May 24, 2011

Attention: Filing Center Oregon Public Utility Commission 550 Capitol Street N.E., Suite 215 P.O. Box 2148 Salem, Oregon 97308-2148 Puc.filingcenter@state.or.us

Re: In the Matter of Revising Net Metering Rules Regarding Aggregation of Meters on

Different Rate Schedules Docket No. AR 548

Enclosed are an original and five copies of Oregon Department of Energy's RULEMAKING COMMENTS in the above-captioned matter for filing with the PUC today.

Sincerely,

Janet L. Prewitt

Senior Assistant Attorney General Natural Resources Section

Enclosures
JLP:jrs/#2817952
c: AR 548 Service List

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON AR 548			
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3	To do Martin Dala Con Department of the Control of			
4	In the Matter of Revising Net Metering Rules Regarding Aggregation of Meters on Different RULEMAKING COMMENTS			
5	Rate Schedules			
6	The Oregon Department of Energy ("ODOE") supports the Oregon Public Utility			
7	Commission Staff's ("Staff") efforts to adopt rules that allow for customer-generators in Oregon			
8	investor-owned utilities to aggregate meters subject to varying rate schedules, to the extent that			
9	the proposed rules facilitate long-term benefits to outweigh the costs associated with aggregating			
10	across differential rate schedules, and to the extent that the proposed rules conform to the overall			
11	intent of ORS 757.300.			
12	ODOE also supports this rulemaking effort to the extent that it does not affect the current			
13	requirement that customer-generators who are either eligible for or have received a Business			
14	Energy Tax Credit ("BETC"), as defined in ORS 469.185(5) and OAR 330-090-0110(25)(g),			
15	may not undertake any aggregation of differing-rate meters. In previous workshops, ODOE			
16	received support from Staff and key utilities - Portland General Electric ("PGE") and			
17	PacificPower ("PAC") – that ODOE will be able to work with the utilities to add appropriate			
18	language to their existing and/or future customer-generator net-metering contracts to identify			
19	whether the customer-generators are eligible for or have received BETC funds for their			
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Page #2817				

1	businesses. The addition of this language will help to ensure that aggregation of meters does not				
2	take place for those customer-generators who have BETC funded projects, whose meters need to				
3	be tracked distinctly.				
4					
5	DATED this <u>24</u> day of May 2011.				
6		Respectfully submitted,			
7		JOHN R. KROGER Attorney General			
8		^			
9		June Ottles for 05B # 043944			
10		Assistant Attorney General			
11		Of Attorneys for Oregon Department of Energy			
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Page 2 - OREGON DEPARTMENT OF ENERGY'S RULEMAKING COMMENTS #2817993

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_	W=Waive Paper service				
2	W	W	W		
	Oregon Dockets	Erik Anderson	Stephanie S. Andrus		
3	Pacificorp, dba Pacific Power	Pacific Power & Light	PUC StaffDepartment of Justice		
	825 NE Multnomah St, Ste 2000	825 NE Multnomah St Ste 1800	Business Activities Section		
4	Portland OR 97232	Portland OR 97232	1162 Court St NE		
	oregondockets@pacificorp.com	erik.anderson@pacificorp.com	Salem OR 97301-4096		
5			stephanie.andrus@state.or.us		
	W	W	W		
6	Christa Bearry	Gordon Feighner	Ryan Flynn		
	Idaho Power Company	Citizens' Utility Board of Oregon	PacifiCorp		
7	PO Box 70	610 SW Broadway, Ste 400	825 NE Multnomah, Ste 1800		
,	Boise ID 83707-0070	Portland OR 97205	Portland OR 97232		
8	cbearry@idahopower.com	gordon@oregoncub.org	ryan.flynn@pacificorp.com		
U	W	W	W		
9	J. Richard George	Jennifer Hall	Harold Hartman		
,	Portland General Electric	Synchrosolar	35243 Malin Loop Rd		
10	Company	1111 E Burnside Ste 308	Malin OR 97632		
10	121 SW Salmon St 1WTC1301	Portland OR 97214	lynhartconsult@hotmail.com		
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11	richard.george@pgn.com				
10	W	W	W		
12	Heath Kearns	G. Catriona Mccracken	Glenn Montgomery		
1.0	Lite Solar Corp	Citizens' Utility Board Of Oregon	Oregon Solar Energy Industries		
13	1001 SE Division St. Ste 2	610 SW Broadway, Ste 400	Association		
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14	heath@litesolar.com	catriona@oregoncub.org	Portland OR 97293		
			glenn@oseia.org		
15	W		W		
	Raymond Myers	Vijay A. Satyal	Patrick Schellerup		
16	Citizens' Utility Board Of Oregon	Oregon Department Of Energy	Lite Solar Corp		
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17	Portland OR 97205	Salem OR 97301	Portland OR 97202		
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18	Jay Tinker	W	W		
	Portland General Electric	David Tooze	Sandra Walden		
19	Portland General Electric Company	City Of Portland - Planning &	621 SW Alder St #300		
	121 SW Salmon St. 1WTC-0702	Sustainability	Portland OR 97205		
20	Portland OR 97204	1900 SW 4th Ste 7100	swalden@r-e-s.us		
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22	Joseph F. Wiedman				
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24	Oakland CA 94612				
	jwiedman@irecusa.org				

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Page 3 - SERVICE LIST #2817993

1	CERTIFICATE OF SERVICE		
2	I hearby certify that on May 24, 2011, I served the foregoing OREGON DEPARTMENT		
3	OF ENERGY'S RULEMAKING COMMENTS upon the persons named on the service list, by		
4	mailing a full, true and correct copy thereof and to such persons waiving such service by mail		
5	who were served at their e-mail address as listed on the service list.		
6	DATED: May 24, 2011.		
7	(Jose OSB #043944		
8	Janet L. Prewitt, OSB #853070 Senior Assistant Attorney General		
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