## e-FILING REPORT COVER SHEET



Send completed Cover Sheet and the Report in an email addressed to: <u>PUC.FilingCenter@state.or.us</u>

REPORT NAME: Request for waiver of 12-month installation requirement - OAR 860-084-0210(1)

COMPANY NAME: RS Energy LLC, on behalf of Baley-Trotman Farms (project owner)

DOES REPORT CONTAIN CONFIDENTIAL INFORMATION?

If yes, please submit only the cover letter electronically. Submit confidential information as directed in OAR 860-001-0070 or the terms of an applicable protective order.

If known, please select designation: $\square RE$ (Electric) $\square RG$ (Gas) $\square RW$ (Water) $\square RO$ (Other)	
Report is required by: OAR	OAR 860-084-0210(1)
Statute	Enter statute number
Order	Enter PUC Order No
Other	Enter reason
Is this report associated with a specific docket/case? No	
If yes, enter docket number: UM1538	

List applicable Key Words for this report to facilitate electronic search: Baley Trotman Solar Project, UM1538, Solar waiver request

## DO NOT electronically file with the PUC Filing Center:

- Annual Fee Statement form and payment remittance or
- OUS or RSPF Surcharge form or surcharge remittance or
  - Any other Telecommunications Reporting or
  - Any daily safety or safety incident reports or
  - Accident reports required by ORS 654.715

Please file the above reports according to their individual instructions.

PUC FM050 (Rev. 6/29/12)

March 6, 2014

Oregon Public Utilities Commission 550 Capitol Street NE #215 P.O. Box 2148 Salem, OR 97308-2148

## RE: Request for waiver of twelve-month installation requirement (OAR 860-084-0210) for solar photovoltaic system. Pacific Power Solar Incentive Program Tracking # 5792222

To Whom It May Concern:

Pursuant to OAR 860-084-0000(3), Edgewood Ranch, hereby requests a waiver to the 12-month Capacity Reservation Expiration Date referenced in OAR 860-084-0210(1). We respectfully request that the Oregon Public Utility Commission grant the waiver and extend the Capacity Reservation Expiration Date to August 11, 2014.

Edgewood Ranch (project tracking number is 579222) was approved to participate in Pacific Power's Oregon Solar Incentive Program with a Capacity Reservation Start date of April 11, 2013. The bank we have been working with for the past 10 years gave us a verbal approval on the loan for this 97.5 kW solar project, however they notified us in February that they were no longer interested in working with us on financing solar.

I have spent the last two weeks making connections with other banks in the area, as well as working with the Oregon Department of Energy's SELP program. It has become apparent that the funding will not be secured in time to pay our contractor to start construction work on the project and meet the current expiration date.

Our contractor, RS Energy, has an approved permit from Klamath County to begin work on the project, and they have purchased the Solectria inverter for the system. It is our understanding that racking equipment has also been purchased for the ground mounted system. Solar modules have not been purchased, but are reserved and on hold with the distributor as we continue to work through the financing and waiver request process.

We fully intend to install the system, and we are confident that a new loan source will be secured in the next 30 days. Edgewood Ranch has completed two 10 kW solar projects under the OSIP program, and those systems were delivered and commissioned on time.

This larger solar project is an important strategic initiative for our farm as we look to lower our long-term operating costs in light of rising energy rates. We appreciate your consideration and respectfully request an extension. The additional time will allow us to evaluate financing options with the SELP loan, as well as local banks that provide agricultural loans in the area.

Please feel free to contact me with any questions.

Sincerely,

Lauren M Jespersen Chief Financial Officer Edgewood Ranch, Inc. 12501 Swan Lake Rd. Klamath Falls, OR 97603 Direct: <u>541.891.1471</u> Email: <u>lauren@edgewoodranchinc.com</u> www.edgewoodranchinc.com