

October 24, 2012

Oregon Public Utilities Commission  
550 Capitol Street NE #215  
PO Box 2148  
Salem, Oregon 97308-2148

**RE: REQUEST FOR WAIVER OF TWELVE-MONTH INSTALLATION REQUIREMENT [OAR 860-084-0210]**

Pursuant to OAR 860-084-0000(3), Crook County Solar 1 LLC, a wholly owned subsidiary of Solitas Energy LLC, hereby requests a waiver to the twelve-month Capacity Reservation Expiration Date referenced in OAR 860-084-0210(1) due to a delay in the Level 2 System Interconnection Process, as further described below.

**Background**

Crook County Solar 1 LLC ("CC Solar 1") was awarded a 500kW Capacity Reservation on April 6, 2012, under Pacific Power's Oregon Solar Incentive Program ("OSIP"). The 500kW<sub>AC</sub> Solar Electric Generating Facility (the "Facility") is located in Crook County, Oregon and will interconnect into a radial distribution circuit (12.47kV, 3P, 4W) that originates from the Powell Butte Substation ("Powell Butte").

Power Engineers, an engineering consultant that specializes in electrical transmission and distribution systems, completed the required engineering to interconnect the Facility, and the Interconnection Application was subsequently filed with PacifiCorp on June 2, 2012. After supplying additional data related to impedance and conductor lengths, the Interconnection Application was perfected with PacifiCorp on June 26, 2012.

PacifiCorp began studying the Interconnection Application under the Level 2 System Interconnection Review as outlined in OAR 860-084-0320. On October 2, 2012, PacifiCorp notified CC Solar 1 that the Facility met all of the requirements referenced in OAR 860-084-0320(2). PacifiCorp, however, identified a network upgrade consisting of three potential transformers and a protective relay that may have been needed at the Powell Butte Substation. After further review, PacifiCorp determined that the protection scheme was not needed and approved the Interconnection Application on October 17, 2012.

As outlined in OAR 860-084-0320, the Level 2 System Interconnection Review shall take fifteen business days from the date that the Interconnection Application is perfected. Due to the complexity of the protection scheme that was studied, the review period took ninety-seven days.

**Circumstances of Request**

CC Solar 1 has expended a considerable amount of time and placed a substantial amount of capital at-risk in an effort to complete tasks that are required to place the Facility in-service. The tasks include, but are not limited to, the following:

- ALTA Survey
- Phase 1 Environmental Survey
- Wildlife Impact and Monitoring Plan [Conditional Use Permit]
- Emergency Management Plan [Conditional Use Permit]
- Erosion Control Plan [Conditional Use Permit]
- Noxious Weed Control Plan [Conditional Use Permit]
- Electrical Engineering Plans for Construction Permitting
- 5% Safe Harbor Agreed-Upon Procedures Report

Despite the work that has been performed, the delay in receiving approval of the interconnection application has directly impacted the schedule. Equipment could not be ordered and the conditional-use permit could not be filed with Crook County until PacifiCorp approved the Interconnection Application. In addition, the lending institution that will be providing term financing to the Facility has expressed concern over the Capacity Reservation Expiration Date of April 6, 2013. Without an extension to recover the time that has been lost during the interconnection process, the Facility will not reach commercial operation.

Solitas Energy LLC, d/b/a CC Solar 1, respectfully requests that the Oregon Public Utility Commission waive the twelve-month Capacity Reservation Expiration Date under OAR 860-084-0000(3) and extend the Capacity Reservation Expiration Date by three months. The revised Capacity Reservation Expiration Date would be July 6, 2013.

Thank you for your consideration. We look forward to working with PacifiCorp and the Oregon Public Utility Commission to complete the Facility.

Respectfully,  
**CROOK COUNTY SOLAR 1 LLC**

/s/

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