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A CHRISTENSON COMPANY

September 9, 2011

Oregon Public Utilities Commission
550 Capital St NE #215
PO Box 2148
Salem, OR 97308-2148

RE: EXPIDITED REQUEST for a waiver of the 12-month installation requirement (OAR 860-084-2010 (1) for Pacific Power and Light (PP&L) Oregon Solar Incentive Program (OSIP) applications for Williams Heifer Raising

To Whom It May Concern:

Tanner Creek Energy is submitting this request on behalf of Williams Heifer Raising/Williams Hudson Bay Farm which has (2) Pacific Power and Light Oregon Solar Incentive Program applications due October 5, 2011 (5480093) and October 14, 2011 (5484073) respectively.

Specifically, we are asking for a 45-day extension to each application to allow time for system completion.

General Information

The Williams-Hudson Bay Farm and Williams Heifer Raising encompass 3,000 acres in Umatilla County. From 1821 to 1854 it was owned by, and provided agricultural products to, the Hudson Bay Company. It now operates as an integrated organic farm producing wheat, wine grapes, alfalfa, dry beans, buckwheat, potatoes, Walla Walla sweet onions and heifer dairy calves. Its customers include Bob's Red Mill, Amy's Kitchen, Café Yumm and Essential Baking as well as dairy farms around the Northwest. The two PV systems in question are part of the Williams Hudson Bay Farm's overall efforts in energy and agricultural sustainability.

In October of 2010 Tanner Creek Energy secured (2) PP&L OSIP reservations for systems under 10kW. These will be ballasted ground mount systems attached to the PP&L grid at separate irrigation pump meters. The locations are relatively remote. Construction requires a greater window of time than more urban locations. They also require a great deal of coordination with local building agency and utility personnel for on-site inspections and work.

Circumstances in Request

Tanner Creek Energy has installed over 25 small and medium sized commercial PV systems around the state of Oregon including several on agricultural properties including wineries, nursery operations and hop farms. We are very experienced in working in rural environments and

understand the challenges not always faced by others more experienced in urban areas. Construction deliveries become problematic and stretched local building jurisdiction and utility crews are not always able to respond in a timely manner. It was our opinion that proceeding under the current schedule included too much risk in missing the October completion dates.

We always knew that these would be late summer installations based on farm harvest and market factors. However, the colder than normal year – resulting in very late harvests - have caused two factors to impact the installation dates. These factors are access to the construction site and impact of power shutdowns on irrigation schedules. First of all, because of required field access during cultivation and harvest season, we had no ability to begin construction earlier. Second, in our experience, coordination with local utility crews for assistance in shutdown and cutover efforts can be very time consuming – sometimes taking an entire day. This is desert country and scheduled irrigation is critical as the crops near harvest. An extended irrigation shutdown was not an option.

In summary, we are asking for (45) day extensions based on the following factors:

- Harvest and irrigation factors forced a late summer installation window to begin with.
- Colder than normal year pushed out harvest two to three weeks past estimated schedules.
- The relatively remote locations impose longer construction schedules.
- The remote locations also require more time and coordination with local building jurisdiction and utility crews.

We are hoping that these circumstances and along with the short extension request will help the commission find in our favor.

Please let us know if any further information would be helpful in your evaluation of our request.

On behalf of Williams Heifer Raising/Williams Hudson Bay Farm,

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Alan Hickenbottom', with a long horizontal line extending to the right.

Alan Hickenbottom
General Manager