



Program Administrator's Project Recommendation

September 28, 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 three projects:

Fourteen-month and sixteen-day extension for PP-2020-89 (Reservoir Solar LLC)

Ten-month and eight-day extension for PP-2021-122 (McKinley Solar LLC)

Fourteen-month and sixteen-day extension for PGE-2020-21 (Buckner Creek Solar LLC)

The PA has reviewed the three 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 October 12, 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.

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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 Certification deadline be extended by fourteen months.

Project Information

Project ID: PP-2020-89

Project Name: Reservoir Solar LLC

Project Manager: Sulus Solar

Subscription Manager: Sulus Solar

Utility Service Area: Pacific Power

Project Site Address: 2665 South Kings Valley Highway, Dallas, OR 97338

Project Size (kW-AC): 875

Carveout-eligible: No

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

Project Description

Reservoir Solar LLC is an 875 kW-AC project located in Dallas, Oregon, in Polk County. The Project Manager is currently Sulus Solar. However, Hawthorne Renewables recently requested a Project Manager transfer for three projects, including Reservoir Solar, to Hawthorne Renewables. A Subscription Manager has not yet been identified for this project.

Review Summary

Date Review Completed: 09/18/2023

Nature of the Amendment Request: Extend Certification Deadline

PA Recommendation: Approve

Review Notes

Current Certification Deadline: October 15, 2023

Recommended Certification Deadline: December 31, 2024

The Project Manager cites that the project has experienced development delays and needs more time to determine a construction partner. The project is in good standing and the PA recommends granting this amendment request and extending the Certification deadline by fourteen months.

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 Certification deadline be extended by ten months.

Project Information

Project ID: PP-2021-122

Project Name: McKinley Solar LLC

Project Manager: Sulus Solar

Subscription Manager: Sulus Solar

Utility Service Area: Pacific Power

Project Site Address: 44.388830N/-123.015087W, Brownsville, OR

Project Size (kW-AC): 450 kW-AC

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-certified, 08/23/2022

Project Description

McKinley Solar is a 450 kW-AC project located in Brownsville, Oregon, in Linn County. The Project Manager entity is Sulus Solar. However, Hawthorne Renewables recently requested a Project Manager transfer for three projects, including McKinley Solar, to Hawthorne Renewables. A Subscription Manager has not yet been identified for this project.

Review Summary

Date Review Completed: 09/18/2023

Nature of the Amendment Request: Extend Certification Deadline

PA Recommendation: Approve

Review Notes

Current Certification Deadline: February 23, 2024

Recommended Certification Deadline: December 31, 2024

The Project Manager cites that the project has experienced development delays and needs more time to determine a construction partner. The project is in good standing and the PA recommends granting this amendment request and extending the Certification deadline by ten months.

Attachments Included

The extension request received from the Project Manager is attached.



September 7th, 2023

Oregon Community Solar Program
c/o Program Administrator

Re: Request for Extension Certification Date

Dear Program Administrator,

We are writing on behalf of Hawthorne Renewables, a registered Project Manager in the Oregon Community Solar Program. For the two pre-certified projects below, the Project Manager is requesting an extension of the Certification Date:

Name of Project	Date Pre-Certified	Requested Extension for Certification Date
McKinley Solar LLC	August 23 rd , 2022	December 31 st , 2024
Reservoir Solar LLC	April 15 th , 2022	December 31 st , 2024

Oregon Community Solar Project Implementation Manual 2022:

OAR 860-088-0040(5) provides that “[a] project remains pre-certified for a period of 18 months, unless granted an extension by Commission order.” The rules do not address extensions, but the CSP Program Implementation Manual (the “PIM”) indicates that “requests to extend a Project’s Certification deadline [] are considered amendments to a Project’s Pre-Certification.”¹ Section 4.7.4 of the PIM provides the following guidance:

Major revisions require the submission of a written request. This request is submitted through the Community Solar Program Platform and accompanies the details of the proposed revision.

The written request for major revisions should detail the Project’s progress, the reasons for the requested change and, in the case of extension requests, a realistic timeline for the completion of Certification requirements and the achievement of commercial operation.² In brief, the project has made substantial progress toward certification and is expected to succeed.



Development Status

The McKinley Solar and Reservoir Solar projects have continued to make progress and achieve key milestones throughout the predevelopment process. The Interconnection Agreements with Pacific Power have all been completed and fully executed by all parties, as well as all milestone payments have been made. Hawthorne Renewables has also received Conditional Use Permits for each of the projects from their respective counties.

In addition, Hawthorne Renewables is working with a low-income facilitator who has established agreements that will satisfy the program requirements for the total number of subscribers (and allocation of subscribers) ready to participate when construction goes underway.

The Hawthorne team plans to start construction on the projects in the third quarter of 2024, following the determination and completion of an EPC Agreement with a construction partner. Since Hawthorne Renewables has not yet hired a construction partner and has undergone a merger as well as rebranding within the last few months, the organization is requesting an extension of the Certification date to December 31st, 2024, to work to ensure that the Certification Date can be met. The reason for submitting the extension request for McKinley Solar in advance is due to the organization's need to finance the project in order to procure the materials necessary for construction.

Interconnection Status- Pacific Power

Hawthorne Renewables currently has active Interconnection Agreements established with Pacific Power for both projects. Payments towards interconnection have been conducted as follows:

- McKinley Solar- satisfied five (all) payments, totaling \$79,000.
- Reservoir Solar- satisfied five (all) payments, totaling \$201,000.

Reasoning for the timing of Construction

Hawthorne Renewables recognizes that at this time, we may not possess all the concrete information related to a construction schedule. With that said, we have been in communication with the utility, the counties, and have built out an internal team that is actively carrying out the work necessary to start construction. The Hawthorne team is excited to get the two projects in operation, provide renewable energy and financial benefits to historically underserved Oregonians, and continue to help the State of Oregon meet their 2040 clean energy goals.

If we are to experience any unforeseen circumstances or delays, it is possible that we will need to ask for further extensions in the future. This will rely on interconnection facilitated with the utility. Hawthorne Renewables respectfully asks that the Oregon Public Utility Commission grant the request for the extension of the Certification Date for McKinley Solar and Reservoir Solar to December 31st, 2024.

Thank you so much for your time and consideration.

Respectfully,

Kesean Coleman
Project Manager
Hawthorne Renewables



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 Certification deadline be extended by fourteen months.

Project Information

Project ID: PGE-2020-21

Project Name: Buckner Creek Solar, LLC

Project Manager: Conifer Community Energy, LLC

Subscription Manager: Arcadia

Utility Service Area: PGE

Project Site Address: 15050 S Spangler Rd, Oregon City, OR 97045

Project Size (kW-AC): 2500

Carveout-eligible: No

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

Project Description

Buckner Creek Solar, LLC is a 2,500 kW-AC project located in Oregon City, Oregon, in Clackamas County. The Project Manager entity is controlled by TLS Capital. Arcadia is the Subscription Manager identified for this project.

Review Summary

Date Review Completed: 09/18/2023

Nature of the Amendment Request: Extend Certification Deadline

PA Recommendation: Approve

Review Notes

Current Certification Deadline: October 15, 2023

Recommended Certification Deadline: December 31, 2024

The Project Manager cites that the project has experienced development delays and needs more time to construct the project. The project is in good standing and the PA recommends granting this amendment request and extending the Certification deadline by fourteen months.

Attachments Included

The extension request received from the Project Manager is attached.

August 18, 2023

Program Administrator
Oregon Community Solar Program

RE: Community Solar Program Extension of the Certification Deadline

Dear Program Administrator,

We hereby submit this letter requesting an extension of the Certification Deadline for the following community solar projects:

Project	Project Manager	Requested Certification Date
Buckner Creek Solar	Conifer Community Energy, LLC	12/31/2024

The original certification deadlines for these projects were 10/15/2023. Buckner Creek is 79% subscribed. An EPC has been engaged and building permits being applied for. Further, all major equipment (modules and transformers) has been purchased. The request for an extension is due to 1) the inability for the contractor to work during the winter months due to the ground being saturated and 2) the contractor's overall schedule and other constraints. As such, we are asking for a Certification Deadline extension for the dates above.

Thank you for your time and consideration.



Troy Snyder
on Behalf of
Conifer Community Energy, LLC