



Program Administrator's Project Recommendation

May 26, 2023

Community Solar Program - Docket No. UM 1930

On January 11, 2022, in Order No. 22-007, the Commission permitted the delegation of Commission authority to the Community Solar Program Administrator (PA) to grant noncontroversial project pre-certifications, waivers, extensions, and amendments. Under the permitted delegation of authority, Staff will post the PA's project recommendation to UM 1930 with a comment period of two weeks. If no comments in opposition are received prior to the end of the comment period, the recommendation will go into effect. If comments in opposition are received prior to the end of the comment period, the recommendation will not go into effect and the matter will be referred to the Commission for a decision at the next available public meeting.

Staff posts the PA's recommendation to grant Certification deadline extensions for the following six projects:

- Six-month extension for PP-2020-80 (Linkville Solar)
- Nine-month extension for IP-2020-72 (Verde Light Community Solar)
- Ten-month extension for PP-2021-94 (Canyonville Solar 1)
- Ten-month extension for PP-2022-142 (Canyonville Solar 2)
- Ten-month extension for PP-2020-82 (Marble Solar)
- Ten-month extension for PP-2020-77 (Wallace Solar)

The PA has reviewed the six project Certification deadline extension requests and has recommended granting the extensions. Those extension requests are included below. Staff finds the PA's recommendations to be noncontroversial and that granting the extensions may be delegated to the PA. Stakeholders in opposition of the PA's recommendations should post comments to UM 1930 by June 9, 2023.

To Submit Public Comment:

Stakeholders can submit written comments on the PA's recommendation by email to puc.filingcenter@puc.oregon.gov. Please email puc.hearings@puc.oregon.gov to be added to the UM 1930 docket service list and receive notifications in the UM 1930 docket.

Joe Abraham
Oregon Public Utility Commission
201 High St. SE
Salem, OR 97301
(503) 428-0699
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Project Amendment Review and Recommendation

The Oregon Community Solar Program Administrator (PA) has reviewed the amendment request of the project described below and recommends that the project Certification date be extended by six months.

Project Information

Project ID: PP-2020-80

Project Name: Linkville Solar

Project Manager: Linkville PM, LLC

Subscription Manager: Oregon Shines

Utility Service Area: Pacific Power

Project Site Address: 42°12'27.58"N, 121°48'52.48"W, Klamath Falls, OR 97601

Project Size (kW-AC): 2500

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-Certified, 06/12/2020

Project Description

Linkville Solar is a 2500 kW-AC project located in Klamath Falls, Oregon, in Klamath County. The Project Manager entity is controlled by TLS Capital, which currently manages eight projects in the program. Outreach and customer management for the project will be conducted through Oregon Shines, an entity formed by several ORCSP Project Managers to conduct customer management in the program.

Review Summary

Date Review Completed: 05/11/2023

Nature of the Amendment Request: Extend Certification Deadline

PA Recommendation: Approve

Review Notes

Current Certification Deadline: May 17, 2023

Recommended Certification Deadline: November 17, 2023

Linkville Solar is managed by Linkville PM, LLC, which is controlled by TLS Capital. The project has previously received an extension of six months due to supply chain disruptions and COVID-19 delays and shutdowns.

The project is fully constructed and subscribed with participants and is experiencing interconnection delays that are expected to be resolved by Fall 2023. Due to ongoing conversations and planning regarding interconnection between the project and utility, the PA supports extending the Certification deadline for this project for six months.

Attachments Included

The extension request received from the Project Manager is attached.

March 30, 2023

VIA EMAIL (administrator@oregoncsp.org)

Program Administrator
Oregon Community Solar Program

**RE: Community Solar Program Extension of the Certification Deadline
PP-2020-80 (Linkville) (the “Project”)**

Dear Program Administrator,

On behalf of Linkville PM, LLC the Project Manager for the above referenced project as well as Linkville Solar LLC the owner of the project (collectively the “**Developer**”), we hereby submit this letter requesting an extension of the 18-month Pre-certification period.

As you are aware, the Project was previously granted an extension to 5/17/23 pursuant to PUC Order No. 21-388 of November 3, 2021 due to delays from the utilities, Counties, and suppliers as a result of the COVID-19 impact to both labor and supply chains.

Unfortunately, while the Project was fully constructed and ready for commercial operation on or about November of 2022, Pacificorp has advised that they may not be able to get the fiber work done for the interconnection until September/October of 2023. The Developer is actively working to find a solution outside of the work required by Pacificorp, which includes the use of wireless communications as an alternative. However, as recently as this week, Pacificorp advised that while they will investigate this option, in the past they’ve allowed “microwave” equipment for wireless communication/transmission on certain projects but that was on a case-by-case basis. They cannot provide any guarantees as the use of wireless technologies may cause portions of the design to be reworked and potential additional costs.

As a result of the foregoing, it is only prudent that we must recognize, there is a strong likelihood that we will encounter additional delays as a result of this failure of the utility to meet its obligations under the interconnection agreement. At this time, while it is not possible to guaranty Pacificorp will meet its projected September/October 2023 timeframe for interconnection, we believe a six (6) month extension for program compliance would be sufficient to overcome the known delays and any unforeseen delays that may arise. We therefore respectfully request a six (6) month extension to the 18-month Pre-certification period, bringing the new date to November 17, 2023.

We are available to address any questions or concerns.

Thank you for your time and consideration.

Linkville PM, LLC


Ingo Burkhardt

cc: Linkville Solar, LLC
Emerald Garden Holdings 2, LLC



Project Amendment Review and Recommendation

The Oregon Community Solar Program Administrator (PA) has reviewed the amendment request of the project described below and recommends that the project Certification deadline be extended by nine months.

Project Information

Project ID: IP-2020-72

Project Name: Verde Light Community Solar

Project Manager: Fleet Development, LLC

Subscription Manager: Fleet Development, LLC

Utility Service Area: Idaho Power

Project Site Address: 1900 Malheur Dr, Ontario, OR 97914

Project Size (kW-AC): 2,950

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-Certified, 06/16/2020

Project Description

Verde Light Community Solar is a 2,950 kW-AC project located in Ontario, Oregon, in Malheur County. This is the only project currently located in Idaho Power territory. Fleet Development, LLC is responsible for their own subscription management.

Review Summary

Date Review Completed: 05/11/2023

Nature of the Amendment Request: Extend Certification deadline to 03/16/2024

PA Recommendation: Approve

Review Notes

Current Certification Deadline: June 16, 2023

Recommended Certification Deadline: March 16, 2024

The Verde Light project was Pre-Certified on June 16, 2020, with an original Certification deadline of December 16, 2021. In Order 21-388, the Commission granted an extension of the project's Certification deadline by six months to June 16, 2022, as part of a series of extensions that were granted to projects in light of supply chain disruptions related to the COVID-19 pandemic.

The Project Manager, Fleet Development, LLC received an additional extension of one year, to June 16, 2023, due to supply chain disruptions related to the US Commerce investigation of imported solar panels. The project also needed additional time to apply for ODOE CREP grant funding in partnership with the City of Ontario, which provides funding certainty for the project.

Fleet Development, LLC is now requesting a third extension of nine months due to unforeseeable development delays. The delays include an environmental study and additional permits that need to be acquired. The PA supports granting this extension in large part due to this project's unique position as the only Pre-Certified project in Idaho Power service area. There is no capacity waitlist

understands that these projects are being developed as a portfolio and that general delays impacting many projects in the program have also delayed these projects. The PA team is in support of granting the ten-month extensions and believes this is in line with the requests and delays of other projects in the program.

Attachments Included

The extension request received from the Project Manager is attached.



8 May, 2023

Oregon Community Solar Program Administrator
Attn: Ryan Cook

Dear Program Administrator,

Fleet Development formally requests a Certification Extension for IP-2020-72 Verde Light Power Project. We have been developing the Verde Light Community Solar project since April 11th, 2019. The project is a 2.95 MW project located in Ontario, OR and is the only project within the Idaho Power Service territory. The project was originally pre-certified on June 16th, 2020. The project has been in consistent development ever since and its rate of progress in the early years was largely controlled by the steady maturation of the Community Solar rules and policies. The project originally had a Certification Deadline in December 2021 which became untenable due to slow progress on land developments and the sale of the proposed site to a new private owner.

On October 25th, 2021, Fleet Development requested an extension of the Certification deadline to June 16th, 2022, which was approved. After this extension was granted, the project suffered through the full effects of the COVID pandemic on the global supply chain. This supply slowdown dovetailed with a freeze on solar module imports due to a tariff investigation. In order to continue developing the project while world events settled out, we asked for an extension on the Certification deadline to June 16th, 2023.

As the June 16th, 2023 certification deadline approaches, we have kept the project in develop and have successfully overcome many more development checkpoints, to include a full NEPA environmental study, wetlands delineation, canal crossing permits, cultural resource inventory, and multiple public comment periods. Some of these development items and delays were unknowable previously. Currently, we have stamped engineering plans, survey complete, all easements in place, all permits in place, \$782,000 invested, \$6M worth of equipment has been ordered, and all financing lined up. We start construction on the project on May 15th. We expect to complete construction in November and to be operational in December 2023.

Fleet Development respectfully requests and extension of the Certification deadline for IP-2020-72 Verde Light Power Project to March 16th, 2024, 9-months from the current date and 3-months after the projected commercial operations date. Considering that very concrete steps have been taken to complete this project, and that so much has been accomplished, we recommend this third Certification extension. It is in the best interest of our team and the program to complete this project. We also believe that a longer timeline for Certification deadlines is appropriate for projects of this size.

If you have any questions or would like to further discuss the elements of our project, I can be reached at ryan.sheehy@fleetdevelopment.org or (541) 263-7684. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "R Sheehy".

Ryan Sheehy
200 E. Main St
Enterprise, OR 97828



Project Amendment Review and Recommendation

The Oregon Community Solar Program Administrator (PA) has reviewed the amendment request of the project described below and recommends that the project Certification deadline be extended by ten months.

Project Information

Project ID: PP-2021-94

Project Name: Canyonville Solar 1

Project Manager: Canyonville Solar 1, LLC

Subscription Manager (if different than PM): Arcadia Power, Inc

Utility Service Area: Pacific Power

Project Site Address: Gazley Road, Canyonville, OR 97417

Project Size (kW-AC): 1000

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-Certified, 5/11/2022

Project Description

Canyonville Solar 1 is a 1,000 kW-AC project located in Canyonville, Oregon, in Douglas County. The Project Manager is Canyonville Solar 1, LLC, which is controlled by SolRiver Capital, LLC. SolRiver Capital controls nine projects in the Oregon Community Solar Program and is working with various Subscription Managers.

Review Summary

Date Review Completed: 05/11/2023

Nature of the Amendment Request: Extend Certification deadline to 7/30/2024

PA Recommendation: Approve

Review Notes

Current Certification Deadline: November 11, 2023

Recommended Certification Deadline: September 11, 2024

SolRiver Capital, LLC is requesting 10-month Certification extensions for four of its projects, including Marble Solar, Wallace Solar, Canyonville Solar 1, and Canyonville Solar 2. Canyonville Solar 1 is a Tier 2 project and has not previously been granted any Certification extensions.

The project has experienced supply chain delays and is expecting delivery of panels in Fall 2023. The Project Manager also cites interconnection delays outside of the developer's control and has not received a new utility timeline for interconnection, including a timeline for a revised point of interconnection plan.

SolRiver has made progress on the four projects requesting Certification, including equipment investments, and has engaged with Subscription Managers for participant enrollment. The PA understands that these projects are being developed as a portfolio and that general delays impacting many projects in the program have also delayed these projects. The PA team is in support of

granting the ten-month extensions and believes this is in line with the requests and delays of other projects in the program.

Attachments Included

The extension request received from the Project Manager is attached.



Project Amendment Review and Recommendation

The Oregon Community Solar Program Administrator (PA) has reviewed the amendment request of the project described below and recommends that the project Certification deadline be extended by ten months.

Project Information

Project ID: PP-2022-142

Project Name: Canyonville Solar 2

Project Manager: Canyonville Solar 2, LLC

Subscription Manager (if different than PM): Arcadia Power, Inc

Utility Service Area: Pacific Power

Project Site Address: Gazley Road, Canyonville, OR 97417

Project Size (kW-AC): 1500

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-Certified, 05/11/2022

Project Description

Canyonville Solar 2 is a 1,500 kW-AC project located in Canyonville, Oregon, in Douglas County. The Project Manager is Canyonville Solar 2, LLC, which is controlled by SolRiver Capital, LLC. SolRiver Capital controls nine projects in the Oregon Community Solar Program and is working with various Subscription Managers.

Review Summary

Date Review Completed: 05/11/2023

Nature of the Amendment Request: Extend Certification deadline to 7/30/2024

PA Recommendation: Approve

Review Notes

Current Certification Deadline: November 12, 2023

Recommended Certification Deadline: September 12, 2024

SolRiver Capital, LLC is requesting 10-month Certification extensions for four of its projects, including Marble Solar, Wallace Solar, Canyonville Solar 1, and Canyonville Solar 2. Canyonville Solar 1 is a Tier 2 project and has not previously been granted any Certification extensions.

The project has experienced supply chain delays and is expecting delivery of panels in Fall 2023. The Project Manager also cites interconnection delays outside of the developer's control and has not received a new utility timeline for interconnection, including a timeline for a revised point of interconnection plan.

SolRiver has made progress on the four projects requesting Certification, including equipment investments, and has engaged with Subscription Managers for participant enrollment. The PA understands that these projects are being developed as a portfolio and that general delays impacting many projects in the program have also delayed these projects. The PA team is in support of granting the ten-month extensions and believes this is in line with the requests and delays of other projects in the program.

Attachments Included

The extension request received from the Project Manager is attached.



Project Amendment Review and Recommendation

The Oregon Community Solar Program Administrator (PA) has reviewed the amendment request of the project described below and recommends that the project certification date be extended by ten months.

Project Information

Project ID: PP-2020-82

Project Name: Marble Solar

Project Manager: Marble Solar, LLC

Subscription Manager (if different than PM): Oregon Shines, LLC

Utility Service Area: Pacific Power

Project Site Address: 44.629326° N, 123.020312° W, Albany, OR 97322

Project Size (kW-AC): 2875

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-Certified, 12/29/2020

Project Description

Marble Solar is a 2,875 kW-AC project located in Albany, Oregon, in Linn County. The project manager is Marble Solar, LLC, which is controlled by SolRiver Capital, LLC. SolRiver Capital controls nine projects in the Oregon Community Solar Program and is working with various subscription managers.

Review Summary

Date Review Completed: 05/11/2023

Nature of the Amendment Request: Extend certification deadline to 7/30/2024

PA Recommendation: Approve

Review Notes

Current Certification Deadline: September 30, 2023

Recommended Certification Deadline: July 30, 2024

SolRiver Capital, LLC is requesting 10-month certification extensions for four of its projects, including Marble Solar, Wallace Solar, Canyonville Solar 1, and Canyonville Solar 2. Marble Solar previously received two extensions: the first was a six-month extension that was granted due to delays related to market disruption caused by the COVID-19 pandemic and the second was due to supply chain issues caused by the US Department of Commerce investigation into imported solar panels from certain countries.

The project has continued to experience supply chain delays and is expecting delivery of panels in Fall 2023. The Project Manager also cites interconnection delays outside of the developer's control as well as unexpected wetland permitting delays.

SolRiver has made progress on the four projects requesting Certification, including equipment investments, and has engaged with Subscription Managers for participant enrollment. The PA

in Idaho Power service area and the PA is not aware of other potential projects planned in Idaho Power service area.

Attachments Included

The extension request received from the Project Manager is attached.



Project Amendment Review and Recommendation

The Oregon Community Solar Program Administrator (PA) has reviewed the amendment request of the project described below and recommends that the project Certification date be extended by ten months.

Project Information

Project ID: PGE-2020-77

Project Name: Wallace Solar, LLC

Project Manager: Wallace Solar, LLC

Subscription Manager (if different than PM): Oregon Shines, LLC

Utility Service Area: Portland General Electric

Project Site Address: 45° 1'40.82"N, 123° 5'37.35"W, Zena, OR 97304

Project Size (kW-AC): 2970

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-Certified, 04/15/2022

Project Description

Wallace Solar, LLC is a 2,970 kW-AC project located in Zena, Oregon, in Polk County. The project manager is Wallace Solar LLC, which is controlled by SolRiver Capital, LLC. SolRiver Capital controls nine projects in the Oregon Community Solar Program and is working with various subscription managers.

Review Summary

Date Review Completed: 05/11/2023

Nature of the Amendment Request: Extend Certification deadline to 08/15/2024

PA Recommendation: Approve

Review Notes

Current Certification Deadline: October 15, 2023

Recommended Certification Deadline: July 30, 2024

SolRiver Capital, LLC is requesting 10-month Certification extensions for four of its projects, including Marble Solar, Wallace Solar, Canyonville Solar 1 and Canyonville Solar 2. Wallace Solar is a Tier 2 project and has not previously been granted any Certification extensions.

The project has experienced supply chain delays and is expecting delivery of panels in Fall 2023. The Project Manager also cites interconnection delays outside of the developer's control as well as unexpected wetland permitting delays as reasons for the Certification extension.

SolRiver has made progress on the four projects requesting Certification, including equipment investments, and has engaged with Subscription Managers for participant enrollment. The PA understands that these projects are being developed as a portfolio and that general delays impacting many projects in the program have also delayed these projects. The Program Administration team is

in support of granting the ten-month extension for these four projects and believes this is in line with the requests and delays of other projects in the program.

Attachments Included

The extension request received from the Project Manager is attached.



Brandon Conard
SolRiver Capital, LLC
700 17th Street, Suite 1500

May 11, 2023

VIA EMAIL (administrator@oregoncsp.org)

Program Administrator
Oregon Community Solar Program

RE: Community Solar Program Extension of the Pre-certification period

Dear Program Administrator,

SolRiver Capital, LLC, a Colorado limited liability company (“SolRiver”), on behalf of SRS Solar, LLC, a Colorado limited liability company (“SRS”), who is the owner of the following Projects and Project Managers listed below (collectively the “Developers”), hereby kindly submits this letter to request an approximately ten (10) month extension of the Pre-certification period for the Wallace, Marble, and Canyonville Projects to account for delays caused by the equipment procurement / supply chain issues, the utility interconnection process, and wetlands permitting. SRS has invested over \$5.4MM in these projects and remains committed to their completion.

Project	Project Manager	Pre-Certification Date	Certification Deadline	Requested Certification Deadline
Wallace Solar	Wallace Solar LLC	04/15/2022	10/15/2023	08/15/2024
Marble Solar	Marble Solar LLC	12/29/2020	09/30/2023	07/30/2024
Canyonville Solar 1	Canyonville Solar 1 LLC	5/11/2022	11/11/2023	9/11/2024
Canyonville Solar 2	Canyonville Solar 2 LLC	5/12/2022	11/12/2023	9/12/2024

The requested extensions are reasonable because of: (i) the sustained and material procurement delays due to continued global supply chain issues, (ii) unforeseen and lengthy delays with wetlands permitting despite best efforts by the Developers, (iii) utility interconnection delays and general timeline uncertainty, and (iv) continued development and financial commitment towards the Projects by SRS, including spending more than \$5.4MM on the Projects to date. These aspects are explained in further detail below.

Supply Chain Equipment Delays

As the Program is aware, delivery of key equipment (primarily solar panels and transformers) has been disrupted by global supply chain issues and shortages, in part stemming from Covid-19. The Developers entered contracts to procure all key equipment in October of 2022. This included investing over \$1.0MM in solar panel equipment deposits with a delivery expectation ranging from late Spring / early Summer of 2023 for the Projects. Current delivery timelines for panels are Fall of 2023. Arrival of solar panels at the same approximate time as the Certification deadlines makes achieving Certification by those dates unfeasible for the Developers.

Utility Interconnection Delays

The Developers have experienced general utility interconnection delays. The applicable utilities are PGE for Wallace and PAC for Marble, Canyonville 1, and Canyonville 2. It became clear by the Winter of 2022 that many of the critical Utility milestones in each of the Interconnection Agreements were not complete by the dates set forth therein. The Developers requested formal schedule amendments to the Interconnection Agreements in December of 2022 for each of the Projects. The reason for doing so was (i) to understand which

milestones had been completed and (ii) to set realistic and current expectations for remaining milestones. Doing so is critical to properly plan key development activities, like construction and Program subscription. New schedules remain unavailable as the date of this request. The lack of clear formalized documentation creates substantial uncertainty for committing to a Certification date. While the Developers appreciate meetings that have been held with the utilities, the lack of written agreement regarding the utility timeline creates a significant risk (outside of the Developer's control) of achieving the current Certification dates.

Marble and Wallace - Wetland Permitting

The Marble and Wallace Projects have faced unexpected delays obtaining state and nationwide wetland permits. For context, all Projects in Oregon are required to perform wetlands delineation fieldwork and consult with both the Oregon Department of State Lands ("DSL") and United States Army Corps of Engineers ("USACE") for review. The fieldwork and subsequent consultancy by each governing body dictate which wetlands permits are required.

The Developers began this process in June of 2022. Fieldwork was completed by September 2022. Minimal wetlands were identified on each site, which translated to a straightforward permitting process and system design. Submissions to DSL and USACE were completed on September 14, 2022. The USACE was prepared to issue letters of No Permit Needed for both sites. However, in January of 2023 DSL notified the Developers that DSL disagreed with the results of the original fieldwork. This decision effectively paused both the DSL and USACE process. The Developers engaged environmental consultants to perform more fieldwork in early March of 2023, the earliest timeframe allowed due to the wet season. The findings in March of 2023 indicated significantly more wetlands than the original fieldwork had. The new findings were subsequently submitted to USACE and DSL.

As a result, the wetlands process was delayed by approximately 5 months and the changing outcome requires more significant permitting work than initially contemplated. The DSL and USACE review remain pending. Shortly after the reviews get finalized, the Developers will proceed with the removal/fill permitting process with DSL and Nationwide Permit with USACE. The Developers expect to submit the applications for each in June 2023 and obtain the permits in December of 2023.

Canyonville – Point of Interconnection

The Canyonville Solar 1 and Canyonville Solar 2 Projects are facing unexpected delays due to changes in their points of interconnection ("POI"). These Projects originally planned to use two separate POIs, one of which was significantly farther from the project site. This strategy was complex and became cost-prohibitive in the rising equipment cost environment of 2022 / 2023. Accordingly, the Canyonville Projects made an initial request to PAC to utilize a single POI on August 18, 2022. Per discussions with Program Administrators, the Projects will still utilize separate meters and remain separate Projects under the Program, however the POI will be at approximately the same location.

PAC confirmed on January 10, 2023 that a single POI that is closer to the project-site could be utilized. Proceeding with PAC required an authorization to perform a system impact study updated and new single line diagram. Authorization was given on January 11, 2023 and the single line diagram was provided on January 31, 2023. The completed system impact study was delivered on March 8, 2023, with confirmation that a facilities study and updated interconnection agreement would follow. The Developers have not received either deliverable as of the date of this request, further exacerbating the general interconnection schedule delays previously discussed.

Material Progress and Investment

Despite the unforeseen circumstances and delays, the Developers are continuing to invest, procure equipment, and develop the Projects. To date, SRS has invested more than \$5.4MM in the Projects, with more spend committed.

Here are some examples of other development activities that have occurred:

- The Developers have executed agreements to procure critical pieces of equipment including inverters, transformers, panels, and racking. Collectively, SRS has spent over \$2.5MM on equipment deposits with an additional \$4.6MM committed upon arrival of the equipment.
- The Developers have engaged with experienced subscriber managers for all the Projects. Marble and Wallace engaged Oregon Shines, LLC. Canyonville 1 and Canyonville 2 engaged Arcadia Power, Inc.
- The Developers have also executed turnkey EPC contracts for each of the Projects.

Closing Request

We respectfully ask the Program to grant the extension to the Pre-certification period described herein in recognition of the continued investment made by SRS and the unexpected and uncontrollable delays related to equipment procurement, utility interconnection work, and wetlands permitting.

[Separate Signature Page Follows]

Brandon Conard

A handwritten signature in blue ink, appearing to be "BC", written over a horizontal line.

As Manager, on behalf of

Wallace Solar LLC, an Oregon limited liability company

Marble Solar LLC, an Oregon limited liability company

Canyonville Solar 1 LLC, an Oregon limited liability company

Canyonville Solar 2 LLC, an Oregon limited liability company