



**NW Photon Energy**  
Commercial and Utility Scale Solar Projects

To: Nadine Hanhan  
Utility Analyst

August 29<sup>th</sup> 2016 (**Revision in bold**)  
NW Photon Energy  
10720 SW Moapa Ave  
Portland, Or 97219

In the Matter of  
NW Photon Energy on behalf of  
WPC Bancroft, LLC

WPC Bancroft, LLC  
PGE Account #001715826-509409  
System Size 10 - 100kW  
Reservation #W96731  
Permit Approval #15-251931  
**Structural approval 8/23/2016**

NW Photon Energy is requesting a Waiver for the PGE Feed In Tariff (FiT) one-year project completion date, per the Solar Photovoltaic Pilot Program. We do not wish to withdraw the original award capacity reservation per Award email notification dated May 22, 2015.

On May 22, 2015 Portland General Electric (PGE) sent a confirmation email notifying the Capacity Reservation Application for the Solar Payment Option Pilot program was being awarded. WPC Bancroft's volumetric incentive rate bid of \$0.23 had won a reservation (email attached) in the Capacity allotted for Medium Systems (10 to 100kW).

Per the date of the award (May 22, 2015), NW Photon Energy was given 12 months to complete the Project and have solar system operational.

NW Photon Energy after multiple discussions with the City of Portland's solar structure engineer, which began in early August, submitted its plans for permit approval on October 19, 2015. At that time City of Portland informed us that there is only One (1) solar structural engineer who could approve this project and he was 6-8 weeks out. We opted and authorized to pay overtime and the review occurred in early December. We had multiple revisions that include manufacture engineering and testing validation by third part – peer review. This requirement was time consuming, not to mention expensive.

On Thursday February 11<sup>th</sup>, 2016 almost four (4) months after the plans were submitted the approval was presented. During this time, WPC has experienced a section of its roof that began leaking. The owner would like to re-roof his roof while installing a solar system so that both systems will last for decades.

Re-roofing requires good weather and we are concerned that if we include a new roof that the operational date of May 22, 2016 may be in jeopardy. We will do everything in our power to achieve the May 22<sup>nd</sup> date, but the weather has not been cooperating, especially this Spring.

We are very interested in maintaining PGE's Solar Payment Option program and would appreciate an extension to allow us to include a new roof.

**Extension Update and an additional 60 day extension requested.**

**Unfortunately we were not able to make the September 1, extension date primarily for two reasons:**

**1) June weather postponed the roofing project as the roofing company could not start as Planned and the city of Portland required new structural plans (to include seismic) that pushed the roofing company (Fisher Roofing) back two weeks. We did not have access to the roof until mid-July vs. June as originally planned.**

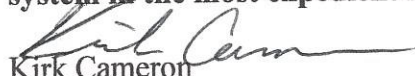
**2) Electrical PGE added an additional requirement that was unusual and unforeseen.**

The installation needed to add zig-zag transformers to meet the PGE metering requirements. These are being utilized to create a neutral reference point from the 480Vac transformer. We discussed the system operation with the PGE metering group and they are holding us to the requirement to include the neutral reference for their meter. The solar installation team was delayed in order to find the most acceptable solution for both PGE and NW Photon Energy and then to source the proper materials.

**Structural has been approved (included and attached) by the City of Portland and only the Electrical remains outstanding.**

**Based on the additional information described above, we are confident that completion will be Realized in 60 days at the most and are schedule is to commission the system mid-September. The additional time will only be required if PGE implements changes that have not been accounted.**

**I sincerely appreciate your consideration and we will diligently proceed to commission the system in the most expedient manner.**

  
Kirk Cameron  
President, NW Photon Energy

**k.cameron@comcast.net**

---

**From:** "BDS Inspections" <bdsinspections@portlandoregon.gov>  
**Date:** Wednesday, August 24, 2016 7:13 AM  
**To:** <k.cameron@comcast.net>; "BDS Inspections" <bdsinspections@portlandoregon.gov>  
**Cc:** "larry reading" <larembo55@hotmail.com>  
**Subject:** RE: Permit #15-251931-000-00-CO

Good morning Kirk,

I confirmed with Robin Ford, the approved inspection completed yesterday extended the permit. You are good to go.

Have a great day.  
 Carole

---

**From:** k.cameron@comcast.net [mailto:k.cameron@comcast.net]  
**Sent:** Monday, August 22, 2016 5:30 PM  
**To:** BDS Inspections <bdsinspections@portlandoregon.gov>  
**Cc:** larry reading <larembo55@hotmail.com>  
**Subject:** Re: Permit #15-251931-000-00-CO

Hello Carole.. there is an outside change we will not be able to make the September 15th date. PGE threw us a snag on Friday and is requiring us to provide a separate transformer and disconnect. We have sourced the materials, and are expecting delivery early next week and are scheduled to immediately start installation.

If at all possible, we would like to request a final extension in the event we can not make the September 15th date. We are doing everything we can to make that happen.

FYI - Structural has been called and is scheduled for tomorrow. Electrical then will be the only permit open.

Thank you for your consideration !!

Kirk  
 Kirk Cameron  
 NW Photon Energy  
[www.nwphotonenergy.com](http://www.nwphotonenergy.com)  
 3C Solar LLC  
 W 503 697-4482  
 C 503 703-4046

**From:** [BDS Inspections](#)  
**Sent:** Tuesday, July 12, 2016 7:14 AM  
**To:** [k.cameron@comcast.net](mailto:k.cameron@comcast.net)  
**Subject:** RE: Permit #15-251931-000-00-CO

Good morning,

Your request to extend permit 15-251931-000-00-CO has been approved for 30 days. The new expiration date is

340 SW 2ND ST #12  
Corvallis OR 97333

541 754-2001

**Kirk Cameron**

**From:** "solar" <solar@pgn.com>  
**Date:** Friday, May 22, 2015 2:23 PM  
**To:** <kirk@nwphotonenergy.com>  
**Cc:** "solar" <solar@pgn.com>  
**Subject:** Capacity Reservation Application Awarded-Medium RFP  
Dear WPC Bancroft LLC,

Thank you for your recent Capacity Reservation Application for the Solar Payment Option pilot program. Portland General Electric is pleased to inform you that your volumetric incentive rate bid of \$0.23 has won a reservation in the capacity allotted for Medium Systems (10 to 100 kW). This notification will serve as your official award letter.

**RFP Awarded for:**

**WPC Bancroft LLC**  
0680 SW Bancroft St.  
Portland, OR 97239

**Acct: 001715826-509409**

**System size: 100 kW**

Please be aware that PGE may make bid prices publicly available as required by the Oregon Public Utility Commission.

Today's date (May 22, 2015) is your Capacity Reservation Start Date. You now have two months from this date (May 22, 2015) to submit an Interconnection Application and one year from this date (May 22, 2015) to have executed a Solar Photovoltaic Pilot Program and Interconnection Services Agreement and have your solar system operational. If you are unable to meet these milestone dates, your reservation will be considered withdrawn and you will lose the deposit submitted with the Capacity Reservation Application.

You must obtain authority to make wholesale sales of energy at Market Based Rates to be eligible to participate in the Bid Option portion of the pilot program. Qualifying Facilities under the Public Utility Regulatory Policies Act (PURPA) are not eligible to participate.

The physical point of interconnection (point of common coupling) for this system must be located on facilities capable of doing so at PGE's distribution voltage for the feeder line servicing the site. As the participant, you will be responsible for the construction and maintenance of the customer-owned interconnection facilities and equipment. Customer-owned interconnection facilities (transformer, switchgear, etc.) must meet PGE Electric Service Requirements and be approved by PGE personnel prior to construction. Metering for the project must be primary voltage level metering and be located in PGE approved customer-owned and maintained equipment. Please feel free to contact us with any questions you may have regarding these requirements and this process.

From the information you submitted with your online Capacity Reservation Application, your system requires a Level 2 Interconnection Application. Interconnection Applications as well as the Solar Photovoltaic Pilot Program and Interconnection Services Agreement for bid option systems can be found at:

[https://www.portlandgeneral.com/renewables\\_efficiency/generate\\_power/solar\\_payment/default](https://www.portlandgeneral.com/renewables_efficiency/generate_power/solar_payment/default)

## PGE Capacity Reservation Application for Medium Commercial Qualifying Systems (>10 to ≤100 kW)

PGE will notify the Customer that an application is complete and whether the proposed system has been awarded a reservation via this RFP for the volumetric incentive rate bidding option of the Oregon feed-in tariff pilot program. The required deposit becomes nonrefundable once the system has been awarded a reservation and if the following conditions are not met: Within two (2) months from the date of reservation notification (the "capacity reservation start date"), Customer must submit an Application for Interconnection or lose the reservation. Within twelve (12) months of the date of reservation notification (the "capacity reservation start date"), Systems must be built and have passed final Authority Holding Jurisdiction electrical inspection.

Event	Date
Bid Response Deadline	Friday, May 1, 2015
Bid Award Date	Friday, May 22, 2015
Capacity Reservation Start Date	Friday, May 22, 2015
Interconnection Application Deadline	Wednesday, July 22, 2015
Capacity Reservation Expiration Date	System must be installed and have passed local Authority Holding Jurisdiction's final electrical inspection within 12 months of capacity reservation start date

**Customer and Facility Information:**

PGE Customer Name: WPC Bancroft LLC

PGE account number for property where system will be installed (from PGE bill):  
0017 15826-5094096

Customer E-Mail: \_\_\_\_\_

Site location:

Street Address: 0680 SW Bancroft St.

City: Portland State: OR Zip Code: 97239

Anticipated online date: 9/2015

Anticipated Level of Interconnection Application:

Level 2

Level 3

(continued on next page)

**Eligible System Owner Information (if different from above):**

Owner Name and Address: \_\_\_\_\_

Project Owner E-mail: \_\_\_\_\_

Does project owner have site control (yes or no)? YES (Bidder may attach evidence of site control, i.e. copy of land deed or lease agreement)

**System Capacity Reservation Size and Fee:**

Nameplate Capacity: 99,840 kW DC

DC Nameplate x \$20 = \$ 1980.<sup>00</sup>.\*

\*PGE is required to collect a deposit in the amount of \$500.00 or \$20.00 per kW of DC nameplate capacity, whichever is greater.

**Please attach a check for the DC Nameplate deposit fee (\$500.00 or amount calculated immediately above, whichever is greater) payable to Portland General Electric and submit with this application to:**

PGE Solar Payment Option  
RFP for Large Scale Systems  
PO Box 4079  
Portland, OR 97208-4079

The Capacity Reservation Application deposit will be refunded to applicants who do not forfeit (i.e. fail to file their interconnection application by the deadline listed above, complete system within twelve (12) months). The winning bidders will receive the deposit refund after the first generation payment.

**Volumetric Incentive Rate (VIR) Bid:**

\$0. 230 per kWh

The bid amount may extend to four decimal places since winning bids are based on the lowest bidder's VIR (e.g., \$0.1234 /kWh).

**System Installer Information:**

Company Name: NW Photon Energy, LLC

Contact Name: Kirk Cameron

E-mail Name: Kirk@nwphotonenergy.com

Installer is an Energy Trust of Oregon Trade Ally (yes/no): YES

(continued on next page)