

September 18, 2011

Oregon Public Utility Commission
Main Hearing Room
550 Capitol Street NE
Salem, OR 97308
Sent via facsimile 503-378-5505 & electronic mail

Re: September 20, 2011 Regular Agenda Item 3, Docket UM1538 Request by Kigin Energy Partners for waiver of 12-month Solar System Installation Requirement Pursuant to OAR 860-084-0210(1)

Dear Oregon Public Utility Commission Members,

I am writing to you in response to the recommendations of the Public Utility Commission Staff (“Staff”) contained within their report of September 12, 2011 regarding the request of Kigin Energy Partners (“KEP”) to waive the 12-month solar system installation requirement for a photovoltaic project to be constructed at the Rogue Valley Sewer System (“RVSS”) in Central Point, Oregon.

First and foremost, I would like to thank Staff for taking the time to speak with me on more than a few occasions on this topic, as well as undertaking the herculean task to review the one hundred and forty-five pages of documentation that we have submitted to Staff for their review in conjunction with our waiver request. In particular, I would like to note that Mr. Moshrek Sobhy has been extraordinarily helpful and patient, during our many conversations and email exchanges as we have prepared the request for waiver that you are now considering.

Furthermore, I am thankful that Staff has chosen to recommend that the Commission grant our waiver request and extend the installation deadline beyond the original date of October 4, 2011. However, I would like to request that if the Commission agrees with Staff’s recommendation to grant our waiver, that the Commission consider extending the installation deadline beyond the Staff recommended date of December 30, 2011.

While I certainly appreciate that Staff is recommending granting an additional eighty seven days in which to complete our project, this window of time is substantially narrower than our original request of 120 days. While I believe that all of the parties who have been participating in this project (including

the Rogue Valley Sewer Service, Umpqua Bank, the Indian Energy & Economic Development Agency, Oregon Economic Community Development Department, Jackson County Assessors Office, numerous suppliers and vendors, and Kigin Energy Partners) remain committed to completing this project as soon as possible, the recommended Staff extension to December 30, 2011 leaves little margin in the event of inclement weather or staffing absences during the Thanksgiving and year-end holiday seasons.

As a result, I respectfully request that if the Commission agrees with Staff's recommendation to grant our waiver, that the Commission extend the deadline for installation to our original request of 120 days. This extension will ensure that the project is installed in a timely fashion while leaving a small margin for elements that may arise during the remaining portion of this year.

Thank you again for considering our request and for the time that Staff has afforded to us during our discussion of this topic.

Respectfully submitted,



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