



Program Administrator's Project Recommendation

May 24, 2022

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 six-month certification deadline extensions for the following thirteen projects:

PGE-2020-34 (Cosper Creek Solar, LLC)

PP-2021-116 (Cherry Creek Solar)

PGE-2020-56 (Carnes Creek Solar LLC)

PGE-2020-41 (Fruitland Creek Solar)

PGE-2020-42 (Kaiser Creek Solar, LLC)

PP-2020-80 (Linkville Solar)

PP-2020-84 (Pine Grove Solar)

PP-2020-86 (Round Lake Solar)

PGE-2020-38 (Sandy River Solar)

PGE-2020-45 (Sesqui-C Solar, LLC)

PP-2021-93 (Sunset Ridge Solar)

PP-2021-92 (Whisky Creek Solar)

PP-2020-85 (Wocus Marsh Solar)

The PA has reviewed the project certification deadline extension request for the thirteen projects listed above and has recommended granting the extensions. The extension request is included at the bottom of this document. Staff finds the PA's recommendations to be noncontroversial and that granting precertification may be delegated to the PA. Stakeholders in opposition of the PA's recommendation should post comments to UM 1930 by June 7, 2022.

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.



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: PGE-2020-34

Project Name: Cosper Creek Solar, LLC

Project Manager: Conifer Community Energy 1, LLC

Subscription Manager: Oregon Shines

Utility Service Area: PGE

Project Site Address: 45.058°, -123.499°, Willamina, OR 97396

Project Size (kW-AC): 2500

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-certified, 06/12/20

Project Description

Cosper Creek Solar is a 2500 kW-AC project located in Yamhill, Oregon, in Polk County. The project manager entity is controlled by Conifer Energy Partners, which currently manages 5 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 community solar program.

Review Summary

Date Review Completed: 05/12/22

Nature of the Amendment Request: Extend Certification Deadline to 12/12/22

PA Recommendation: Approve

Review Notes

A group of 13 projects, including this one, have requested a six-month extension of their Certification deadlines. Cosper Creek has received one previous six month extension, prior to this one, that extended the Certification deadline from 12/12/21 to 6/12/22 due to delays related to the COVID-19 pandemic. Cosper Creek is managed by Conifer Community Energy 1, LLC, which is controlled by Conifer Energy Partners LLC. The subscription manager is Oregon Shines. The new requested Certification deadline is 12/12/22.

The PA is concerned, however, that projects could use continued supply chain disruption as a means to delay action on projects that may not be ultimately financeable or otherwise viable. Therefore, the PA would recommend granting a single six-month extension to any project that is able to demonstrate challenges related to ongoing supply chain disruption, and would recommend a second extension only if the project is otherwise able to demonstrate progress towards certification in other ways.

Among the seven projects that have requested a second extension, the PA confirms that the project managers have enrolled and verified enough participants to subscribe 97% of combined project capacity. The project managers have also signed interconnection agreements for all projects and indicated substantial progress in project development. Because of this, the PA considers these projects to be making considerable progress towards certification, and that current supply chain issues are the primary issue delaying the projects.

Because of this, the PA supports extending the certification deadline of these thirteen projects 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 project certification date be extended by six months.

Project Information

Project ID: PP-2021-116

Project Name: Cherry Creek Solar

Project Manager: Cherry Creek Project Manager, LLC

Subscription Manager: Oregon Shines **Utility Service Area:** Pacific Power

Project Site Address: 42°27′9.22″N, 121°29′15.30″W

Project Size (kW-AC): 359 Carveout-eligible: Yes

Current Program Status and Date Achieved: Pre-certified, 07/27/21

Project Description

Cherry Creek Solar is a 359 kW-AC project located in Sprague River, Oregon, in Klamath County. The project manager entity is controlled by Green Key Solar, which currently manages 5 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 community solar program.

Review Summary

Date Review Completed: 05/12/22

Nature of the Amendment Request: Extend Certification Deadline to 7/27/23

PA Recommendation: Approve

Review Notes

A group of 13 projects, including this one, have requested a six-month extension of their certification deadlines. This is Cherry Creek Solar's first extension request. Cherry Creek Solar is managed by Cherry Creek Project Manager LLC, which is controlled by Green Key Solar. The subscription manager is Oregon Shines. This project's Certification deadline is currently 1/27/23 and is requesting to be extended to 7/27/23.

The PA is concerned, however, that projects could use continued supply chain disruption as a means to delay action on projects that may not be ultimately financeable or otherwise viable. Therefore, the PA would recommend granting a single six-month extension to any project that is able to demonstrate challenges related to ongoing supply chain disruption, and would recommend a second extension only if the project is otherwise able to demonstrate progress towards certification in other ways.

Among the seven projects that have requested a second extension, the PA confirms that the project managers have enrolled and verified enough participants to subscribe 97% of combined project capacity. The project managers have also signed interconnection agreements for all projects and indicated substantial progress in project development. Because of this, the PA considers these projects to be making considerable progress towards certification, and that current supply chain issues are the primary issue delaying the projects.

Because of this, the PA supports extending the certification deadline of these thirteen projects 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 project certification date be extended by six months.

Project Information

Project ID: PGE-2020-56

Project Name: Carnes Creek Solar LLC

Project Manager: Conifer Community Energy 5, LLC

Subscription Manager: Oregon Shines

Utility Service Area: PGE

Project Site Address: 10825 Portland Rd NE, Salem, OR 97305

Project Size (kW-AC): 2500

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-certified, 06/12/20

Project Description

Carnes Creek Solar is a 2500 kW-AC project located in Salem, Oregon, in Marion County. The project manager entity is controlled by Conifer Energy Partners, which currently manages 5 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 community solar program.

Review Summary

Date Review Completed: 05/12/22

Nature of the Amendment Request: Extend Certification Deadline to 12/12/22

PA Recommendation: Approve

Review Notes

A group of 13 projects, including this one, have requested a six-month extension of their Certification deadlines. Carnes Creek has received one previous six month extension, prior to this one, that extended the Certification deadline from 12/12/21 to 6/12/22 due to delays related to the COVID-19 pandemic. Carnes Creek is managed by Conifer Community Energy 5, LLC, which is controlled by Conifer Energy Partners LLC. The subscription manager is Oregon Shines. The new requested Certification deadline is 12/12/22.

The PA is concerned, however, that projects could use continued supply chain disruption as a means to delay action on projects that may not be ultimately financeable or otherwise viable. Therefore, the PA would recommend granting a single six-month extension to any project that is able to demonstrate challenges related to ongoing supply chain disruption, and would recommend a second extension only if the project is otherwise able to demonstrate progress towards certification in other ways.

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Because of this, the PA supports extending the certification deadline of these thirteen projects 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 project certification date be extended by six months.

Project Information

Project ID: PGE-2020-41

Project Name: Fruitland Creek Solar **Project Manager:** FC PM, LLC

Subscription Manager: Oregon Shines

Utility Service Area: PGE

Project Site Address: 44°55'48.5"N 122°56'15.0"W, Salem, OR 97317

Project Size (kW-AC): 1750

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-certified, 06/12/20

Project Description

Fruitland Creek Solar is a 1750 kW-AC project located in Salem, Oregon, in Marion County. The project manager entity is controlled by TLS Capital, which currently manages 9 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 community solar program.

Review Summary

Date Review Completed: 05/12/22

Nature of the Amendment Request: Extend Certification Deadline to 12/12/22

PA Recommendation: Approve

Review Notes

A group of 13 projects, including this one, have requested a six-month extension of their Certification deadlines. Fruitland Creek has received one previous six month extension, prior to this one, that extended the Certification deadline from 12/12/21 to 6/12/22 due to delays related to the COVID-19 pandemic. Fruitland Creek is managed by FC PM, LLC, which is controlled by TLS Capital. The subscription manager is Oregon Shines. The new requested Certification deadline is 12/12/22.

The PA is concerned, however, that projects could use continued supply chain disruption as a means to delay action on projects that may not be ultimately financeable or otherwise viable. Therefore, the PA would recommend granting a single six-month extension to any project that is able to demonstrate challenges related to ongoing supply chain disruption, and would recommend a second extension only if the project is otherwise able to demonstrate progress towards certification in other ways.

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Because of this, the PA supports extending the certification deadline of these thirteen projects 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 project certification date be extended by six months.

Project Information

Project ID: PGE-2020-42

Project Name: Kaiser Creek Solar, LLC

Project Manager: Kaiser Creek Project Manager, LLC

Subscription Manager: Oregon Shines

Utility Service Area: PGE

Project Site Address: 45°08'34.8"N, 122°36'32.4"W, Molalla, OR 97038

Project Size (kW-AC): 2000

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-certified, 06/18/20

Project Description

Kaiser Creek Solar is a 2000 kW-AC project located in Molalla, Oregon, in Clackamas County. The project manager entity is controlled by Green Key Solar, which currently manages 5 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 community solar program.

Review Summary

Date Review Completed: 05/12/22

Nature of the Amendment Request: Extend Certification Deadline to 12/18/22

PA Recommendation: Approve

Review Notes

A group of 13 projects, including this one, have requested a six-month extension of their Certification deadlines. Kaiser Creek has received one previous six month extension, prior to this one, that extended the Certification deadline from 12/18/21 to 6/12/22 due to delays related to the COVID-19 pandemic. Kaiser Creek is managed by Kaiser Creek Project Manager LLC, which is controlled by Green Key Solar. The subscription manager is Oregon Shines. The new requested Certification deadline is 12/18/22.

The PA is concerned, however, that projects could use continued supply chain disruption as a means to delay action on projects that may not be ultimately financeable or otherwise viable. Therefore, the PA would recommend granting a single six-month extension to any project that is able to demonstrate challenges related to ongoing supply chain disruption, and would recommend a second extension only if the project is otherwise able to demonstrate progress towards certification in other ways.

Among the seven projects that have requested a second extension, the PA confirms that the project managers have enrolled and verified enough participants to subscribe 97% of combined project capacity. The project managers have also signed interconnection agreements for all projects and indicated substantial progress in project development. Because of this, the PA considers these projects to be making considerable progress towards certification, and that current supply chain issues are the primary issue delaying the projects.

Because of this, the PA supports extending the certification deadline of these thirteen projects 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 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, 06/12/20

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 9 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 community solar program.

Review Summary

Date Review Completed: 05/12/22

Nature of the Amendment Request: Extend Certification Deadline to 5/17/23

PA Recommendation: Approve

Review Notes

A group of 13 projects, including this one, have requested a six-month extension of their Certification deadlines. Linkville Solar has received one previous six month extension, prior to this one, that extended the Certification deadline from 5/17/22 to 11/17/22 due to delays related to the COVID-19 pandemic. Linkville Solar is managed by Linkville PM, LLC, which is controlled by TLS Capital. The new requested Certification deadline is 5/17/23.

The PA is concerned, however, that projects could use continued supply chain disruption as a means to delay action on projects that may not be ultimately financeable or otherwise viable. Therefore, the PA would recommend granting a single six-month extension to any project that is able to demonstrate challenges related to ongoing supply chain disruption, and would recommend a second extension only if the project is otherwise able to demonstrate progress towards certification in other ways.

Among the seven projects that have requested a second extension, the PA confirms that the project managers have enrolled and verified enough participants to subscribe 97% of combined project capacity. The project managers have also signed interconnection agreements for all projects and indicated substantial progress in project development. Because of this, the PA considers these projects to be making considerable progress towards certification, and that current supply chain issues are the primary issue delaying the projects.

Because of this, the PA supports extending the certification deadline of these thirteen projects 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 project certification date be extended by six months.

Project Information

Project ID: PP-2020-84

Project Name: Pine Grove Solar

Project Manager: Pine Grove PM, LLC **Subscription Manager:** Oregon Shines **Utility Service Area:** Pacific Power

Project Site Address: 42°11'7.70"N, 121°41'12.42"W, Klamath Falls, OR 97621

Project Size (kW-AC): 1400

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-certified, 12/29/20

Project Description

Pine Grove Solar is a 1400 kW-AC project located in Klamath Falls, Oregon, in Klamath County. The project manager entity is controlled by TLS Capital, which currently manages 9 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 community solar program.

Review Summary

Date Review Completed: 05/12/22

Nature of the Amendment Request: Extend Certification Deadline to 12/29/22

PA Recommendation: Approve

Review Notes

A group of 13 projects, including this one, have requested a six-month extension of their certification deadlines. This is Pine Grove's first extension request. Pine Grove is managed by Pine Grove PM, LLC, which is controlled by TLS Capital. This project's Certification deadline is currently 06/29/22 and is requesting to be extended to 12/29/22.

The PA is concerned, however, that projects could use continued supply chain disruption as a means to delay action on projects that may not be ultimately financeable or otherwise viable. Therefore, the PA would recommend granting a single six-month extension to any project that is able to demonstrate challenges related to ongoing supply chain disruption, and would recommend a second extension only if the project is otherwise able to demonstrate progress towards certification in other ways.

Among the seven projects that have requested a second extension, the PA confirms that the project managers have enrolled and verified enough participants to subscribe 97% of combined project capacity. The project managers have also signed interconnection agreements for all projects and indicated substantial progress in project development. Because of this, the PA considers these projects to be making considerable progress towards certification, and that current supply chain issues are the primary issue delaying the projects.

Because of this, the PA supports extending the certification deadline of these thirteen projects 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 project certification date be extended by six months.

Project Information

Project ID: PP-2020-86

Project Name: Round Lake Solar

Project Manager: Round Lake PM, LLC **Subscription Manager:** Oregon Shines **Utility Service Area:** Pacific Power

Project Site Address: 42° 7'37.12"N, 121°54'24.14"W, Klamath Falls, OR 97621

Project Size (kW-AC): 978 Carveout-eligible: No

Current Program Status and Date Achieved: Pre-certified, 12/29/20

Project Description

Round Lake Solar is a 978 kW-AC project located in Klamath Falls, Oregon, in Klamath County. The project manager entity is controlled by TLS Capital, which currently manages 9 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 community solar program.

Review Summary

Date Review Completed: 05/12/22

Nature of the Amendment Request: Extend Certification Deadline to 12/29/22

PA Recommendation: Approve

Review Notes

A group of 13 projects, including this one, have requested a six-month extension of their certification deadlines. This is Round Lake's first extension request. Round Lake Solar is managed by Round Lake PM, LLC, which is controlled by TLS Capital. This project's Certification deadline is currently 06/29/22 and is requesting to be extended to 12/29/22.

The PA is concerned, however, that projects could use continued supply chain disruption as a means to delay action on projects that may not be ultimately financeable or otherwise viable. Therefore, the PA would recommend granting a single six-month extension to any project that is able to demonstrate challenges related to ongoing supply chain disruption, and would recommend a second extension only if the project is otherwise able to demonstrate progress towards certification in other ways.

Among the seven projects that have requested a second extension, the PA confirms that the project managers have enrolled and verified enough participants to subscribe 97% of combined project capacity. The project managers have also signed interconnection agreements for all projects and indicated substantial progress in project development. Because of this, the PA considers these projects to be making considerable progress towards certification, and that current supply chain issues are the primary issue delaying the projects.

Because of this, the PA supports extending the certification deadline of these thirteen projects 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 project certification date be extended by six months.

Project Information

Project ID: PGE-2020-38

Project Name: Sandy River Solar **Project Manager:** SR PM, LLC

Subscription Manager: Oregon Shines

Utility Service Area: PGE

Project Site Address: 45°25′51.8″N 122°17′42.6″W, Sandy, OR 97055

Project Size (kW-AC): 1850

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-certified, 06/12/20

Project Description

Sandy River Solar is a 1850 kW-AC project located in Salem, Oregon, in Marion County. The project manager entity is controlled by TLS Capital, which currently manages 9 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 community solar program.

Review Summary

Date Review Completed: 05/12/22

Nature of the Amendment Request: Extend Certification Deadline to 12/12/22

PA Recommendation: Approve

Review Notes

A group of 13 projects, including this one, have requested a six-month extension of their Certification deadlines. Sandy River Solar has received one previous six month extension, prior to this one, that extended the Certification deadline from 12/12/21 to 06/12/22 due to delays related to the COVID-19 pandemic. Sandy River Solar is managed by SR PM, LLC, which is controlled by TLS Capital. The new requested Certification deadline is 12/12/22.

The PA is concerned, however, that projects could use continued supply chain disruption as a means to delay action on projects that may not be ultimately financeable or otherwise viable. Therefore, the PA would recommend granting a single six-month extension to any project that is able to demonstrate challenges related to ongoing supply chain disruption, and would recommend a second extension only if the project is otherwise able to demonstrate progress towards certification in other ways.

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Because of this, the PA supports extending the certification deadline of these thirteen projects 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 project certification date be extended by six months.

Project Information

Project ID: PGE-2020-45

Project Name: Sesqui-C Solar, LLC

Project Manager: Conifer Community Energy 3, LLC

Subscription Manager: Oregon Shines

Utility Service Area: PGE

Project Site Address: 15000 Highway 47, Yamhill, OR 97148

Project Size (kW-AC): 2500

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-certified, 06/12/20

Project Description

Sesqui—C Solar is a 2500 kW-AC project located in Yamhill, Oregon, in Yamhill County. The project manager entity is controlled by Conifer Energy Partners, which currently manages 5 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 community solar program.

Review Summary

Date Review Completed: 05/12/22

Nature of the Amendment Request: Extend Certification Deadline is 12/22/22

PA Recommendation: Approve

Review Notes

A group of 13 projects, including this one, have requested a six-month extension of their Certification deadlines. Sesqui-C Solar has received one previous six month extension, prior to this one, that extended the Certification deadline from 12/12/21 to 06/12/22 due to delays related to the COVID-19 pandemic. Sesqui-C Solar is managed by Conifer Community Energy 3, LLC, which is controlled by Conifer Energy Partners LLC. The subscription manager is Oregon Shines. The new requested Certification deadline is 12/12/22.

The PA is concerned, however, that projects could use continued supply chain disruption as a means to delay action on projects that may not be ultimately financeable or otherwise viable. Therefore, the PA would recommend granting a single six-month extension to any project that is able to demonstrate challenges related to ongoing supply chain disruption, and would recommend a second extension only if the project is otherwise able to demonstrate progress towards certification in other ways.

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Because of this, the PA supports extending the certification deadline of these thirteen projects 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 project certification date be extended by six months.

Project Information

Project ID: PP-2021-93

Project Name: Sunset Ridge Solar

Project Manager: Sunset Ridge Project Manager, LLC

Subscription Manager: Oregon Shines **Utility Service Area:** Pacific Power

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

Project Size (kW-AC): 2250

Carveout-eligible: No

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

Project Description

Sunset Ridge Solar is a 2250 kW-AC project located in Klamath Falls, Oregon, in Klamath County. The project manager entity is controlled by Green Key Solar, which currently manages 5 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 community solar program.

Review Summary

Date Review Completed: 05/12/22

Nature of the Amendment Request: Extend Certification Deadline to 04/20/23

PA Recommendation: Approve

Review Notes

A group of 13 projects, including this one, have requested a six-month extension of their certification deadlines. This is Sunset Ridge Solar's first extension request. Sunset Ridge Solar is managed by Sunset Ridge Project Manager LLC, which is controlled by Green Key Solar. The subscription manager is Oregon Shines. This project's Certification deadline is currently 10/20/22 and is requesting to be extended to 04/20/23.

The PA is concerned, however, that projects could use continued supply chain disruption as a means to delay action on projects that may not be ultimately financeable or otherwise viable. Therefore, the PA would recommend granting a single six-month extension to any project that is able to demonstrate challenges related to ongoing supply chain disruption, and would recommend a second extension only if the project is otherwise able to demonstrate progress towards certification in other ways.

Among the seven projects that have requested a second extension, the PA confirms that the project managers have enrolled and verified enough participants to subscribe 97% of combined project capacity. The project managers have also signed interconnection agreements for all projects and indicated substantial progress in project development. Because of this, the PA considers these projects to be making considerable progress towards certification, and that current supply chain issues are the primary issue delaying the projects.

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Attachments Included



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-2021-92

Project Name: Whisky Creek Solar

Project Manager: Whisky Creek PM, LLC **Subscription Manager:** Oregon Shines **Utility Service Area:** Pacific Power

Project Site Address: 42°26′26.9″N, 121°16′23.8″W, Beatty, OR 97621

Project Size (kW-AC): 165 Carveout-eligible: Yes

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

Project Description

Whisky Creek Solar is a 165 kW-AC project located in Beatty, Oregon, in Klamath County. The project manager entity is controlled by TLS Capital, which currently manages 9 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 community solar program.

Review Summary

Date Review Completed: 05/12/22

Nature of the Amendment Request: Extend Certification Deadline to 04/20/23

PA Recommendation: Approve

Review Notes

A group of 13 projects, including this one, have requested a six-month extension of their certification deadlines. This is Whisky Creek Solar's first extension request. Whisky Creek Solar is managed by Whisky Creek PM, LLC, which is controlled by TLS Capital. This project's Certification deadline is currently 10/20/22 and is requesting to be extended to 04/20/23.

The PA is concerned, however, that projects could use continued supply chain disruption as a means to delay action on projects that may not be ultimately financeable or otherwise viable. Therefore, the PA would recommend granting a single six-month extension to any project that is able to demonstrate challenges related to ongoing supply chain disruption, and would recommend a second extension only if the project is otherwise able to demonstrate progress towards certification in other ways.

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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 certification date be extended by six months.

Project Information

Project ID: PP-2020-85

Project Name: Wocus Marsh Solar

Project Manager: Wocus Marsh PM, LLC Subscription Manager: Oregon Shines Utility Service Area: Pacific Power

Project Site Address: 42°16'16.70"N, 121°53'4.01"W, Klamath Falls, OR 97601

Project Size (kW-AC): 882 Carveout-eligible: No

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

Project Description

Wocus Marsh Solar is a 882 kW-AC project located in Klamath Falls, Oregon, in Klamath County. The project manager entity is controlled by TLS Capital, which currently manages 9 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 community solar program.

Review Summary

Date Review Completed: 05/12/22

Nature of the Amendment Request: Extend Certification Deadline to 04/20/23

PA Recommendation: Approve

Review Notes

A group of 13 projects, including this one, have requested a six-month extension of their certification deadlines. This is Wocus Marsh Solar's first extension request. Wocus Marsh Solar is managed by Wocus Marsh PM, LLC, which is controlled by TLS Capital. This project's Certification deadline is currently 10/20/22 and is requesting to be extended to 04/20/23.

The PA is concerned, however, that projects could use continued supply chain disruption as a means to delay action on projects that may not be ultimately financeable or otherwise viable. Therefore, the PA would recommend granting a single six-month extension to any project that is able to demonstrate challenges related to ongoing supply chain disruption, and would recommend a second extension only if the project is otherwise able to demonstrate progress towards certification in other ways.

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Because of this, the PA supports extending the certification deadline of these thirteen projects by six months.

Attachments Included

VIA EMAIL (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 a 6-month extension of the Precertification period.

Project	Project Manager	Pre-Cert. Date
Carnes Creek Solar	Conifer Community Energy 5, LLC	6/12/2020
Cherry Creek Solar	Cherry Creek Project Manager, LLC	7/27/2021
Cosper Creek Solar	Conifer Community Energy 1, LLC	6/12/2020
Fruitland Creek Solar	FC PM, LLC	6/12/2020
Kaiser Creek Solar	Kaiser Creek Project Manager, LLC	6/18/2020
Linkville Solar	Linkville PM, LLC	11/17/2020
Pine Grove Solar	Pine Grove PM, LLC	12/29/2020
Round Lake Solar	Round Lake PM, LLC	12/29/2020
Sandy River Solar	SR PM, LLC	6/12/2020
Sesqui C Solar	Conifer Community Energy 3, LLC	6/12/2020
Sunset Ridge Solar	Sunset Ridge Project Manager, LLC	4/20/2021
Whisky Creek Solar	Whisky Creek PM, LLC	4/20/2021
Wocus Marsh Solar	Wocus Marsh PM, LLC	4/20/2021

On March 28, 2022, the US Department of Commerce (the "DOC") announced that it would launch an investigation into the alleged circumvention of duties for solar panels imported into the United States from Cambodia, Malaysia, Thailand, and Vietnam, which currently account for approximately 80% of overall solar panels imported into the U.S. Because any new tariffs imposed as a result of the investigation can be applied retroactively, the investigation is already reaping havoc across the industry, with many module manufacturers no longer willing to import modules into the U.S. while the extent of this risk is unknown. Further, following the DOC's announcement, many module manufacturers cancelled or delayed existing orders, creating uncertainty with many projects that believed they had secured modules. Preliminary results from the DOC's investigation are expected in August 2022.

Of the Projects listed above, seven projects are fully constructed but are still awaiting modules to arrive at all of the sites. Three Projects have executed construction contracts and are expected to begin construction within the next month, but the exact date of module delivery is now unknown. The remaining Projects were in the process of negotiating module purchase agreements and construction contracts when the announcement was made, now creating uncertainty on their

planned schedules. The collective Projects have made nearly 100% of the required interconnection payments, representing over \$2.25 million in interconnection payments paid to date. Further, the collective Projects are approximately 94% subscribed. Unfortunately, most module delivery dates are now unknown.

At this time, it is not possible to quantify the delay in its' entirety, however, we are requesting a six (6) month extension for program compliance in order to work towards a solution with securing modules for each Project. We therefore respectfully request a six (6) month extension to the Pre-certification period.

Additional information regarding the impacts of the DOC's investigation can be found in the attached Solar Energy Industries Association presentation titled "Impact of the Auxin Solar Tariff Petition".

Thank you for your time and consideration.

Troy Snyder

Hunter Strader

Jonathan Nelson

on Behalf of FC PM, LLC SR PM, LLC Linkville PM, LLC

Pine Grove PM, LLC Round Lake PM, LLC Whisky Creek PM, LLC Wocus Marsh PM, LLC

on Behalf of

Kaiser Creek Project Manager, LLC Sunset Ridge Project Manager, LLC Cherry Creek Project Manager, LLC on Behalf of

Conifer Community Energy 5, LLC Conifer Community Energy 3, LLC Conifer Community Energy 1, LLC

cc: Fruitland Creek Solar, LLC

Sandy River Solar, LLC

Linkville Solar, LLC

Grove Solar, LLC

Round Lake Solar, LLC

Whisky Creek Solar, LLC

Wocus Marsh Solar, LLC

Kaiser Creek Solar, LLC

Sunset Ridge Solar, LLC

Cherry Creek Solar, LLC

Carnes Creek Solar, LLC

Sesqui C Solar, LLC

Cosper Creek Solar, LLC

Oregon Shines, LLC