



Program Administrator's Project Recommendation

October 27, 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 precertifications, 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:

Six months for PGE-2020-75 (Auburn Solar)
Eight months for PP-2021-99 (Green Solar)
Twelve months for PP-2021-113 (Chapman Creek Solar)
Sixty-days for PP-2021-112 (7 Mile Solar)
Sixty-days for PP-2021-93 (Sunset Ridge Solar)
Twelve months and fifteen days for PP-2021-97 (Kelly Creek Solar)
Twelve months and fifteen days for PGE 2021-115 (Mompano Solar)
Nine months and eleven days for PGE 2020-55 (Zena Solar, LLC)

The PA has reviewed the eight 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 November 10, 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.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
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The Oregon Community Solar Program Administrator (PA) has reviewed the amendment request of the project described below and recommends that the project be extended for six months.

Project Information

Project ID: PGE-2020-75 **Project Name:** Auburn Solar

Project Manager: Auburn Solar, LLC

Subscription Manager: Arcadia Community Solar, LLC

Utility Service Area: PGE

Project Site Address: 45°23'29.52"N, 122°20'38.22"W, Sandy, OR 97009

Project Size (kW-AC): 2970

Carveout-eligible: No

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

Project Description

Auburn Solar is a 2,970 kW-AC project located in Sandy, Oregon, in Clackamas County. Auburn Solar, LLC is controlled by SolRiver Capital, LLC. Outreach and customer management will be conducted by Arcadia Community Solar, LLC.

Review Summary

Date Review Completed: 10/20/2023

Nature of the Amendment Request: Extend Certification Deadline

PA Recommendation: Approve

Review Notes

Current Certification Deadline: October 15, 2023

Recommended Certification Deadline: April 15, 2024

Auburn is currently 11% subscribed and is currently under construction. The requested extension is due to interconnection delays and the developers experiencing construction delays due to equipment sourcing and procurement issues beyond their reasonable control. The project is in good standing and the PA recommends granting this amendment request and extending the Certification deadline by six months.

Attachments Included



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 eight months.

Project Information

Project ID: PP-2021-99
Project Name: Green Solar

Project Manager: Green Solar, LLC

Subscription Manager: Arcadia Community Solar, LLC

Utility Service Area: PAC

Project Site Address: SW Green Drive, Culver, OR 97734

Project Size (kW-AC): 2,875

Carveout-eligible: No

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

Project Description

Green Solar is a 2,875 kW-AC project located in Culver, Oregon, in Jefferson County. Green Solar, LLC is controlled by SolRiver Capital, LLC. Outreach and customer management will be conducted by Arcadia Community Solar LLC.

Review Summary

Date Review Completed: 10/20/2023

Nature of the Amendment Request: Extend Certification Deadline

PA Recommendation: Approve

Review Notes

Current Certification Deadline: October 15, 2023

Recommended Certification Deadline: June 15, 2024

Green Solar is currently 99% subscribed and the project is mechanically complete. The requested extension is due to the developers experiencing delays due to utility interconnection issues beyond their reasonable control. The project is in good standing and the PA recommends granting this amendment request and extending the Certification deadline by eight months.

Attachments Included



Brandon Conard SolRiver Capital, LLC 700 17th Street, Suite 1500 Denver, CO 80202

September 27, 2022

VIA EMAIL (administrator@oregoncsp.org)

Program Administrator Oregon Community Solar Program

RE: Certification Deadline Extension Requests

Dear Program Administrator,

SolRiver Capital, LLC, a Colorado limited liability company ("SolRiver"), on behalf of the following Projects and Project Managers listed below (collectively, the "Developers"), hereby kindly submits this letter to request an eight (8) month and six (6) month extension of the Certification Deadlines of Green Solar and Auburn Solar, respectively.

| Project | Project Manager | Certification Deadline | Requested Extension Date |
|--------------|------------------|------------------------|-----------------------------|
| Green Solar | Green Solar LLC | 10/15/2023 | 06/15/2024 |
| Auburn Solar | Auburn Solar LLC | 10/15/2023 | 04/15/2024 |

The requested extensions are reasonable because the Developers (i) have experienced delays due to interconnection issues beyond their reasonable control, (ii) have made substantial investment and continued efforts towards developing the Projects to date, and (iii) the current subscription levels show that the project manager is making material progress toward fully subscribing each project.

Green Solar

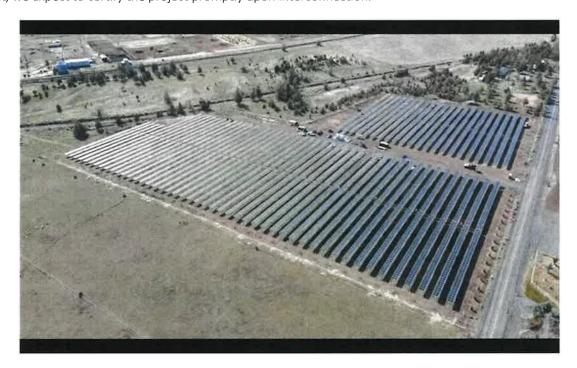
<u>Progress to Date</u> The Green Solar project ("Green") is mechanically complete. Both the Developers and the project EPC contractor completed work according to a timeline that would have seen Green in-service in June 2023. Green Solar is currently 99% subscribed, according to the project's subscriber manager, Arcadia.

Reason for Delay Green Solar has not yet been certified in the Oregon Community Solar Program due to interconnection delays on the part of the utility, PacifiCorp ("PAC"). PAC recently discovered that poles of unknown specifications may have been installed in error at the site during early-stage interconnection work. The



utility has conducted a ground survey and now must review the results, order materials, and install poles of correct heights in order to properly interconnect the system. Ultimately, the timeliness of PAC's response determines when the system can be placed in service, and thereby, be ready to request for certification. The Developers are in regular communication with the utility and exploring every available avenue to expedite interconnection.

Realistic Timeline to Achieve Commercial Operations In the event the process is not expedited, the utility's current timeline for interconnection puts Green Solar's in-service date in February/March 2024. We are requesting an eight (8) month extension in order to fall comfortably within the timeline provided by PAC. In any event, we expect to certify the project promptly upon interconnection.



Green Solar as of May 26, 2023

Auburn Solar

<u>Progress to Date</u> The Auburn Solar Project ("**Auburn**") is currently under construction. As of September 26, the EPC contractor has completed grading the site, driven 92% of the piers, installed 80% of the racking and 13% of the modules. The project is on schedule to reach mechanical completion by October 30, 2023. According to Arcadia, Auburn is currently 11% subscribed and is expected to be 50% subscribed withing the next month.

Reason for Delay Auburn Solar's original certification deadline was based on early project timelines that were estimated before an EPC contractor had been engaged and while the project was sourcing and procuring



equipment. At the time of Auburn's 6- and 12-month Pre-Certification Updates, the project was subject to long equipment delivery timelines of 40-50 weeks for transformers and 45-50 weeks for panels.

In 2021, the US Federal Government banned imports of goods utilizing silicon sourced from the Xinjiang region of China. In 2022, the US Department of Commerce announced it was launching an investigation into the alleged circumvention of duties for solar panel imports from Cambodia, Malaysia, Thailand, and Vietnam into the U.S. As a result, most panel suppliers began renegotiating their terms, raising prices materially to account for new tariff risks, and/or cancelling orders to the U.S. entirely. Both federal matters were outside of Developers' reasonable control and materially delayed procurement of panels, altering construction schedules dramatically.

Efforts to Complete Interconnection & Timeline to Achieve Commercial Operations. The Developers are in regular communication with the project's utility, PGE, and have begun coordinating final electrical inspection. According to the project EPC contractor and PGE's estimated timelines, Auburn Solar will reach commercial operations in December 2023.



Auburn Solar as of September 26, 2023

Based on the material interconnection delays, along with the continued development and investment in the Projects, we respectfully request that the Public Utility Commission grant the extension of Certification Deadlines described herein.



Brandon Conard

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As Manager, on behalf of **Green Solar LLC**, an Oregon limited liability company

Auburn Solar LLC, an Oregon limited liability company



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 twelve months.

Project Information

Project ID: PP-2021-113

Project Name: Chapman Creek Solar

Project Manager: Chapman Creek PM, LLC

Subscription Manager: Arcadia Community Solar, LLC

Utility Service Area: PAC

Project Site Address: 42° 9'15.09"N, 123°37'26.33"W, Cave Junction, OR 97523

Project Size (kW-AC): 2,990

Carveout-eligible: No

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

Project Description

Chapman Creek Solar is a 2,990 kW-AC project located in Cave Junction, Oregon, in Josephine County. Chapman Creek PM, LLC is controlled by TLS Capital. Outreach and customer management will be conducted by Arcadia Community Solar, LLC.

Review Summary

Date Review Completed: 10/20/2023

Nature of the Amendment Request: Extend Certification Deadline

PA Recommendation: Approve

Review Notes

Current Certification Deadline: October 15, 2023

Recommended Certification Deadline: October 15, 2024

Chapman Creek is 60% subscribed and an engineering, procurement, and construction company has been engaged. The Certification request for an extension is due to 1) interconnection utility delays 2) the contractor's overall schedule and other constraints. The project is in good standing and the PA supports extending the Certification deadline for this project by twelve months.

Attachments Included

September 26, 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 project:

| Project | Project Manager | Requested Certification Date |
|---------------------|-----------------------|------------------------------|
| Chapman Creek Solar | Chapman Creek PM, LLC | 10/15/2024 |

The original certification deadline for this project was 10/15/2023. Chapman Creek is about 60% subscribed and an EPC has been engaged. The request for an extension is due to 1) interconnection utility delays 2) the contractor's overall schedule and other constraints. As such, we are asking for a Certification Deadline extension for the date above.

Thank you for your time and consideration.

Troy Snyder on Behalf of

Chapman Creek PM, LLC



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 sixty days.

Project Information

Project ID: PP-2021-112 Project Name: 7 Mile Solar

Project Manager: 7 Mile PM, LLC

Subscription Manager: Arcadia Community Solar, LLC

Utility Service Area: PAC

Project Site Address: 44°24'21.0"N 122°59'50.7"W, Brownsville, OR 97327

Project Size (kW-AC): 951 **Carveout-eligible:** No

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

Project Description

7 Mile Solar is a 951 kW-AC project located in Brownsville, Oregon, in Linn County. 7 Mile PM, LLC is controlled by Luminace. Outreach and customer management for the project will be conducted through Arcadia Community Solar, LLC.

Review Summary

Date Review Completed: 10/20/2023

Nature of the Amendment Request: Extend Certification Deadline

PA Recommendation: Approve

Review Notes

Current Certification Deadline: October 15, 2023

Recommended Certification Deadline: December 14, 2023

The Project Manager cites interconnection utility delays pushing back the commercial operation date. The project is in good standing and the PA recommends granting this amendment request and extending the Certification deadline by sixty days.

Attachments Included



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 sixty days.

Project Information

Project ID: PP-2021-93

Project Name: Sunset Ridge Solar

Project Manager: Sunset Ridge PM, LLC

Subscription Manager: Arcadia Community Solar, LLC

Utility Service Area: PAC

Project Site Address: 42°16'49.7"N 121°48'44.5"W, Klamath Falls, OR 97601

Project Size (kW-AC): 2,250

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-certified, 04/20/2021

Project Description

Sunset Ridge Solar is a 2,250 kW-AC project located in Klamath Falls, Oregon, in Klamath County. Sunset Ridge PM, LLC is controlled by Luminace. Outreach and customer management for the project will be conducted through Arcadia Community Solar, LLC.

Review Summary

Date Review Completed: 10/20/2023

Nature of the Amendment Request: Extend Certification Deadline

PA Recommendation: Approve

Review Notes

Current Certification Deadline: October 15, 2023

Recommended Certification Deadline: December 14, 2023

The Project Manager cites interconnection utility delays pushing back the commercial operation date. The project is in good standing and the PA recommends granting this amendment request and extending the Certification deadline by sixty days.

Attachments Included



September 27, 2023

Program Administrator Oregon Community Solar Program administrator@oregoncsp.org

RE: Community Solar Program Extension of the Certification Deadline

Dear Program Administrator,

On behalf of 7 Mile Solar, LLC and Sunset Ridge Solar, LLC (collectively the "Owners") of the Projects and Project Managers listed below, we hereby submit this letter requesting an extension of the Pre-certification period to correspond with the utility's interconnection schedule.

| Project | Project Manager |
|--------------|----------------------|
| 7 Mile | 7 Mile PM, LLC |
| Sunset Ridge | Sunset Ridge PM, LLC |

All of these projects have executed all construction contracts, building permits, and required interconnection documents. We are experiencing utility delays pushing back our COD dates to Q1 and Q2 2024. We are requesting a 60-day extension to provide all certification documents to the Program Administrator.

Thank you for your consideration of our request for an extension. Please contact Julia Peacock at 301-775-9511 or julia.peacock@luminace.com if you have any questions.

Very truly yours,

Joshua Udler

Senior Director, Legal

John Villen

cc: Julia Peacock, John Drexinger (Luminace)



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 year.

Project Information

Project ID: PP-2021-97

Project Name: Kelly Creek Solar

Project Manager: Kelly Creek Project Manager, LLC **Subscription Manager:** Arcadia Community Solar, LLC

Utility Service Area: PAC

Project Site Address: 42°8'2.13" N, 123°37'51.98" W Cave Junction, OR 97523

Project Size (kW-AC): 2,250

Carveout-eligible: No

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

Project Description

Kelly Creek Solar is a 2,250 kW-AC project located in Cave Junction, Oregon, in Josephine County. Kelly Creek Project Manager, LLC is controlled by Coast Energy, LLC. Outreach and customer management for the project will be conducted through Arcadia Community Solar, LLC.

Review Summary

Date Review Completed: 10/16/2023

Nature of the Amendment Request: Extend Certification Deadline

PA Recommendation: Approve

Review Notes

Current Certification Deadline: October 15, 2023

Recommended Certification Deadline: October 30, 2024

The Project Manager cites the reason for the extension as the inability for the contractor to work during the winter months due to the overall schedule and other constraints. The project is in good standing and the PA recommends granting this amendment request and extending the Certification deadline by one year.

Attachments Included



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 year.

Project Information

Project ID: PGE-2021-115

Project Name: Mompano Solar

Project Manager: Mompano Solar Project Manager, LLC **Subscription Manager:** Arcadia Community Solar, LLC

Utility Service Area: PGE

Project Site Address: 45°17′43.3″N 122°30′44.9″W, Beavercreek, OR 97004

Project Size (kW-AC): 2,000

Carveout-eligible: No

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

Project Description

Mompano Solar is a 2,000 kW-AC project located in Beavercreek, Oregon, in Clackamas County. Mompano Solar Project Manager, LLC is controlled by Coast Energy, LLC. Outreach and customer management for the project will be conducted through Arcadia Community Solar, LLC.

Review Summary

Date Review Completed: 10/17/2023

Nature of the Amendment Request: Extend Certification Deadline

PA Recommendation: Approve

Review Notes

Current Certification Deadline: October 15, 2023

Recommended Certification Deadline: October 30, 2024

The Project Manager cites the reason for the extension as the inability for the contractor to work during the winter months due to the overall schedule and other constraints. The project is in good standing and the PA recommends granting this amendment request and extending the Certification deadline by one year.

Attachments Included

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 |
|-------------------|------------------------|------------------------------|
| Mompano Solar | Mompano Solar, LLC | 10/30/2024 |
| Kelly Creek Solar | Kelly Creek Solar, LLC | 10/30/2024 |

The original certification deadlines for these projects were 10/14/2023. Mompano is 100% subscribed and Kelly Creek is 100% subscribed. An EPC has been engaged and building permits for Mompano and Kelly Creek are expected within the next 3 months. PPA execution is expected in the next 3 months. 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.

Blair Herbert

Blair Herbert

on Behalf of:

Mompano Solar, LLC

&

Kelly Creek Solar, LLC



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 nine months.

Project Information

Project ID: PGE-2020-55

Project Name: Zena Solar, LLC

Project Manager: Conifer Community Energy 6, LLC

Subscription Manager: Zena Solar, LLC

Utility Service Area: PGE

Project Site Address: 45°01'12.0"N, 123°05'52.8"W, Salem, OR 97304

Project Size (kW-AC): 2,500

Carveout-eligible: No

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

Project Description

Zena Solar, LLC is a 2,500 kW-AC project located in Salem, Oregon, in Polk County. Conifer Community Energy 6, LLC is controlled by UGE. A Subscription Manager has not yet been identified for this project.

Review Summary

Date Review Completed: 10/17/2023

Nature of the Amendment Request: Extend Certification Deadline

PA Recommendation: Approve

Review Notes

Current Certification Deadline: October 15, 2023

Recommended Certification Deadline: July 26, 2024

The Project Manager cites utility interconnection utility delays pushing back the commercial operation date. The project is in good standing and the PA recommends granting this amendment request and extending the Certification deadline by nine months.

Attachments Included

October 11, 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 project:

| Project | Project Manager |
|-----------------|---------------------------------|
| Zena Solar, LLC | Conifer Community Energy 6, LLC |

We acquired this project from Conifer energy Partners, LLC in Q3, 2022. After acquiring the project, we've conducted site surveys to evaluate Cultural and Environmental requirements, partnered with an EPC contractor, deployed manpower to the site, initiated the installation of fencing, received module deliveries at the site, and commenced racking deliveries with all foundations now in place at the site.

We also have two prominent national companies that are set to subscribe to our project which will account for 40% of the energy generated.

Because of the delayed schedule from the Utility 'PGE', we anticipate the COD to be end of June 2024. We are therefore requesting an extension for the Certification Deadline until July 26, 2024.

Thank you for your time and consideration.

2023/10/11

Nick Blitterswyk

On behalf of Zena Solar, LLC

Signature: Nick Blitterswyk (Oct 12, 2023 07:00 GMT+8)

Email: nick.blitterswyk@ugei.com

Zena Solar_Community Solar Program Extension of the Certification Deadline

Final Audit Report 2023-10-11

Created: 2023-10-11

By: Mir Salman Ali (salman.ali@ugei.com)

Status: Signed

Transaction ID: CBJCHBCAABAAUDtpkyzB4Wi6Ts2penuSgXxpJEO2XhU4

"Zena Solar_Community Solar Program Extension of the Certific ation Deadline" History

- Document created by Mir Salman Ali (salman.ali@ugei.com) 2023-10-11 7:44:05 PM GMT
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- Email viewed by Nick Blitterswyk (nick.blitterswyk@ugei.com) 2023-10-11 10:59:40 PM GMT
- Document e-signed by Nick Blitterswyk (nick.blitterswyk@ugei.com)
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