

August 20, 2019

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
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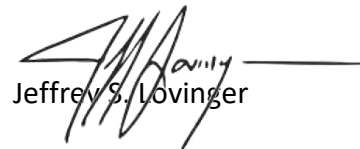
Re: UM 1971 - Waconda Solar, LLC v. Portland General Electric Company

Attention Filing Center:

Enclosed for filing today in the above-named docket is Jason Zappe's Declaration in Support of Portland General Electric Company's Second Motion for Summary Judgment.

Thank you for your assistance.

Very truly yours,


Jeffrey S. Lovinger

901667

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1971**

WACONDA SOLAR, LLC,

Complainant,

vs.

PORTLAND GENERAL ELECTRIC
COMPANY,

Defendant.

**DECLARATION OF JASON
ZAPPE IN SUPPORT OF
PORTLAND GENERAL
ELECTRIC COMPANY'S
SECOND MOTION FOR
SUMMARY JUDGMENT**

I, Jason Zappe, declare:

1. I am a Customer Generation Specialist at Portland General Electric Company ("PGE"), and I make this declaration in support of PGE's Second Motion for Summary Judgment. The following statements are true and correct and, if called upon, I could competently testify to the facts averred herein.

2. I am responsible for acting as the primary point of contact between PGE and interconnection applicants under the Public Utility Commission of Oregon's ("Commission") small generator interconnection rules; I have served in that role since January 3, 2017. As a result, I am familiar with the Commission's small generator interconnection rules and with PGE's implementation of those rules.

3. Waconda Solar, LLC ("Waconda") applied to interconnect its proposed project to PGE's distribution system on March 20, 2018. On March 27, 2018, PGE notified Waconda that its application appeared to be complete. A true and accurate copy of PGE's March 27, 2018, email providing this notice to Waconda is attached to this declaration as **Exhibit 1**. Following this notice, PGE assigned Waconda's interconnection application to queue position SPQ0172.

4. On April 5, 2018, PGE sent Waconda an email proposing a scoping meeting on April 9, 2018, or April 11, 2018. The same day, Waconda responded by email that it preferred to hold the scoping meeting on April 11, 2018. A true and accurate copy of this April 5, 2018,

email exchange is attached to this declaration as **Exhibit 2**. The parties held a scoping meeting on April 11, 2018.

5. Waconda executed a feasibility study agreement on April 17, 2018, and PGE received the study deposit on April 19, 2018.

6. On July 10, 2018, PGE completed the feasibility study and sent a copy of the study to Waconda.

7. On October 25, 2018, PGE completed the system impact study and provided a copy of that study to Waconda.

8. Waconda has not requested any specific information from PGE for the identified purpose of conducting an independent system impact study. Waconda has not requested access to any specific PGE facilities for the identified purpose of conducting an independent system impact study. To my knowledge, the only request Waconda has made for the identified purpose of conducting an independent system impact study is the following statement in an August 24, 2018, letter from Waconda's counsel to PGE's counsel: "Waconda Solar intends to seek an independent System Impact Study under OAR 860-082-0060(7)(h) ... please provide Waconda Solar with the system configuration so that its independent consultant can complete the study." A copy of that letter has already been made part of the record in this case as Exhibit I to PGE's Answer to the First Amended Complaint.

9. On June 27, 2019, interconnection application SPQ0048 withdrew from PGE's interconnection queue. SPQ0048 had applied to interconnect to the same feeder as Waconda and occupied a higher-queue position than Waconda. On July 9, 2019, PGE sent an email to Waconda indicating that a higher queued project (SPQ0048) on PGE's Waconda-13 feeder had withdrawn from the interconnection process and that PGE would therefore need to re-study the system impact study for the Waconda interconnection request. A true and accurate copy of this July 9, 2019 email is attached to this declaration as **Exhibit 3**.

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 19th day of August, 2019.



Jason Zappe

900852

From: Small Power Production
Sent: Tuesday, March 27, 2018 7:47 AM
To: Troy@tlscapital.com
Cc: Small Power Production
Subject: Application Received: Waconda

Dear Troy,

We are sending this notification to inform you that the Tier 4 Small Generator Facility Interconnection Application for the following projects has been received.

Waconda Solar, LLC

From our initial review, the application appears complete.

Thanks,



Nikee Weber

Interconnection Coordinator • 503-464-2264•

PortlandGeneral.com • Follow us on social @PortlandGeneral

From: Troy Snyder <troy@tlscapital.com>
Sent: Thursday, April 5, 2018 8:57 AM
To: Small Power Production
Subject: Re: Application Received: Waconda

Please take care when opening links, attachments or responding to this email as it originated outside of PGE.

That should be fine. Please send a calendar invite.

On Thu, Apr 5, 2018 at 8:54 AM, Small Power Production <Small.PowerProduction@pgn.com> wrote:

How about 9:30 then?

From: Troy Snyder [mailto:troy@tlscapital.com]
Sent: Thursday, April 5, 2018 8:47 AM

To: Small Power Production
Subject: Re: Application Received: Waconda

Please take care when opening links, attachments or responding to this email as it originated outside of PGE.

Nikki,

Let's do next Wednesday the 11th. I am available anytime that morning with the exception of 10:30 to 11:00.

Troy

On Thu, Apr 5, 2018 at 7:39 AM, Small Power Production <Small.PowerProduction@pgn.com> wrote:

So sorry Troy, I was out of the office most of last week and then things got busy. We are available in the morning on Monday the 9th and on Wednesday the 11th. Are you available either of those days?



Nikee Weber

Interconnection Coordinator • 503-464-2264•

PortlandGeneral.com • Follow us on social @PortlandGeneral

From: Troy Snyder [mailto:troy@tlscapital.com]
Sent: Wednesday, March 28, 2018 11:23 AM
To: Small Power Production
Subject: Re: Application Received: Waconda

Please take care when opening links, attachments or responding to this email as it originated outside of PGE.

Nikee,

I am generally available on Monday or Tuesday of next week.

Thanks,

Troy

On Tue, Mar 27, 2018 at 1:51 PM, Small Power Production <Small.PowerProduction@pgn.com> wrote:

Sorry Troy, I forgot to ask you when a good time for a scoping call would be?

Nikee Weber • Interconnection Coordinator • [503-464-2264](tel:503-464-2264)

From: Small Power Production
Sent: Tuesday, March 27, 2018 7:47 AM
To: Troy@tlscapital.com
Cc: Small Power Production
Subject: Application Received: Waconda

Dear Troy,

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Nikee Weber

Interconnection Coordinator • [503-464-2264](tel:503-464-2264)•

PortlandGeneral.com • Follow us on social @PortlandGeneral

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Troy Snyder

TLS Capital, Inc.

Phone: 503-816-6608

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Troy Snyder

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Phone: 503-816-6608

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Troy Snyder

TLS Capital, Inc.

Phone: 503-816-6608

From: Small Power Production <Small.PowerProduction@pgn.com>
Sent: Tuesday, July 9, 2019 1:51 PM
To: Troy Snyder
Cc: Small Power Production
Subject: Waconda Solar SPQ0172 - Restudy Required

Troy,

Recently a higher queued project (SPQ0048) on PGE's Waconda-13 feeder withdrew from the interconnection process. At the time the project withdrew it had a signed interconnection agreement.

Our engineering team has determined the withdrawal will cause the need for Waconda Solar to be restudied. The location of SPQ0048 in relation to the remaining projects make a restudy necessary to ensure the interconnection requirements are properly allocated.

Once Waconda Solar is ready to proceed a System Impact Study will be required.

Please let us know if you have any questions.



Jason Zappe

Customer Generation Specialist • 503-464-7264 • 503-464-8300
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