

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

April 13th, 2018
To: PUC
From: Peter Greenberg
P.O. Box 765
Salem, OR 97308
pgpvllc@gmail.com

Subject: Extension of Time
(Docket No. UM 1538)

Request by PGPV, LLC for a waiver of the 12-month solar photovoltaic system installation requirement pursuant to OAR 860-084-0210 (1)

To Whom it May Concern,

We would like to re-locate the following project:

Hammerich Willy's
305 Haskins RD #75 HP, Bonanza, OR 97623
Size: 100 kW

Reasons for Project Re-location:

In May of 2015 we were awarded a 100 kW slot in the VIR Solar Pilot Program for this project. We were told by the Pacific Power program coordinator at the time that we wouldn't be required to pay more than \$11,000 for any necessary upgrades to their infrastructure for this site. We submitted a level 2 Interconnection Application within 60 days of the the award date. Eight months later, on 3/17/16, we received an email from Pacific Power notifying us that the project would require a level 3 study. The cost of the study was \$3,000. We sent out a \$3,000 check to Pacific Power the same day. However, by this time the foundation, racking and solar modules had already been installed at the site. On 7/18/16, Pacific Power sent us an email with the results of the study. They estimated it would cost \$160,025 to make the required upgrades to their infrastructure. We did not have this sum available at the time as our available funds were already devoted to the other projects in our pipeline. Pacific Power said this quote would be valid for one year. On 8/15/17 we finally had the funds available and called Pacific Power to notify them. We were told that since a year had passed, a new study would have to be performed. On 11/16/17, we were sent the results of the new study, which now estimated the cost of the required upgrades at \$245,123 +/- 30%. We were told by the new program coordinator that the previous study wasn't complete in its scope and that even if we had been able to pay the \$160,025 within a year, upon commencement of the upgrade work it would have been discovered that additional work would have been required and we would have been charged accordingly. On 12/18/17 we participated in a conference call with the Pacific Power program coordinator where we asked and they agreed that we could move the system to a new site. We chose to pursue this course of action as moving the system would only cost us around \$40,000, which is substantially less than a potential upgrade cost of \$318,659 (245K + 30%). On 1/17/18 we emailed Pacific Power a potential site. We were then asked if we would participate in another conference call to discuss the matter further. On

1/25/18 we participated in a conference call with the program coordinator where we were told that Pacific Power would like us to get PUC approval before moving the system to protect ourselves. We were also told that in the meantime they would evaluate our potential site. On 2/19/18 we were notified that our new site would only cost us \$10,000 in infrastructure upgrades. The Klamath County Planning Department performed a site plan review and on 3/2/18 approved our proposed project site. On 4/09/18 the landowner of the new site signed our site agreement. Now that we have site control, we will be applying for a building permit within a week. As we have planning department approval, the County estimates it will take 3-4 weeks to obtain a building permit. We can't re-use the foundation posts, so we ordered replacements which will take one month to receive. Moving and installing the system will take 3 weeks.

Company Background:

Energy Wise Lighting, Inc. and their sister company PGPV, LLC are the largest owners of solar PV systems on K-12 schools, Boys and Girls Clubs and other non-profits in the State. We've installed over 125 solar PV systems under the VIR program in Oregon, ranging in size from 5 to 500 kW, for a total installed capacity of over 5 MW. Over the next 15 years, our systems will inject millions of dollars back into Oregon schools, nonprofits and farmers in the form of host fees.

Sincerely,

/s/ Peter Greenberg
pgpvllc@gmail.com