

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1971

In the Matter of

WACONDA SOLAR, LLC,

Complainant,

v.

PORTLAND GENERAL ELECTRIC
COMPANY,

Defendant.

DECLARATION OF TROY
SNYDER IN SUPPORT OF
WACONDA SOLAR'S MOTION
FOR SUMMARY JUDGMENT

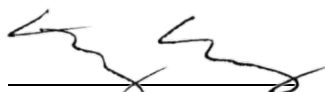
1. I, Troy Snyder, declare under the penalty of perjury as follows:
2. I am the principal owner of TLS Capital, Inc., developer of Waconda Solar, LLC ("Waconda Solar").
3. This declaration is based on my personal knowledge and, if called to testify to the following facts, I could and would competently do so. I submit this declaration in support of Waconda Solar's Motion for Summary Judgment.
4. Waconda Solar needs to be able to make informed, reasoned business decisions before pursuing the development of an energy project. Part of making informed business decisions is ensuring the interconnection costs Waconda Solar is going to pay are reasonable. One way for Waconda Solar to do this is to conduct an independent System Impact Study ("iSIS"). An iSIS allows Waconda Solar to rebut and challenge utility interconnection upgrades and costs. However, the iSIS costs money to conduct.

5. Waconda Solar is concerned that Portland General Electric Company's ("PGE's") review of the iSIS will be unreasonable, inconsistent with Good Utility Practice, unjustly discriminate against Waconda Solar, and not evaluate whether Waconda Solar is only responsible for system upgrades that are necessary to mitigate against adverse system impacts caused by the interconnection of Waconda Solar. To date, PGE has not been clear on what standards of review it will apply when it reviews an iSIS.

6. Waconda Solar needs clarity regarding its legal rights surrounding an iSIS before making an informed, reasoned business decision to expend money on the iSIS and potentially pursue development of the project. If the Commission is unwilling to provide clarity regarding how a utility must review an iSIS, then Waconda Solar is not willing to conduct the iSIS or pursue the project. Further, if PGE is not required to review the iSIS in a reasonable, non-discriminatory manner consistent with Good Utility Practice and the utility's obligation to identify system upgrades necessary to mitigate adverse system impacts caused by the interconnection of Waconda Solar, then Waconda Solar will abandon the project.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED this 4th day of February 2022.


Troy Snyder