

Oregon Public Utility Commission
Main Hearing Room
550 Capitol Street NE
Salem, Oregon 97308
Sent via facsimile 503-378-5505 & Electronic Mail

January 6th, 2014
To: PUC
From: Peter Greenberg
P.O. Box 1483
Albany, OR 97321
pgpvllc@gmail.com

Subject: Extension of Time
(Docket No. UM 1538)

Request by PGPV, LLC for a waiver of the 12-month solar photovoltaic system installation requirement pursuant to OAR 860-084-0210 (1)

To Whom it May Concern,

We would like to request an extension for the following project:

Platt Oak Dairy; Tracking #: R7P8M8; Size: 100 kw
Original Deadline: 04/15/2014
Extension Requested: 3 months; 7/15/2014

Reasons for Extension:

We're big believers in maximizing the efficiency of our solar photovoltaic arrays. From our use of only positive tolerance PV modules to our switch to high efficiency inverters, we're continually looking for new ways to improve our systems. We've found that one of the best ways to increase efficiency is through the use of dual-axis trackers. In our search for a cost effective dual-axis tracker, we've contacted every major tracker manufacturer in the US, Canada, Europe and China. We've also visited factories and installation sites in Greece, China and the U.S. Most companies won't give us the time of day as they are only interested in multi-megawatt projects; others have products that require extensive maintenance or are not cost effective. We were finally able to find a California based company with a very innovative tracker system that seemed to be a good match. As we were their first major sale (500 kW), they were willing to go the extra mile with customer service and support with the intention of using our sites and experience to promote future sales. We jumped at the opportunity as they were the only manufacture with a cost effective tracker that would deal with installations of our size. We initially planned to use their trackers for this project, however, after installing 500 kW of their units, we found the electrical work and materials required for their system are much greater than we anticipated. This led us to our discussions with a Eugene based manufacturer that's been fabricating parts for our energy efficient lighting fixtures for over 10 years. Their main source of income comes from designing and manufacturing machines used to process corn, carrots and other agricultural products, with technical expertise and manufacturing capabilities far exceeding those required to design and fabricate a tracker. By combining our solar experience with their expertise, they were able to design a simpler dual-axis tracker that's more cost effective and both easier to install and maintain. It will also be manufactured in Oregon by an Oregon based company as opposed to being manufactured in China by a

California based company. As an Oregon business, we would much rather see our money stay in Oregon and support local manufacturers. On 12/27/13 we gave them a down payment of \$55,000. They will have the parts fabricated and ready to ship by March 14th. Prior to this date, we will have the foundations installed and the preliminary electrical work complete; the foundation material will be delivered by February 15th. When we receive the trackers, they will be assembled on-site and attached to the foundations, the PV modules will be attached to the trackers, the inverters will be installed and the required electrical work completed. This will take 12 weeks, bringing us past our original project deadline.

In the past, obtaining financing has been our biggest obstacle to completing projects on time. This is no longer an issue as we have secured financing for our current projects and approval for our future solar projects from an Oregon bank. An extension will let us to avoid using a foreign made tracker that's much more costly than we anticipated, allowing us sufficient time to finish using a smarter designed tracker that's made in Oregon. It will also let an Oregon manufacturer get their foot in the door with a cost-effective solar product. We would like to ask for a three-month extension, which will allow us ample time to complete this project.

Company Background:

Energy Wise Lighting, Inc. and their sister company PGPV, LLC are the largest owners of solar PV systems on K-12 schools, Boys and Girls Clubs, churches and other nonprofits in the State. We've installed around 75 solar PV systems under the VIR program in Oregon, ranging in size from 10 kW to 300 kW, for a total installed capacity of over 3.5 MW. In the process we've outgrown two local banks, which drove us to search for a larger lending partner. After many months of setbacks, paperwork and legal and accounting fees, we were able to consolidate our previous loans and secure financing for our future and current projects with a larger bank. Over the next 15 years, our systems will inject millions of dollars back into Oregon schools, nonprofits and farmers in the form of host fees.

Sincerely,

/s/ Peter Greenberg
pgpvllc@gmail.com