

**PUBLIC UTILITY COMMISSION OF OREGON  
STAFF REPORT  
PUBLIC MEETING DATE: August 6, 2013**

REGULAR  CONSENT  EFFECTIVE DATE August 6, 2013

DATE: July 30, 2013

TO: Public Utility Commission

FROM: John Crider

*EC*

*MG*

*AA*

THROUGH: Jason Eisdorfer, Maury Galbraith and Aster Adams

SUBJECT: OREGON PUBLIC UTILITY COMMISSION STAFF: (Docket No. UM 1538) Request by Solwatt, LLC, for a waiver of the 12-month solar photovoltaic system installation requirement pursuant to OAR 860-084-0210(1).

**STAFF RECOMMENDATION:**

Staff recommends the Commission grant the waiver request to Solwatt Solar, LLC, and extend the installation deadline to January 12, 2014.

**DISCUSSION:**

The customer was awarded a winning bid on October 12, 2012, for a solar photovoltaic (SPV) generating system through Pacific Power's Oregon Solar Incentive Program (OSIP), the Pacific Power (Company) implementation of the Oregon Solar Volumetric Incentive Rate (VIR) program.

As reported by the customer, there was a prolonged utility interconnection approval process which delayed the date of initial project construction for four months. According to PacifiCorp, the Solwatt interconnection review was lengthened for two reasons. First, the circuit the PV system is to be interconnected to is heavily saturated with customer owned generation. Circuits with high penetration require a greater level of review. Second, to further complicate the review process a project with a higher queue position on the same circuit was received prior to the Solwatt interconnection application. The new project had to be reviewed first before it could be determined what would be required for Solwatt.

The customer's solar contractor initially filed an application for interconnection on October 31, 2012 and the Company finally completed and approved the interconnection review on March 19, 2013.

As a consequence of the extended interconnection process, the remainder of the original construction timeline must be pursued aggressively in order to meet the original installation deadline of October 12, 2013. The contractor's schedule allows no contingency time for potential delays in permitting, materials acquisition and procurement, shipment schedules and construction.

The project contractor believes that a three month extension would provide adequate additional time for managing any contingencies for delay in constructing the project. At present, the contractor estimates that the project will be completed and operational by November 19, 2013. An extension to January 12, 2014 (a three month extension) should allow ample time for managing any unforeseen delays.

**PROPOSED COMMISSION MOTION:**

Solwatt Solar's request for waiver of the 12-month installation requirement for the SPV system is granted and the deadline extended to January 12, 2014.