

Jonathan Nagar
3740 SE Haig Street
Portland, OR 97202
September 20, 2016

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, and has since been extended 7 months to 12/15/2016. We request a further 5-month extension to 5/15/2017 due to supplier delays.

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 and approved by PGE within the required 60 day timeline (5/1/2015). We have the funds on hand to purchase the equipment and do not require financing. At the time when the Solar Incentive Program application was made there were plans to construct a new structure that both PV systems would be installed on. There were permitting and engineering challenges related to the building structure and shape in relation to existing property lines. Due to numerous unforeseen delays, complications, and engineering revisions, the construction broke only ground in April 2016 upon issuance of the revised building permit. Rough framing is currently underway, and completion is projected by December 31, 2016.

An engineering-related permit revision for the solar portion of the building is under review by Portland Bureau of Development Services, and we expect to have the revised permit approved by October 2016. To date we have invested over \$300,000 toward plans, permits, engineering, and construction, and are committed to the project and the solar installation. While the superstructure that will support the solar installation will be built by December 2016, there is a strong chance our equipment will arrive too late to be fully commissioned by the December 15th, 2016 deadline. The modules chosen for the system under the recommendation of the solar contractor (Solterra) are facing delays in manufacturing, and the manufacturer (Solarworld) is now unable to guarantee a delivery date in 2016. These bi-facial modules were chosen due to the unique design of the installation being able to take advantage of light reflected from the light-colored flat roof of the building. Solarworld had originally indicated 3Q2016 availability, but has since revised this to 1Q2017. As the custom structure was designed and engineered around these unique panels' size and mounting details, it is not feasible to be changing the design based on availability.

Aside from supply issues, we would anticipate completion and inspection of the 2 10 kW Solar Incentive Program projects to take place as early as 12/2016, though this may go as late as 3/2017 depending on delivery of the equipment. We request this 5-month extension to allow for extra time in the event that materials are further delayed by the supplier. Further, we anticipate this will be the last such request.

Thank you for your consideration of this request,



Jonathan Nagar
Owner