

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1631

In the Matter of

CARNES CREEK SOLAR, LLC,

Petition for Waiver of OAR 860-082-
0025(1)(b) & (c)

REPLY IN SUPPORT OF PETITION
FOR WAIVER

I. INTRODUCTION

Carnes Creek Solar, LLC (“Carnes Creek Solar” or the “Project”) submits this reply in support of its petition to the Public Utility Commission of Oregon (the “Commission”) for partial waiver of OAR 860-082-0025(1)(b) & (c). Portland General Electric Company (“PGE”) filed comments in opposition to Carnes Creek Solar’s petition, and Staff has prepared a recommendation in its Staff Report. PGE’s arguments appear to be aimed at ensuring the uniform application of the rules and protecting other interconnection customers, and Carnes Creek Solar appreciates the value of these principles. Carnes Creek Solar also appreciates Staff’s analysis of the matter with concern for fairness and consistency. Carnes Creek Solar also submits that the circumstances relevant to its waiver request highlight competing alternative facts from PGE that Carnes Creek Solar has struggled to remedy in good faith with PGE since October 2019. PGE’s alternative facts amount to arguments against itself that have obscured the issues at hand and threaten to waste precious time and resources not only for Carnes Creek Solar but also the Commission.

These competing alternative facts are: (1) that the appropriate and “correct” MDL is 2.4 MW as PGE provided in the Carnes Creek Solar system impact study which if true means that granting the waiver request would allow Carnes Creek Solar to avoid unnecessary upgrades; or (2) that the 2.4 MW MDL originally asserted by PGE as “correct” was never actually truly correct and the impacts of the higher queued project, SPQ0028, were not ever taken into account in the system impact study PGE performed for Carnes Creek Solar, therefore the adverse system impacts PGE is concerned about preexist Carnes Creek Solar and the potential “harm” to lower queued projects is diminutive relative to what PGE would have the Commission believe. If this second alternative fact is true, then it would also constitute a clear violation of the small generator interconnection rules and the current interconnection agreement with Carnes Creek Solar, and would indicate lower queued projects may already be harmed as a result of PGE’s unreliable and unprofessional conduct.

In its reply, Carnes Creek Solar seeks to address PGE’s arguments associated with both sets of competing alternative facts by providing a comprehensive view of the specific factual circumstances. Upon review of the circumstances, Carnes Creek Solar hopes that the Commission will appreciate Carnes Creek Solar’s perspective that PGE has placed it and the Commission in a muddled predicament, contrary to the good faith and fair dealing principles that underpin the interconnection rules and that both the Commission and all interconnection customers expect from the utility in its administration of the interconnection process.

In this reply, Carnes Creek Solar addresses each of PGE’s arguments and, as needed, provides clarifying information on certain facts. Carnes Creek Solar respectfully

requests that the Commission either grant the requested waiver or issue an order compelling PGE to correct its conduct or face sanctions.

II. BACKGROUND ON WAIVER REQUESTED

OAR 860-082-0025(1)(b) & (c) relate to whether a Small Generator Interconnection Customer is required to submit a new interconnection application when proposing changes, other than a minor equipment modification, to its facility. Changes necessitating the submittal of a new application include changes affecting the nameplate capacity of the proposed facility.¹ Carnes Creek Solar respectfully requests waiver of these rules so that the Project can reduce its nameplate capacity by up to 199 kilowatts. Specifically, Carnes Creek Solar seeks to reduce its Project's nameplate capacity from 2.5 megawatts ("MW") to approximately 2.3 MW in order to be below the minimum daytime load ("MDL") on PGE's substation transformer, which PGE stated in the Project's interconnection studies as 2.4 MW. Reducing the Project's nameplate capacity below the MDL will enable the Project to avoid costly interconnection upgrades.²

¹ OAR 860-082-0025(1)(b) and (c).

² There is a potential dispute about whether PGE has properly or improperly assigned these upgrades to Carnes Creek Solar. The system impact study PGE provided Carnes Creek Solar on October 25, 2019 cited an MDL on the substation transformer of only 1.34 MW. This MDL is below the capacity of Carnes Creek Solar, suggesting that the adverse system impacts PGE desired to protect against through proposed upgrades for Carnes Creek Solar were preexisting conditions from higher queued projects. When asked to explain this, PGE responded, stating that the original number was provided in error and that the correct MDL was 2.4 MW occurring on May 5, 2019, which (based on PGE's prior course of conduct with its MDL methods and its interconnection standard) indicates the addition of Carnes Creek Solar was causing the potential adverse system impacts. However, PGE also subsequently provided a screenshot from its power loading software that showed a lower recorded MDL of 2.01 MW occurring earlier on the *same*

Finally, Carnes Creek Solar seeks to develop the Project for the CSP but cannot do so if it must pay for these unnecessary interconnection upgrades. Based on these facts, good cause exists for the Commission to grant Carnes Creek Solar's requested waiver, so that the Project can proceed with development for the CSP.

Carnes Creek Solar notes that it seeks this waiver as an alternative to litigation. The waiver request assumes that PGE's system impact study for Carnes Creek Solar is reliable and accurate. In theory, this assumption should be reasonable, since PGE performed the study specifically to update the terms of the parties' fully executed interconnection agreement. However, PGE opposes the waiver, in part, because PGE says the information cannot be relied upon and is outdated. Carnes Creek Solar is not here to defend PGE's work product. Carnes Creek Solar has its own concerns with PGE's methods. Based on its review of PGE's data, Carnes Creek Solar believes that PGE overlooked one or more requirements for a different, *earlier* project and now seeks to assign these requirements and associated costs to Carnes Creek Solar. Whether PGE's

day as the 2.4 MW reading. See Attachment D to Petition (Letter from Nimbus Power Engineers, LLC to Carnes Creek Solar). This is significant because the 2.01 MW value is less than the 2.2 MW nameplate capacity of a higher-queued project, SPQ0028, and the reading occurred five months prior to that project coming online. The adverse system impact that PGE alleges Carnes Creek Solar is responsible to pay for and protect against is an instantaneous event. Therefore, if the MDL prior to SPQ0028 coming online was less than that project's nameplate capacity of SPQ0028, then the potential for the adverse system impact exists even *without* the addition of Carnes Creek Solar. However, this dispute is only mitigated if the 2.4 MW number is legitimate and if Carnes Creek Solar can downsize its capacity to be below 2.4 MW, PGE's stated MDL for the substation transformer. If the 2.4 MW is inaccurate as PGE now claims, then the only resolution to this dispute is for PGE to simply respect and adhere to the current executed interconnection agreement between it and Carnes Creek Solar.

study is accurate or not, ultimately these requirements should not apply to Carnes Creek Solar. The requested waiver will allow Carnes Creek Solar to avoid these unnecessary costs, based on PGE's study. Without the waiver, Carnes Creek Solar's remaining options for relief will be limited; pursuing them would be unnecessary if PGE's study and statements are accurate, and if PGE respects the terms of the current standing agreement which excludes the costs of these upgrades.

III. REPLY TO PGE'S ARGUMENTS

In opposition to Carnes Creek Solar's petition for waiver, PGE submitted comments to the Commission on May 29, 2020 raising five arguments against the waiver.³ Carnes Creek Solar has detailed its rebuttal to PGE's arguments below.

A. Carnes Creek Solar Reducing Its Capacity by Up to 199 kW Will Allow It to Avoid Interconnection Upgrades

PGE's first argument is that even if Carnes Creek Solar is allowed to reduce its nameplate capacity by up to 199 kW that such reduction will not allow the Project to avoid interconnection upgrades.⁴ In its comments, PGE states:

A preliminary analysis by PGE's engineers suggests that adding a 2.3 MW Carnes Creek Solar Project will increase the risk of catastrophic equipment damage during a fault on the high side of the transformer due to backfeed. In order to address this impact, PGE's engineers expect that they will need to require substation transformer relay panels, substation voltage transformers, and a transfer trip protective scheme.⁵

To support this, PGE states that downsizing the Project to avoid backfeeding upgrades "relies on old data that is no longer representative of the daytime minimum load to be

³ PGE, Comments Opposing Petition for Waiver at 1 (May 29, 2020).

⁴ *Id.* at 5-6.

⁵ *Id.* at 5.

expected at the substation transformer.”⁶ According to PGE, this “old data” is sufficiently “representative” to require Carnes Creek Solar to pay for potentially unnecessary upgrades, but is no longer valid when Carnes Creek Solar wants to avoid these same upgrades.

Both of PGE’s above statements are concerning. They suggest that PGE is neither studying interconnection requests, nor administering its own interconnection standards in a consistent manner. This is despite the importance of consistency being stressed in PGE’s own comments.⁷

First, PGE asserts that reducing the Project’s sized to 2.3 MW so that it can be below the MDL of 2.4 MW would still face the same substation and transfer trip upgrades as it would if it were sized at 2.5 MW.⁸ This suggests that PGE’s use of the MDL to determine interconnection system upgrades (and queue eligibility in the case of the CSP interconnection queue) is invalid for determining adverse system impacts and illegitimate for the purpose of determining interconnection eligibility in the case of CSP interconnections.⁹

Second, the statement is inconsistent with: 1) all of PGE’s interconnection studies to date for Carnes Creek Solar; 2) all of PGE’s interconnection studies to date for any

⁶ *Id.*

⁷ *Id.* at 7.

⁸ *Id.* at 6.

⁹ PGE, *Distribution Interconnection Standards* §§ 2.1.3, 2.2 (June 17, 2019), available at https://www.oasis.oati.com/woa/docs/PGE/PGEdocs/PGE_Distribution_Interconnection_Standards.pdf; PGE, *Schedule 204 - Community Solar Program Interconnection and Power Purchase Schedule*, Part 1(A)(3); PGE, *Standards for Interconnection of Community Solar Program Projects*, Section 5(1)(e).

other project in the interconnection queue that PGE has prescribed similar backfeeding protection for; and 3) with PGE's own Distribution Interconnection Standards on OASIS.¹⁰ In its interconnection studies and in its Distribution Interconnection Standards, PGE states that backfeeding protection is only required when the incremental project capacity exceeds the substation transformer MDL.¹¹ This is particularly concerning since Carnes Creek Solar has a fully executed interconnection agreement. QFs should enjoy greater certainty as they move through the interconnection process, not less, especially once they reach the point of having an executed interconnection agreement in place.

Third, PGE asserts that downsizing to avoid upgrades “relies on old data that is no longer representative of the daytime minimum load to be expected at the substation transformer”. PGE essentially suggests that now, coincidentally, for Carnes Creek Solar, PGE will take a new approach to determining upgrades via an ambiguous prospective method rather than using real historic system data as is used for all other similarly situated interconnections in PGE's queue. PGE's new approach is also inconsistent with PGE's Distribution Interconnection Standards.¹² Allowing PGE to make this change in methodology would also violate the nondiscriminatory and reasonableness principles in the rules and required under the Public Utility Regulatory Policies Act,¹³ and Oregon law barring a utility from giving undue or unreasonable preferences.¹⁴

¹⁰ See generally PGE, *Distribution Interconnection Standards*.

¹¹ *Id.* §§ 2.2.4, 2.2.4.5, 2.2.4.6; e.g., Petition for Waiver at Attachment A at 5 (System Impact Study, SPQ0158, (Oct. 25, 2019).

¹² PGE, *Distribution Interconnection Standards* § 2.1.3.

¹³ See generally OAR 860-082; PURPA, Pub. L. 95-617, 92 Stat. 3117; 16 USC § 824a-3; ORS 758.505 to 758.555.

¹⁴ ORS 758.325.

In relation to the project ahead of Carnes Creek Solar that recently came online in October 2019, SPQ0028, PGE states that “With the addition of a 2.2 MW generator to the feeder in October 2019, PGE expects the current daytime minimum load on the substation transformer to be significantly less than the 2.4 MW established in May 2019.”¹⁵ This statement is also highly concerning and does not make sense in the context of what PGE is requiring for Carnes Creek Solar. SPQ0028 was in the queue in May 2019 and its generation ought to have been taken into account when PGE determined the MDL for the Carnes Creek Solar system impact study. However, we already know that its contribution was not properly taken into account due to the 2.01 MW MDL value shown in the power loading screenshot.¹⁶ In PGE’s filed comments and its reply to Staff’s information request, PGE states that Carnes Creek Solar is ignoring the contributions of the new 2.2 MW generator interconnection to the feeder after May 2019. It is not Carnes Creek Solar that is ignoring this fact. Carnes Creek Solar has pressed this fact to PGE exhaustively since October 2019. Rather PGE has in its comments, and reply to Staff’s information request, admitted that it is the one ignoring this fact, until now.

Therefore, either PGE’s comments are incorrect and should be disregarded, or this statement is PGE’s admission that: 1) it is attempting to require Carnes Creek Solar to protect against conditions that are preexisting which is a clear violation of the interconnection rules; and 2) that the system impact study for Carnes Creek Solar with the “correct” MDL data still actually contained wrong data that is entirely irrelevant and

¹⁵ PGE, Comments Opposing Petition for Waiver at 6.

¹⁶ Petition for Waiver at Attachment D (Letter from Nimbus Power Engineers, LLC to Carnes Creek Solar (Mar. 24, 2020)).

unreliable. This astonishing admission by PGE begs the question of how can a project in PGE's interconnection queue have any reasonable expectation that it will receive reliable and accurate information regarding necessary interconnection upgrades?

Fourth, PGE's statement that the interconnection study is outdated simply makes no sense. The interconnection study was used to determine the appropriate level of upgrades, which found that protection upgrades were only required if the project was at 2.5 MW, a capacity above PGE's MDL of 2.4 MW.¹⁷ PGE has affirmed in its prior studies for other projects, as well as in its interconnection standard, that such protection upgrades are only needed when the project capacity exceeds the MDL.¹⁸ Either Carnes Creek Solar's capacity is above the MDL of 2.4 MW or it is not. If the MDL is lower than 2.4 MW, then the MDL has already been exceeded by a prior interconnected project. Either PGE's study and citation of the 2.4 MW MDL is correct, or it is not, due to PGE disregarding the impact of SPQ0028 as previously described.

B. PGE Will Not Need to Conduct a New System Impact Study and Facilities Study if Carnes Creek Solar Reduces Its Capacity

PGE states that it will need to first complete a new system impact study for the project at the new reduced capacity.¹⁹ If this is true, then PGE's: 1) existing system impact study; 2) facilities study; and 3) Distribution Interconnection Standards are all defective and unreliable. If, however, the existing studies are accurate and reliable, then no restudy is needed.

¹⁷ Petition for Waiver at 3-4, Attachment A at 5-6 (System Impact Study).

¹⁸ PGE, *Distribution Interconnection Standards* §§ 2.2.4, 2.2.4.5, 2.2.4.6; e.g., Petition for Waiver at Attachment A at 5 (System Impact Study).

¹⁹ PGE, Comments Opposing Petition for Waiver at 6.

The system impact study and the facility study PGE has provided to Carnes Creek Solar show that absent the backfeeding requirements (which, per PGE's studies and their interconnection standards, are only applicable *if* Carnes Creek Solar's capacity exceeds the MDL), the only prescribed interconnection facility upgrade is a \$30,000 meter installation.²⁰ There are no other necessary upgrades cited in any of the studies PGE has provided to Carnes Creek Solar that the Project must pay for.²¹ Therefore if the Commission grants the waiver petition, Carnes Creek Solar *and* PGE ought to have enough assurance and certainty in the existing interconnection studies for the Project at its reduced size to be able to proceed. Setting aside any disagreement about the use of the MDL and backfeeding concepts as relevant to determine necessary upgrades, the Project will not cause backfeeding that rises to the level of requiring protection. Also, the system impact study for Carnes Creek Solar contains an endorsed statement from PGE's own contract engineer, POWER Engineers, stating the following:

This generator interconnection is expected to backfeed onto the transmission system during periods of light load. The low level of backfeed is not expected to cause or worsen any thermal, voltage, or stability concerns for the transmission system.²²

PGE's own comment filing proves Carnes Creek Solar's point. PGE's assertion that Carnes would still face the same upgrades despite a lower nameplate capacity is directly contradicted by PGE's own admission that the capacity reduction would allow

²⁰ Petition for Waiver at 3-4, Attachment A at 5-6 (System Impact Study).

²¹ *Id.*

²² *Id.* at Attachment A at 3.

Carnes Creek Solar to “narrowly avoid paying for upgrades” that would otherwise be required.²³

Allowing projects to “narrowly avoid paying for upgrades” is exactly what the Commission should be striving for. It is monumental waste of PGE’s, interconnection customers’ and society’s resources to force interconnection customers to build expensive upgrades for a 2.5 MW project, when those upgrades can be avoided if the project is built at 2.3 MW. The only reason to require projects to be built in an inefficient way is to make it more difficult and costly for small developers to build projects.

C. Carnes Creek Solar Will Be Able to Meet the Required September 4, 2020 Milestone for the Project’s Land Use Permit

PGE states that, even if the waiver is granted, it is unlikely that the waiver will allow Carnes Creek Solar to complete the interconnection before the September 4, 2020 deadline in the Project’s land use permit.²⁴ This is factually incorrect. The land use rules require Carnes Creek Solar to “initiate the use” by the deadline.²⁵ Carnes Creek Solar can do so by pulling building permits for the project with Marion County. Carnes Creek Solar can reasonably accomplish this by the September 4, 2020 deadline. However, it would be commercially unreasonable for Carnes Creek Solar to undertake these actions and associated expenses if it lacks assurance and certainty as to its interconnection costs.

PGE’s arguments on the land use permit are illustrative that the Commission should be cautious in considering PGE’s assertions in its comments in opposition to the

²³ PGE, Comments Opposing Petition for Waiver at 8.

²⁴ PGE, Comments Opposing Petition for Waiver at 6-7.

²⁵ Petition for Waiver at Attachment F (Email from Marion County to Carnes Creek Solar, Apr. 16, 2020).

waiver. PGE is simply making up arguments that are easily verified as inaccurate and that make no sense to those familiar with project development and land use permitting. The Commission should take a similar level of care in reviewing PGE’s more technical and engineering related arguments as well.

D. Granting the Waiver Will Not Harm Lower Queued Projects, which *Support Carnes Creek Solar’s Waiver Request*

PGE’s fourth argument is that granting the waiver will result in harm that “ripples through all lower queued projects.”²⁶ The Commission should be skeptical when PGE is claiming to defend the interests of other interconnection customers. In fact, other interconnection customers *disagree* with PGE. The only remaining Tier 4 project in the queue behind Carnes Creek Solar supports its waiver request. Notably, that project, SPQ0172, is already subject to delay due to an ongoing dispute with PGE regarding inconsistencies in PGE’s interconnection practices.²⁷

Notwithstanding the support from SPQ0172, Carnes Creek Solar does not desire to harm lower queued projects and submits to the Commission that its petition seeks to avoid harming any project, including the Project. The harm is not tied to the waiver but PGE’s inconsistent determination of the MDL and inconsistent application of its protection standard. The information presented in Carnes Creek Solar’s petition is ample and sufficient evidence that the Project ought not to even be subject to the protection requirements because the alleged adverse system impacts were preexisting due to

²⁶ PGE, Comments Opposing Petition for Waiver at 8.

²⁷ *See generally Waconda Solar v. PGE*, Docket No. UM 1971, Complaint at 1 (Sept. 28, 2018).

SPQ0028, and they are not even considered adverse system impacts by PGE’s own third-party engineer that performed the system impact study analysis. Therefore, the only option available to Carnes Creek Solar to avoid paying for unnecessary upgrades and maintain its development timeline is to reduce its capacity to be below PGE’s stated “correct” MDL of 2.4 MW.

Further, granting the waiver will not create any material net change in the potential “harm” to lower queued projects. Carnes Creek Solar wishes to size its project efficiently to avoid harms that PGE states only occur if Carnes Creek Solar’s generation causes the total generation to exceed the MDL on the substation transformer. According to data from PGE and PGE’s own statements in its opposition comments and reply to Staff’s information requests, the current level of generation already exceeds the MDL.²⁸ PGE’s new position is that the problem could not be avoided, even if Carnes Creek Solar does *not* come online. In other words, there may be no material net change in the potential “harm” to lower queued projects if Carnes Creek Solar is allowed to avoid paying for backfeeding upgrades. Carnes Creek Solar is seeking to only pay for the interconnection equipment necessary and appropriate for its own interconnection, as per the Commission’s interconnection rules.²⁹

²⁸ See Petition for Waiver at Attachment D (Letter from Nimbus Power Engineers, LLC to Carnes Creek Solar (Mar. 24, 2020)).

²⁹ See OAR 860-082-0035(2).

E. Applying and Participating in the CSP Are Not Discrete and Do Overlap with the Interconnection Rules

PGE argues that with its waiver petition, Carnes Creek Solar is conflating two distinct concepts: 1) applying to participate in the CSP; and 2) applying to interconnect to PGE’s system under the Commission’s small generator interconnection rules.³⁰ As a preliminary matter, PGE mistakes applying to participate in the CSP for continuing to be eligible to participate in the CSP. PGE states that “the CSP rules allow changes in nameplate [capacity] for the purpose of *qualifying* for the CSP...”³¹ Carnes Creek Solar disagrees because the possibility of a minor nameplate capacity reduction for any project would happen after the project has already qualified for the CSP and is pre-certified by the Commission.

More broadly, PGE’s argument is not valid because it is based on a false premise that the two regulatory regimes (the CSP rules and the Small Generator Interconnection Rules) are distinctly separate and have no functional bearing on each other. The CSP requires a project to have at least a completed system impact study or pass a Fast Track interconnection screening process to be eligible for pre-certification.³² Thus, the two regimes are intertwined.

Additionally, even if the regimes were separate, the requirements are the same in this instance. PGE’s approved CSP specific interconnection rules contain the same verbatim provisions for nameplate capacity changes and rule waiver requests. Therefore,

³⁰ PGE, Comments Opposing Petition for Waiver at 9.

³¹ *Id.* at 10 (emphasis in original).

³² Or. Community Solar Program, *Program Implementation Manual* at 34 (Dec. 26, 2019).

a reduction of 199 kW at any time after pre-certification would require a project to request a Commission waiver to change its nameplate capacity under either interconnection regime, the Small Generator Interconnection Rules under OAR 860-082 or the CSP interconnection rules.

Therefore, the Commission approved CSP rules themselves justify Carnes Creek Solar's waiver request because it is the only functional way for the CSP provisions allowing minor capacity reductions to be implemented.³³

In addition, the allowance of nameplate capacity reductions up to 199kW without any negative impact to a project's eligibility for final certification bears on the earlier discussion that the reduction need not necessitate new interconnection studies if there is sufficient information in the existing studies that shows such a capacity reduction would mitigate the adverse system impacts identified in the studies for the project at the original higher capacity. Here, the timeline adopted and approved by the Commission illustrates that there was no expectation that new studies would ever be required for CSP projects making a small reduction in nameplate capacity. Specifically, a CSP project would only make a reduction after being pre-certified, and CSP projects have a limited amount of time to become certified.³⁴ Requiring a new study during that time would risk preventing CSP projects from becoming certified, as it would delay the final certification of the project and ultimately threaten the precertification eligibility of the previously pre-

³³ *Id.* at 66-67.

³⁴ OAR 860-088-0040(5) and (6) (providing only 18 months for a pre-certified project to become certification and noting that any project amendment does not extend the 18-month period).

certified project, which could also pose harm to the eventual CSP customers of the project.

IV. CONCLUSION

For the foregoing reasons, Carnes Creek Solar respectfully requests that the Commission find good cause exists to grant its petition for waiver of OAR 860-082-0025(1)(b) & (c). Carnes Creek Solar appreciates the principles behind PGE's arguments as a general matter, but in this case PGE's conclusions are incorrect upon an examination of all the facts. Carnes Creek Solar also appreciates the principles supporting Staff's memo and recommendation, but it believes that a complete view of the issues supports its position and cause in avoiding unnecessary interconnection upgrades. The Project also fully supports consistency in application of the rules and treatment of interconnection customers. Were it not for PGE's inconsistent determination of the MDL, disregard of impacts from higher queued projects and prescription of interconnection upgrades to Carnes Creek Solar rather than a preexisting project, this waiver request would be unnecessary. The Project is simply trying to remedy the matter—without litigation--by resizing so that it conforms to PGE's standards to avoid costly protection upgrades that are unnecessary at the reduced capacity. While consistent application of the rules is a laudable goal, that goal should be pursued holistically. Granting a waiver of the rules in this case will benefit Carnes Creek Solar and the CSP without harming other interconnection customers.

Further, Carnes Creek Solar notes that interconnection customers do not currently enjoy consistency in PGE's treatment of interconnection requests, as is perhaps illustrated by the brief discussion here. Some improvement is clearly needed to the interconnection

process. Carnes Creek Solar hopes that it can be a benefactor of these improvements rather than an unnecessary victim.

Dated this 12th day of June 2020.

Respectfully submitted,

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