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Denis Griffin and Donna Daniels

June 25, 2007

Central Electric Cooperative
PURPA Compliance
2098 N. Highway 97
Redmond, Oregon 97756

Dear Central Electric Cooperative Decision Makers:

COMMENTS ON THE NOTICE REGARDING CONSIDERATION OF NEW PURPA STANDARDS

We have reviewed the *Notice of PURPA Consideration and Implementation Process to all Interested Persons Issued May 8, 2007*. We generally support implementation of any standards that will help to reduce our use of electricity and our dependency on non-renewable energy resources. Unless Central Electric Cooperative (CEC) can determine through this hearing process that they have a better way or ways to measurably reduce per-capita use of electricity and use of fossil fuels within CEC boundaries then we feel that you have no choice but to adopt all five of the PURPA provisions under consideration.

We previously lived in California where we generated much of our own electric power with a 5K photovoltaic system. We were connected to our electric provider and took advantage of net metering and time of use programs. We believe our choice was more environmentally sound than other alternatives and we were also rewarded with electricity bills that ranged from about \$100.00 to \$200.00 per year. This was less than one tenth of what we pay here for less total kilowatt hours. We encourage CEC to independently explore the benefits to members that the combinations of Time Base Metering, Interconnection and Net Metering could achieve. Our specific comments on each of the five standards follow:

A) Smart Metering: We support adoption of the smart metering standard. It is very easy for most residential energy consumers to adjust daily usage to take advantage of cheaper rates. Clothes washing and drying, irrigation, swimming pool maintenance and hot water recirculation can all be timed to coincide with a cheaper rate. Additionally individuals would be more likely to conserve energy by keeping their homes either warmer or cooler than they otherwise would if rates were more expensive during peak times. Smart metering might also provide individuals with more incentive to spend money on insulation, solar water heaters, energy saving appliances and other energy savings tactics if the financial incentive was there. There is likely some opportunity for businesses to take advantage of smart metering by scheduling more energy consuming activities during off-peak hours. Absent specific information in the record indicating smart metering would increase electrical usage, this standard should be adopted by the CEC and members should be immediately able to take advantage of a smart metering program.

B) Interconnection: We support adoption of the interconnection standard to the extent that it is more beneficial to CEC members that produce electricity than any program currently in use. We expect that if co-op members that want to produce solar or other renewable power have incentive to produce power for the CEC that it will pay off for all in the long run.

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C) Net Metering: We support adoption of the net metering standard to the extent that it is more beneficial to producers than CECs current net metering policy. As we previously mentioned, we have experience using a net metering program in conjunction with our production of solar power and use of a smart metering program. We generally produced energy on hot sunny days when it was most needed in California which was an environmentally sound practice. An added net metering benefit was that we were credited for energy we overproduced at the higher peak use rate. This worked out well for us and we believe it would work out well for CEC members here.

D) Fuel Sources: We support adoption of the fuel source standard. Fossil fuels are becoming scarce and will likely become increasingly expensive in the future. Additionally, there is strong evidence that use of fossil fuels is harmful to the environment. Now is the time to develop alternatives.

E) Fossil Fuel Generation Efficiency Standard: We support the adoption of the fossil fuel efficiency standard. We do, however, believe that it is even more important to invest in alternatives to fossil fuels or better yet to make power generation systems that more efficiently use any fuel type.

It is very important to us for the CEC to do everything it can to insure that we will have reliable, affordable, clean power now and in the future. Other members who may not have the time to respond to this request for comments likely feel the same. Please do your best to keep us environmentally responsible.

Sincerely,

Denis Griffin and Donna Daniels