

Attachment A to
UM 2074 Motion for Interim Relief Preliminary Injunction

Declaration of Jonathan Nelson

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Docket No. UM 2074

ZENA SOLAR, LLC,

Complainant,

v.

PORTLAND GENERAL ELECTRIC
COMPANY,

Defendant.

DECLARATION OF JONATHAN
NELSON IN SUPPORT OF
COMPLAINANT'S MOTION FOR
INTERIM RELIEF AND
PRELIMINARY INJUNCTION

I, Jonathan Nelson, declare under the penalty of perjury as follows:

1. I am the Manager of the Complainant Zena Solar, LLC ("Zena Solar") in the above-captioned proceeding before the Oregon Public Utility Commission. This declaration is based on my personal knowledge and, if called to testify to the following facts, I could and would competently do so. I submit this declaration in support of Complainant's Motion for Interim Relief and Preliminary Injunction.

2. Zena Solar filed an application for interconnection service with Portland General Electric Company ("PGE") that was accepted on February 8, 2018.

3. PGE has represented that it will have the right to deem Zena Solar to have withdrawn from the interconnection queue on Friday, March 27, 2020.

4. Losing Zena Solar's place in the interconnection queue would place one or more other projects ahead of Zena Solar in the serial queue.

5. The interconnection of other projects could make the interconnection of Zena Solar technologically infeasible or prohibitively expensive.
6. Losing Zena Solar's place in the interconnection queue would cause Zena Solar to suffer significant delays in pursuing interconnection service from PGE.
7. Losing Zena Solar's place in the interconnection queue could cause Zena Solar to be unable to afford interconnection.
8. Losing Zena Solar's place in the interconnection queue could result in PGE terminating Zena Solar's power purchase agreement with PGE.
9. The costs and delays associated with losing its place in the interconnection queue could be devastating to Zena Solar.
10. Losing Zena Solar's place in the interconnection queue could cause Zena Solar to go out of business.
11. Zena Solar has conferred with the developer of SPQ0240 and the developer does not object to Zena Solar remaining in the interconnection queue during the pendency of the complaint.

I hereby declare that the above statements are true to the best of my knowledge and belief, and that I understand they are made for use as evidence in the Oregon Public Utility Commission and are subject to penalty of perjury.

DATED this 27th date of March 2020.



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