

Philomath Public Schools

Benton County School District No. 17J, 1620 Applegate St, Philomath OR 97370 (541) 929-3169

December 5, 2012

Public Utility Commission of Oregon 550 Capitol St NE, Suite 215 PO Box 2148 Salem, OR 97308-2148

Re: Request for waiver of 12-month installation deadline for solar photovoltaic system Pacific Power Solar Incentive Program Interconnection (Request #5539815) UM 1538/Item # CA11

To Whom It May Concern:

Pursuant to OAR 860-084-0000(3), the Philomath School District is requesting a three-week extension to the Commission's waiver of the 12-month deadline granted on October 23, 2012 for its solar photovoltaic system. The current deadline is January 7, 2013. We now request a short extension to January 31, 2013.

A waiver is necessary due to two primary factors. First, while still in the RFP process of deciding a solar contractor at the time making its original extension request, the District was mistaken in its January 7, 2013 estimated deadline for this first-ever solar project for the District. As such, this request was made without the informed input of a solar construction company.

Our original, granted request for extension had construction planned for October 1-December 15 with a three-week contingency to derive the January 7, 2013 date. As a consequence, the District is now presented with an extremely aggressive construction deadline that allows for no inclement weather, materials shortage, or other construction contingencies.

Second, additional delays in project approval have set back the construction start time. While part of a complex, multi-phase \$20 million school renovation project, the permitting of the solar electric system must be pursued independently. This has taken longer than the District has expected with the Authority Having Jurisdiction (AHJ), the final permit being issued on 11/28/2012. In addition, the utility determined on November 30, 2012 that to meet utility requirements the PV system's AC disconnect installed at the time of building construction will need to be relocated with final approval granted to solar contractor's design on 12/3/2012.

On December 3, 2012, construction was commenced. With winter weather and holiday hours at the District, AHJ, and others, there is now a possibility that the extension granted to have the system fully installed and passed electrical inspection per OAR 860-084-0010 (10) may not be sufficient. An additional three weeks' grace period will insure that the District will not lose its expected source of project financing through the pilot program.

Thank you for your consideration of this extension request. Please feel free to contact me if you need additional information.

Sincerely,

Kelly Howard Business Manager