

April 6, 2016

To: Public Utility Commission

From: Elemental Energy on behalf of Peter Brennan

Subject: Request for waiver in the Solar Pilot Program – Docket UM 1538 - OAR 860-084-0210 (1)

Hello,

I am writing on behalf of Brennan of 1720 SW Canby Street in Portland, Oregon 97213. Mr. Brennan won the lottery for PGE's Solar Payment Option on May 15, 2015. His system was accepted under Level 1 Interconnection Application with an expected system size of 10 kW DC. His acceptance letters from PGE are included with this letter.

Peter intended to have 10 kW of solar installed on his property in two phases. Phase 1 was solar on the south-facing roof sections of the property. Phase 2 was a solar awning to provide shade over the back patio near the pool. Elemental Energy installed Phase 1 in December of 2016. PGE inspected and activated the system on January 8th, 2016.

Upon designing Phase 2, Mr. Brennan contacted me with some questions. I contacted PGE to confirm that we still have a year to build his project, as the expected deadline was May 15, 2016. I was told that the system was activated at 5.7 kW and the rest of the capacity allocated to his account is no longer available. I was told that it has been reassigned to other projects who were on a waiting list. Mr. Brennan and I don't see how this is fair.

I formally request an extension to finish Mr. Brennan's residential solar array. Mr. Brennan's capacity was given away prematurely and it must be given back. If this is a matter of capacity in PGE's Solar Payment Option Program, then know that Elemental Energy has 20 kW worth of allocated capacity for projects that are not going expire without being built. I imagine that each solar contractor in the state has a similar figure. What will happen to this capacity allocated to projects are never built? Will that capacity just expire?

The Phase 2 extension will be 4.275 kW, made up of 15 SolarWorld 285-watt panels, making the total system size 9.975 kW DC. This was the original system size that Mr. Brennan had envisioned. We will need a time extension to build Phase 2 of Mr. Brennan's solar electric system, because we had to wait to secure the capacity in the Solar Payment Option program which was reassigned. At this point, we have conducted a site inspection, and are settling on final system design. The system can be installed within 90 days of Elemental Energy's receipt of approval.

Thank you very much for your consideration.

Terry Tomei

Elemental Energy

503-209-6963

Terry@ElementalEnergy.net



Confirmation Number: Z9K907

Capacity Reservation Application for Solar Payment Option

Capacity for Solar Payment Option is reserved on a first-come, first-served basis until the capacity limit is reached for the current reservation period. We will e-mail you when your reservation is approved and provide your reservation start date.

A deposit is required, but it will be refunded with PGE's first solar payment to you. You must meet the following deadlines or your deposit will be forfeited:

- Interconnection Application submitted within two months of your reservation start date.
- Solar system must be fully operational within 12 months of your reservation start date.

Customer and Facility Information:

Account Type: **Individual**

PGE Customer Name (First, Middle Initial, Last): **Peter Brennan**

Customer Email Address: **peterjbrennan1@gmail.com**

Customer Phone Number: **(503) 550-8499**

PGE account for property where system will be installed (from PGE bill):

PGE Account Number: **0005 27395-118727-7**

Site Location:

Address: **1720 SW Canby St
Portland, OR 97219**

County: **Multnomah**

VIR Rate: **\$0.3510 per kWh**

System Capacity Reservation Size:

Systems applying for participation in the Solar Payment Option must be sized to generate 90% or less than existing service's annual usage. If annual usage is unavailable, it will be estimated by PGE based upon the rolling average of three years' usage by a similarly situated site.

Nameplate Capacity (kW DC): **10.00**

System Production Estimate (annual): **10000 kWh**

The Eligible System is limited to 90 percent of the electric site's previous usage. You can find information about expected generation at <http://energytrust.org/shared-resources/solar-calculator>

Anticipated date when solar system will be fully operational: **8/28/2015**

Anticipated Level of Interconnection Application: **Level 1 (system sized up to and including 25 kW DC)**

System Installer Information:

Installer Company Name: **Elemental Energy**
Installer Phone Number: **(503) 967-5786**
Contact Name: **Terry Tomei**
E-Mail: **terry@elementalenergy.net**

Systems must be installed by an ETO trade ally in good standing.

When submitting your capacity reservation, you agreed to the following statements:

Capacity Reservation Certification:

I hereby certify that I have read and understand the Solar Photovoltaic Pilot Program and Interconnection Services Agreement ("Agreement"). I acknowledge that the rate paid for the generation the solar system produces over the contract period is provide in PGE Schedule 205 and fixed by the Agreement. I acknowledge that I will receive the rate in place at the time the capacity reservation start date.

Interconnection Application Fee:

I hereby attest that an interconnection application fee, if applicable, is required before the interconnection application can be processed. There is no application fee for a Level 1 interconnection. The fee amount for a Level 2 interconnection is \$50 base plus per kW of DC Nameplate Capacity. The Interconnection Application fee is payable to Portland General Electric and will be included with the interconnection application.

Appropriate System Size and Quality:

I hereby attest that system size must be sized to generate 90% or less than existing service's annual usage. If my system is oversized in accordance with my annual usage, I will reduce the size of the system. I will attest that I have control of the site where is system is installed.

Applicant Signature:

I hereby attest that the information submitted on this application is accurate to the best of my knowledge. I certify that the system will be constructed from new components and compliant with Oregon Public Utility Commission quality and reliability requirements for photovoltaic systems. I also certify the system will use all new equipment and is financed without Energy Trust of Oregon payments under ORS 757.612(3)(b)(B) or Oregon tax credits under ORS 469.160 or ORS 469.185 to 469.225, or Blue Sky program grant.

NOTE: Approval for a Solar Payment Option System is contingent upon the applicant's system passing the Interconnection Application screens and completing the review process set forth in OPUC Administrative Rule Chapter 860, Division 084 and is not granted by the submission of this application form. The Capacity Reservation Deposit will be refunded with the first VIR payment to those systems that do not forfeit.



Terry Tomei <terry@elementalenergy.net>

Capacity Reservation Awarded | Action Required

solar <solar@pgn.com>

Mon, May 18, 2015 at 7:38 AM

To: "peterjbrennan1@gmail.com" <peterjbrennan1@gmail.com> ,

"terry@elementalenergy.net" <terry@elementalenergy.net>

Cc: solar <solar@pgn.com>

Dear Peter:

Thank you for your recent Capacity Reservation Application for Portland General Electric's Solar Payment Option program. We are pleased to inform you of your acceptance into the pilot program. Attached is a copy of your Capacity Reservation Application (PDF) showing PGE's approval for your records.

Today's date (5/15/2015) is your Reservation Start Date. You now have two months from this date to submit an Interconnection Application and one year from this date to have your solar system operational. If you are unable to meet these milestones, your reservation will be considered withdrawn and you will lose your deposit paid when you submitted the Capacity Reservation Application.

Based on the information you submitted with your online Capacity Reservation Application, your system requires a Level 1 Interconnection Application. Interconnection Applications as well as the Agreement (contract) common to all application levels can be found at <http://PortlandGeneral.com/GenerateYourOwnPower>. You will also find there the Solar Payment Option Customer Checklist which outlines the interconnection process.

At this time, PGE only accepts paper copies of Interconnection Applications and Agreements. Please mail completed documents to:

PGE Solar Payment Option
PO Box 4079
Portland, OR 97208-4079

To track your status at any time during the process, you may log in to our website by visiting <https://www.pgesolarprogram.com/applicationstatus.aspx> and entering your unique confirmation number: Z9K907.

Warm regards,

Solar Payment Option
solar@pgn.com
(503) 464-8200



Brennan, Peter_Z9K907_May_15.pdf

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