

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT**

PUBLIC MEETING DATE: December 18, 2012

REGULAR _____ CONSENT X EFFECTIVE DATE December 18, 2012

DATE: December 10, 2012

TO: Public Utility Commission

FROM: Robert J. Procter

THROUGH: Jason Eisdorfer and Maury Galbraith

SUBJECT: OREGON PUBLIC UTILITY COMMISSION STAFF: (Docket No. UM 1538) Request by SolTerra for a waiver of the 12 month solar photovoltaic system installation requirement pursuant to OAR 860-084-0210(1) and the 60-day deadline for filing the interconnection request pursuant to OAR 860-084-0000.

STAFF RECOMMENDATION:

Staff recommends the Commission grant the waiver request to SolTerra Systems and extend both the installation deadline and the interconnection request filing deadline to December 31, 2012.

DISCUSSION:

SolTerra Systems (Applicant) was awarded a capacity reservation under the Solar Photovoltaic Pilot Program (Pilot) by Portland General Electric (PGE) on October 14, 2011. Since receiving that award, when engineering and design was completed, SolTerra Systems discovered the need to provide structural upgrades to the building, primarily for the support of an ecoroof. The customer agreed to the structural upgrades as long as they could be completed on nights and weekends so as to not affect normal business operations. SolTerra Systems agreed, but the timeline for the project changed and the structural upgrades and roofing happened during the summer and fall as weather permitted.

OAR 860-084-0000(3) provides:

"The Commission may waive any of the rules contained in Division 084 for good cause."

Applicant has completed the system design, obtained a signed contract, purchased the solar panels, and additional design work on the mounting system. Applicant is ready to complete the installation immediately upon receiving notice that this extension request has been approved. Applicant has also been in contact with PGE regarding missing the deadline for filing the Interconnection Request. Staff has also separately contacted PGE to discuss whether the capacity is still available and whether PGE will allow the Applicant to interconnect with the PGE system. PGE supports the Applicant moving forward with the installation and interconnection. Despite the fact that SoiTerra knew about the 60-day deadline for filing the interconnection request, there were extenuating circumstances that they have been proactive in solving. They have also proactively worked with PGE to resolve that issue. Based on SoiTerra's actions to remedy these issues, work with PGE, and work constructively with Staff, SoiTerra has demonstrated good cause for the waiver.

PROPOSED COMMISSION MOTION:

SoiTerra Systems' request for an extension of both the 12-month installation deadline, and the 60-day deadline for submitting the Interconnection Request, until December 31, 2012 be approved.