

**NATHAN LEVIN CO.**  
COMMERCIAL | INDUSTRIAL REAL ESTATE

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September 6, 2011

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

RE: **EXPEDITED REQUEST** for waiver of 12-month installation requirement (OAR 860-084-0210 (1) – REQUESTING A *4 MONTH EXTENTION*.

To Whom It May Concern:

**THIS IS AN EXPEDITED REQUEST. GIVEN THE NATURE OF THE REQUEST AND THE INCREDIBLY TIGHT TIMEFRAME WE HAVE AVAILABLE, I ASK THAT YOU REVIEW AND WORK THROUGH THE APPROPRIATE PROCESS AS SOON AS POSSIBLE. I VERY MUCH APPRECIATE YOUR COOPERATION.**

I have been attempting to finance the solar system on our roof and provide electricity savings value to my tenants at 2710 Pringle Rd., Salem - General Distributors Inc., NW Distribution & Storage Inc., and Consolidated Supply Co. All of whom are customers with Portland General Electric and I have Solar Payment Option (SPO) applications from October of 2010.

I own and manage the building at 2710 Pringle and have been working developing this property as a solar project. I built the building with a roof membrane that is south facing and constructed out of heavy gauge standing seam system, making it ideal for a solar project.

The SPO was the perfect option for me to finance a project on my building, but the timing fell poorly per my capital requirements. The current rates of the SPO no longer work for this investments and the value I'd promised my tenants and PGE customers.

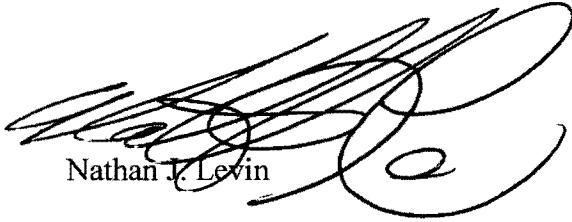
My ability to expend the capital during the critical time to move forward has been hamstrung by the commercial real estate market conditions over the past year. As owner and manager of over 500,000 SF of commercial industrial and office space, I have experienced the highest vacancy rates of my career. However, the market has slowly begun to recover and my vacancy rates have diminished, and my financial capacity has improved. It is important to me to be able to use my SPO to reduce my tenant's operating expense, thereby increasing their longevity and diversifying my investment.

Request for Waiver

I was recently made aware of the ability to request a waiver; otherwise we would have submitted this sooner. My understanding is that in conformance with OAR 860-084-000 (3), which states

that "OPUC commission may issue a waiver of any of the rules governing the SPO for good cause," that the Commission waive the 12-month requirement for the project's three Oct 2010 SPO allocations - General Distributers Inc., NW Distribution & Storage Inc., and Consolidated Supply Co.- and allow PGE to provide an extension of 4 months from October 15, 2011. Now that financing options for solar projects are more flexible and my company's position is better, I plan to complete this project in the next 4 months. I thank the Commission for including a waiver for situations that halted good solar projects which simply stumbled over initial financing and then concerns of not being able to hit the original timeline. At this point we feel a 4 month extension gives us the time to complete the project.

Sincerely,

A handwritten signature in black ink, appearing to read "Nathan J. Levin". The signature is stylized with large, sweeping loops and is positioned above the printed name.

Nathan J. Levin