Jonathan Nagar 3740 SE Haig Street Portland, OR 97202 February 22, 2017

To: Public Utility Commission

Re: Request for Waiver of OAR 860-084 Installation requirements; Docket # UM 1538

I am requesting a waiver of the rules regarding the deadline to complete 2 Solar Incentive Program projects for a multifamily residential addition (Haig Haus). Both reservations are with PGE and are at the same location but associated with different addresses and meters. The deadline for these was originally 5/15/2016, since extended to 3/31/2017. We request a further 4-month extension to 7/31/2017 due to supplier, weather, and construction delays. Further, our previous extension was erroneously processed through 3/2017 instead of the requested 5/2017 per the request.

The reservation identifications are: #P395J3 - reservation size: 10 kW location: 3736 SE Haig St, Portland, OR 97202 #A6N0G3 - reservation size: 10 kW location: 3740 SE Haig St, Portland, OR 97202

The Solar Incentive Program Applications and Agreements for both reservations were submitted to and approved by PGE within the required 60-day timeline (5/1/2015). We have funds on hand to purchase the equipment and do not require financing. Due to numerous unforeseen delays, complications, and engineering revisions, construction broke ground in April 2016 upon issuance of a revised building permit. Though rough framing is complete, the record-breaking weather this season resulted in further unforeseen complications and delays with myriad subcontractors.

Though the unique bi-facial modules (able to take advantage of light reflected from the light-colored flat roof of the building) chosen for the system by recommendation of the solar contractor (Solterra) continue short on supply, the manufacturer (Solarworld) assures us we will have modules by 4/2017. Solarworld had originally indicated earlier availability, but internal confusion with their distributor was recently resolved. Due to repeat delays, we seek a longer extension to avoid any further requests to the Commission.

Conversations with city personnel regarding a final code appeal and permit revision have been positive and we appear to be on track to have our revised solar permit by 3/2017. To date we have invested \$500,000 toward plans, permits, engineering, and construction, and are committed to the project and the solar installation. We were approved under this docket in late 2016 for an extension request through 3/2017, two months short of our requested extension date: our request was written and intended for an extension through 5/2017. Aside from supply issues, we now anticipate completion and inspection of the 2 10 kW Solar Incentive Program projects to take place as early as 5/2017. However, this may stretch as late as 7/2017 depending on delivery of the equipment. We therefore request this 4-month extension to allow for extra time in the event that inclement weather continues to hamper progress or materials are further delayed by the supplier, and anticipate this will be the last such request.

Thank you for your consideration of this request,

ALA

Jonathan Nagar Owner