



## Program Administrator's Project Recommendation

March 21, 2024

### 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 eight projects:

Five months for IP-2020-72 (Verde Light Community Solar)  
One-hundred-and-eight days for PGE-2020-19 (Dover Solar)  
Seven months for PP-2020-63 (Goodling Annex)  
Twenty-two months for PP-2021-104 (Buckaroo Solar 1, LLC)  
Twenty-two months for PP-2021-103 (Buckaroo Solar 2, LLC)

The PA has reviewed the five project Certification deadline extension requests and has recommended granting the extensions. Those extension requests are included below. While Staff is concerned about these additional project delays, it 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 April 4, 2024.

#### To Submit Public Comment:

Stakeholders can submit written comments on the PA's recommendation by email to [puc.filingcenter@puc.oregon.gov](mailto:puc.filingcenter@puc.oregon.gov). Please email [puc.hearings@puc.oregon.gov](mailto: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 five 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. Outreach and customer management is conducted by Fleet Development, LLC.

### Review Summary

**Date Review Completed:** 03/18/2024

**Nature of the Amendment Request:** Extend Certification Deadline

**PA Recommendation:** Approve

### Review Notes

*Current Certification Deadline: 03/16/2024*

*Recommended Certification Deadline: 08/01/2024*

The Verde Light project was Pre-certified on 6/16/2020, with an original certification deadline of 12/16/2021. In Order 21-388, the Commission granted an extension of the project's Certification deadline by six months to 6/16/2022, as part of a series of extensions that were granted to projects in light of supply chain disruption related to the COVID-19 pandemic. The Project Manager requested an additional extension of one year, to 6/16/2023 due to supply chain disruptions related to the US commerce investigation of imported solar panels and a third extension of nine months to 3/16/2024 due to unforeseeable development delays, including the need to acquire an environmental study and additional permits.

The project is now fully constructed. The Project Manager is requesting an additional five-month extension to complete participant enrollment and finalize Idaho Power's review of the project. The project has demonstrated progress towards completion and the PA supports granting this extension.

**Attachments Included**

The extension request received from the Project Manager is attached.



18 March, 2024

Oregon Community Solar Program Administrator  
Attn: Renita Lamberth

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 11<sup>th</sup>, 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 16<sup>th</sup>, 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 25<sup>th</sup>, 2021, Fleet Development requested an extension of the Certification deadline to June 16<sup>th</sup>, 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 16<sup>th</sup>, 2023.

On May 8<sup>th</sup>, 2023, Fleet requested a second extension to March 16<sup>th</sup> 2024 while the project was being constructed. As this deadline approaches, the project is now fully constructed and has been operating and generating energy since December 27<sup>th</sup>, 2023. Verde Light lacks just two items to finalize certification:

- 1) Complete the final low-income subscriptions. Currently the project is at 8.5%. General enrollment is still taking place, but participant requirements have been met.
- 2) Finalize Idaho Power review of the project. The project must complete a witness test that includes measurement of plant response to external grid environment. Idaho Power has a plant response requirement that exceeds Oregon interconnection requirements. Despite the stated requirement not being an actual Oregon interconnection requirement, we are attempting to satisfy their standard. This has caused delays as the plant controller is tuned.

Fleet Development respectfully requests an extension of the Certification deadline for IP-2020-72 Verde Light Power Project to August 1<sup>st</sup>, 2024, 6-months from the current date. We expect to finish the required certification pre-requisites in the next 2-3 weeks. This project is very close to completion.

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](mailto: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 Certification deadline be extended by one hundred and eighty days.

### Project Information

**Project ID:** PGE-2020-19

**Project Name:** Dover Solar

**Project Manager:** Solar Town

**Subscription Manager:** Common Energy

**Utility Service Area:** PGE

**Project Site Address:** 45°12'34.71"N, 122°40'33.30"W Canby, OR 97038

**Project Size (kW-AC):** 1,980

**Carveout-eligible:** No

**Current Program Status and Date Achieved:** Pre-certified, 7/1/2020

### Project Description

Dover Solar is a 1,980 kW-AC project located in Canby, Oregon, in Marion County. The Project Manager entity is controlled by Luminace. Outreach and customer management for the project are conducted by Common Energy.

### Review Summary

**Date Review Completed:** 03/12/2024

**Nature of the Amendment Request:** Extend Certification Deadline

**PA Recommendation:** Approve

### Review Notes

*Current Certification Deadline: February 29, 2024*

*Recommended Certification Deadline: August 27, 2024*

The Project Manager has met all the requirements for Certification except for customer enrollment. The Project Manager is requesting a one-hundred-and-eighty-day extension to allow time for the Subscription Manager to complete customer enrollment.

### Attachments Included

The extension request received from the Project Manager is attached.



March 11, 2024

Program Administrator  
Oregon Community Solar Program

[administrator@oregoncsp.org](mailto:administrator@oregoncsp.org)

**RE: Community Solar Program Extension of the Certification Deadline**

Dear Program Administrator,

On behalf Solar Town, LLC (“Owner”) as owner of the Project Manager listed below, we hereby submit this letter requesting an extension of the Pre-certification period to correspond with the utility’s interconnection schedule.

<b>Project</b>	<b>Project Manager</b>
Dover	Solar Town, LLC

This project has executed all construction contracts, building permits, and required interconnection document and on track to meet the commercial operation date (COD) in Q2 2024. We are requesting a 180-day extension to allow the Subscription manager to complete customer recruitment.

Current certification deadline: February 29, 2024  
Requested extension certification deadline: August 29, 2024

Thank you for your consideration of our request for an extension. Please contact my colleague Julia Peacock at 301-775-9511 or [Julia.peacock@luminace.com](mailto:Julia.peacock@luminace.com) if you have any questions.

Sincerely,

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Joshua Udler  
Senior Director, Legal

cc: John Drexinger, Julia Peacock (Luminace)



## 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 7 months.

### Project Information

**Project ID:** PP-2020-63

**Project Name:** Goodling Annex

**Project Manager:** Bonneville Environmental Foundation

**Subscription Manager:** Verde

**Utility Service Area:** Pacific Power

**Project Site Address:** 9138 NE Sunderland Avenue, Portland, OR 97211

**Project Size (kW-AC):** 1,000

**Carveout-eligible:** Yes, the project is managed by a non-profit entity.

**Current Program Status and Date Achieved:** Pre-Certified, 04/21/20

### Project Description

Goodling Annex is a 1,000 kW-AC project located in Portland, Oregon, in Multnomah County. The project is in the designated Carve-out section of the program, with the intent of reserving at least 50% of the project's capacity for low-income subscribers. Outreach and customer management is conducted by Verde.

### Review Summary

**Date Review Completed:** 03/09/2024

**Nature of the Amendment Request:** Extend Certification Deadline

**PA Recommendation:** Approve

### Review Notes

*Current Certification Deadline: 02/28/2024*

*Recommended Certification Deadline: 09/01/2024*

The Goodling Annex project was Pre-certified on 4/21/2020, with an original Certification deadline of 10/21/2021. In Order 21-294, the Commission granted an extension of the project's Certification deadline to 4/1/2023, conditional on an interim deadline of 6/01/2022 for the project to provide financing certainty.

The project was granted a second project extension to 7/1/2023 to allow time for the Project Manager to apply for a Portland Clean Energy Fund (PCEF) grant. The project was awarded PCEF funding but requested an additional 7 months to receive the award and begin development. The Project Manager is now requesting an extension to allow time for equipment to be delivered, construction to take place, and outreach and subscriber enrollment to begin. The project has demonstrated progress towards completion and the PA supports granting this extension as it is necessary to complete development.

**Attachments Included**

The extension request received from the Project Manager is attached.



February, 29<sup>th</sup> 2024

To whom it may concern,

I am writing to request an extension for the Goodling Annex community solar project. We at Bonneville Environmental Foundation (BEF) have been partnering with Verde to develop this project. Verde has finalized the grant agreement with the Portland Clean Energy Fund (PCEF) Grant contract and has begun to make payments to the project. We have executed a contract with Imagine Energy to construct the system, we are currently waiting on the availability of a transformer to begin project construction. Deposits have been made on key equipment. We will begin construction of the project when the transformer becomes available in Summer 2024. I have attached the Goodling Installation and Equipment schedule that reflects the current timeline for construction. We are beginning subscriber engagement and contracting in March 2024.

Our project development timeline will be shifted back based on equipment availability. Updated timeline:

Utility interconnection studies completed: 7/10/2020

All ministerial permits secured: 11/31/2023

Contract executed with a construction contractor: 7/1/2023

Construction-ready plan set completed: 10/31/2023

Interconnection agreement(s) executed: 7/10/2020

Utility Power Purchase Agreement executed: 1/30/2024

50% of Project's capacity subscribed: 6/30/2024

Recruitment of low-income participants completed: 10/30/2024

Project Certification requested: 9/1/2024

Commercial Operation: 9/2/2024

This extension is necessary as there is key equipment in the construction schedule that will not be available until July 2024. I have attached the equipment delivery schedule that includes the lead time estimates and the current payment statuses. Please let us know if there is any additional information we can provide for this request.

Thank you,

Cassandra Martin  
Renewables Project Manager

Bonneville Environmental Foundation



## 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 twenty-two months.

### Project Information

**Project ID:** PP-2021-104

**Project Name:** Buckaroo Solar 1, LLC

**Project Manager:** Buckaroo Solar 1, LLC

**Subscription Manager:** Buckaroo Solar 1, LLC

**Utility Service Area:** PAC

**Project Site Address:** 45°39'39.57"N, 118°46'17.39"W, Pendleton, OR 97801

**Project Size (kW-AC):** 2,400

**Carveout-eligible:** No

**Current Program Status and Date Achieved:** Pre-certified 05/02/2022

### Project Description

Buckaroo Solar 1, LLC is a 2,400 kW-AC project located in Pendleton, Oregon, in Umatilla County. The Project Manager entity is controlled by Sunthurst. Outreach and subscription management are conducted by Buckaroo Solar 1 LLC.

### Review Summary

**Date Review Completed:** 03/05/2024

**Nature of the Amendment Request:** Extend Certification Deadline

**PA Recommendation:** Approve, with conditions

### Review Notes

*Current Certification Deadline: November 2, 2023*

*Recommended Certification Deadline: September 25, 2025*

The Project Manager (PM) cites the need for a Certification extension for twenty-two months due to a 5.5 month utility delay in executing a PPA and a revised interconnection agreement provided by PacifiCorp with an additional 17-month delay for the commercial operation date (COD). Sunthurst states that the initial request for a revised interconnection agreement was due to Covid-19 and supply chain delays; Sunthurst did not request or anticipate the revision would result in a 17-month revised interconnection timeline.

This is the project's first extension request and the PM and PacifiCorp have agreed to a revised milestone schedule. The Program Administrator (PA) considers utility interconnection issues to be the primary reason for the delay. The PA is concerned, however, that projects with lengthy Certification extensions will reserve capacity within the Program for projects that may not ultimately be financeable or otherwise viable. Additionally, since Pre-certification, the PM has added battery storage to the project design. The PA has confirmed with the PM that the storage integration will not have an impact on project generation or billing and the battery backup is to

provide critical service in the event of an outage only. However, the PA confirmed with the utility that the battery has not yet been included in the interconnection agreement with the utility.

The PA supports extending the Certification deadline by twenty-two months if the following conditions are met:

- 1) The PM includes the storage system in an updated interconnection agreement with the utility and the PM provides a copy of the amended interconnection agreement to the PA by September 2, 2024.
- 2) The PM provides a funding plan that details how the PM plans to finance the project to the PA within six months of the extension request, or by May 2, 2024.
- 3) The PM provides an update to the PA that demonstrates progress toward project development and details progress toward financing based on the provided funding plan. This update should be provided by November 2, 2024, and again by May 2, 2025.

The PA recommends granting this amendment request and extending the Certification deadline by twenty-two months with conditions.

### **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 twenty-two months.

### Project Information

**Project ID:** PP-2021-103

**Project Name:** Buckaroo Solar 2

**Project Manager:** Buckaroo Solar 2, LLC

**Subscription Manager:** Buckaroo Solar 2, LLC

**Utility Service Area:** PAC

**Project Site Address:** 45°39'55.24"N, 118°50'44.85"W, Pendleton, OR 97801

**Project Size (kW-AC):** 2,990

**Carveout-eligible:** No

**Current Program Status and Date Achieved:** Pre-certified 05/02/2022

### Project Description

Buckaroo Solar 2 is a 2,990 kW-AC project located in Pendleton, Oregon, in Umatilla County. The Project Manager entity is controlled by Sunthurst. Outreach and customer management are conducted by Buckaroo Solar 2, LLC.

### Review Summary

**Date Review Completed:** 03/05/2024

**Nature of the Amendment Request:** Extend Certification Deadline

**PA Recommendation:** Approve, with conditions

### Review Notes

*Current Certification Deadline: November 2, 2023*

*Recommended Certification Deadline: September 30, 2025*

The Project Manager (PM) cites the need for a Certification extension for twenty-two months due to a 5.5 month utility delay in executing a PPA and a revised interconnection agreement provided by PacifiCorp with an additional 17-month delay for the commercial operation date (COD). Sunthurst states that the initial request for a revised interconnection agreement was due to Covid-19 and supply chain delays; Sunthurst did not request or anticipate the revision would result in a 17-month revised interconnection timeline.

This is the project's first extension request and the project manager and PacifiCorp have agreed to a revised milestone schedule. The Program Administrator (PA) considers utility interconnection issues to be the primary reason for the delay. The PA is concerned, however, that projects with lengthy Certification extensions will reserve capacity within the Program for projects that may not ultimately be financeable or otherwise viable. The PA supports extending the Certification deadline by twenty-two months if the following conditions are met:

1) The PM includes the storage system in an updated interconnection agreement with the utility and the PM provides a copy of the amended interconnection agreement to the PA by September 2, 2024.

2) The PM provides an update to the PA that demonstrates progress toward project development and details progress toward financing based on the provided funding plan. This update should be provided by November 2, 2024 and again by May 2, 2025.

The PA recommends granting the amendment request and extending the Certification deadline by twenty-two months with conditions.

**Attachments Included**

The extension request received from the Project Manager is attached.

November 2, 2023

VIA EMAIL ([administrator@oregoncsp.org](mailto:administrator@oregoncsp.org))

Program Administrator  
Oregon Community Solar Program

**RE: Community Solar Program Extension of the Certification Deadline**

Dear Program Administrator,

On behalf the following owners of Projects and Project Managers listed below (collectively the “**Developers**”), we hereby submit this letter requesting an extension of the Pre-certification period to correspond with the utility’s interconnection schedule.

<b>Project Name</b>	<b>Project Manager</b>	<b>Extension Request</b>
Buckaroo Solar 1	Buckaroo Solar 1, LLC	Sept 30, 2025
Buckaroo Solar 2	Buckaroo Solar 2, LLC	Sept 30, 2025

Both projects were pre-certified into the Program on April 15, 2022. Each incurred significant investment, e.g., Buckaroo Solar 1 consummated a land sale in March 2023 name of the Project Manager and all development approvals remain valid. Both are 50% subscribed.

Despite our progress, we seek an extension to correspond to the Utilities current COD schedule, provided to the Program Administrator. Since pre-certification, many unforeseen delays have occurred and are beyond our reasonable control.

First, there was a 5.5-month delay from Utility tendering an execution ready PPA for these projects. Drafts were first submitted April 8<sup>th</sup>. Execution copy was rendered September 27<sup>th</sup>.

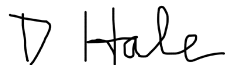
Additionally, as a result of the well-documented Covid-19, followed by this DOC lawsuit that caused uncertainty at that time with how this would affect the availability of solar panels and ultimately the timing of when these Projects could be constructed, a representative of the Projects requested that PacifiCorp modify the Interconnection Agreements to have a revised Interconnection Commercial Operation Dates (“CODs”). PacifiCorp responded to our modest COD extension requests with a schedule adding 17 months to the COD. Likely, in part from their crews charged with injected switches in their Southern Oregon Territory as a result of the Labor Day fires, they are found guilty in contributing. The new COD for these projects given back is September 30, 2025. Therefore, we seek Certification Extension for projects corresponding to the Utility’s agreement to COD and assurances they will not delay those date.

Also, as far back as October 2021, during our UM 2177 contest case negotiations, the Project Manager requested interconnection using storage be studied as an option. Later, Buckaroo Solar 1 is an ODOE C-REP Project in partnership with the City of Pendleton and adds BESS to back up the City's Water Treatment Plant, a County critical facility. ODOE announce the project on October 17, 2022, but took 6 months to release their Performance Agreement and additional 3 months to approve other documentation. Moreover, to date, PacifiCorp has yet to provide that option pricing, despite recognizing this BESS in their 2023 Clean Energy Plan<sup>1</sup> and stating both conducted outreach and support such application, generally.

Next, PacifiCorp is not connecting OCS projects in UM 1930 filing, of late and published lack of performance is challenging funding interest on these projects<sup>2</sup>. We need the PUC to clarify how Project Manager can receive certainty of COD by utility.

Lastly, while Buckaroo Solar 1 purchased the parcel from a privately party, the seller-maintained site occupancy for planting wheat crop just harvested this Fall. Adding, late control of the parcel.

Thank you for your time and consideration.



Daniel Hale  
on Behalf of  
Buckaroo Solar 1, LLC  
Buckaroo Solar 2, LLC

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<sup>1</sup> [https://www.pacificcorp.com/content/dam/pcorp/documents/en/pacificpower/about/2023\\_Oregon\\_Clean\\_Energy\\_Plan\\_October.pdf](https://www.pacificcorp.com/content/dam/pcorp/documents/en/pacificpower/about/2023_Oregon_Clean_Energy_Plan_October.pdf) (pgs 37-43).

<sup>2</sup> <https://edocs.puc.state.or.us/efdocs/HAH/um1930hah153527.pdf>