the master-metering criteria.

Please let me know if you have any questions or concerns.

Thank you,

Risa Talo
Customer Advocacy and Customer Service
801-955-2435

9/19/2022 12:20:00 PM EMAIL FROM JULIAN/GP - SUGGESTED SPECS

From: Alpha Associates <alpha.associatesoffice@gmail.com>
Sent: Monday, September 19, 2022 12:20 PM
To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>; Mike Helms <michaelhelms810@gmail.com>; Paul Spies <spiespaul@gmail.com>; Ed Stanton <eds@emconstructors.com>; Mike Purcell <mikep@emconstructors.com>; jennifer@oregoncub.org; tucker.hill@pacificorp.com; CONWAY Bryan * PUC <Bryan.CONWAY@puc.oregon.gov>
Subject: assistance request on electrical service (file name 'Mike Purcell')

Hi Deanna;

Thanks for looking into this issue for us. Attached is a letter, along with

Analyst: drios

Open Date: 9/1/2022

layout drawings and specification sheets for equipment suggested. Our intention is to build the electrical system exactly as approved by Pacific Power, but supply chain issues for that gear is holding up 35 families from moving into this complex. We have designed and proposed a temporary solution that Pacific Power, so far, is not accepting. We're hoping to change that.. But it's a temporary solution only.. We're hoping, with your help, to move forward with this. I've copied all of the parties having a stake in this, so you have a way to communicate with any or all of us. Thanks

Regards;
Julian Johnson
General Partner

ALPHA ASSOCIATES OFFICE
2813 PACIFIC BLVD SW
ALBANY, OR 97321
(541) 928-7561 office
(541) 231-5744 cell
alpha.associatesoffice@gmail.com

9/19/2022 12:27:00 PM EMAIL FROM JULIAN - ATTACHMENTS

From: Alpha Associates <alpha.associatesoffice@gmail.com>
Sent: Monday, September 19, 2022 12:27 PM
To: jennifer@oregoncub.org; CONWAY Bryan * PUC <Bryan.CONWAY@puc.oregon.gov>; Mike Purcell <mikep@emconstructors.com>; Ed Stanton <eds@emconstructors.com>; tucker.hill@pacificorp.com; Paul Spies <spiespaul@gmail.com>; Mike Helms <michaelhelms810@gmail.com>; RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>
Subject: Back up to previous email

Deanna;
Sorry, I forgot the other attachments. Here they are.

Regards;
Julian Johnson
General Partner

9/23/2022 4:10:00 PM EMAIL TO RISA - UPDATED CASE & ATTACHMENTS

From: RIOS Deanna * PUC
Sent: Friday, September 23, 2022 4:10 PM
To: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>; Customer Advocacy Team <CustomerAdvocacyTeam@PacifiCorp.com>
Subject: RE: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - UPDATED CASE RECORD & ATTACHMENTS

Analyst: drios

Open Date: 9/1/2022

Hi Risa,

I am forwarding you the entire case and all the attachment so you have the latest information received the customer for your records and response. I am out of the office after I push send - hope you have a good weekend!

Deanna

9/26/2022 7:27:00 AM EMAIL FROM RISA - RESPONSE SENT 9/16, RECEIVED?

From: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>

Sent: Monday, September 26, 2022 7:27 AM

To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>

Cc: Customer Advocacy Team <CustomerAdvocacyTeam@PacifiCorp.com>

Subject: FW: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - AMENDED CASE RECORD

Good Morning Deanna,

This was sent to you September 16, 2022. Please let me know that you received it, you did not include it in the information you sent over.

Please let me know.

Thank you!

Risa Talo

Customer Advocacy and Customer Service

801-955-2435

9/27/2022 7:40:00 AM EMAIL FROM CUSTOMER - REQ STATUS

From: Mike Purcell <mikep@emconstructors.com>

Sent: Tuesday, September 27, 2022 7:40 AM

To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>

Subject: Grand Prairie Apts

Deanna, it has been several days since I last heard about the progress on your investigation about a temporary variance to the multi-meter rule for our apartment building. Can you give me an update so I can broadcast to our owner and other stake-holders?

9/29/2022 3:50:00 PM EMAIL TO RISA - LOCATED RESPONSE

From: RIOS Deanna * PUC

Sent: Thursday, September 29, 2022 3:50 PM

To: 'Talo, Florisa (PacifiCorp)' <Florisa.Talo@pacificorp.com>

Subject: RE: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - AMENDED CASE RECORD

Analyst: drios

Open Date: 9/1/2022

Hi Risa,

Cleaning out email and found it in my junk email. I have added it to the record and will let you know if I have any additional questions.

Thank you,
Deanna

9/30/2022 11:47:00 AM EMAIL TO MIKE P RE STATUS - RESPONSE TO GO OUT BY 10/4

From: RIOS Deanna * PUC
Sent: Friday, September 30, 2022 11:47 AM
To: Mike Purcell <mikep@emconstructors.com>
Subject: RE: Grand Prairie Apts

Hi Mike,

I received a response from Pacific Power and have circulated it internally to those who you contacted within the agency for any further comments. I will have a response to you no later than Tuesday afternoon.

Deanna Rios
Senior Compliance Specialist (Lead)
Hours: Tuesday-Friday 7:00-5:30
Oregon Public Utility Commission
Consumer Services Section
Tel: 503.378.6600 Toll free: 1.800.522.2404
deanna.rios@puc.oregon.gov

10/5/2022 3:31:00 PM EMAIL TO MIKE P - PAC'S REPOSE INC ATTACHMENTS(X3)

From: RIOS Deanna * PUC
Sent: Wednesday, October 5, 2022 3:31 PM
To: Mike Purcell <mikep@emconstructors.com>
Cc: WOLF Charla * PUC <Charla.WOLF@puc.oregon.gov>
Subject: Grand Prairie Apts - PACIFIC POWER'S RESPONSE
Importance: High

Hi Mike,

Below is the response I received from Pacific Power (PAC). Please share the information with the owner and other stakeholders for review and consideration. If there is additional information that PAC is unaware of, please provide that to me and I will forward it to their executive office.

I will be out of the office 10/6 - 10/18. If you have questions related to your case, my co-worker, Charla Wolf, will be monitoring your complaint for me. I have copied her in the event you need to

Analyst: drios

Open Date: 9/1/2022

reach me or have additional questions. I will touch base with you upon my return to the office in the event there are still unresolved issues.

Pacific Power Response:

"Grand Prairie Townhomes
2710 GRAND PRAIRIE RD SE
ALBANY OR, 97321

Q1. What is currently in place providing power to this development?

A1. The development is currently being provided temporary power for construction.

Q2. What is PAC requiring for permanent service to this development?

A2. The customer is going to be installing 2-800amp pull sections and 1-1200amp pull sections that will provide the service to the three buildings with meter packs. There are to be a total of 35 units between the three buildings. Attached is the power design that was sent to the customer. The markup outlines metering requirements, the vault installation, trench and conduit installations, and clearance requirements. I have also attached the Pacific Power construction map that points to the requirements web site. The 225kva 3 phase transformer needed for the job was ordered in January and was received on August 18, 2022.

Q3. What is causing the delay in providing permanent power to this location? Please elaborate.

A3. The developer called our estimator on August 28, 2022 and advised him that their metering gear has been delayed until February and May of 2023. They asked at that time if Pacific Power was willing to make exceptions to the metering and allow one master meter. I explained that Rule 8 had just changed, but that they do not meet the criteria because the projected usage was too great to allow the single meter. Our Estimator discussed the issue with our metering Foreman and he said depending on what part of their equipment is delayed there may be some exceptions we could make, but they would not fit the criteria for a single meter. The exceptions that were discussed would be the height of the meters on the building. If the developer is having issues getting 3 pack meters, but could find 5 packs that would be an area the metering Foreman was willing to make the exception for. Our estimator contacted their electrician and asked what equipment was delayed and he confirmed that it was more than just the meter packs.

Q4 What do the account notes show regarding contact from the customer/agents about permanent service to this development?

A4. Pacific Power was waiting to receive payment to be able to schedule a pole installation so the customer can finish their conduit to the pole for the primary installation to the transformer vault. The customer was emailed the contract, costs, and easement on July 9, 2022 and the contract and easement were returned August 8, 2022 but the payment wasn't received until August 13, 2022. The communication with the customer about the metering took place over the phone (per A3) and an email was sent with a link to Rule 8 on September 9, 2022 after the customer requested the location of the rule (see attached email).

Q5. The customer is requesting one meter, which I understand is allowed under a recent docket if certain conditions are met. Has it been determined these conditions are not met? Please elaborate.

Analyst: drios

Open Date: 9/1/2022

A5. Please refer to A3.

Q6. If he installs one meter to serve each building is that okay? If not, why?

A6. The change to rule 8 does allow for a single meter if certain criteria are met and the loading for each unit is more than the maximum allowable usage of 250 kWh per month. These will be single bed room units that are 661 sq. ft. per unit and two bed room units that are 960 sq. ft. per unit. Each unit has its own washer, dryer and water heater and all of the units will be all electric. According to the electrician there are no gas appliances. According to Pacific Powers loading standard, the units are projected to use 5kva per unit. This number is diversified for winter loading. With this load if the customer was home for 8hrs a day for 5 days a week they would use 823 kWh.

Q: Please provide any other relevant information that would be helpful addressing this complaint. This change to the rule is very new and our Estimator has not yet told the customer what they would need to provide to see if they meet any of the other requirements to for a single meter. The below criteria is what the customer must meet -

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

The burden of meeting the criteria in Oregon Rule 8. Section C, items 1-4, falls upon the developer. The developer needs to meet the criteria, which means providing documentation for each criterion before we will move ahead with master-metering.

If the developer wants to master-meter the individual apartments when construction is completed, for the interim before the ordered metering equipment arrives, they have to qualify for master-metering, even though they may choose to individually meter later on. If they qualify and want to master-meter now and convert to individual metering later on, we will have to address this in the special provisions section of the contract. In this case since they already have a contract, we will have to address the master metering in an amendment or a separate contract addressing just the metering. But the first step is the documentation of meeting the master-metering criteria."

Kind regards,

Deanna Rios
Senior Compliance Specialist (Lead)
Hours: Tuesday-Friday 7:00-5:30
Oregon Public Utility Commission
Consumer Services Section

Analyst: drios

Open Date: 9/1/2022

Tel: 503.378.6600 Toll free: 1.800.522.2404
deanna.rios@puc.oregon.gov

10/17/2022 9:48:00 AM EMAIL TO RISA - NEED UPDATE

From: WOLF Charla * PUC
Sent: Monday, October 17, 2022 9:48 AM
To: 'Talo, Florisa (PacifiCorp)' <Florisa.Talo@pacificorp.com>
Cc: 'Customer Advocacy (PUC)' <uswpuc@centurylink.com>
Subject: Grand Prairie Townhouses

Risa:

While Deanna is still out, can I get an update on this complaint. On 10/5, PAC was requiring the contractor to provide a few things. Has the contractor provided the documentation that you requested?

Has there been any other movement since 10/5?

Thank you.

Charla Wolf
Sr. Compliance Specialist
Consumer Services
Oregon Public Utility Commission
503-378-6600
1-800-522-2404
Charla.wolf@puc.oregon.gov

10/17/2022 10:23:00 AM EMAIL FROM RISA (PAC) - NO RECENT COMMUNICATION WITH CUSTOMER (BY CHARLA)

From: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>
Sent: Monday, October 17, 2022 10:23 AM
To: WOLF Charla * PUC <Charla.WOLF@puc.oregon.gov>
Cc: Customer Advocacy (PUC) <uswpuc@centurylink.com>
Subject: RE: Grand Prairie Townhouses

Good Morning Charla,

I have attached the last email I received from Deanna regarding this complaint. Our estimator went out to the location recently just to stake a pole, but otherwise Pacific Power has not heard anything back or received anything from the customers since their complaint was filed.

Please let me know if you have any additional questions or concerns.

Thank you,

Analyst: drios

Open Date: 9/1/2022

Risa Talo
Customer Advocacy and Customer Service
801-955-2435

10/17/2022 1:44:00 PM EMAIL TO MIKE P - CRITERIA MET? (BY CHARLA)

From: WOLF Charla * PUC <Charla.WOLF@puc.oregon.gov>
Sent: Monday, October 17, 2022 10:39:03 AM
To: mikep@emconstructors.com <mikep@emconstructors.com>
Cc: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>
Subject: Grand Prairie Apartments/OPUC

Hi Mike:

I'm unsure if you responded to Deanna while she is out. If you did, can you please forward the response to me.

Can the criteria below that PAC listed be met? If yes, what actions are you taking to respond to PAC?

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.

I look forward to an update from you.

Kind regards,

Charla Wolf
Sr. Compliance Specialist
Consumer Services
Oregon Public Utility Commission
503-378-6600
1-800-522-2404
Charla.wolf@puc.oregon.gov

10/17/2022 1:44:00 PM EMAIL FROM MIKE - WANT TEMP SINGLE METER APPROVAL (BY CHARLA)

From: Mike Purcell <mikep@emconstructors.com>

Analyst: drios

Open Date: 9/1/2022

Sent: Monday, October 17, 2022 1:44 PM
To: WOLF Charla * PUC <Charla.WOLF@puc.oregon.gov>; Mike Purcell <mikep@emconstructors.com>
Cc: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>
Subject: Re: Grand Prairie Apartments/OPUC

How can we get a temp approval for a single meter on these apts?

Sent from my Verizon, Samsung Galaxy smartphone
Get Outlook for Android

10/18/2022 11:17:00 AM EMAIL FROM MIKE HELMS/ALPHA ASSOC - PLZ CALL

-----Original Message-----

From: Michael Helms <michaelhelms810@gmail.com>
Sent: Tuesday, October 18, 2022 11:17 AM
To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>
Subject: Grand Prairie project Albany or

Hi Deanna

This is Mike with Alpha Associates in Albany, OR. I'm contacting in regards to the Grand Prairie project that we are on with Pacific Power. I was hoping to ask you some questions about their response and how to proceed. My number is 541-602-6793. Ty

10/18/2022 11:36:00 AM EMAIL TO MIKE P - NO RESPONSE TO 10/5 EMAIL/PLZ ADVISE

From: RIOS Deanna * PUC
Sent: Tuesday, October 18, 2022 11:36 AM
To: Mike Purcell <mikep@emconstructors.com>
Subject: OREGON PUC: Grand Prairie Apts - REQUEST FOR INFORMATION
Importance: High

Hi Mike,

I am aware you reached out to Senator Gelsler who in turn reached out to Senator Beyer and Senator Jama regarding this situation. Your contact with them was referred back to our agency. Have you had an opportunity to review the information I provided on 10/5 below, as I have not received a response from you?

Is the developer able to meet the required criteria below? If so, what actions have been taken? Please provide specific details.

If the developer is unable to meet the requirements, a waiver can be requested. However, the developer would still need to meet #1 below. Please advise.

Kind regards,

Analyst: drios

Open Date: 9/1/2022

Deanna Rios
Senior Compliance Specialist (Lead)

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.

10/18/2022 11:39:00 AM VOICE MAIL TO MIKE H - RETURNED CALL

I attempted to return Mike Helms' call. I left a detailed vm message advising I was aware of the Senator contacts and had just sent an email to Mike Purcell requesting some information. I advised the criteria in my email must be met by the developer. If that is not possible, a waiver may be filed, but the requirements of #1 must still be met. I provided my contact information for him to return my call.

10/18/2022 12:19:00 PM VOICE MAIL TO MIKE H TO CALL ME

I left a brief message asking Mike Helms at Alpha Associates to return my call.

10/18/2022 12:19:00 PM CALL FROM MIKE H @ ALPHA ASSOC - ELECTRICIAN

Mike returned my call to provide some additional information about the electrical load.

He said there is no central air; everything has already been built. He said they will not be able to overcome the 5 KW load. There is no way to lower the load given the set up in each unit. Based on the response from PAC, they are nearly double the allowed load. In order to qualify with a zero lot line, would require a full redo. They are looking for a temporary exception.

Mike said they are not looking to fall permanently under the waiver; the temp solution is only needed until the right parts come in. He said they are willing to work any angles, as they have the parts for the temporary installation.

We discussed the issue with Building Codes. Mike was wondering if anyone is able to overcome the Building Codes issue. I told him I did not know since it is not something our agency has control over.

I thanked him for this information and let him know I would be providing it to my manager for further review.

10/19/2022 7:34:00 AM EMAIL FROM MIKE P - BACK TO ORIGINAL QUESTION/WAIVER?

From: Mike Purcell <mikep@emconstructors.com>

Sent: Wednesday, October 19, 2022 7:34 AM

Analyst: drios

Open Date: 9/1/2022

To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>
Subject: RE: OREGON PUC: Grand Prairie Apts - REQUEST FOR INFORMATION

Deanna, I know you had conversations with our electrical contractor concerning this. This project does not qualify under the strict terms of the master meter rules. I am back to my original question. Is it possible to get a temporary exemption to the rule given the difficult times with supply chain issues currently being experienced in the industry? What needs to happen to get this change? This project is affordable housing at a time when there is a critical lack of housing on the market. Would going to the media and press be a way to highlight the issue so that the PUC would create a temporary rule change until the marketplace changes?

10/19/2022 8:55:00 AM EMAIL TO MIKE P & MIKE H - BUILDING CODES INFO/REQ MEETING

From: RIOS Deanna * PUC
Sent: Wednesday, October 19, 2022 8:55 AM
To: mikep@emconstructors.com; michaelhelms810@gmail.com
Subject: FW: OREGON PUC: Grand Prairie Apts - REQUEST FOR INFORMATION
Importance: High

Good morning,

I did speak with Mike Helms yesterday right after I sent the email to you. Mike advised the conditions stated below in #1 and #4 could not be met. He stated they would not be able to overcome the Oregon Building Codes criteria; however, we did not have further discussion of why this could not be overcome. Has anyone on this project contacted Oregon Building Codes to discuss the documentation requested? (1. Documentation that the multiple residential units have received the necessary exemptions to individual metering as required by the Oregon State Building Code,) Who are they working with there and what was the outcome? I ask because the PUC cannot grant a waiver for another agency's rules or code requirements.

That being said, once I have the information about Building Codes for review and possible further contact, I would like to set up a meeting with PUC (myself, my manager, safety staff), Pacific Power (district manager, estimator, regulatory liaison), and whomever you would like to have as a representative(s) on the Teams or Zoom call. If you would also provide the names of those you would like in attendance and their contact information, I can schedule a meeting. I will also need dates and times of availability over the next two weeks. My goal is to meet next week if schedules allow. The meeting will be informal with the intent to mediate or talk through any other options.

There is nothing that prevents a party from seeking a waiver; however, if the required criterion are not met, it is unlikely the waiver would be granted. Approval would require a temporary waiver, but we would have to know the status of PAC's four requirements, especially the Oregon Building Code issue. Any request would be analyzed by staff, which would include information requests, and ultimately bringing it to a public meeting with a recommendation to the Commission.

I look forward to receiving this information to see if we can work towards either a mediated solution or a waiver.

Analyst: drios

Open Date: 9/1/2022

Thank you,

Deanna Rios
Senior Compliance Specialist (Lead)

10/19/2022 3:02:00 PM EMAIL FROM MIKE P - CHECKING W/BLDG CODES & WANTS TO MEET

From: Mike Purcell <mikep@emconstructors.com>
Sent: Wednesday, October 19, 2022 3:02 PM
To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>
Subject: RE: OREGON PUC: Grand Prairie Apts - REQUEST FOR INFORMATION

Deanna, thank you for the response. We are seeing if there is any appeal on the building code issue. Yes we will make ourselves available for a zoom meeting any time you select next week. Please send the invite to: mikep@emconstructors.com, eds@emconstructors.com, spiespaul@gmail.com, Helms at michaelhelms810@gmail.com,

10/20/2022 9:45:00 AM EMAIL TO RISA - REQ INFORMAL MTG

From: RIOS Deanna * PUC
Sent: Thursday, October 20, 2022 9:45 AM
To: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>
Cc: NOTTINGHAM Melissa * PUC <melissa.nottingham@puc.oregon.gov>
Subject: RE: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - REQUEST INFORMAL MEETING W/PARTIES

Hi Risa,

I have been talking internally with PUC staff, Melissa and various people working on the Grand Prairie Townhomes development. After much back and forth, it has been decided it would be best if we can set up a Teams meeting for all parties.

PUC would include: myself, Melissa and possibly one of our safety staff.
PAC we would like: you, the district manager and the estimator (any others you deem necessary).
From Grand Prairie they have asked the following people be invited - mikep@emconstructors.com (Mike Purcell/contractor), eds@emconstructors.com, spiespaul@gmail.com (Paul Spies/managing partner), michaelhelms810@gmail.com (Michael Helms/Alpha Associates/electrical contractor).

If possible, I would like to set this meeting for next week if schedules will allow. Tuesday, Thursday or Friday work best for me. Wednesdays are filled with weekly meetings. Please reach out to PAC staff to see what days/times they have available over the next two weeks. Let me know and I will set up the meeting if PAC is agreeable to meet.

Thanks,
Deanna

Analyst: drios

Open Date: 9/1/2022

10/26/2022 11:02:00 AM EMAIL TO RISA - FLUP MTG REQUEST

From: RIOS Deanna * PUC
Sent: Wednesday, October 26, 2022 11:02 AM
To: 'CustomerAdvocacy@PacifiCorp.com' <CustomerAdvocacy@PacifiCorp.com>
Cc: 'Talo, Florisa (PacifiCorp)' <Florisa.Talo@pacificorp.com>; NOTTINGHAM Melissa * PUC <melissa.nottingham@puc.oregon.gov>; CASWELL Heide * PUC <Heide.CASWELL@puc.oregon.gov>
Subject: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - REQUEST INFORMAL MEETING W/PARTIES (2nd REQUEST)
Importance: High

Good morning Risa,

I have been out of the office, so I apologize for the delayed follow up. I have not received a response to my email request below. Please advise as soon as possible.

Thank you,
Deanna

10/26/2022 11:41:00 AM EMAIL FROM RISA - MEDIATION?

From: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>
Sent: Wednesday, October 26, 2022 11:41 AM
To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>; Customer Advocacy Team <CustomerAdvocacyTeam@PacifiCorp.com>; _Tariff Policy <TariffPolicy@PacifiCorp.com>
Cc: NOTTINGHAM Melissa * PUC <Melissa.NOTTINGHAM@puc.oregon.gov>; CASWELL Heide * PUC <Heide.CASWELL@puc.oregon.gov>; Hoskins, Amy (PacifiCorp) <Amy.Hoskins@pacificorp.com>
Subject: RE: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - REQUEST INFORMAL MEETING W/PARTIES (2nd REQUEST)
Importance: High

Good Afternoon Deanna,

I also apologize, I've been out of the office since October 19, 2022, and just returned today. Customeradvocacyteam@pacificorp.com is the email every request should be sent to so nothing is missed.

I will check with my group and our field personnel to see if and when they are available for a meeting. Please provide us with an agenda for the meeting that you are requesting and confirm whether or not this is will be a mediation.

Thank you,

Risa Talo
Customer Advocacy and Customer Service

Analyst: drios

Open Date: 9/1/2022

801-955-2435

10/26/2022 11:58:00 AM EMAIL TO RISA BY MELISSA - VOLUNTARY DISCUSSION

From: NOTTINGHAM Melissa * PUC

Sent: Wednesday, October 26, 2022 11:58 AM

To: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>; RIOS Deanna * PUC

<Deanna.RIOS@puc.oregon.gov>; Customer Advocacy Team

<CustomerAdvocacyTeam@PacifiCorp.com>; _Tariff Policy <TariffPolicy@PacifiCorp.com>

Cc: CASWELL Heide * PUC <Heide.CASWELL@puc.oregon.gov>; Hoskins, Amy (PacifiCorp) <Amy.Hoskins@pacificorp.com>

Subject: RE: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - REQUEST INFORMAL MEETING W/PARTIES (2nd REQUEST)

Risa,

This is not mediation. The customer will not be in attendance.

To level set, this is informal voluntary discussion. I thought a conversation would expedite the process.

The other option would be to email questions back and forth.

Let me know how the company would like to proceed.

Thanks,
Melissa

10/26/2022 11:59:00 AM EMAIL TO RISA - YES, MEDIATION

From: RIOS Deanna * PUC

Sent: Wednesday, October 26, 2022 11:59 AM

To: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>; Customer Advocacy Team

<CustomerAdvocacyTeam@PacifiCorp.com>; _Tariff Policy <TariffPolicy@PacifiCorp.com>

Cc: NOTTINGHAM Melissa * PUC <melissa.nottingham@puc.oregon.gov>; CASWELL Heide * PUC

<Heide.CASWELL@puc.oregon.gov>; Hoskins, Amy (PacifiCorp) <Amy.Hoskins@pacificorp.com>

Subject: RE: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - REQUEST INFORMAL MEETING W/PARTIES (2nd REQUEST)

Oh dang, I'm sorry to hear that. Hope you are feeling better! I understand there was some back and forth with the email address for customer advocacy and it was all corrected prior to today. We would like to facilitate an informal conversation with the company and customer. It is a mediation to get all parties involved at the table to see if there are any alternatives available and what those would look like.

Thank you,
Deanna

Analyst: drios

Open Date: 9/1/2022

10/26/2022 12:02:00 PM EMAIL TO RISA - FLUP TO 10/20 REQUEST

From: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>

Sent: Wednesday, October 26, 2022 12:02 PM

To: CustomerAdvocacy@PacifiCorp.com

Cc: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>; NOTTINGHAM Melissa * PUC <Melissa.NOTTINGHAM@puc.oregon.gov>; CASWELL Heide * PUC

<Heide.CASWELL@puc.oregon.gov>

Subject: [INTERNET] OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - REQUEST INFORMAL MEETING W/PARTIES (2nd REQUEST)

Importance: High

Good morning Risa,

I have been out of the office, so I apologize for the delayed follow up. I have not received a response to my email request below. Please advise as soon as possible.

Thank you,
Deanna

10/26/2022 12:03:00 PM EMAIL TO RISA - DISREGARD PREV EMAIL

From: NOTTINGHAM Melissa * PUC <Melissa.NOTTINGHAM@puc.oregon.gov>

Sent: Wednesday, October 26, 2022 12:03 PM

To: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>; RIOS Deanna * PUC

<Deanna.RIOS@puc.oregon.gov>; Customer Advocacy Team

<CustomerAdvocacyTeam@PacifiCorp.com>; _Tariff Policy <TariffPolicy@PacifiCorp.com>

Cc: CASWELL Heide * PUC <Heide.CASWELL@puc.oregon.gov>; Hoskins, Amy (PacifiCorp) <Amy.Hoskins@pacificorp.com>

Subject: RE: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - REQUEST INFORMAL MEETING W/PARTIES (2nd REQUEST)

Risa,

Completely disregard this email. I am sorry!

I was thinking this was another complaint.

The meeting for Grand Prairie will include the customers. It is a voluntary meeting of the parties to see if any options are available to bring service to the townhomes.

The commission understands the company is following its tariff on the master metering requirements.

Our hope is a conversation with all parties might produce a creative solution or close the issue.

Please let me know if you have any questions.

Analyst: drios

Open Date: 9/1/2022

I apologize for the confusion. At first, I thought it was related to the Heim complaint.

Melissa

10/28/2022 8:27:00 AM EMAIL FROM CUSTOMER - SAME ?/PROCESS FOR TEMP RULE REVISION

From: Mike Purcell <mikep@emconstructors.com>
Sent: Friday, October 28, 2022 8:27 AM
To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>
Subject: RE: OREGON PUC: Grand Prairie Apts - REQUEST FOR INFORMATION

Is there a process where we can request a temporary rule revision for our situation?

10/28/2022 10:37:00 AM EMAIL TO RISA BY MELISSA - ANY UPDATES

From: NOTTINGHAM Melissa * PUC <Melissa.NOTTINGHAM@puc.oregon.gov>
Sent: Friday, October 28, 2022 10:37 AM
To: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>; RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>; Customer Advocacy Team <CustomerAdvocacyTeam@PacifiCorp.com>; _Tariff Policy <TariffPolicy@PacifiCorp.com>
Cc: CASWELL Heide * PUC <Heide.CASWELL@puc.oregon.gov>; Hoskins, Amy (PacifiCorp) <Amy.Hoskins@pacificorp.com>
Subject: RE: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - REQUEST INFORMAL MEETING W/PARTIES (2nd REQUEST)

Risa

We would like to get this set up as soon as possible.

Any updates?

Thank you,
Melissa

10/28/2022 1:33:00 PM EMAIL TO MIKE P - STATUS OF MTG/BLDG CODES STATUS?

From: RIOS Deanna * PUC
Sent: Friday, October 28, 2022 1:33 PM
To: Mike Purcell <mikep@emconstructors.com>
Cc: NOTTINGHAM Melissa * PUC <melissa.nottingham@puc.oregon.gov>
Subject: RE: OREGON PUC: Grand Prairie Apts - REQUEST FOR INFORMATION

Mike,

Analyst: drios

Open Date: 9/1/2022

I understand your frustration. I was hoping to have the meeting scheduled this week. I have all PUC members and your folks on board to schedule. I am currently waiting on Pacific Power (PAC) to get me available dates for their team who will be attending. It's looking like it will be next week now. I have also discussed your situation at length with my manager regarding any alternatives. This is the best path given this project does not meet PAC's requirements for a master meter situation.

For clarification, is the master meter base already inspected and approved by the county?

If not, what discussions have you had with the county about approving a "temporary" master meter for a building originally designed for multiple meters.

Are you requesting a waiver to Pacific Power's master metering rule, or a waiver of building codes?

This additional information will help guide us to the proper jurisdiction and how we can or cannot be able to help.

Please let me know if you no longer wish to have an informal meeting. Otherwise, I will push for the meeting to be scheduled next week.

Kind regards,

Deanna

10/28/2022 2:40:00 PM EMAIL FROM RISA TO MELISSA - CHECKING ON UNEXPLORED ALTERNATIVES W/FIELD

From: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>

Sent: Friday, October 28, 2022 2:40 PM

To: NOTTINGHAM Melissa * PUC <Melissa.NOTTINGHAM@puc.oregon.gov>; RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>; Customer Advocacy Team

<CustomerAdvocacyTeam@PacifiCorp.com>; _Tariff Policy <TariffPolicy@PacifiCorp.com>

Cc: CASWELL Heide * PUC <Heide.CASWELL@puc.oregon.gov>; Hoskins, Amy (PacifiCorp) <Amy.Hoskins@pacificorp.com>

Subject: RE: RE: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - REQUEST INFORMAL MEETING W/PARTIES (2nd REQUEST)

Good Afternoon Melissa,

We truly appreciate your request for an informal meeting to try to find a resolution for this customer. I will speak with our local field office and management to see if there are any other alternatives we have not looked at or provided already and I will get back to you as soon as possible.

Are there any other questions or concerns that you may have that I can pass along for you in the mean time?

Please let me know.

Analyst: drios

Open Date: 9/1/2022

Thank you,

Risa Talo
Customer Advocacy and Customer Service
801-955-2435

11/1/2022 1:07:00 PM EMAIL FROM RISA TO MELISSA - OK TO CONTACT CUSTOMER?

From: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>
Sent: Tuesday, November 1, 2022 1:07 PM
To: NOTTINGHAM Melissa * PUC <Melissa.NOTTINGHAM@puc.oregon.gov>; RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>; Customer Advocacy Team <CustomerAdvocacyTeam@PacifiCorp.com>; _Tariff Policy <TariffPolicy@PacifiCorp.com>
Cc: CASWELL Heide * PUC <Heide.CASWELL@puc.oregon.gov>; Hoskins, Amy (PacifiCorp) <Amy.Hoskins@pacificorp.com>
Subject: RE: RE: OREGON PUC - OPEN COMPLAINT - GRAND PRAIRIE TOWNHOMES - REQUEST INFORMAL MEETING W/PARTIES (2nd REQUEST)
Importance: High

Good Afternoon Melissa,

May we reach out to the customer directly to get clarification on what specific equipment they are still waiting on/missing please?

Please let me know.

Thank you,

Risa Talo
Customer Advocacy and Customer Service
801-955-2435

11/1/2022 4:21:00 PM EMAIL TO RISA BY MELISSA - REQ FLUP W/CARY & ADDL LOAD ?S

From: NOTTINGHAM Melissa * PUC <Melissa.NOTTINGHAM@puc.oregon.gov>
Sent: Tuesday, November 1, 2022 4:21 PM
To: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>
Cc: _Tariff Policy <TariffPolicy@PacifiCorp.com>; PUC_GR-CONSUMER <PUC_consumer@puc.oregon.gov>
Subject: Grand Prairie Townhomes

Risa,

Thank you for the call today.

Analyst: drios

Open Date: 9/1/2022

Please let me know about Cary's conversation with the developer as soon as you can. Hopefully, they can work out a compromise.

If we could get some recommended times for meeting by tomorrow?

Could you also check on the forecasted load information provided in your prior response?

The 250 kwh per unit is after heating and cooling and I am not sure if the estimator's calculation took that into consideration.

Thank you,

Melissa Nottingham (She, Her, Hers)
Manager, Consumer Services & RSPF Program
Oregon Public Utility Commission
201 High Street SE, Salem, OR 97301
(503) 689-7646

11/2/2022 11:19:00 AM EMAIL FROM RISA - LOAD INFO/MORE EQUIP ISSUES

From: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>
Sent: Wednesday, November 2, 2022 11:19 AM
To: NOTTINGHAM Melissa * PUC <Melissa.NOTTINGHAM@puc.oregon.gov>
Cc: _Tariff Policy <TariffPolicy@PacifiCorp.com>; PUC_GR-CONSUMER <PUC_consumer@puc.oregon.gov>; Customer Advocacy Team <CustomerAdvocacyTeam@PacifiCorp.com>
Subject: RE: Grand Prairie Townhomes
Importance: High

Good Afternoon Melissa,

Cary Ann had our Estimator reach out to the developer's electrician. The first section below is the response to your question from our Estimator about the load calculation and the italicized section is a summary of the conversation he had with their electrician this morning -

Pacific Powers loading standard doesn't have an option for loading without taking into account heating and cooling. The calculation I showed in my previous email was as good of a guess as I could with the information from the customer and using Pacific Powers standard.

The customers units are all electric and for the square footage Pacific Powers standard shows a demand of 8-9kw. I used 5kw as a guess because each unit has a washer and dryer and a water heater. Below is the table from Pacific Powers standard that I used for my example.

[See attached email, which includes the table.]

Analyst: drios

Open Date: 9/1/2022

For the customer to meet the 250 kwh criteria they would have to provide reasonable substantiation of the load projection. One more example, if the projected load to each unit is 1kw and each unit has that amount of load for 8hrs a day for 30 days, the kwh would be 240. I don't believe these units with electric range, electric water heater, and washers/dryers are going to be able to stay under the 250 kwh to meet the criteria of Master Metering.

The language in Rule 8, Section I.C. requires the applicant to provide reasonable substantiation of the load projection of their units. The Company's responsibility is to review the information submitted for its reasonableness.

I called the electrician and he said he is missing components for the main disconnect. He said he has some meter stacks but not anywhere close to the amount he needs for the project. He says he cant get any 3 or 4 stack meter bases. I discussed this with the Metering Foreman and his stance is each unit needs to be individually metered per the Tariff and single metering points as a "temporary" solution has already been vetted and denied in multiple locations for other customers. He also said as long as each unit is individually metered we are open to make exceptions to the ESR metering install spec. If the customer can come up with a solution that shows all units individually metered we will review it and see what exceptions can be made. I called the electrician to see if he could source any other metering configuration for the meter bases and he said he cant. He explained the gear is rated for the fault current and the busing in the meter stacks gets the AIC down to below 10k at each meter to coordinate with the disconnect at each meter. He said some of the gear is now scheduled to arrive in February but the largest buildings gear is still scheduled to arrive in May.

I am happy to schedule the TEAMS meeting for everyone for tomorrow morning - what time works best for your group and who would you like us to add to the meeting?

Please let me know.

Thank you so much,

Risa Talo
Customer Advocacy and Customer Service
801-955-2435

11/2/2022 3:29:00 PM CALL TO MIKE P FOR ADD'L INFORMATION

I called Mike to follow up on the email I sent him. I asked if they have had any contact with Building Codes and whether they have requested an inspection with the county/city? They have not contacted the City of Albany for an inspection.

He said a request was put in with the energy expert of Building Codes; she has not responded to him yet.

He said PAC spoke with his electrician and wanted particulars that Mike P did not have available.

Analyst: drios

Open Date: 9/1/2022

He said the project is 94% complete. They are currently installing appliances, hardware, and the landscaping.

11/2/2022 3:50:00 PM CALL TO CARY ANN/PAC BY MELISSA - DISCUSSED REQUIREMENTS

From: NOTTINGHAM Melissa * PUC <Melissa.NOTTINGHAM@puc.oregon.gov>

Sent: Thursday, November 10, 2022 11:48 AM

To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>

Cc: WOLF Charla * PUC <Charla.WOLF@puc.oregon.gov>

Subject: RE: Grand Prairie Townhomes - Call to Mike Purcell

11/2/2022 @ 3:50 pm

Spoke with Pacific Power distribution manager Cary Ann Bailey. We discussed the metering requirements for Grand Prairie.

Cary Ann reiterated the estimator contact the electrician for the development and reported back to her the customer was missing gears for the disconnect switch in addition to the multi-meter bases and was told the disconnect switch was required regardless of the type of metering. We discussed the load per unit calculation and how the load exceeded the tariff. The company strives to have consistent application for the tariffs. To many variances are contrary to having tariffs and standards in place. Also, she was concerned about a "temporary" installation as the company would have no leverage to request the builder to convert back to a multi-meter base after the "temporary" option becomes permanent. I encouraged her to continue to work with the customer to find a resolution.

11/3/2022 9:03:00 AM EMAIL FROM ED/E&M - CONTACTS WITH BLDG CODES & CITY OF ALBANY

From: Ed Stanton <eds@emconstructors.com>

Sent: Thursday, November 3, 2022 9:03 AM

To: John Balkema (johnathan.balkema@cityofalbany.net) <johnathan.balkema@cityofalbany.net>

Cc: Michael Helms (michaelhelms810@gmail.com) <michaelhelms810@gmail.com>; Paul Spies (spiespaul@gmail.com) <spiespaul@gmail.com>; Derek Dustman (derekdustman@gmail.com) <derekdustman@gmail.com>; RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>; Tucker Hill (Tucker.hill@pacificcorp.com) <Tucker.hill@pacificcorp.com>; ANDERSON William K * DCBS <William.K.ANDERSON@dcbs.oregon.gov>; Mike Purcell <mikep@emconstructors.com>

Subject: FW: Grand Prairie Apts, Albany

Mr. Johnathan Balkema,
City Of Albany Building Official,

We have received a temporary variance from Keith Anderson (Electrical Program Chief) regarding temporary Master metering condition for the Grand Prairie project.

The Developer Mr. Paul Spies is anticipating this variance can be approved by your department so that the project can move forward with the variance until the Approved Submitted switch gear can be installed.

Analyst: drios

Open Date: 9/1/2022

Note our Electrical contractor is Michael Helms of Alpha & Associates (541-602-6793)

Please contact me and Mr. Helms regarding any question regarding this issue.
Thank you for your assistance in this matter.

Ed Stanton
Superintendent
E & M Constructors, LLC. | PO Box 80638 | Portland, OR 97280
Phone: 503.445.6340 | cell: 503.577.5806 | fax: 503.445.6347 | CCB

From: Mike Purcell <mikep@emconstructors.com>
Sent: Thursday, November 3, 2022 8:42 AM
To: Paul Spies <spiespaul@gmail.com>; Ed Stanton <eds@emconstructors.com>; Michael Helms <mike.helms@alpha-associates-svcs.com>
Subject: Fwd: Grand Prairie Apts, Albany

From: ANDERSON William K * DCBS <William.K.ANDERSON@dcbs.oregon.gov>
Sent: Thursday, November 3, 2022 8:36:14 AM
To: 'mikep@emconstructors.com' <mikep@emconstructors.com>
Cc: MCMULLEN Eric T * DCBS <Eric.T.MCMULLEN@dcbs.oregon.gov>; THOMAS Kelly I * DCBS <Kelly.I.THOMAS@dcbs.oregon.gov>; 'johnathan.balkema@cityofalbany.net' <johnathan.balkema@cityofalbany.net>; 'eric@emeriodesign.com' <eric@emeriodesign.com>
Subject: RE: Grand Prairie Apts, Albany

Mike, any variance would come from the local building department. Under current supply chain issues, it is not unreasonable to ask for or grant a temporary variance until the equipment is available. I have attached some docs that address a similar issue on a more permanent basis.

Keith Anderson
Electrical Program Chief
503-798-7350 cell
William.K.Anderson@dcbs.oregon.gov

From: Mike Purcell <mikep@emconstructors.com>
Sent: Wednesday, November 2, 2022 3:51 PM
To: Eric Evans <eric@emeriodesign.com>; MCMULLEN Eric T * DCBS <Eric.T.MCMULLEN@dcbs.oregon.gov>
Subject: Grand Prairie Apts, Albany

Eric, I am the general contractor for a 35 unit apartment building located in Albany, OR. This 3-building complex consists of smaller 1 & 2 bedroom units that will be affordable for working people. The project is 90% complete and our electrical service equipment will not be available to us until April of next year due to supply chain issues. We can use a single meter to immediately provide power as

Analyst: drios

Open Date: 9/1/2022

an emergency temporary measure. Is there a process to obtain a temporary variance for the individual metering requirement in the building code while waiting for the equipment to be manufactured and delivered? We have been in contact with Pacific Power, our utility, who say they are bound by PUC rules. The PUC may be open to a variance for this situation if allowed by the building division.

Mike Purcell

Project Manager

E & M Constructors, LLC. | PO Box 80638 | Portland, OR 97280

Phone: 503.445.6340 | cell: 503.577.5801 | fax: 503.445.6347 | CCB#: 187780

11/3/2022 9:38:00 AM EMAIL TO RISA FROM MELISSA - CALL W/CARY ANN(PAC ESTIMATOR)-NO D/C SWITCH

From: NOTTINGHAM Melissa * PUC <Melissa.NOTTINGHAM@puc.oregon.gov>

Sent: Thursday, November 3, 2022 9:38 AM

To: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>; RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>

Cc: _Tariff Policy <TariffPolicy@PacifiCorp.com>; Customer Advocacy Team <CustomerAdvocacyTeam@PacifiCorp.com>

Subject: RE: RE: Grand Prairie Townhomes

Risa,

I spoke with Cary Ann yesterday and it was a very helpful conversation.

As stated below, the electrician reports the gears for the disconnect switches is also unavailable. Disconnect switches are required regardless of the type of metering.

Mr. Purcell continues to request a waiver to Tariff 8 (l) c , the commission staff cannot request a waiver to a company tariff unless it is tied to a proceeding like a rate case or a public meeting hearing.

Since the lack of customer equipment expands beyond the type of metering and no proceeding currently exists for commission staff to request the commission to review a waiver, I would recommend waiting on a meeting.

Please continue to communicate with the electrician and the developer to move towards connecting service.

Deanna will be communicating this information to Mr. Purcell.

Thank you,
Melissa

11/3/2022 9:51:00 AM EMAIL FROM RISA TO MELISSA - WILL RELAY INFO

Analyst: drios

Open Date: 9/1/2022

From: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>
Sent: Thursday, November 3, 2022 9:51 AM
To: NOTTINGHAM Melissa * PUC <Melissa.NOTTINGHAM@puc.oregon.gov>; RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>
Cc: _Tariff Policy <TariffPolicy@PacifiCorp.com>; Customer Advocacy Team <CustomerAdvocacyTeam@PacifiCorp.com>
Subject: RE: RE: RE: Grand Prairie Townhomes

Good Morning Melissa,

Thank you so much - I will pass this information along to everyone and keep you all updated on this project.

Have a great day!

Risa Talo
Customer Advocacy and Customer Service
801-955-2435

11/4/2022 10:36:00 AM CALL TO MIKE P - NO D/C SWITCHES & NO CURRENT PROCEEDING

I called Mike to let him know I learned they do not have the disconnect switches. I explained d/c switches are required regardless of the type of meter. Without those, nothing is going to get approved, as safety is always priority.

Mike said this was not correct information. I told him I was informed PACs's regulatory liaison spoke with the electrician who advised they don't have the d/c switches. He said this was incorrect and wanted to speak with Mike Helms. I offered to read to him what was said, but he declined and said he wanted to speak with Mike H first.

11/4/2022 11:03:00 AM CALL FROM MIKE H RE SWITCHES

Mike called to let me know there is some miscommunication about the d/c switches. He said they have the main gear, but they don't have all the main breakers and meter stacks. Because his call kept cutting in/out, I asked him to send me an email regarding what they have and I will forward it to my manager.

He said he also spoke with Tucker at PAC today to relay the same information. I asked if Tucker was going to relay that information to Risa; he said Tucker would but it takes a bit to go through the various channels before his information will reach Risa, so he wanted Mike to call me.

I explained without the d/c switches the tariff would not be waived and PAC has the final say. Mike said Tucker has told them that from the beginning; however, Mike said they have to do whatever they can in an attempt to not let their client lose their money on this investment.

11/4/2022 11:22:00 AM EMAIL FROM MIKE H - MISSING MAIN SWITCHES & METER SECTIONS

From: Michael Helms <mike.helms@alpha-associates-svcs.com>

Analyst: drios

Open Date: 9/1/2022

Sent: Friday, November 4, 2022 11:22 AM

To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>; Mike Purcell <mikep@emconstructors.com>; Ed Stanton <eds@emconstructors.com>; Tucker Hill (Tucker.hill@pacificorp.com) <tucker.hill@pacificorp.com>
Subject: Grand Prairie

Hi Deanna

Mike from alpha associates here. To clear up the conversation we had today. We are missing the main switches and meter sections for the permanent metering equipment. Those are delayed till mid next year from the manufacturer. We do have all the parts secured for the temporary solution. We are still seeking the waiver from BCD, and PUC in hopes that pacific power can allow the temporary metering.

11/4/2022 1:18:00 PM EMAIL TO RISA - RE FLUP W/TUCKER

From: RIOS Deanna * PUC
Sent: Friday, November 4, 2022 1:18 PM
To: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>; NOTTINGHAM Melissa * PUC <melissa.nottingham@puc.oregon.gov>
Cc: _Tariff Policy <TariffPolicy@PacifiCorp.com>; Customer Advocacy Team <CustomerAdvocacyTeam@PacifiCorp.com>
Subject: RE: RE: RE: Grand Prairie Townhomes - Discussion w/Tucker

Hi Risa,

I spoke with both Mike Purcell and Mike Helms this morning. They stated there is a misunderstanding regarding the disconnect switches. Mike H informed me he spoke with Tucker this morning just prior to calling me to straighten out some miscommunication regarding the disconnect switches. I understand this information is supposed to be relayed to you. If you could follow up with Tucker, I would appreciate it.

Deanna Rios
Hours: Tuesday-Friday 7:00-5:30
Sr Compliance Specialist (Lead)
Consumer Services Section
Oregon Public Utility Commission
Cell: 971.375.5100
deanna.rios@puc.oregon.gov

11/7/2022 9:33:00 AM EMAIL FROM J. BALKEMA/CITY OF ALBANY - NO CONCERNS/MUST MEET OESC & PASS INSPECTION

From: Balkema, Johnathan <Johnathan.Balkema@cityofalbany.net>
Sent: Monday, November 7, 2022 9:33 AM
To: Ed Stanton <eds@emconstructors.com>

Analyst: drios

Open Date: 9/1/2022

Cc: Michael Helms (michaelhelms810@gmail.com) <michaelhelms810@gmail.com>; Paul Spies (spiespaul@gmail.com) <spiespaul@gmail.com>; Derek Dustman (derekdustman@gmail.com) <derekdustman@gmail.com>; RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>; Tucker Hill (Tucker.hill@pacificorp.com) <Tucker.hill@pacificorp.com>; ANDERSON William K * DCBS <William.K.ANDERSON@dcbs.oregon.gov>; Mike Purcell <mikep@emconstructors.com>; Godsey, Philip <Philip.Godsey@cityofalbany.net>
Subject: RE: Grand Prairie Apts, Albany

Good morning, Ed-

I spoke with our commercial electrical inspector and we would not have any concerns about allowing a common master meter in this project due to supply restraints, with the caveat any alterations needed to achieve such installation meets the OESC and is inspected by our office.

Please let us know if we can be of any further assistance.

Thank you,

Johnathan Balkema
Building Official Manager
541-791-0199 phone | 541-917-7598 fax
Community Development
City of Albany, Oregon
333 Broadalbin St SW, Albany, Oregon 97321
www.cityofalbany.net

11/7/2022 1:14:00 PM EMAIL FROM MIKE P - CITY CLEARANCE - MTG NOW?

From: Mike Purcell <mikep@emconstructors.com>
Sent: Monday, November 7, 2022 1:14 PM
To: RIOS Deanna * PUC <Deanna.RIOS@puc.oregon.gov>
Subject: FW: Grand Prairie Apts, Albany

Deanna, per the below email from the City of Albany, we now have approval of the Building Codes division and the Building department for the location of our project, will you be scheduling the conference call now?

Mike Purcell
Project Manager
E & M Constructors, LLC. | PO Box 80638 | Portland, OR 97280
Phone: 503.445.6340 | cell: 503.577.5801 | fax: 503.445.6347 | CCB#: 187780

11/9/2022 2:52:00 PM VOICE MAIL TO MIKE P TO CALL ME - EXHAUSTED INFORMAL LEVEL

Analyst: drios

Open Date: 9/1/2022

I called Mike to let him know I have exhausted the informal level of his complaint. I have worked with my manager and PAC regarding the situation. If the goal of the meeting was to obtain the waiver, that will not happen because the tariff conditions are not being met with regard to the load.

I asked him to return my call so we can touch base on the complaint. I provide my hours of availability and our contact information.

11/9/2022 4:23:00 PM CALL FROM MIKE P - WANTS FORMAL

Mike returned my call and I let him know the informal process has been exhausted. There is nothing more I can do at the informal level. PAC is not going to agree to the waiver because they cannot meet the conditions of the tariff for the load. It is possible the set up would pass city inspection but not PAC's final inspection.

He asked if there was an appeal process with PAC. I advised they can file a formal complaint with the Commission. The issue will be reviewed by our administrative hearings division by one of our judges.

Mike asked if the form was available online. He also asked for a copy of the tariff. I advised he will receive a copy of his complaint to go along with the formal packet. I will send the forms to him tomorrow.

Attachments to Case:

- 9/9/2022 10:46:00 AM - PAC Rule 8 Metering
- 9/16/2022 11:11:00 AM - Emails between PAC & Customer
- 9/16/2022 11:11:00 AM - Grand Prairie Civil - Mark up power conduit & vault
- 9/16/2022 11:11:00 AM - 008011128_Print NA - 1 of 1 WITH STAMP
- 9/19/2022 12:20:00 PM - Mail from Julian Johnson (GP) - suggested specs
- 9/19/2022 12:20:00 PM - METER CT BASE
- 9/19/2022 12:20:00 PM - METER CT BASE PG 2
- 9/19/2022 12:20:00 PM - METER CT BASE PG 3 LUG KIT
- 9/19/2022 12:20:00 PM - CT CAN 800A
- 9/19/2022 12:20:00 PM - TEMP SWITCHGEAR BILL OF MATERIALS
- 9/19/2022 12:20:00 PM - BUILDING A & B TEMP SWITCHGEAR LAYOUT
- 9/19/2022 12:20:00 PM - BUILDING C TEMP SWITCHGEAR LAYOUT
- 9/19/2022 12:20:00 PM - ADV-1391 LETTER OR-PUC
- 11/2/2022 11:19:00 AM - Email from Risa with Load Table
- 11/3/2022 9:03:00 AM - MLK Master Meter - BCD example ltr
- 11/3/2022 9:03:00 AM - Fleet Development Master Meter

I. Metering – General**A. Installation, Maintenance and Registration**

The Company will install and maintain all meters and other equipment necessary for measuring the electric power and energy used by the Customer and will inspect such installations to maintain a high standard of accuracy.

The Company will, without charge, make a test of the accuracy of registration of a meter upon the request of the Customer or their ESS, provided that the Customer does not request such a test more frequently than once in twelve (12) months. If more than one requested test is made in twelve (12) months, the Company may charge the Customer a meter test charge as specified in Schedule 300. If results of the test show that such meter is outside the 2% accepted tolerance standard under normal operating conditions, the Company may not charge the Customer for the subsequent test(s).

An accurate record will be kept by the Company of all meter readings, and such record shall be the basis for determination of all bills rendered for metered service.

If any meter shall fail to register correctly the amount of electric power or energy used by the Customer, the amount of such use will be estimated by the Company from the best available information.

B. Individual Metering

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.

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

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.

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.

(continued)

I. Metering – General (continued)**D. Meter Verification Fee and Meter Labeling**

When multiple meters are installed at a location with multiple units, it is the developer/owner's responsibility to permanently, and correctly, label each meter base for the associated service address. The Company may check such meter installations to verify they are correctly labeled. The Company will charge the Meter Verification Fee, set forth in Schedule 300, to the developer/owner for each meter installation checked. In the event all meters are labeled correctly for each unit, the Company will waive the Meter Verification Fee for that building.

When a complaint is received from a Customer, landlord or governmental agency of possible switched meters, the Company will check such meter installations to verify that they are correctly labeled. The Company will charge the Meter Verification Fee, as set forth in Schedule 300 to the developer/owner for each meter installation checked. If all meters at a building are correctly labeled for each unit, the Company will waive the Meter Verification Fees for that building. If a Customer or landlord requests more than one meter installation verification within any 12-month period, the Company will require the requesting party to pay the Meter Verification Fee as set forth in Schedule 300, in advance. If the Company determines that the meter is switched or mislabeled, it will refund the deposit to the Customer and the Company will charge the Meter Verification Fee set forth in Schedule 300, to the developer/owner for each meter installation checked.

If a developer/owner or landlord requests the Company to verify or certify that each meter base is labeled correctly, including when locations with multiple units are sold, the Company will charge the party requesting such verification or certification the Meter Verification Fee, as set forth in Schedule 300.

II. Metering – Direct Access**A. Direct Access Meter Requirement**

The Company's metering standard for Direct Access and Standard Offer Consumers is for remotely interrogated interval metering equipment. Direct Access and Standard Offer Consumers that do not have installed remotely interrogated interval meters may be metered using other approved Company metering equipment. In the absence of a meter installation backlog, the Company will endeavor to install standard meter equipment within 30 days of acceptance of a DASR or receipt of written or electronic authorization for Standard Offer Service. In the event of a backlog, the Company will notify the Consumer or Consumer's ESS and provide an estimate of the installation date. The Company will provide metering equipment for all Consumers.

B. Meter Charge

Direct Access and Standard Offer Consumers taking Company-specified metering services are obligated to pay the direct access metering charges stated in Schedule 300. Consumers taking non-standard metering services as described in Section II.E of this Rule are obligated to pay the metering charges specified in the applicable contract.

C. Standard Services

The Company will provide Standard Metering Services without charge to Large Nonresidential Consumers and will provide Standard Metering Services at a charge stated in Schedule 300 to Small Nonresidential Consumers. Standard Metering Services provided in conjunction with Direct Access and Standard Offer Service include:

(continued)

II. Metering – Direct Access (continued)**C. Standard Services (continued)**

1. An interval meter equipped with a communication modem.
2. Installation, removal, testing and maintenance of the meter.
3. Remote communication equipment. Calling fees will be passed through to the Consumer.
4. The meter readings and the results provided to ESS' will be the same as those used as the basis for the Company's charges.
5. The standard method of communicating results of meter reading is specified in the standard form of the Company's ESS Service Agreement.

D. Standard Meter Capabilities

These include interval and remote communication functions.

E. Non-Standard Services

An ESS may request that the Company provide non-standard metering capabilities, functions or services.

1. Requests must be submitted to the Company in writing.
2. The Company will consider and approve or deny the request within ten (10) business days.
3. The Company will file with the Commission rates and charges for non-standard metering capabilities, functions or services within thirty (30) days of approving a request.

Terms and conditions for approved non-standard metering capabilities, functions or services will be incorporated into the Company's ESS Service Agreement.

III. Non-Radio Frequency Metering Accommodation

A Customer may request an alternative to the Company's standard radio frequency meter installation from the following:

- a. Relocation of the Customer's meter base to a different location approved by the Company and the installation of a standard meter;
- b. Relocation of the Customer's meter base to a different location approved by the Company and the installation of a Company approved non-radio frequency meter;
- c. Exchanging a standard meter for a Company approved non-radio frequency meter.

A Customer selecting the option to relocate the meter base will be subject to the meter installation requirements of this regulation as well as Electric Service Rule 13. If the relocation requires a change in the existing service the Customer is responsible for charges to relocate the service including but not limited to the installation of conduit, trenching, obtaining easements, and any additional costs of removing and installing new facilities. If an acceptable meter location cannot be provided on the premises, the Customer's request will not be granted. The Customer must provide written permission of the owner stating the Customer has obtained the owner's permission to proceed with relocating the meter base.

(continued)

III. Non-Radio Frequency Metering Accommodation (continued)

Customers who elect to have a non-radio frequency meter will be subject to installation of the non-radio frequency meter as set forth in Schedule 300. All applicable fees will be paid prior to the installation of the non-radio frequency meter. The Schedule 300 charges for the installation is in addition to any aforementioned costs to relocate the Customer's service.

If a radio frequency meter is installed at the Customer's premise prior to January 1, 2018 and the Customer requests a non-radio frequency meter, the Customer will not be required to pay the installation charge in Schedule 300.

Only non-radio frequency meters approved, obtained, installed, and owned by the Company will be allowed. The Customer's request to replace a radio frequency meter with a non-radio frequency meter cannot be accommodated until an approved non-radio frequency meter can be obtained by the Company.

All Customers with a non-radio frequency meter shall be responsible to pay the monthly meter reading fee in Schedule 300, which will be included in the Customer's monthly service billing.

Customers with non-radio frequency meters may be excluded from participating in Company offered programs for which a standard radio frequency meter is required.

The Company may revoke the meter exchange accommodation of a non-radio frequency meter by reinstalling the Company's standard radio frequency meter for any of the following conditions:

- a. Meter tampering;
- b. Impeding Company access to the meter to obtain monthly meter readings, perform maintenance or to disconnect meter for non-payment of electric service; or
- c. Service has been disconnected for non-payment of electric service twice within a 12-month period.

Customers opting-out of the Company's standard metering and are metered by a non-standard meter and are otherwise eligible for service under Schedule 4 Residential Service or have a meter without a demand register and are eligible for service under Schedule 23 General Service, Small Non-Residential may contract with the Company for a triannual meter reading schedule. Meter readings will be three times a year and monthly billings between meter readings will be based on estimated usage assumptions. At the discretion of the Company, meter readings may be more frequent without any additional charge to the Customers. Customers are required to pay the triannual meter reading fee as stated in Schedule 300, and enroll in the Company's Equal Payment Plan as described in Rule 10 of this tariff.

The Company reserves the right to remove a Customer from the triannual read program for any of the following reasons:

The Customer is disconnected for nonpayment of bills,
The Customer fails to abide by the terms of the Equal Payment Plan, or
Safe and unobstructed access is not provided to the Company.


This option is not available for service in conjunction with net metering or time-of-use schedules.

From: [Hill, Tucker \(PacifiCorp\)](#)
To: [Paul Spies](#)
Subject: RE: [INTERNET] Tariff Section of Rules that prohibit single meter on apartments
Attachments: [image001.png](#)

Hey Paul,

Its in Rule 8. [08_Metering.pdf \(pacificpower.net\)](#)

Thank you,

Tucker Hill
Journeyman Estimator
541-967-6161
[Electrical Service Requirements](#)
[Underground Manual](#)


From: Paul Spies <spiespaul@gmail.com>
Sent: Friday, September 9, 2022 10:10 AM
To: Hill, Tucker (PacifiCorp) <Tucker.hill@pacificorp.com>
Subject: [INTERNET] Tariff Section of Rules that prohibit single meter on apartments

THIS MESSAGE IS FROM AN EXTERNAL SENDER.

Look closely at the **SENDER** address. Do not open **ATTACHMENTS** unless expected. Check for **INDICATORS** of phishing. Hover over **LINKS** before clicking. [Learn to spot a phishing message](#)

Can you send me a PDF or screenshot of this rule? We are working with Bryan Conway, who is the head of the Utility Division at the PUC.

Thanks

--

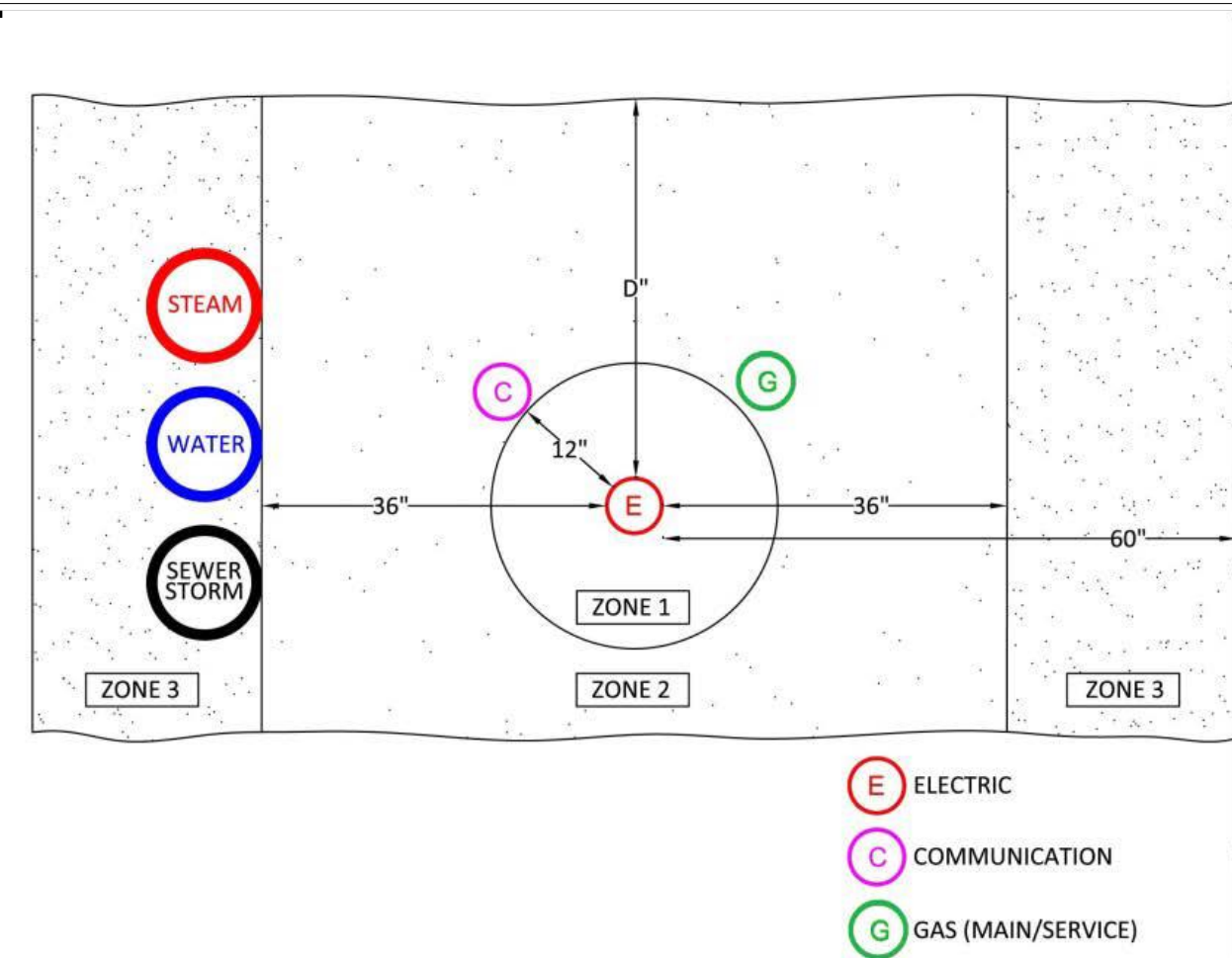
Paul Spies

Managing Member

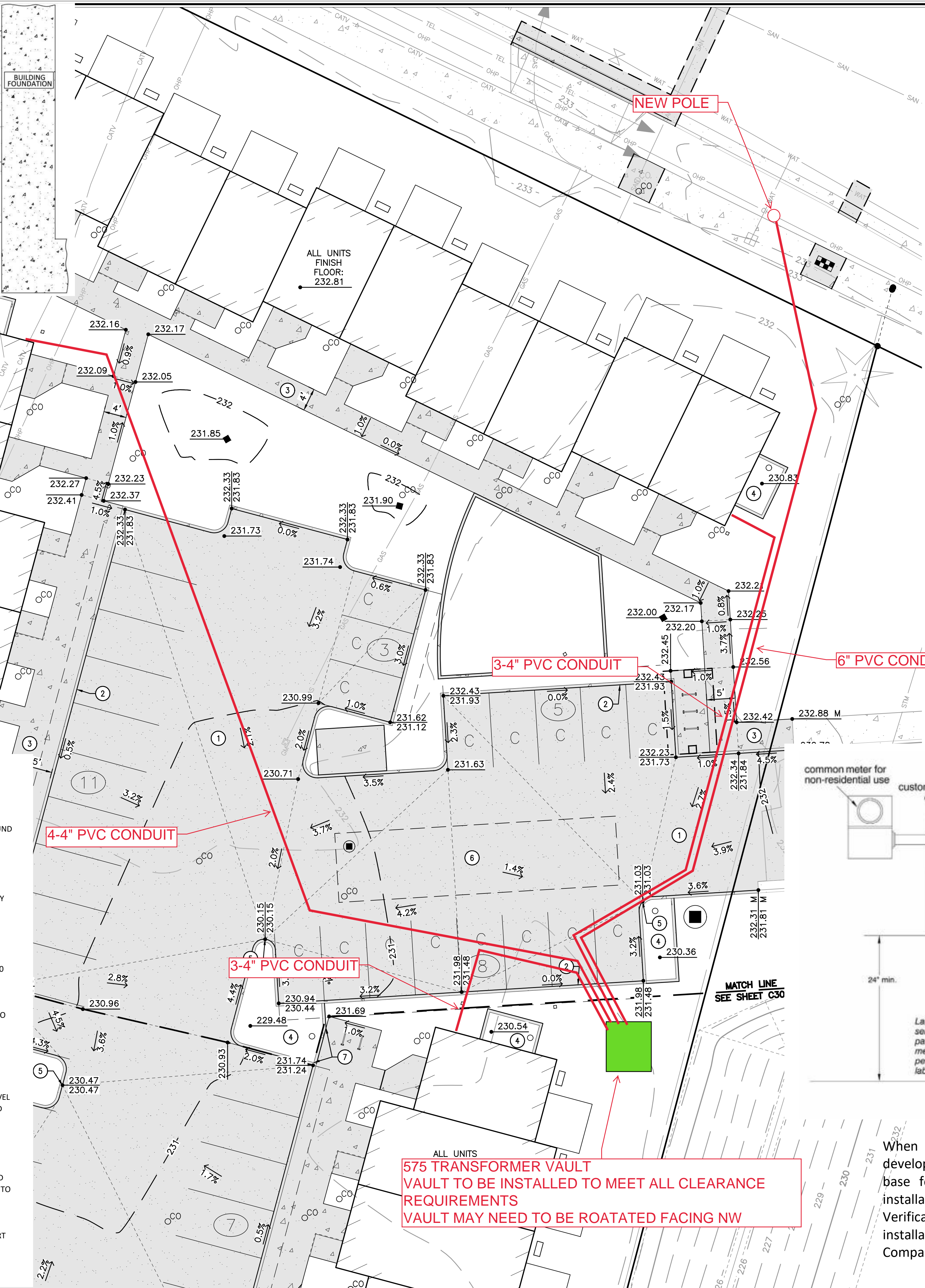
Spies Corporation/8020 Property LLC

Cell: [541.231.2828](#)

PO Box 548 Corvallis OR 97339



- DEVELOPER NOTES:**
- TRENCH**
- TRENCH AND CONDUIT WORK NOT BE PERFORMED UNTIL A GRADE HAS BEEN ESTABLISHED WITHIN 6" OF FINAL GRADE.
 - ADJUST TRENCH TO MAINTAIN 1' VERTICAL SEPERATION WHEN CROSSING ANY UNDERGROUND COMFLICTS. IT IS PREFERRED THAT POWER PASS UNDERNEATH OTHER UTILITIES WHERE POSSIBLE.
 - MAINTAIN A MINIMUM 3' HORIZONTAL SEPERATION WHEN TRENCHING PARALLEL TO NON-ELECTRIC FACILITIES (IE. WATER, SEWER, GAS, ETC.).
 - TELEPHONE AND CABLE TV CONDUCTORS MAY BE IN A JOINT TRENCH WITH ELCTRIC. THEY MUST HAVE 12" HORIZONTAL CLEARANCE FROM APPROPRIATE COMMUNICATION COMPANY FOR THEIR SPECIFICATIONS AND DESIGN.
 - DO NOT TRENCH CLOSER THAN 2' TO ENERGIZED FACILITIES WITHOUT A COMPANY REPRESENTATIVE PRESENT.
- CONDUIT**
- PVC SWEEPS MAY BE USED WHERE CONDUIT RUNS ARE LESS THAN 150'. NO MORE THAN 270 DEGREES IN BENDS ARE ALLOWED.
 - ALL PRIMARY AND SECONDARY SWEEPS MUST HAVE A MINIMUM BEN RADIUS OF 36". 6" CONDUIT SWEEPS SHALL BE 48" RADIUS.
 - ALL CONDUIT STUBS SHOULD BE CAPPED AND MARKED SUFFICIENTLY FOR THE CUSTOMER TO LOCATE IN THE FUTURE WHEN COMPLETING THE RUN. USE ELECTRONIC MARKERS IN CASE PACIFIC POWER MUST LOCATE LATER.
 - THE CUSTOMER SHALL PROVIDE A FLAT PULL LINE (PREFERRED) OR POLY ROPE RATED AT 1000LBS.
- VAULTS**
- TOP OF VAULT TO BE 2" ABOVE GRADE. LID THEN ON TOP OF VAULT. EXCAVATION TO BE LEVEL AND FIRMLY COMPACTED, 6" OF COMPACTED GRAVEL BELOW VAULT BASE FOR LEVELING AND DRAINAGE.
 - TRANSFORMER VAULTS SHOULD BE LOCATED WITHIN THE PUE.
 - CONDUITS SHOULD ENTER VAULT AT LOWEST POSSIBLE LOCATION. HOWEVER, CONDUITS ENTERING ADJACENT VAULT OPENINGS IN THE CORNERS SHOULD ENTER AT DIFFERENT ELEVATIONS.
 - PVC BELL ENDS SHOULD BE INSTALLED ON ALL CONDUITS INSIDE VAULTS. BELL ENDS SHOULD BE FLUSH WITH THE INSIDE WALL OF THE VAULT-THIS WOULD BE REQUIRED WHEN TYING INTO AN EXISTING VAULT THAT DOES NOT HAVE TERM-A-DUCTS. GROUTING REQUIRED AROUND HOLES MADE INTO THESE VAULTS.
 - THREE PHASE TRANSFORMER THAT HAVE A LID WITH AN OVERHANG SHALL HAVE 6" COMPACTED GRAVEL UNDER THE LID LEVEL WITH THE TOP OF THE VAULT BASE FOR SUPPORT OF THE TRANSFORMER WEIGHT. THIS GRAVEL SHALL EXTEND A MINIMUM OF 12" OUT AND ROUND THE LID.



PACIFIC POWER
A DIVISION OF INTERCOMP

13.3 Customer Installs Padvault
The customer will install the pad box and conduits as shown in Figures 13.3.1 – 13.3.5. Note that the number of conduits may vary depending on the infrastructure design.
The top of the padvault lid must be three inches above final grade, unless installed in a traffic area, where it must be flush with grade.

When the lid extends past the back wall of the vault, backfill of 3/4" minus material must be compacted so as to support the overhanging lid.

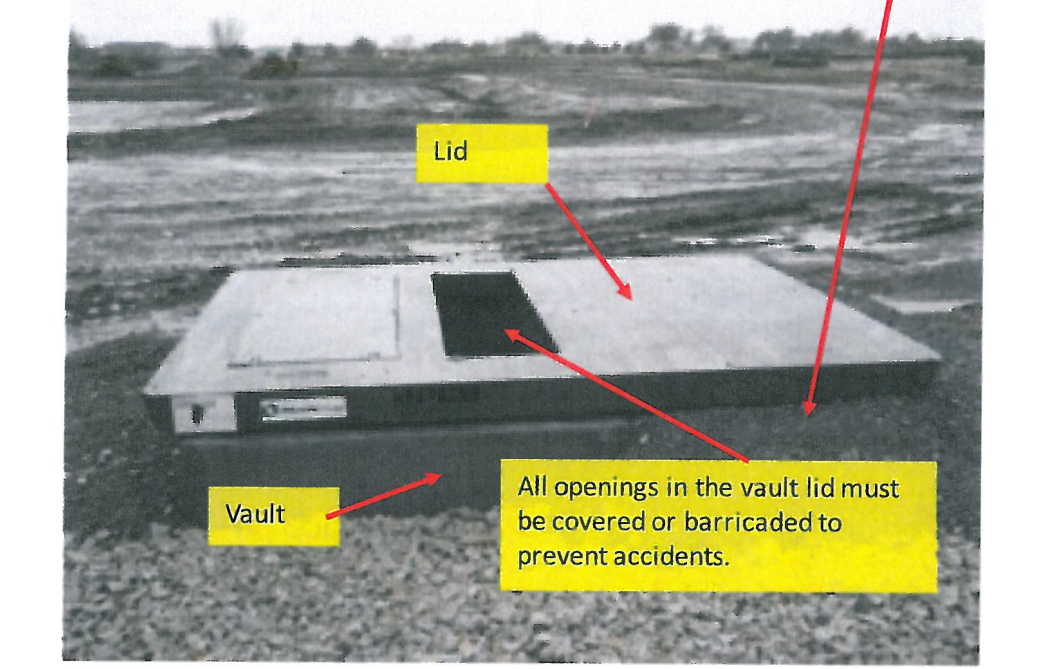
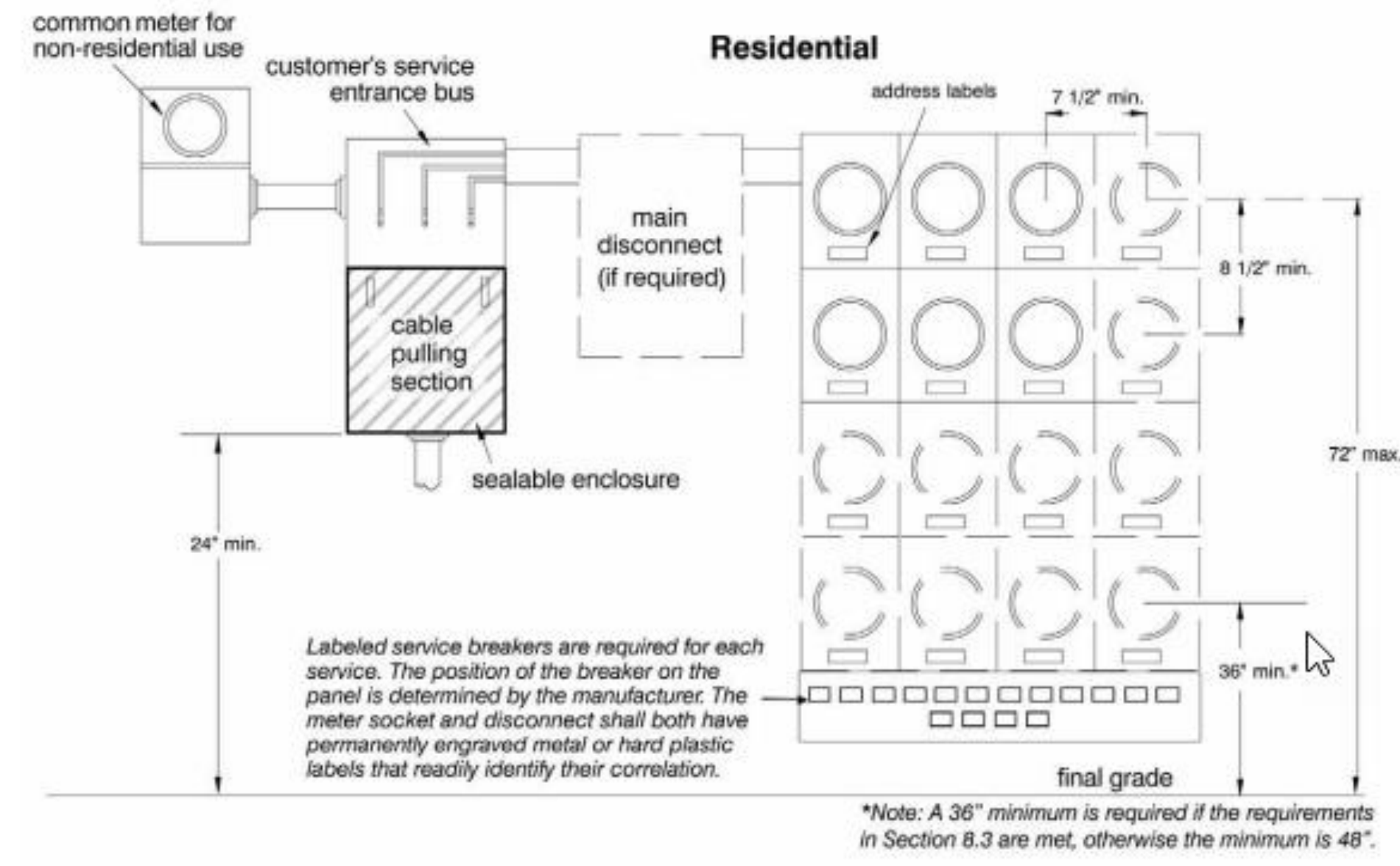


Figure 13.3.1 - Padvault Lid

J:\Publications\FPP\DIS\PRO 242-EMP Underground Conduit Systems.docx, R6, 5/13/11
This document is posted online at rockmountainpower.net, and all engineering is intrinsic site for distribution procedures.
Modification of this document must be authorized by PacificCorp engineering publications, (503) 813-5293.



When multiple meters are installed at a location with multiple units, it is the developer/owner's responsibility to permanently, and correctly, label each meter base for the associated service address. Company may check such meter installations to verify they are correctly labeled. Company will charge the Meter Verification Fee, set forth in Schedule 300, to the developer/owner for each meter installation checked. In the event all meters are labeled correctly for each unit, Company will waive the Meter Verification Fee for that building.

575 TRANSFORMER VAULT
VAULT TO BE INSTALLED TO MEET ALL CLEARANCE REQUIREMENTS
VAULT MAY NEED TO BE ROATATED FACING NW

5/27/2021 9:44:47 AM X:\2019\19032\CIVIL\GRADE.DWG SAVED ON 5/27/2021

SPIES REAL ESTATE GROUP
P.O. BOX 548
CORVALLIS, OREGON
541-231-2828

GRAND PRAIRIE TOWNHOMES
ALBANY, OREGON
GRADING PLAN
2710 GRAND PRAIRIE RD SE

REGISTERED PROFESSIONAL ENGINEER
60183PE
OREGON
JULY 13, 2005
PETER J. SEADERS
RENEWAL: 6/30/2022

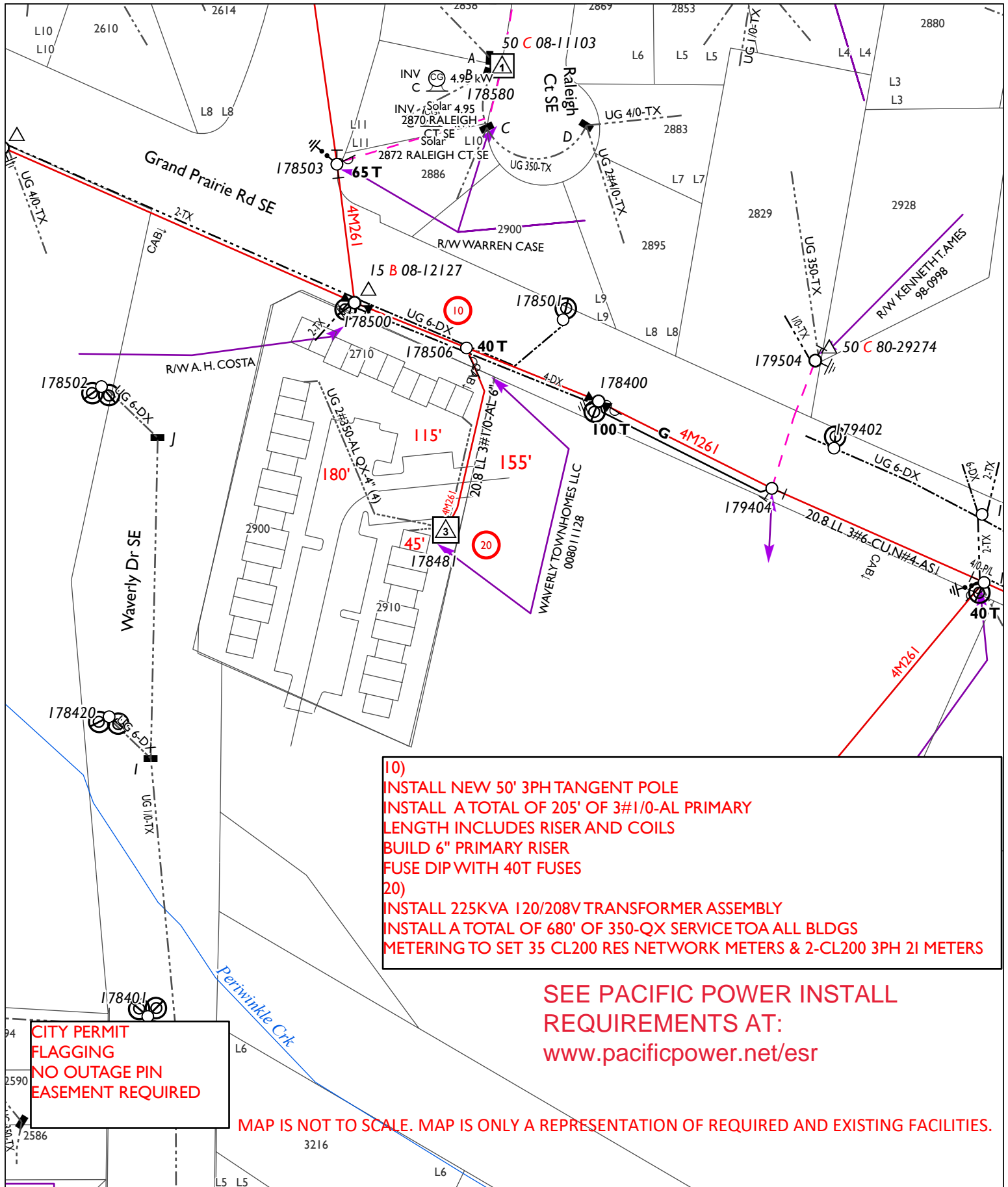
MSS INC
ENGINEERING CONSULTANTS AND PLANNERS
215 NW 4TH STREET
CORVALLIS, OR 97330
(541) 753-1320 FAX: (541) 753-5956

JOB # 19032 FILE GRADE DRAW NMT
SCALE AS SHOWN DATE 05/25/2021

C301
6 OF 16 SHEETS

PERMIT NO.

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(10)
 INSTALL NEW 50' 3PH TANGENT POLE
 INSTALL A TOTAL OF 205' OF 3#1/0-AL PRIMARY
 LENGTH INCLUDES RISER AND COILS
 BUILD 6" PRIMARY RISER
 FUSE DIP WITH 40T FUSES
 (20)
 INSTALL 225KVA 120/208V TRANSFORMER ASSEMBLY
 INSTALL A TOTAL OF 680' OF 350-QX SERVICE TOA ALL BLDGS
 METERING TO SET 35 CL200 RES NETWORK METERS & 2-CL200 3PH 2I METERS

SEE PACIFIC POWER INSTALL
 REQUIREMENTS AT:
www.pacificpower.net/esr

CITY PERMIT
 FLAGGING
 NO OUTAGE PIN
 EASEMENT REQUIRED

MAP IS NOT TO SCALE. MAP IS ONLY A REPRESENTATION OF REQUIRED AND EXISTING FACILITIES.

Foreman		Emp #	Job Start Date		
CC# 11256	WO# / REQ# 008011128	Map String 01311003.0	Job Comp Date		
Customer: SPIES REAL ESTATE Address: 2710 GRAND PRAIRIE RD SE, ALBANY			Circuit 4M261	Post Jobs RQII Posted <input type="checkbox"/>	EST ID# P33949
				Print Date 5/9/2022	Scale 1 in = 100'



Alpha Associates Services LLP
2813 Pacific Blvd. SW
Albany, OR 97321
CCB: 206955 / BCD: C1138 (electrical)

Tel: (541) 928-7561
Tel: (541) 602-6793
www.alpha-associates-svcs.com
alpha.associatesoffice@gmail.com

9/19/2022

TO:

Deanna Rios
Investigator; Oregon P.U.C.
201 High St. SE, Ste: 100
Salem, OR 97301-3398

PROJECT:

Grand Prairie Townhomes
File: 'Mike Purcell'

Dear Deanna;

Alpha Associates Services LLP is the electrical contractor for the Grand Prairie Townhomes project at 2710 Grand Prairie Rd SW in Albany. I'm Mike Helms, a general partner in the company.

Due to horrendous supply-chain issues we are unable to provide the electrical metering and switchgear that was approved by Pacific Power. The manufacturer says that there is now a 1-year delay. (Current ETA is now May 30th, 2023)

We're asking for a slight variance in a recently-adopted rule ADV-1391. We have designed a temporary solution for the metering equipment problem that meets the standards of ADV-1390 except for the following: ADV-1390 says 'low-income housing'. These residential units will be certainly affordable, but were not designated that way when we got our permits. ADV-1390 also says 'apartments'. These units were described as 'townhomes', but are essentially apartments. ADV-1390 says that the units must have central heating and air conditioning. These units do not. So, two of the issues are just language, and the variance would be for the central HVAC.

The way we've designed this will require no additional labor or costs to Pacific Power. Each of the 3 buildings will have one meter the way we've designed it. (spec sheets for the meter bases, current transformer panels, and lug kits are attached, as well as a copy of ADV-1390, and drawings of the layout of the temporary equipment)

I need to also state that our solution is temporary only. The equipment *will* eventually get here, and we *will* install it just as approved by Pacific Power. Pacific Power will still, temporarily, be able to charge for electricity; just 3 meters initially, then 37 meters once the approved equipment shows up.



Alpha Associates Services LLP
2813 Pacific Blvd. SW
Albany, OR 97321
CCB: 206955 / BCD: C1138 (electrical)

Tel: (541) 928-7561
Tel: (541) 602-6793
www.alpha-associates-svcs.com
alpha.associatesoffice@gmail.com

With regards to the financial losses that will be incurred if we're not able to provide electricity to the buildings, not only will the owners be losing more than \$53,000 per month, in addition to penalties on the bank loan, but there will be *35 families* who will not be able to move in. The housing shortage here in Albany is extreme. We know, personally, some of the tenants lined up to move in by November with their families.

We hope that you will see fit to help us with this issue and allow us to temporarily provide electrical service to these buildings.

Sincerely,

Michael L. Helms

Cc List:

Paul Spies- Spies Corporation /8020 Property LLC
Bryan Conway-PUC
Ed Stanton-E & M Constructors
Mike Purcell- E & M Constructors
Michael Helms-Alpha Associates Services LLP
Jennifer Hill Hart- OR-CUB
Tucker Hill- Pacific Power



121413

APPLICATION

- Single meter position
- Designed to receive wathour positions that meet ANSI C12.10
- For use with separate CT enclosure
- Overhead or underground feed

CONSTRUCTION

- Type 3R construction
- Test switch provisions
- Available with installed pre-wired test switches – add prefix “W” to catalog number
- AW hub provision
- Snap type sealing ring included
- Ring style

STANDARDS

- UL 414 listed, complies with ANSI C12.7

FINISH

- ANSI 61 gray acrylic electrocoat finish

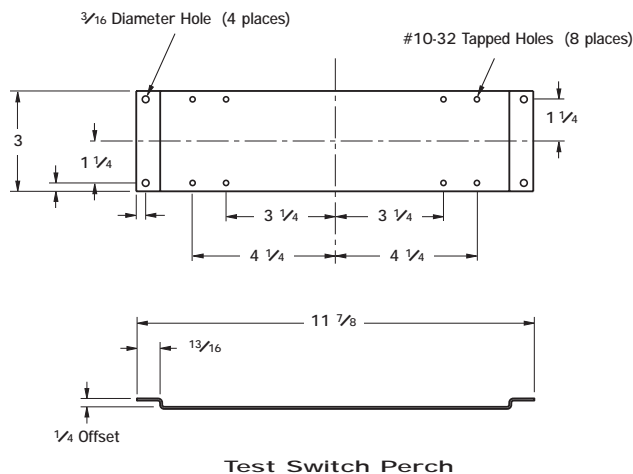
ACCESSORIES

- Screw type sealing ring — catalog #25016D
- AW hubs
- Steel or clear lexan covers for socket openings

Overhead/Underground–Surface Mount

CATALOG* NUMBER	MAIN DISCONNECT	AMPACITY		VOLTAGE	SERVICE TYPE	NUMBER OF JAWS	HUB PROV.	CONDUCTOR LUG RANGE		FIGURE NUMBER	DIMENSIONS (INCHES)		
		MAX.	CONT.					ALL TERMINALS	GROUNDING TERMINAL		HEIGHT (H)	WIDTH (W)	DEPTH (D)
12144	NONE	20	20	600	1Ø	4	AW	14 AWG - 10 AWG	14 AWG - 2/0 AWG	Fig. 1	20	12	4 5/8
12145	NONE	20	20	600	1Ø	5	AW	14 AWG - 10 AWG	14 AWG - 2/0 AWG	Fig. 1	20	12	4 5/8
12146	NONE	20	20	600	1Ø	6	AW	14 AWG - 10 AWG	14 AWG - 2/0 AWG	Fig. 1	20	12	4 5/8
12148	NONE	20	20	600	1Ø or 3Ø	8	AW	14 AWG - 10 AWG	14 AWG - 2/0 AWG	Fig. 1	20	12	4 5/8
121413	NONE	20	20	600	3Ø	13	AW	14 AWG - 10 AWG	14 AWG - 2/0 AWG	Fig. 1	20	12	4 5/8
121415	NONE	20	20	600	3Ø	15	AW	14 AWG - 10 AWG	14 AWG - 2/0 AWG	Fig. 1	20	12	4 5/8

* New reversible test switch perch allows test switch installation at two heights



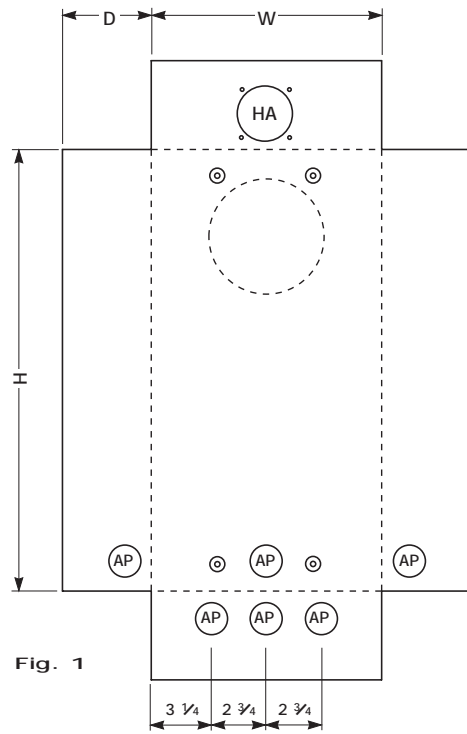
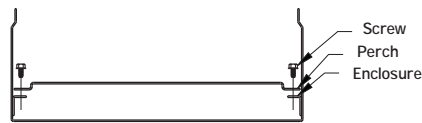


Fig. 1

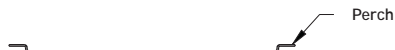
Knockouts — Conduit Sizes

AP = 1 1/4" - 1" - 3/4" - 1/2"
 HA = AW HUB

Test Switch Perch Instructions



Drawing 1



Drawing 2



Drawing 3

To offset test switch perch so that additional space is available for the use of a test switch cover, see instructions below.

1. Remove (4) screws that hold the perch to the enclosure (see Drawing 1)
2. Flip perch over as shown (see Drawing 2)
3. Now use the screws you removed in step one and screw the perch to the enclosure, torque screws to 35 in/lbs. (see Drawing 3)

Single Meter Sockets

CT Rated With Test Switch Bypass Provision



121413 (closed)



121413 (open)

Application

- Test switch section under separate cover
- Test switch perch included
- Receive ANSI C12.10 watt-hour meters
- Overhead and underground feed (see chart)
- Surface mount

Construction

- Ring type
- NEMA Type 3R
- ANSI 61 gray E-coat finish
- Aluminum snap ring included



Standards

- UL 414 Listed
- ANSI C12.7
- EUSERC 339

Accessories

- AW Hub
- Screw Type Ring - 25016D

Part/UPC Number	Catalog Number	Amp Rating	Jaws	Service Type	Access	Connections		
						Line	Load	Neutral
78205146000	12144	20	4	1Ø	OH/UG	#14 - #10	#14 - #10	#14 - #10
78205146010	12145	20	5	1Ø	OH/UG	#14 - #10	#14 - #10	#14 - #10
78205146020	12146	20	6	1Ø	OH/UG	#14 - #10	#14 - #10	#14 - #10
78205144640	12148	20	8	1Ø or 3Ø	OH/UG	#14 - #10	#14 - #10	#14 - #10
78205144650	121413	20	13	3Ø	OH/UG	#14 - #10	#14 - #10	#14 - #10
78205144065	121415	20	15	3Ø	OH/UG	#14 - #10	#14 - #10	#14 - #10
78205146070	1214208 *	20	8	1Ø or 3Ø	OH/UG	#14 - #10	#14 - #10	#14 - #10
78205146060	1214213 *	20	13	3Ø	OH/UG	#14 - #10	#14 - #10	#14 - #10
78205180265	1214215 *	20	13	3Ø	OH/UG	#14 - #10	#14 - #10	#14 - #10

Part/UPC Number	Catalog Number	Overall Dimensions			Top Provision	Knockout Layout
		Height	Width	Depth		
78205146000	12144	20"	12"	4 ⁵ / ₈ "	AW Hub	Fig. 1
78205146010	12145	20"	12"	4 ⁵ / ₈ "	AW Hub	Fig. 1
78205146020	12146	20"	12"	4 ⁵ / ₈ "	AW Hub	Fig. 1
78205144640	12148	20"	12"	4 ⁵ / ₈ "	AW Hub	Fig. 1
78205144650	121413	20"	12"	4 ⁵ / ₈ "	AW Hub	Fig. 1
78205144065	121415	20"	12"	4 ⁵ / ₈ "	AW Hub	Fig. 1
78205146070	1214208 *	20"	24 ³ / ₈ "	4 ⁵ / ₈ "	AW Hub	Fig. 2
78205146060	1214213 *	20"	24 ³ / ₈ "	4 ⁵ / ₈ "	AW Hub	Fig. 2
78205180265	1214215 *	20"	24 ³ / ₈ "	4 ⁵ / ₈ "	AW Hub	Fig. 2

* Not EUSERC 339 compliant.

Utility/Current Transformer Metering

800 Amp/50K AIC/Bussed Current Transformer Enclosure



803 HEE

APPLICATION

- For remote metering when main service is 201-800 amps
- For use with utility supplied bar type current transformers that meet ANSI C12.11

CONSTRUCTION

- Type 3R construction
- Removable hinged door with sealing provision
- Cover has newly designed fixed handles (not shown)

STANDARDS

- UL 414 listed, complies with ANSI C12.7

FINISH

- ANSI 61 gray acrylic electrocoat finish

Overhead/Underground-Surface Mount

CATALOG NUMBER	AIC RATING	AMPACITY		VOLTAGE	CONDUCTOR LUG RANGE			DIMENSIONS (INCHES)		
		MAX.	CONT.		SERVICE TYPE	PHASE CONDUCTOR LINE/LOAD	NEUTRAL CONDUCTOR	HEIGHT (H)	WIDTH (W)	DEPTH (D)
803 HEE	50K	800	800	600	3Ø 4W	STUDS	STUDS	48	30	12

Utility/Current Transformer Metering

400-800 Amp/10K & 50K AIC/Bussed Current Transformer Mounting Base



6019A



6019HA

APPLICATION

- For use with CT rated metering enclosures
- For use with bar type CT that meet ANSI C12.11
- 1/2" studs on 1 3/4" centers - line & load

STANDARDS

- UL 414 listed, complies with ANSI C12.7

FINISH

- ANSI 61 gray acrylic electrocoat finish (mounting plate only)

Overhead/Underground-Surface Mount

CATALOG NUMBER	AIC RATING	# OF C.T. PROVISIONS	AMPACITY CONT.	VOLTAGE MAX.	CONDUCTOR LUG RANGE			NEUTRAL CONDUCTOR	MIN. SIZE ENCLOSURE
					SERVICE TYPE	PHASE CONDUCTOR LINE	CONDUCTOR LOAD		
6019A	10K	2	400	600	1Ø or 3Ø 3W	STUDS	STUDS	STUDS	24"
6019HA	50K	2	400	600	1Ø or 3Ø 3W	STUDS	STUDS	STUDS	24"
6019E	10K	2	800	600	1Ø or 3Ø 3W	STUDS	STUDS	STUDS	24"
6019HE	50K	2	800	600	1Ø or 3Ø 3W	STUDS	STUDS	STUDS	24"
6067A	10K	3	400	600	3Ø 3W or 4W	STUDS	STUDS	STUDS	30"
6067HA	50K	3	400	600	3Ø 3W or 4W	STUDS	STUDS	STUDS	30"
6067EE	10K	3	800	600	3Ø 3W or 4W	STUDS	STUDS	STUDS	30"
6067HEE	50K	3	800	600	3Ø 3W or 4W	STUDS	STUDS	STUDS	30"



6067 HEEL

APPLICATION

- For use with CT rated metering enclosures
- For use with bar type CT that meet ANSI C12.11
- Integral mechanical lugs - line & load

STANDARDS

- UL 414 listed, complies with ANSI C12.7

FINISH

- ANSI 61 gray acrylic electrocoat finish (mounting plate only)

Overhead/Underground-Surface Mount

CATALOG NUMBER	AIC RATING	# OF C.T. PROVISIONS	AMPACITY MAX.	CONT.	VOLTAGE	SERVICE TYPE	CONDUCTOR LUG RANGE	
							LINE	LUG WIRE RANGE LINE & LOAD
6019 HAL	50K	2	400	400	600	1Ø or 3Ø/3W		(1) 4 AWG - 600kcmil or (2) 1/0 - 250kcmil
6019 HEL	50K	2	800	800	600	1Ø or 3Ø/3W		(3) 4 AWG - 600kcmil or (6) 1/0 - 250kcmil
6067 HAL	50K	3	400	400	600	3Ø 4W		(1) 4 AWG - 600kcmil or (2) 1/0 - 250kcmil
6067 HEEL	50K	3	800	800	600	3Ø 4W		(3) 4 AWG - 600kcmil or (6) 1/0 - 250kcmil



6067 HEELS

APPLICATION

- For use with CT rated metering enclosures
- For use with bar type CT that meet ANSI C12.11
- Studs line side - lugs load side
- 1/2" studs on 1 3/4" centers

STANDARDS

- UL 414 listed, complies with ANSI C12.7

FINISH

- ANSI 61 gray acrylic electrocoat finish (mounting plate only)

Overhead/Underground-Surface Mount

CATALOG NUMBER	AIC RATING	# OF C.T. PROVISIONS	AMPACITY MAX.	CONT.	VOLTAGE	SERVICE TYPE	CONDUCTOR LUG RANGE	
							LINE	LUG WIRE RANGE LOAD
6019 HALS	50K	2	400	400	600	1Ø or 3Ø/3W	STUDS	(1) 4 AWG - 600kcmil or (2) 1/0 - 250kcmil
6019 HELS	50K	2	800	800	600	1Ø or 3Ø/3W	STUDS	(3) 4 AWG - 600kcmil or (6) 1/0 - 250kcmil
6067 HALS	50K	3	400	400	600	3Ø 4W	STUDS	(1) 4 AWG - 600kcmil or (2) 1/0 - 250kcmil
6067 HELS	50K	3	800	800	600	3Ø 4W	STUDS	(3) 4 AWG - 600kcmil or (6) 1/0 - 250kcmil

CURRENT TRANSFORMER, SCREW COVER, TYPE 3R



INDUSTRY STANDARDS

UL 50, 50E Listed; Type 3R; File No. E27525
 cUL Listed per CSA C22.2 No 94; Type 3R; File No. E27525

NEMA Type 3R
 IEC 60529, IP32

APPLICATION

Current Transformer Cabinets provide outdoor protection and security for instrument current transformers, which are frequently required for transformer-rated watt-hour metering. Cabinets can also be used as junction or service boxes and house meter, transformer, relay or terminal assemblies.

FEATURES

- Dripshield top and seam-free sides, front and back
- Slip-on removable cover fastened with captivated plated steel screws along bottom edge
- Mounting studs on enclosure body
- Mounting holes on back of enclosure
- Door handles provided
- Provisions for padlocking
- No gasketing or knockouts
- Ground lug

SPECIFICATIONS

- 16, 14 or 12 gauge plated steel

FINISH

ANSI 61 gray polyester powder paint finish inside and out over plated surfaces.

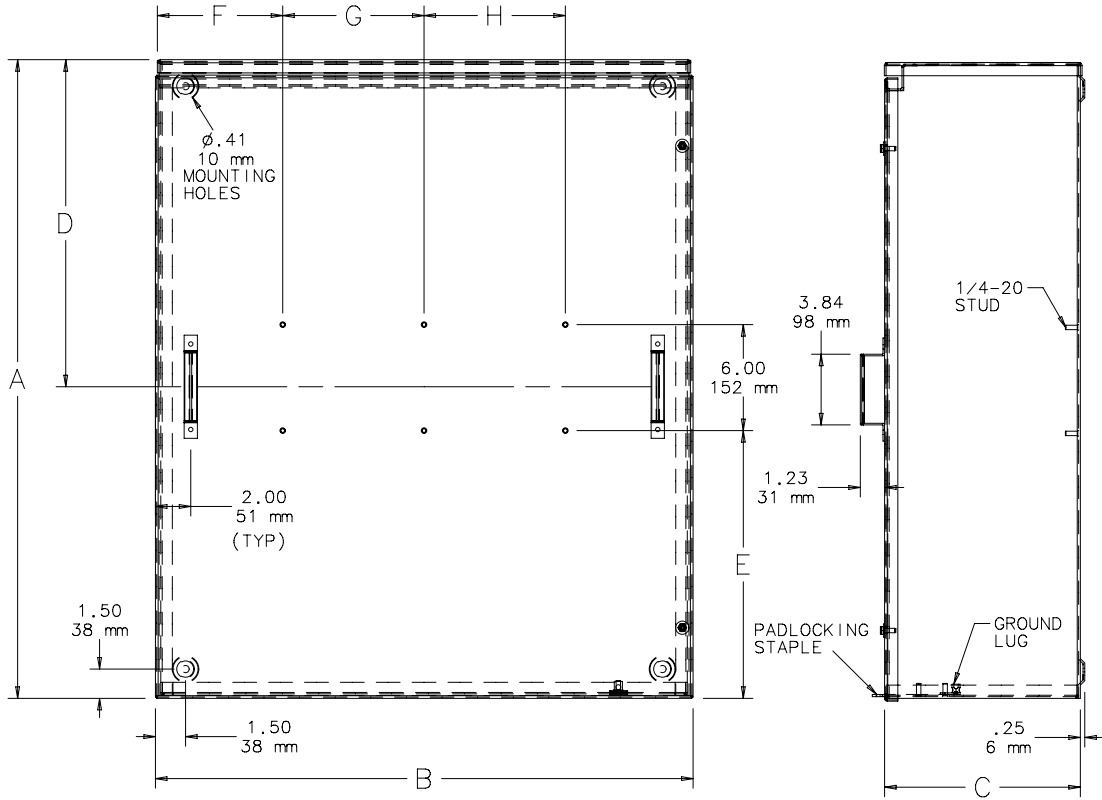
ACCESSORIES

See also Accessories.
 Industrial Corrosion Inhibitors
 Grounding Device
 Touch-Up Paint

BULLETIN: A90CT

Standard Product

Catalog Number	AxBxC in./mm	D in./mm	E in./mm	F in./mm	G in./mm	H in./mm
A242411CT	24.00 x 24.00 x 11.00 610 x 610 x 279	12.19 310	9.00 229	8.00 203	8.00 203	— —
A303011CT	30.00 x 30.00 x 11.00 762 x 762 x 279	15.19 386	12.00 305	7.00 178	8.00 203	8.00 203
A363011CT	36.00 x 30.00 x 11.00 914 x 762 x 279	18.19 462	15.00 381	7.00 178	8.00 203	8.00 203
A363611CT	36.00 x 36.00 x 11.00 914 x 914 x 279	18.19 462	15.00 381	10.00 254	8.00 203	8.00 203
A483611CT	48.00 x 36.00 x 11.00 1219 x 914 x 279	24.19 614	21.00 533	10.00 254	8.00 203	8.00 203



87925196



Detail Bill of Material

Project Name: Alpha
General Order No:

Negotiation No: DAGV0817X2K1
Alternate No: 0000

Item No.	Qty	Product	Description
	1	Loadcenters	CH PON LOADCENTER, 200A, MAIN BREAKER, 32 SPACE, N

Catalog No CHP32B200R

Catalog No	Qty	List of Materials
CHP32B200R	1	CH PON LOADCENTER, 200A, MAIN BREAKER, 32 SPACE, N
CH2100	16	Type CH Breaker 100A/2 Pole 120/240V 10K

Eaton Selling Policy 25-000 applies.

All orders must be released for manufacture within 90 days of date of order entry. If approval drawings are required, drawings must be returned approved for release within 60 days of mailing. If drawings are not returned accordingly, and/or if shipment is delayed for any reason, the price of the order will increase by 1.0% per month or fraction thereof for the time the shipment is delayed.

Seller shall not be responsible for any failure to perform, or delay in performance of, its obligations resulting from the COVID-19 pandemic or any future epidemic, and Buyer shall not be entitled to any damages resulting thereof.



TYPE CH LOADCENTER RATINGS:

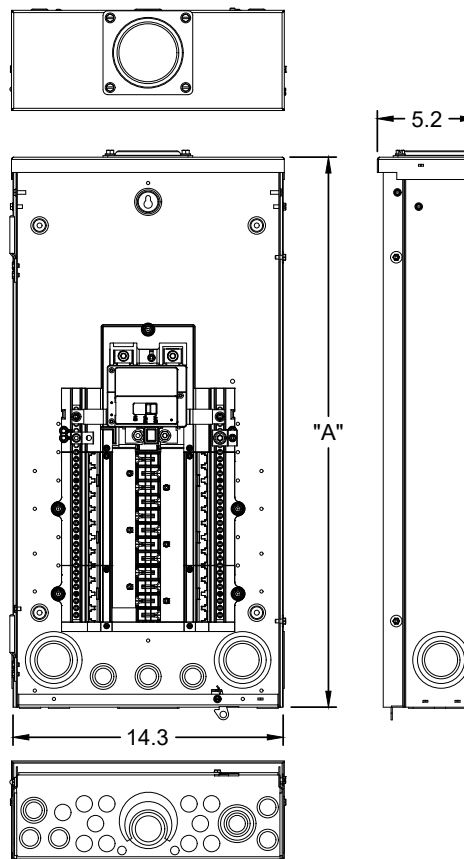
Enclosure: Outdoor NEMA 3R
 Incoming Main: Type CSR Main Breaker
 Loadcenter Electrical Rating: 120/240 VAC, Single Phase
 Loadcenter Ampere: 225 Amps Max
 Number of Spaces & Circuits: See Table on Page 2
 Incoming Wire Range: See Table on Page 2
 Bus Bar Material: Copper
 Enclosure Paint: ANSI 61 Light Gray
 Short Circuit Rating: See Branch Breaker Ratings
 Box Dimensions: 14.3"W x 5.2"D x "A" (See Table on page 2)

FEATURES:

- Warranty** - Lifetime warranty on all CH Loadcenters and Breakers.
- Silver Flashed Copper Bus** - Provides superior conductivity, corrosion resistance and durability.
- Mechanical Trip Flag** - Trip indication on type CH Breakers (CHF).
- Diagnostic LED** - CH AFCI Breakers include a diagnostic LED indication 1 of 7 trip codes.
- Plastic Backpan** - For Plug-On Neutral Branch Breakers.
- Inboard Neutral Bar Assembly** - For better management of load wires.

OPTIONAL ACCESSORIES:

Catalog Number	Description
GBKP5	5 POS #14-4 Ground Bar
GBKP10	10 POS #14-4 Ground Bar
GBKP14	14 POS #14-4 Ground Bar
GBKP21	21 POS #14-4 Ground Bar
NL20	Neutral/Ground Lug #2/0 max
NLP20	Neutral/Ground Lug #2/0 max w/Bonding Tab
NL300	Neutral/Ground Lug #300MCM max
NLP300	Neutral/Ground Lug #300MCM max w/Bonding Tab
CHPPF	3/4" Filler Plate
CHPHD	Hold-down kit for Type CH breaker
CHPMKCSR	Generator Interlock Kit



TITLE: CH 3/4" LOADCENTER, CSR MAIN BREAKER, OUTDOOR NEMA 3R, 120/240 VAC, 1 PH | DRAFTER/DESIGNER: M.S. | DATE (YYYYMMDD): 2018/07/27

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	DSD_AFM_PORT_ACAD_CUSTOMER.DWG	

GO/NEG-Alt-Date: DAGV0817X2K1-0000-8/17/2022		Job Name: Alpha
Item Number:	Catalog Number: CHP32B200R	Designation:



Powering Business Worldwide

LOADCENTER DETAILS

Catalog #	Dim "A"	Main Brkr Amps	Spaces / Circuits	Bus Bar Amps Max.	Wire Size Range Cu/Al 60°C or 75°C	Notes
CHP08B200RF	29.12	200	8/16	225	#2-300 kcmil	Sub-Feed Lugs Installed
CHP08B200RFP	29.12	200	8/16	225	#2-300 kcmil	Sub-Feed Lugs Installed
CHP24B150R	29.12	150	24/48	225	#2-300 kcmil	
CHP24B200R	29.12	200	24/48	225	#2-300 kcmil	
CHP32B150R	34.12	150	32/64	225	#2-300 kcmil	
CHP32B200R	34.12	200	32/64	225	#2-300 kcmil	
CHP32B225R	34.12	225	32/64	225	#2-300 kcmil	
CHP42B200R	37	200	42/84	225	#2-300 kcmil	
CHP42B225R	37	225	42/84	225	#2-300 kcmil	
CHP42H225R	39	225	42/84	225	#2-300 kcmil	CSH 35k Main Breaker

HUB ACCESSORIES:

Catalog Number	Description
DS075H1	3/4" HUB
DS100H1	1" HUB
DS125H1	1-1/4" HUB
DS150H1	1-1/2" HUB
DS200H1	2" HUB
DS200H2	2" HUB
DS250H2	2-1/2" HUB
DS300H2	3" HUB

Note: Catalog Numbers may have additional characters at the end which describe alternate details, including but not limited to the following: F, W, G, K, M, N, Q, P and #s, DG, V and #s. Contact sales for those specific details when necessary.

TITLE CH 3/4" LOADCENTER, CSR MAIN BREAKER, OUTDOOR NEMA 3R, 120/240 VAC, 1 PH	DRAFTER/DESIGNER M.S.	DATE (YYYYMMDD) 2018/07/27
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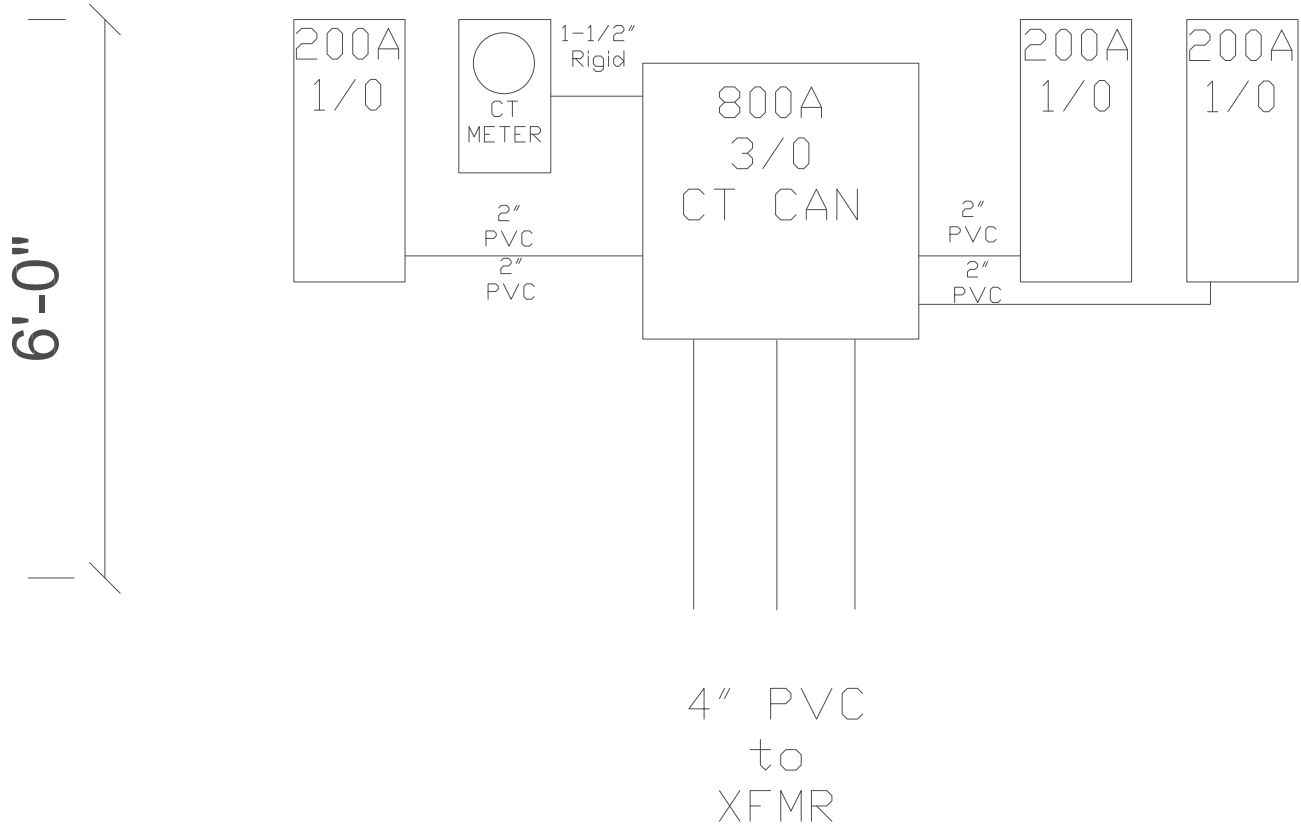
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DSD_AFM_PORT_ACAD_CUSTOMER.DWG

GO/NEG-Alt-Date: DAGV0817X2K1-0000-8/17/2022		Job Name: Alpha
Item Number:	Catalog Number: CHP32B200R	Designation:

BUILDINGS "A"&"B"

Temporary SWITCH GEAR



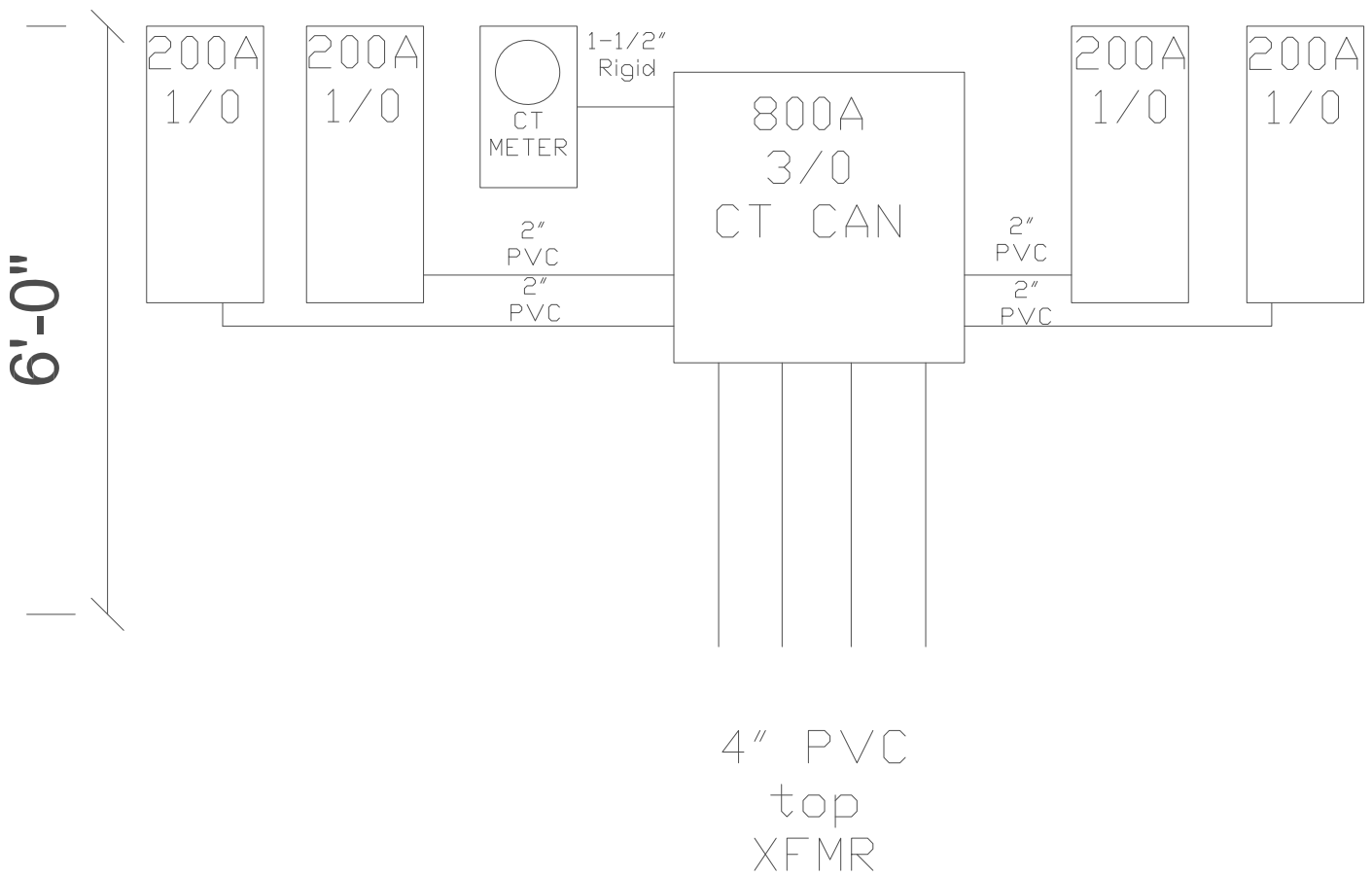
JOBNAME GRAND PRAIRIE TOWNHOMES
 ADDRESS 2915 Waverly Dr SE & 2710 Grand Prairie Rd.
 CITYSTATE Albany, Oregon 97322

9/13/2022
DATE
 206-2021
PROJ. NO.

SHEETNAME TEMP Electrical Switch gear

BLD-B-A
SHEET NO

BUILDING "C" Temporary SWITCH GEAR



JOBNAME GRAND PRAIRIE TOWNHOMES
 ADDRESS 2901 Waverly Dr SE
 CITYSTATE Albany, Oregon 97322

9/13/2022
DATE

206-2021
PROJ. NO.

SHEETNAME TEMP Electrical Switch gear

BLDG-C
SHEET NO



Oregon

Kate Brown, Governor

Public Utility Commission

201 High St SE Suite 100

Salem, OR 97301-3398

Mailing Address: PO Box 1088

Salem, OR 97308-1088

503-373-7394

August 9, 2022



BY EMAIL

PacifiCorp

oregondockets@pacificorp.com

RE: Advice No. 22-005

At the public meeting on August 9, 2022, the Commission adopted Staff's recommendation in this matter docketed as ADV 1391, with one change, in stipulation 1, the forty-five-day timeline is changed to a sixty-day timeline. The Staff Report and a receipted copy of the sheets in your advice filing are attached.

A handwritten signature in blue ink, reading "Nolan Moser".

Nolan Moser

Chief Administrative Law Judge

Public Utility Commission of Oregon

(503) 378-3098

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: August 9, 2022**

REGULAR X **CONSENT** _____ **EFFECTIVE DATE** August 10, 2022

DATE: August 1, 2022

TO: Public Utility Commission

FROM: Scott Gibbens and Melissa Nottingham

THROUGH: Bryan Conway and Caroline Moore **SIGNED**

SUBJECT: PACIFIC POWER:
(Docket No. ADV 1391/Advice No. 22-005)
Amends Rule 8, Metering to include an Exemption for Master Metering.

STAFF RECOMMENDATION:

Approve Pacific Power's (PacifiCorp or Company) Advice No. 22-005 which amends Rule 8 with the following stipulations, effective with service on and after August 10, 2022.

1. The Company must use good-faith efforts to discuss and propose any viable solution for allowing qualifying tenants residing in any unit that is subject to this exemption access to the proposed Schedule 7 energy prices on the same forty-five-day timeline directed by the Commission in regards to ADV 1412.
2. The Company must provide the Commission with a report of the number of buildings utilizing this exemption by August 2024.

DISCUSSION:

Issue

Whether the Oregon Public Utility Commission (Commission) should approve an exemption process to the master meter prohibition currently in place in the Company's Rule 8 Tariff.

Applicable Rule or Law

PacifiCorp makes this filing pursuant to ORS 757.205, OAR 860-022-0025, and OAR 860-022-0030.

- ORS 757.205 requires public utilities file to all rates, rules, and charges with the Commission.
- ORS 757.220 requires utilities to file changes to any rates, tolls, charges, rules, or regulations with at least 30 days before the effective date of the changes. The Commission may approve tariff changes on less than 30 days' notice for good cause shown.
- OAR 860-022-0025 requires that revised tariff filings include statements showing the change in rates, the number of customers affected and resulting change in annual revenue, and the reasons for the tariff revision.
- OAR 860-022-0030 requires that tariff filings which result in increased rate include statements showing the number of customers affected, the annual revenue under existing schedules, the annual revenue under proposed schedules, the average monthly bills under existing and proposed schedules, and the reasons supporting the proposed tariff.

Analysis

Background

PacifiCorp's Rule 8, Metering, currently requires an individually metered service for each unit in an apartment building. This requirement for each resident to be individually metered is a requirement in PacifiCorp's tariffs in all states the Company operates in. The origin of this requirement was the passage of Public Utility Regulatory Policies Act (PURPA) in 1978. PURPA 16 USC §2625(b) identifies policy goals that master metering be prohibited or restricted to promote energy conservation. In Oregon, ORS 455.420 implements this metering recommendation by requiring "[an] individual electrical meter for each dwelling unit" except "where a building inspector...determines that...installation of a single electrical meter for all dwelling units in such building would facilitate an overall reduction in electrical consumption by such units."

On April 27, 2022, PacifiCorp filed Advice No. 22-005 requesting amendments to Rule 8, Metering, which would allow for master metering of apartments in certain situations. In its application, the Company states that it has had several requests from affordable housing developers in the last twelve months to approve master meter installations for new apartment buildings.

After discussions with the Company regarding concerns and potential outreach to stakeholders, the Company filed replacement sheets on May 12, 2022, to extend the effective date to August 10, 2022.

On July 20, 2022, Staff held a stakeholder workshop to elicit input from other parties regarding the issues related to the Company's proposal. Along with Staff and the Company, representatives from the Community Energy Project and Sazan Group were in attendance.

Company Proposal

As previously mentioned, the Company proposed to allow for the installation of master metering in apartment buildings if the project meets certain criteria. These criteria are:

1. The required exemption to individual metering as required by the Oregon State building code has been obtained by the builder.
2. The units are not sub-metered.
3. 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.
4. Electric load within each unit that is controlled by the tenant, excluding any individual load from item three, will be less than 250 kWh per month.

Support for Proposal

The Company has provided several reasons in its application, through discovery, and during the stakeholder workshop as to why Commission approval of the tariff change is in the public interest.

The first is that the Oregon State building codes allow for such an exemption to the individual metering requirement. This creates a mismatch between the Company's tariff and the state building codes.

Second, PacifiCorp states in its initial application that much of the interest from Oregon developers is in the affordable housing market. The reduced costs of installing and wiring separate meters for each unit would presumably make low-income housing projects more viable economically, thus promoting development that may not otherwise take place. Further, PacifiCorp believes that there is value to the tenants who may be on fixed incomes or have tight budgets in the assurance that comes from having a fixed cost for energy built into their monthly rent.

Third, the Company states that central heating or high efficiency heat pumps can promote energy efficiency, lower costs overall, and limit the potential for cross-subsidization amongst residents in a building.

The Company also notes that the 250 kWh limit ensures the developer builds energy efficient units with more eco-conscious appliances, which limits the risk the proposal will result in excessive energy consumption when the direct price signal is lost.

The Company currently has a similar exemption process in place in Utah. In discussions with the Company, they further explained that in addition to affordable housing, the Company sees interest from developers to build residential units for employee housing close to a large facility, and for student housing close to colleges and universities. During the workshop, the representative from Sazan group further stated that this exemption would be desirable for net-zero or other apartment complexes designed with behind the meter solar installations sized to offset the power consumption of the residence. Without being able to aggregate the load of the entire building, the net-zero mandate can only be achieved through individual and more costly smaller solar installations.

Risks and Concerns of Proposal

A primary risk from Staff's perspective is the loss of the direct relationship between the utility and the consumer. If an energy-burdened consumer is no longer a customer of the utility, the Company and the Commission lose some of their ability to directly apply solutions and programs to mitigate the difficulty of paying for energy. Low-Income Rate Assistance Program (LIRAP), Low-Income Home Energy Assistance Program (LIHEAP), differential rates borne by House Bill (HB) 2475, arrearage management programs, etc. would seemingly be unavailable options for tenants of master metered buildings. Disconnection notices, Energy Trust of Oregon (ETO) offerings, and other important information also become more difficult and convoluted to deliver.

In the net-metering space, this exemption could open up an avenue that was not previously considered when net-metering and other distributed generation programs were designed. Staff has not identified any particular concerns with this, but notes that unintended consequences may exist.

The PURPA standard regarding master metering is designed to promote energy usage awareness, providing a direct price signal for the energy used and incentivizing conservation. The Company's proposal would break the connection between energy usage and cost. The Company's proposal attempts to mitigate abuse of this disconnection but does not guarantee it. Energy usage is only based on estimates of

each unit's energy consumption; there is no mechanism for identifying compliance with the 250 kWh limit.

Staff Analysis

Staff generally understands and supports the arguments in support of the Company's proposal. Staff believes that there are potential circumstances that could warrant a master metered service and that finding an appropriate solution to allow these situations is likely in the public interest. However, Staff does have concerns, noted above, that the Commission should consider prior to approval of the Company's tariff change. Staff issued 17 information requests to the Company in order to attempt to better quantify and understand the potential risks associated with the Company's proposal.

Staff reviewed Portland General Electric's (PGE) tariff to identify if it had an exemption process in place for master metered service. Staff found that an exemption does exist with no stipulations. The tariff states:

Individual dwelling units in newly constructed multi-family residential buildings will be individually metered and billed as Residential Customers... In the case where service is supplied through one meter to two or more new dwelling units, or to three or more existing dwelling units, service will be classified as nonresidential service.¹

Staff then reached out to PGE for clarification on its tariff and found that the Company generally works with any developer who has obtained a waiver of the state building codes to put a master metered residential building on nonresidential service.

Staff then worked to understand the potential scale of the issue. In response to Staff Information Request (IR) No. 14, the Company noted that it has approved one exemption request each year from 2018-2022, with the exception of 2021, for a total of four in the last five years in Utah. The Company further states that it has received four requests in the last 12 months in Oregon, with one requestor electing to individually meter and the other three awaiting the result of this filing. In a separate information response, the Company noted that at least two of the requests in Oregon were for affordable housing projects.

In an interview airing on July 6, 2022, Oregon State Economist Josh Lehner provided some brief thoughts on the housing and rental market in Oregon. In the interview, Lehner summarily noted the impact that high interest rates are having on the affordability of home ownership. He notes that there is not an over-supply of housing in the state, so although demand has likely decreased, prices are not declining. This has

¹ PGE Tariff No. E-18, Rule B, Sheet B-6 and B-7.

a cascading effect on rents in the state, as certain individuals are priced out of purchasing a home, and they must choose instead to rent. This increases demand for rentals. In response to a caller who was having difficulty finding a place to rent, Lehner goes on to explain the impact of the rental market on prospective renters.

Caller: This is Barbara Bullard from Milwaukee. I am a senior looking for another house to move into and unfortunately the rents are all the same amount of money as I get with my Social Security and my small retirement fund. The answer is a tent on the side of the road. I don't know what the answer is, but I don't think I'm going to be able to ever pay as much as I actually get in Social Security. Thank you.

Interviewer: *Both Barbara there and Tyler, earlier, talked about renting, which we haven't focused on so far, but I want to just turn briefly to that at least. What does everything we've been talking about in the housing market mean for renters?*

Lehner: It means the rental market will just get even tighter, if people are being priced out of the ownership market. It means you have to have a roof over your head as she was alluding to, or not. Unfortunately too many of us, too many of our neighbors, don't. That, at a base level, owning a home is a choice. It's a choice for the privilege to have the ability to have the down payment and finance and things like that. But the same people could take their strong finances and choose to rent as well. So that's going to just increase the demand in the rental market and vacancy rates and the amount of time on the market for apartments or just all rental units in the Portland area is back to where it was pre-COVID. So it's just gonna continue to see increases in rents statewide and in the Portland market in the years ahead.²

Staff notes that while the scale of risks is potentially growing, the potential usefulness and necessity of the exemption is also growing. This underscores the importance of the risks and merits of the proposal.

Consumer/Utility Relationship

In relation to the loss of the direct connection between the Utility and the consumer, Staff finds that some of the concerns have or could be mitigated. For disconnection notices, OAR 860-021-0326 states that:

² Think Out Loud, OPB Broadcast July 6, 2022, <https://www.opb.org/article/2022/07/05/think-out-loud-oregon-housing-rental-markets-oregon-very-tight/>.

When an energy utility's records show that a residence is a master-metered multi-family dwelling (including rooming houses), the utility must notify the Commission's Consumer Services Division at least five business days before disconnecting the service. The utility will use reasonable efforts to notify occupants of the impending disconnection and alternatives available to them.

While ETO offerings and federally mandated programs like LIRAP and LIHEAP may be difficult to address in this context, Staff does believe there is potential for additional mitigation for some of the state level programs currently being implemented by the Commission. Staff asked the Company about the potential for tenants in affordable housing to access targeted programs for energy burdened customers. The Company states in response to IR No. 15:

The Company has concerns with any program that it would be asked to administer that is not directly linked and calculated from the actual metered usage of the benefiting customer each month. In a master-metered apartment complex, the tenant pays rent and the utilities are included. As the tenant is not a customer of the Company, the Company would not have an account to track when the tenant is in a unit, which unit they are in, if or when the tenant moves, etc. The usage of the tenant is not known, and an average per unit would be distorted by any non-unit electrical usage under the master meter, such as laundry room, common areas, hall and exterior lighting, and potentially electric vehicle charging. The Company is, however, open to further dialog and collaboration with stakeholders on this issue to see if there may be an acceptable solution for incorporating a bill discount with master-metering.

Staff notes that the Commission recently elected to suspend and investigate PacifiCorp's Advice No. 22-008, which sought to establish Schedule 7, Low-Income Discount at the July 26, 2022, public meeting, and thus conversations around how to potentially allow for residents of master-metered buildings could occur with all the relevant parties in a timely manner.

Thus, Staff recommends that the Commission's approval require the Company to analyze, discuss, and propose any viable solution to this issue on the same forty-five-day timeline directed by the Commission in regards to ADV 1412. Staff also encourages the Company to continue to work to identify ways in which tenants of these dwellings could have access to additional programs like ETO, demand response, etc.

Net Metering

Staff first notes that it has not identified any specific risks that would warrant rejection of this filing based on concerns around net metering. Staff understands the challenges that having to individually net meter solar in a multi-unit dwelling pose. Staff further notes that it supports future discussions around these issues which might seek to promote the applicability of this exemption for net metering. Staff examines this risk in light of any potentially unforeseen or unintended consequences.

One mitigation strategy already proposed by the Company is to require that the units not be sub-metered. While sub-metering would potentially allow for reduced cross-subsidization risk, it also removes a large portion of the potential cost savings of master metering. The proposal effectively prohibits a situation where the dwelling unit could be individually metered but for a desire to aggregate load. While Staff notes that this does not prohibit net metering for this application, it does somewhat limit it.

Conservation Risks

Staff notes that the Company's proposed exemption requirements do address this risk in some way.

The requirement to obtain a state building code exemption ensures that a state building inspector has looked at the building plans and determined that a master meter will likely result in reduced energy consumption.

The prohibition on sub metering also promotes conservation in a more indirect manner. The landlord is ultimately responsible for setting a price for utilities in an accurate manner in accordance with state law. If consumption is above the estimated amount, the landlord could be short of full recovery for at least some time. It requires the landlord to take on a certain level of risk, and pushes the design of the apartments towards ensuring that energy abuse is not a major issue. This results in aligning the owner's incentives with the goals of PURPA to promote conservation.

Finally, the requirement that each unit have expected non-heating loads of less than 250 kWh is meant to limit the potential risk that tenants will use large amounts of electricity. In order to examine the level of restriction a 250 kWh requirement is, Staff analyzed individual level data for every multi-family customer within PacifiCorp Oregon service territory from 2017-2022. Staff found that roughly 42 percent of all apartments currently taking service from PacifiCorp average 250 kWh or less non-heating/cooling energy consumption in a given month.³ However, this metric does not account for any apartments or condos that may have had reduced consumption over a six-month period

³ Staff assumed that 50 percent of energy usage was for heating/cooling so Staff utilized 500 kWh as the relevant metric during winter months.

due to vacancy.⁴ Staff also looked at the number of multi-family residents that had not surpassed 250 kWh non-heating consumption in any month, and found that about 20 percent had not eclipsed 250 kWh in each six-month interval. Staff finds that the exemption is targeting housing developments that are more efficient or use less energy than 50-80 percent of the existing rental units that the Company currently serves. This somewhat supports the Company, which stated in response to Staff IR No. 13 that, “the specific requirements that the Company proposes for individual metering exemption eligibility in this filing will mitigate against excessive usage by only applying to residential developments that are likely to have very low per resident usage levels.”

However, Staff does note that the data analyzed was of individually metered customers, who presumably have to pay for every watt of electricity they use. Further Staff notes that the usage included heating/cooling, and which required assumptions to be made to estimate the non-heating/cooling load. Thus, Staff proposes that the Company provide the Commission with a report of the number of buildings utilizing this exemption by August 2024.

The report should identify the number of applications received and approved, and the estimated demand associated with each application. If utilization is determined to warrant further analysis of risk, Staff believes one possible solution could be to have the Company then provide a report with estimated per unit consumption for any building utilizing this exemption. This follow-up report should be timed to provide sufficient time for actual consumption data to be collected and provide the Commission with assurance that the limitation is functioning as intended.

Conclusion

Staff finds that Pacific Power’s proposed amendments to Rule 8 are in the public interest with its proposed additional stipulations. Staff believes that an exemption process is warranted given the direction from the state building codes. Staff notes that the Company’s proposal addresses and mitigates many of the concerns. Staff believes that the two additional recommendations, to address low-income rate application and a report to ensure risks have not grown out of proportion, further help to ensure the proposal is in the public interest. Finally, Staff encourages the Company to continue to monitor and bring forward ideas to provide further safeguards as identified.

⁴ Staff examined all data in 6-month intervals (Jan-June, July-Dec) and aggregated data together due to computer limitations and to reduce calculation times. Staff did remove months with no energy demand for average calculations but made no other adjustments to the data.

PROPOSED COMMISSION MOTION:

Approve Pacific Power's (PacifiCorp or Company) Advice No. 22-005, which amends Rule 8 with the following stipulations, effective with service on and after August 10, 2022.

1. The Company must use good-faith efforts to discuss and propose any viable solution for allowing qualifying tenants residing in any unit that is subject to this exemption access to the proposed Schedule 7 energy prices on the same forty-five-day timeline directed by the Commission in regards to ADV 1412.
2. The Company must provide the Commission with a report of the number of buildings utilizing this exemption by August 2024.

GENERAL RULES AND REGULATIONS
METERING
I. Metering – General
A. Installation, Maintenance and Registration

The Company will install and maintain all meters and other equipment necessary for measuring the electric power and energy used by the Customer and will inspect such installations to maintain a high standard of accuracy. (N)

The Company will, without charge, make a test of the accuracy of registration of a meter upon the request of the Customer or their ESS, provided that the Customer does not request such a test more frequently than once in twelve (12) months. If more than one requested test is made in twelve (12) months, the Company may charge the Customer a meter test charge as specified in Schedule 300. If results of the test show that such meter is outside the 2% accepted tolerance standard under normal operating conditions, the Company may not charge the Customer for the subsequent test(s). (T)

An accurate record will be kept by the Company of all meter readings, and such record shall be the basis for determination of all bills rendered for metered service. (T)

If any meter shall fail to register correctly the amount of electric power or energy used by the Customer, the amount of such use will be estimated by the Company from the best available information. (T)

B. Individual Metering

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. (N)

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)

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

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. (T)

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)

(continued)

GENERAL RULES AND REGULATIONS
METERING
I. Metering – General (continued)
D. Meter Verification Fee and Meter Labeling

When multiple meters are installed at a location with multiple units, it is the developer/owner's responsibility to permanently, and correctly, label each meter base for the associated service address. The Company may check such meter installations to verify they are correctly labeled. The Company will charge the Meter Verification Fee, set forth in Schedule 300, to the developer/owner for each meter installation checked. In the event all meters are labeled correctly for each unit, the Company will waive the Meter Verification Fee for that building.

When a complaint is received from a Customer, landlord or governmental agency of possible switched meters, the Company will check such meter installations to verify that they are correctly labeled. The Company will charge the Meter Verification Fee, as set forth in Schedule 300 to the developer/owner for each meter installation checked. If all meters at a building are correctly labeled for each unit, the Company will waive the Meter Verification Fees for that building. If a Customer or landlord requests more than one meter installation verification within any 12-month period, the Company will require the requesting party to pay the Meter Verification Fee as set forth in Schedule 300, in advance. If the Company determines that the meter is switched or mislabeled, it will refund the deposit to the Customer and the Company will charge the Meter Verification Fee set forth in Schedule 300, to the developer/owner for each meter installation checked.

If a developer/owner or landlord requests the Company to verify or certify that each meter base is labeled correctly, including when locations with multiple units are sold, the Company will charge the party requesting such verification or certification the Meter Verification Fee, as set forth in Schedule 300.

(N)
 (M)
 (T)
 (T)
 (T)
 (T)
 (T)
 (T)
 (T)
 (T)
 (T)
 (M)

II. Metering – Direct Access
A. Direct Access Meter Requirement

The Company's metering standard for Direct Access and Standard Offer Consumers is for remotely interrogated interval metering equipment. Direct Access and Standard Offer Consumers that do not have installed remotely interrogated interval meters may be metered using other approved Company metering equipment. In the absence of a meter installation backlog, the Company will endeavor to install standard meter equipment within 30 days of acceptance of a DASR or receipt of written or electronic authorization for Standard Offer Service. In the event of a backlog, the Company will notify the Consumer or Consumer's ESS and provide an estimate of the installation date. The Company will provide metering equipment for all Consumers.

B. Meter Charge

Direct Access and Standard Offer Consumers taking Company-specified metering services are obligated to pay the direct access metering charges stated in Schedule 300. Consumers taking non-standard metering services as described in Section II.E of this Rule are obligated to pay the metering charges specified in the applicable contract.

C. Standard Services

The Company will provide Standard Metering Services without charge to Large Nonresidential Consumers and will provide Standard Metering Services at a charge stated in Schedule 300 to Small Nonresidential Consumers. Standard Metering Services provided in conjunction with Direct Access and Standard Offer Service include:

(continued)

(M)

GENERAL RULES AND REGULATIONS
METERING

II. Metering – Direct Access (continued)

C. Standard Services (continued)

1. An interval meter equipped with a communication modem.
2. Installation, removal, testing and maintenance of the meter.
3. Remote communication equipment. Calling fees will be passed through to the Consumer.
4. The meter readings and the results provided to ESS' will be the same as those used as the basis for the Company's charges.
5. The standard method of communicating results of meter reading is specified in the standard form of the Company's ESS Service Agreement.

D. Standard Meter Capabilities

These include interval and remote communication functions.

E. Non-Standard Services

An ESS may request that the Company provide non-standard metering capabilities, functions or services.

1. Requests must be submitted to the Company in writing.
2. The Company will consider and approve or deny the request within ten (10) business days.
3. The Company will file with the Commission rates and charges for non-standard metering capabilities, functions or services within thirty (30) days of approving a request.

Terms and conditions for approved non-standard metering capabilities, functions or services will be incorporated into the Company's ESS Service Agreement.

III. Non-Radio Frequency Metering Accommodation

A Customer may request an alternative to the Company's standard radio frequency meter installation from the following:

- a. Relocation of the Customer's meter base to a different location approved by the Company and the installation of a standard meter;
- b. Relocation of the Customer's meter base to a different location approved by the Company and the installation of a Company approved non-radio frequency meter;
- c. Exchanging a standard meter for a Company approved non-radio frequency meter.

A Customer selecting the option to relocate the meter base will be subject to the meter installation requirements of this regulation as well as Electric Service Rule 13. If the relocation requires a change in the existing service the Customer is responsible for charges to relocate the service including but not limited to the installation of conduit, trenching, obtaining easements, and any additional costs of removing and installing new facilities. If an acceptable meter location cannot be provided on the premises, the Customer's request will not be granted. The Customer must provide written permission of the owner stating the Customer has obtained the owner's permission to proceed with relocating the meter base.

(continued)

(M)

(M)

(M)

III. Non-Radio Frequency Metering Accommodation (continued)

Customers who elect to have a non-radio frequency meter will be subject to installation of the non-radio frequency meter as set forth in Schedule 300. All applicable fees will be paid prior to the installation of the non-radio frequency meter. The Schedule 300 charges for the installation is in addition to any aforementioned costs to relocate the Customer's service.

If a radio frequency meter is installed at the Customer's premise prior to January 1, 2018 and the Customer requests a non-radio frequency meter, the Customer will not be required to pay the installation charge in Schedule 300.

Only non-radio frequency meters approved, obtained, installed, and owned by the Company will be allowed. The Customer's request to replace a radio frequency meter with a non-radio frequency meter cannot be accommodated until an approved non-radio frequency meter can be obtained by the Company.

All Customers with a non-radio frequency meter shall be responsible to pay the monthly meter reading fee in Schedule 300, which will be included in the Customer's monthly service billing.

Customers with non-radio frequency meters may be excluded from participating in Company offered programs for which a standard radio frequency meter is required.

The Company may revoke the meter exchange accommodation of a non-radio frequency meter by reinstalling the Company's standard radio frequency meter for any of the following conditions:

- a. Meter tampering;
- b. Impeding Company access to the meter to obtain monthly meter readings, perform maintenance or to disconnect meter for non-payment of electric service; or
- c. Service has been disconnected for non-payment of electric service twice within a 12-month period.

Customers opting-out of the Company's standard metering and are metered by a non-standard meter and are otherwise eligible for service under Schedule 4 Residential Service or have a meter without a demand register and are eligible for service under Schedule 23 General Service, Small Non-Residential may contract with the Company for a triannual meter reading schedule. Meter readings will be three times a year and monthly billings between meter readings will be based on estimated usage assumptions. At the discretion of the Company, meter readings may be more frequent without any additional charge to the Customers. Customers are required to pay the triannual meter reading fee as stated in Schedule 300, and enroll in the Company's Equal Payment Plan as described in Rule 10 of this tariff.

The Company reserves the right to remove a Customer from the triannual read program for any of the following reasons:

The Customer is disconnected for nonpayment of bills,
The Customer fails to abide by the terms of the Equal Payment Plan, or
Safe and unobstructed access is not provided to the Company.

This option is not available for service in conjunction with net metering or time-of-use schedules.

RIOS Deanna * PUC

From: Talo, Florisa (PacifiCorp) <Florisa.Talo@pacificorp.com>
Sent: Wednesday, November 2, 2022 11:19 AM
To: NOTTINGHAM Melissa * PUC
Cc: _Tariff Policy; PUC_GR-CONSUMER; Customer Advocacy Team
Subject: RE: Grand Prairie Townhomes

Importance: High

Follow Up Flag: Follow up

Flag Status: Flagged

Good Afternoon Melissa,

Cary Ann had our Estimator reach out to the developer's electrician. The first section below is the response to your question from our Estimator about the load calculation and the italicized section is a summary of the conversation he had with their electrician this morning -

Pacific Powers loading standard doesn't have an option for loading without taking into account heating and cooling. The calculation I showed in my previous email was as good of a guess as I could with the information from the customer and using Pacific Powers standard.

The customers units are all electric and for the square footage Pacific Powers standard shows a demand of 8-9kw. I used 5kw as a guess because each unit has a washer and dryer and a water heater. Below is the table from Pacific Powers standard that I used for my example.

**Table 3—Multi-Family / Apartment
Estimated Peak Demand (kVA) Per Residence**

DEMAND SHOWN IN EXAMPLE

Ducted Heat Source	< 800 ft. ²	801 - 1000 ft. ²	1001 - 1500 ft. ²
Gas, Heat Pump, Other	5	6	7
Resistive ← CUSTOMERS HEATING	8	9	11

For the customer to meet the 250 kwh criteria they would have to provide reasonable substantiation of the load projection. One more example, if the projected load to each unit is 1kw and each unit has that amount of load for 8hrs a day for 30 days, the kwh would be 240. I don't believe these units with electric range, electric water heater, and washers/dryers are going to be able to stay under the 250 kwh to meet the criteria of Master Metering.

The language in Rule 8, Section I.C. requires the applicant to provide reasonable substantiation of the load projection of their units. The Company's responsibility is to review the information submitted for its reasonableness.

I called the electrician and he said he is missing components for the main disconnect. He said he has some meter stacks but not anywhere close to the amount he needs for the project. He says he cant get any 3 or 4 stack meter bases. I discussed this with the Metering Foreman and his stance is each unit needs to be individually metered per the Tariff and single metering points as a "temporary" solution has already been vetted and denied in multiple locations for other customers. He also said as long as each unit is individually metered we are open to make exceptions to the ESR metering install spec. If the customer can come up with a solution that shows all units individually metered we will review it and

see what exceptions can be made. I called the electrician to see if he could source any other metering configuration for the meter bases and he said he cant. He explained the gear is rated for the fault current and the busing in the meter stacks gets the AIC down to below 10k at each meter to coordinate with the disconnect at each meter. He said some of the gear is now scheduled to arrive in February but the largest buildings gear is still scheduled to arrive in May.

I am happy to schedule the TEAMS meeting for everyone for tomorrow morning – what time works best for your group and who would you like us to add to the meeting?

Please let me know.

Thank you so much,

Risa Talo

Customer Advocacy and Customer Service
801-955-2435



Oregon

Kate Brown, Governor

Department of Consumer and Business Services
Building Codes Division
1535 Edgewater Street NW
P.O. Box 14470
Salem, OR 97309-0404
503-378-4133
Fax: 503-378-2322
bcd.oregon.gov

October 22, 2020

J. Daniel Steffey
jdanielsteffey@jdscobiz.com

Re: Electrical Meter Requirements

Mr. Steffey:

Director Stolfi forwarded your question regarding electrical meters in multifamily residential buildings to me. As you have pointed out, Oregon statute allows multifamily residential buildings to be served by a centralized meter in specific circumstances. This determination is project and site specific, and the local building department is authorized to make this determination.

Questions:

- Are individual meters required for each dwelling unit in a multifamily residential building built in the State of Oregon?
- May an electrical provider use a centralized meter for all dwelling units in a multifamily residential building?

Answer:

Oregon Revised Statute (ORS) 455.420(1) requires each individual dwelling unit in a multifamily residential building to have a separate, individual electrical meter for each unit. However, at the discretion of the local building official or building inspector, an exception may be made if the installation of a single, central electrical meter would facilitate an overall reduction in electrical consumption.

ORS 455.420(1) states the following:

“Each individual dwelling unit in a multifamily residential building constructed after October 4, 1977, shall have installed a separate, individual electrical meter for each such dwelling unit except where a building inspector certified under ORS 455.715 to 455.740 determines that pursuant to standards adopted by the Director of the Department of Consumer and Business Services the installation of a single, central electrical meter for all the dwelling units in such building would facilitate an overall reduction in electrical consumption by such units.”

These issues are project and site specific, but with the way you have described your project, where the development provides all utilities to the residents and the project will include a photovoltaic (PV) installation to reduce energy demand from the utility, it appears that the

Letter to Mr. Steffey

Page 2

utilization of a master meter would meet the standard of facilitating an overall reduction in electrical consumption of the individual dwelling units.

Please consult with your local building department on any electrical meter installations to determine if your project qualifies for the exception listed in ORS 455.420(1).

If you have any further questions or concerns, please contact me.

Sincerely,

Keith Anderson
Chief Electrical Inspector, State of Oregon
503-378-4459
william.k.anderson@oregon.gov



Oregon

Kate Brown, Governor

Department of Consumer and Business Services

Building Codes Division

1535 Edgewater Street NW

P.O. Box 14470

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503-378-4133

Fax: 503-378-2322

bcd.oregon.gov

April 7, 2020

Ryan Sheehy
Fleet Development
200 E. Main St
Enterprise OR 97828

Re: Electrical Meter Requirements

Mr. Sheehy:

You have requested clarification regarding the application of Oregon electrical rules and statutes as they apply to the installation of electrical meters in multifamily residential buildings.

Questions:

- Are individual meters required for each dwelling unit in a multifamily residential building built in the State of Oregon?
- May an electrical provider use a centralized meter for all dwelling units in a multifamily residential building?

Answer:

Oregon Revised Statute (ORS) 455.420(1) requires each individual dwelling unit in a multifamily residential to have a separate, individual electrical meter for each unit. However, at the discretion of the local building official or building inspector, an exception may be made if the installation of a single, central electrical meter would facilitate an overall reduction in electrical consumption.

ORS 455.420(1) states the following:

“Each individual dwelling unit in a multifamily residential building constructed after October 4, 1977, shall have installed a separate, individual electrical meter for each such dwelling unit except where a building inspector certified under ORS 455.715 to 455.740 determines that pursuant to standards adopted by the Director of the Department of Consumer and Business Services the installation of a single, central electrical meter for all the dwelling units in such building would facilitate an overall reduction in electrical consumption by such units.”

These issues are project and site specific, but the way you have described your project it appears that the utilization of a master meter to enable the solar project would meet the standard of facilitating an overall reduction in electrical consumption of the individual dwelling units.

Letter to Mr. Del Vecchio

Page 2

Please consult with your local building department on any electrical meter installations to determine if your project qualifies for the exception listed in ORS 455.420(1).

If you have any further questions or concerns, please contact me.

Sincerely,

Keith Anderson
Chief Electrical Inspector, State of Oregon
503-378-4459
william.k.anderson@oregon.gov

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UCB 71

Served electronically at Salem, Oregon, 12/29/22, to: Amy.Hoskins@pacificorp.com

Amy Hoskins
PacifiCorp
Director, Customer Care Center
Customer Collection Center Wasatch
4171 W Lake Park Blvd
Salt Lake City, UT 84120

PAUL SPIES DBA WAVERLY TOWNHOMES LLC,

Complainant,

vs.

PACIFICORP DBA PACIFIC POWER,

Defendant.

A copy of a complaint filed against Pacificorp dba Pacific Power (PacifiCorp) is attached. The Public Utility Commission must receive an Answer from the defendant or its attorneys by January 13, 2023.

On the bottom of page two, complainant asks that the Commission consider the informal case record in resolving this complaint. This information is comprised of case notes taken by the Consumer Services Division. Complainant attached this information to the complaint, and it is deemed part of complainant's official filing.

You must submit filings electronically to the Commission as described in OAR 860-001-0170. A copy of your filing will automatically be sent to the complainant when it is processed by the Filing Center.

PUBLIC UTILITY COMMISSION OF OREGON

/s/Cheryl Walker
Cheryl Walker
Administrative Specialist 2
Administrative Hearings Division
(971) 388-8306

Attachments: Complaint
Notice of Contested Case Rights and Procedures

c: PacifiCorp Oregon Dockets, oregondockets@pacificorp.com (w/attachments)



Oregon

Kate Brown, Governor

Public Utility Commission

201 High St SE Suite 100

Salem, OR 97301-3398

Mailing Address: PO Box 1088

Salem, OR 97308-1088

503-373-7394

December 29, 2022

ELECTRONIC SERVICE TO: spiespaul@gmail.com

Paul Spies dba Waverly Townhomes LLC
PO Box 548
Corvallis, OR 97339



RE: UCB 71, PAUL SPIES DBA WAVERLY TOWNHOMES LLC, Complainant
v. PACIFICORP DBA PACIFIC POWER, Defendant

The Commission has received your complaint and assigned it docket number UCB 71. You should use this number whenever you refer to this case.

The Commission has served a copy of your complaint on the defendant. The defendant must file an answer to your complaint by January 13, 2023. You will receive a copy of the answer when it is filed.

The Commission will assign an Administrative Law Judge to handle the complaint. If the matter is not resolved through the process of filings or your private settlement discussions with the defendant, the case will be set for hearing and you will be notified of the time and place.

You must submit **future filings** electronically to the Commission. To make a filing electronically, please follow the steps below:

- a. Create or convert your document to Word or text-searchable pdf format so that you can attach it to an email; and
- b. You must date and sign your document. You may use an electronic signature, such as /s/ John Doe.
- c. Attach the document to an email.
- d. In the Subject Line of the email, type "Docket UCB71, [description of your filing], [your name], and [date].
- e. Send the email to the Filing Center's email address at PUC.FilingCenter@puc.oregon.gov;
- f. It is not necessary to send me a copy of your filing; and
- g. A copy of your filing will automatically be sent to the defendant's representative when it is processed by the Filing Center.

PUBLIC UTILITY COMMISSION OF OREGON

/s/ Cheryl Walker
Cheryl Walker
Administrative Specialist 2
Administrative Hearings Division
(971) 388-8306

Attachments: Filing a Formal Complaint Fact Sheet
Notice of Contested Case Rights and Procedures

NOTICE OF CONTESTED CASE RIGHTS AND PROCEDURES

Oregon law requires state agencies to provide parties written notice of contested case rights and procedures. Under ORS 183.413, you are entitled to be informed of the following:

Hearing: The time and place of any hearing held in these proceedings will be noticed separately. The Commission will hold the hearing under its general authority set forth in ORS 756.040 and use procedures set forth in ORS 756.518 through 756.610 and OAR Chapter 860, Division 001. Copies of these statutes and rules may be accessed via the Commission's website at <https://www.oregon.gov/puc/Pages/default.aspx>. The Commission will hear issues as identified by the parties.

Right to Attorney: As a party to these proceedings, you may be represented by counsel. Should you desire counsel but cannot afford one, legal aid may be able to assist you; parties are ordinarily represented by counsel. The Commission Staff, if participating as a party in the case, will be represented by the Department of Justice. Generally, once a hearing has begun, you will not be allowed to postpone the hearing to obtain counsel.

Notice to Active Duty Servicemembers: Active Duty Servicemembers have a right to stay these proceedings under the federal Servicemembers Civil Relief Act. For more information contact the Oregon State Bar at 800-452-8260, the Oregon Military Department at 503-584-3571 or the nearest United States Armed Forces Legal Assistance Office through <http://legalassistance.law.af.mil>. The Oregon Military Department does not have a toll free telephone number.

Administrative Law Judge: The Commission has delegated the authority to preside over hearings to Administrative Law Judges (ALJs). The scope of an ALJ's authority is defined in OAR 860-001-0090. The ALJs make evidentiary and other procedural rulings, analyze the contested issues, and present legal and policy recommendations to the Commission.

Hearing Rights: You have the right to respond to all issues identified and present evidence and witnesses on those issues. *See* OAR 860-001-0450 through OAR 860-001-0490. You may obtain discovery from other parties through depositions, subpoenas, and data requests. *See* ORS 756.538 and 756.543; OAR 860-001-0500 through 860-001-0540.

Evidence: Evidence is generally admissible if it is of a type relied upon by reasonable persons in the conduct of their serious affairs. *See* OAR 860-001-0450. Objections to the admissibility of evidence must be made at the time the evidence is offered. Objections are generally made on grounds that the evidence is unreliable, irrelevant, repetitious, or because its probative value is outweighed by the danger of unfair prejudice, confusion of the issues, or undue delay. The order of presenting evidence is determined by the ALJ. The burden of presenting evidence to support an allegation rests with the person raising the allegation. Generally, once a hearing is completed, the ALJ will not allow the introduction of additional evidence without good cause.

Notice of Contested Case Rights and Procedures continued

Record: The hearing will be recorded, either by a court reporter or by audio digital recording, to preserve the testimony and other evidence presented. Parties may contact the court reporter about ordering a transcript or request, if available, a copy of the audio recording from the Commission for a fee set forth in OAR 860-001-0060. The hearing record will be made part of the evidentiary record that serves as the basis for the Commission's decision and, if necessary, the record on any judicial appeal.

Final Order and Appeal: After the hearing, the ALJ will prepare a draft order resolving all issues and present it to the Commission. The draft order is not open to party comment. The Commission will make the final decision in the case and may adopt, modify, or reject the ALJ's recommendation. If you disagree with the Commission's decision, you may request reconsideration of the final order within 60 days from the date of service of the order. *See* ORS 756.561 and OAR 860-001-0720. You may also file a petition for review with the Court of Appeals within 60 days from the date of service of the order. *See* ORS 756.610.

Filing a Formal Complaint



When do I file a formal complaint?

You may file a formal complaint if you and our Consumer Services Section cannot informally resolve your billing or service dispute with the utility.

How do I file a formal complaint?

Call the Consumer Services Section at (503) 378-6600 or 1-800-522-2404 for a formal complaint form. Fill it out and send the completed form to our Filing Center at PUC.FilingCenter@puc.oregon.gov or to the following address: Public Utility Commission of Oregon, PO Box 1088, Salem, OR 97308-1088.



What happens after I file a formal complaint?

When we receive your complaint, we will assign it a docket number and send a copy to the utility. The utility has 15 days to respond, and you will receive a copy of their response.

We apply the laws and rules and may reach a decision based solely on information in your complaint and the utility's response. In most cases, when we receive the utility's answer, we will assign an Administrative Law Judge (ALJ) to hear the complaint. The ALJ may first hold a prehearing conference to informally discuss the case with you and the utility, and to determine what proceedings are necessary to resolve it. If additional evidence is needed, the ALJ may schedule a hearing.

What happens to my utility service while my complaint is being heard?

If the utility has or intends to disconnect your service, you may ask for our help. Depending on the circumstances, we may direct the utility to continue or restore your service until your complaint is resolved.

Who's who in a formal complaint case?

You and the utility are called parties. You are the complainant and the utility is the defendant.

The utility may be represented by an attorney. You may hire an attorney to represent you, but you are not required to. If you decide before the hearing that you need an attorney, you may ask the ALJ for a continuance to hire an attorney. The ALJ will not grant a continuance once the hearing starts unless you have a good reason for not hiring an attorney before the hearing.

How do I prepare for the hearing?

At the hearing each party may present evidence, ask questions of witnesses, object to evidence, and present argument. You may request information from the utility on issues in your complaint. At least 20 days before the hearing, you should give the ALJ a written list of your witnesses. If necessary, the ALJ can prepare subpoenas to order your witnesses to appear at the hearing. The ALJ will resolve disputes regarding witnesses.

If you want to use documents (such as bills, receipts, letters or other papers), let the ALJ know prior to the hearing. The hearing will not be postponed to give you more time to obtain additional evidence unless you show that you could not have produced the evidence at the time of the hearing.

Filing a Formal Complaint (cont.)



What happens at the hearing?

The hearing is similar to a trial before a judge without a jury. *See* ORS 756.518 to 756.610. As the complainant, you must prove that you are entitled to the requested relief.

The ALJ will decide the order in which evidence will be presented at the hearing. You and the utility will call witnesses and present evidence (orally or in writing) on all issues relating to your complaint. Testimony is given under oath. Witnesses may be asked questions by the opposing parties and the ALJ.

The ALJ will rule on any objections or motions, and will admit evidence into the official case record. After the evidence is offered, each party may give a closing statement. In the statement, you should explain how the facts and law support a ruling in your favor.

The ALJ or court reporter will record the hearing for the official record. The record of the hearing may be used to assist the parties in filing written legal arguments, the Commissioners in deciding the complaint, or the court in reviewing the PUC's decision, if necessary. You may obtain a copy of an audio recording by paying the amount established in our Administrative Rules. *See* OAR 860-001-0060.

If a court reporter recorded the hearing, you may request a word-for-word written transcript of the hearing. You must pay the court reporter for the cost of preparing the transcript. If you cannot afford to pay for the copy of the transcript, you must provide a statement called an "Affidavit of Indigency," explaining why you cannot afford to pay. You may request the "Affidavit of Indigency" from our Administrative Hearings Division and provide it at the time you request the copy.

What happens after the hearing?

Based on the evidence in the record, the ALJ makes recommendations to the Commissioners. You will not have the opportunity to comment on the ALJ's recommendation.

The Commissioners may accept, reject, or modify the ALJ's recommendation. The final order is issued by the Commissioners. ***We cannot grant money damages or attorney fees.*** You will receive a copy of the final order.

The final order will include information about how you may request us to reconsider the order or how you may appeal the decision to the Court of Appeals. *See* ORS 756.610.

Questions?

If you have questions about the process before filing a formal complaint, call the Consumer Services Section at (503) 378-6600 or (800) 522-2404. If you have questions after filing a formal complaint, call the Administrative Hearings Division at (503) 378-6678. We accept all relay calls.

