



June 6, 2011

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

**RE: Expedited request for waiver of 12-month installation requirement [OAR 860-084-0210 (1)]
Blue Heron Farm – 7240 River Road South, Salem, Oregon 97306**

To Whom It May Concern:

This is an expedited request. We ask that in consideration of the rapidly approaching installation deadline for this project, your review and process of this request is in the most expeditious manner possible. Thank you in advance for your time and consideration of this request.

Blue Heron Farm (Peter Dinsdale) was approved to participate in Pacific Power's Oregon Solar Incentive Program (OSIP) and a capacity reservation of 9.0 kW was reserved under Pacific Power Work Order #5449080. The Capacity Reservation start date was July 2, 2010. Under normal circumstances the 12 month deadline, as defined by OAR 860-084-0210 (1)], is a reasonable and obtainable timeline. This project, however, has proven to be complex in nature with extraordinary engineering and plan review requirements as outlined below.

Blue Heron Farm borders the Willamette River, thus a substantial portion of the property has been zoned as either Flood Plain or Floodway, which results in the following obstacles:

- Any construction within these zones is subject to local, state and federal review/approval to ensure that the appropriate safety standards are met for a 100-year flood event. Marion County and the State of Oregon require a Flood Plain Application submittal. The Flood Plain Application review and appeal process takes a **minimum** of 45 days.
- The planning, engineering and land survey review and documentation preparation required for each Flood Plain application/submittal can take approximately 60-days to complete.

The additional need for professional engineering, land surveying and planning, as required by public agencies such as Marion County and the State of Oregon, has proven to be a significant impediment in moving forward with the physical construction/installation of this proposed project.

Our original Flood Plain submittal to the County of Marion was rejected. The proposed installation location was within a "floodway" zone where all construction is prohibited. Our second proposed location for the installation was rejected due to the distance between the new location and the predetermined utility meter location. It would require the installation of over 1,000 feet of cost prohibitive copper wire connection.

A third and final proposed location has been established, engineered and submitted to the County of Marion/State of Oregon. We anticipate approval by the end of June, 2011. Once approved, we can move forward with the electrical and structural permits. We expect the County of Marion to process and approve the electrical and structural permits within three weeks of receipt. Once the permits are issued the construction of the appropriate flood-proof base structures can be completed in four weeks. Installation of the photovoltaic system can be completed in approximately two weeks. With the above milestones in mind, we anticipate being capable of full commissioning by October 1, 2011, thus the request for an extension.

The parties signed below request 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. **Based on the arguments above we would like to formally request an extension of three months for an installed date deadline of October 1, 2011.**

Again, thank you in advance for your time and consideration of this request. Please feel free to contact Paul Israel @ 541-322-1910 should you have any questions and/or concerns.

Sincerely,

/s/

Paul N. Israel, President
Sunlight Solar Energy, Inc.

/s/

Peter Dinsdale, Owner
Blue Heron Farm

PI:qc