

Jonathan Nagar
3740 SE Haig Street
Portland, OR 97202
June 21, 2017

To: Public Utility Commission

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

I write to request a waiver of the rules regarding the deadline to complete 2 Solar Incentive Program projects in conjunction with a multifamily residential addition. Both reservations are with PGE and are at the same location but associated with different addresses and meters. We anticipate the solar arrays will be installed by the (second extension) deadline of 7/31/2017, but the underlying construction has suffered further delays attributable to contractors and weather. With much humility, I request a further 4-month extension to 11/30/2017 due to wholly unforeseen delays as outlined below.

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). The equipment has been reserved, and steel structural materials are available for installation in early July. Though framing for the building is complete and is engineered to support the array, the record-breaking weather over the course of construction resulted in unpredicted complications and delays. Among these: water leakage significantly delayed drying in the building, and in spring 2017 our contracted solar installer (Solterra) quit the Portland market; both resulted in delays.

We have successfully revised our building permit for the solar superstructure, including necessary code appeals. We are on track to install the arrays by end of 7/2017, in line with the extended deadline. The building project as a whole, however, will not be completed until later. The solar permit had to be issued as a revision to the overarching building permit. I recently learned the solar portion of the build cannot have its final inspection approved until the building itself is not only built and deemed occupiable, but landscaped and otherwise finished: the solar permit is dependent on the entire building permit. As the project owner (not a builder by trade), not only was this permit situation unforeseen, but the delays in finishing the building have come as a surprise to me. Due to the building's impact on our interconnection date for the Solar Incentive Program, I now seek a further extension through 11/30/17 to avoid the deal-breaking expiration of said incentive.

To date I have invested \$650,000 toward plans, permits, engineering, and construction, and am committed to the project and to the solar installation. I request this extension to accommodate the delay of the final building inspection. Without the incentive the solar array would not be feasible: I ask for your mercy in granting this extension. In summary:

- Appeals and permits in place for successful installation, no further delays in sight
- Solar installer quit the Portland market, but replacement has been secured; water leakage associated with record weather delayed dry-in of building, negatively impacting downstream scheduling
- Solar equipment and structure on track for July installation, but permit tied to main building permit
- *Extension requested through November 30 2017; entire building on track for October final inspection*

Thank you for your consideration of this request,



Jonathan Nagar
Owner