

## Via Electronic Mail

April 15, 2024

Filing Center  
Public Utility Commission of Oregon  
201 High St. SE  
Salem, OR 97301

Re: *GREEN SOLAR, LLC v. PACIFICORP, dba PACIFIC POWER*  
Docket No. UM 2305

Dear Filing Center:

Enclosed for filing in the above-reference docket, please find the supplemental exhibits 101-107 supporting Brandon Conard's testimony which was filed on Friday, April 12, 2024. These are documents that Green Solar, LLC ("Green Solar") intends to refer to in a Motion for Summary Judgment, and Green Solar is filing the supplemental exhibits early and at this time to expedite PacifiCorp's review of the Complaint, testimony, and other pleadings.

Please do not hesitate to contact me with any questions.

Sincerely,



Dustin Prater

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**Docket No. UM 2305**

GREEN SOLAR, LLC,

Complainant,

v.

PACIFICORP d/b/a PACIFIC POWER,

Defendant.

**EXHIBIT GREEN SOLAR/101**

**EMAILS BETWEEN GREEN SOLAR AND PACIFICORP REGARDING DESIGN**

**April 15, 2024**

---

**Billy Rowse** <B.Rowse@konistoco.com>

Mon, Aug 1, 2022 at 10:49 AM

To: "Pino, Mackenzie (PacifiCorp)" <Mackenzie.Pino@pacificorp.com>, "Martin, Jarrod (PacifiCorp)" <Jarrod.Martin@pacificorp.com>, Charles Buzzelli <charles@solrivercapital.com>, Christopher Sill <C.Sill@konistoco.com>, Sarah Smedley <sarah.smedley@meridiem-eng.com>, Tom Reece <tom.reece@meridiem-eng.com>, Tom Firstbrook <tom.firstbrook@meridiem-eng.com>, "Koslow, Nickolas (PacifiCorp)" <Nickolas.Koslow@pacificorp.com>  
Cc: Riley Sullivan <riley@solrivercapital.com>, John Brown <projects@solrivercapital.com>, Brandon Conard <brandon@solrivercapital.com>

Mackenzie,

Attached are the site layouts and the preliminary single line diagrams for Green and Wallace. We are still working on Marble as with the non typical voltage I am working with Vendors to procure and will complete single line once Inverters and transformer have been confirmed.

I feel it is really important to get review of drawings complete as well as what Pacific Corp plan is.

[Quoted text hidden]

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**4 attachments**

 **2022.07.12 GREEN SOLAR SITE LAYOUT.pdf**  
505K

 **2022.07.12 GREEN SOLAR PRELIM SLD.pdf**  
272K

 **2022.07.21 WALLACE SOLAR PRELIM SLD.pdf**  
273K

 **2022.07.22 WALLACE SOLAR SITE PLAN.pdf**  
2173K

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**Billy Rowse** <B.Rowse@konistoco.com>

Mon, Aug 1, 2022 at 11:03 AM

To: "Pino, Mackenzie (PacifiCorp)" <Mackenzie.Pino@pacificorp.com>, "Martin, Jarrod (PacifiCorp)" <Jarrod.Martin@pacificorp.com>, Charles Buzzelli <charles@solrivercapital.com>, Christopher Sill <C.Sill@konistoco.com>, Sarah Smedley <sarah.smedley@meridiem-eng.com>, Tom Reece <tom.reece@meridiem-eng.com>, Tom Firstbrook <tom.firstbrook@meridiem-eng.com>  
Cc: Riley Sullivan <riley@solrivercapital.com>, John Brown <projects@solrivercapital.com>, Brandon Conard <brandon@solrivercapital.com>

----- Forwarded message -----

From: Billy Rowse <B.Rowse@konistoco.com>  
To: "Engle, Ty (PacifiCorp)" <Ty.Engle@pacificorp.com>, "Bremer, Kristopher (PacifiCorp)" <Kristopher.Bremer@pacificorp.com>, Charles Buzzelli <charles@solrivercapital.com>, "Jeschke, Jordan (PacifiCorp)" <Jordan.Jeschke@pacificorp.com>  
Cc: "Pino, Mackenzie (PacifiCorp)" <Mackenzie.Pino@pacificorp.com>, Brandon Conard <brandon@solrivercapital.com>, Christopher Sill <C.Sill@konistoco.com>, John Brown <projects@solrivercapital.com>, "Martin, Jarrod (PacifiCorp)" <Jarrod.Martin@pacificorp.com>, "Cook, Steven (PacifiCorp)" <Steven.Cook@pacificorp.com>, "Hoffman, Tami (PacifiCorp)" <Tami.Hoffman@pacificorp.com>  
Bcc:  
Date: Thu, 8 Dec 2022 19:12:26 +0000  
Subject: RE: [INTERNET] Green Solar

**THIS MESSAGE IS FROM AN EXTERNAL SENDER.**

Look closely at the **SENDER** address. Do not open **ATTACHMENTS** unless expected. Check for **INDICATORS** of phishing. Hover over **LINKS** before clicking. [Learn to spot a phishing message](#)

Ty,

Sorry about that it is attached now

Billy

---

**From:** Engle, Ty (PacifiCorp) <Ty.Engle@pacificorp.com>  
**Sent:** Thursday, December 8, 2022 12:10 PM  
**To:** Billy Rowse <B.Rowse@KonistoCo.com>; Bremer, Kristopher (PacifiCorp) <Kristopher.Bremer@pacificorp.com>; Charles Buzzelli <charles@solrivercapital.com>; Jeschke, Jordan (PacifiCorp) <Jordan.Jeschke@pacificorp.com>  
**Cc:** Pino, Mackenzie (PacifiCorp) <Mackenzie.Pino@pacificorp.com>; Brandon Conard <brandon@solrivercapital.com>; Christopher Sill <C.Sill@KonistoCo.com>; John Brown <projects@solrivercapital.com>; Martin, Jarrod (PacifiCorp) <Jarrod.Martin@pacificorp.com>; Cook, Steven (PacifiCorp) <Steven.Cook@pacificorp.com>; Hoffman, Tami (PacifiCorp) <Tami.Hoffman@pacificorp.com>  
**Subject:** RE: [INTERNET] Green Solar

Good morning Billy,

Can you provide page E302. That was not part of the PDF you sent prior and our technical team needs that.

Thank you!

**Ty Engle**

**Transmission Services**

**PacifiCorp**

503.813.6419

825 NE Multnomah St, Suite 1600

Portland, OR 97232

---

**From:** Billy Rowse <B.Rowse@KonistoCo.com>  
**Sent:** Tuesday, December 6, 2022 2:34 PM  
**To:** Bremer, Kristopher (PacifiCorp) <Kristopher.Bremer@pacificorp.com>; Charles Buzzelli <charles@solrivercapital.com>; Jeschke, Jordan (PacifiCorp) <Jordan.Jeschke@pacificorp.com>  
**Cc:** Pino, Mackenzie (PacifiCorp) <Mackenzie.Pino@pacificorp.com>; Brandon Conard <brandon@solrivercapital.com>; Christopher Sill <C.Sill@KonistoCo.com>; John Brown <projects@solrivercapital.com>; Martin, Jarrod (PacifiCorp) <Jarrod.Martin@pacificorp.com>; Cook, Steven (PacifiCorp) <Steven.Cook@pacificorp.com>; Hoffman, Tami (PacifiCorp) <Tami.Hoffman@pacificorp.com>; Engle, Ty (PacifiCorp) <Ty.Engle@pacificorp.com>  
**Subject:** RE: [INTERNET] Green Solar

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Kris,

See attached for the SLD for the site.

Thanks,

Billy

---

**From:** Bremer, Kristopher (PacifiCorp) <Kristopher.Bremer@pacificorp.com>  
**Sent:** Tuesday, December 6, 2022 3:31 PM  
**To:** Charles Buzzelli <charles@solrivercapital.com>; Jeschke, Jordan (PacifiCorp) <Jordan.Jeschke@pacificorp.com>  
**Cc:** Pino, Mackenzie (PacifiCorp) <Mackenzie.Pino@pacificorp.com>; Brandon Conard <brandon@solrivercapital.com>; Christopher Sill <C.Sill@KonistoCo.com>; John Brown <projects@solrivercapital.com>; Martin, Jarrod (PacifiCorp) <Jarrod.Martin@pacificorp.com>; Cook, Steven (PacifiCorp) <Steven.Cook@pacificorp.com>; Hoffman, Tami (PacifiCorp) <Tami.Hoffman@pacificorp.com>; Billy Rowse <B.Rowse@KonistoCo.com>; Engle, Ty (PacifiCorp) <Ty.Engle@pacificorp.com>  
**Subject:** RE: [INTERNET] Green Solar

Hello All,

Apologies for the slow response here. Yes, if the inverters have changed from what was studied and what is called out in the SGIA then we'll need an amendment. Could someone please forward me the updated one line diagram. Thank you.

Kris Bremer

---

**From:** Charles Buzzelli <charles@solrivercapital.com>  
**Sent:** Friday, November 11, 2022 3:23 PM

To: Jeschke, Jordan (PacifiCorp) <Jordan.Jeschke@pacificorp.com>; Bremer, Kristopher (PacifiCorp) <Kristopher.Bremer@pacificorp.com>  
Cc: Pino, Mackenzie (PacifiCorp) <Mackenzie.Pino@pacificorp.com>; Brandon Conard <brandon@solrivercapital.com>; Christopher Sill <C.Sill@konistoco.com>; John Brown <projects@solrivercapital.com>; Martin, Jarrod (PacifiCorp) <Jarrod.Martin@pacificorp.com>; Cook, Steven (PacifiCorp) <Steven.Cook@pacificorp.com>; Hoffman, Tami (PacifiCorp) <Tami.Hoffman@pacificorp.com>; Billy Rowse <b.rowse@konistoco.com>  
Subject: Re: [INTERNET] Green Solar Conard/4

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All - adding Joey and Kris.

Joey - can you please advise on the question below?

Have a great weekend.

Thanks,

Charles

On Fri, Nov 4, 2022 at 3:01 PM Charles Buzzelli <charles@solrivercapital.com> wrote:

Mackenzie and PAC Team,

Following up on this chain, do we need to execute an amendment to the IA reflecting the acceptance of Billy's proposed inverter?

Thanks,

Charles

On Wed, Aug 31, 2022 at 8:54 AM Billy Rowse <B.Rowse@konistoco.com> wrote:

Mackenzie,

See attached for IFP electrical drawings. The SLD captures the Grounding transformer. Please review and advise.

Thanks,

Billy

**From:** Pino, Mackenzie (PacifiCorp) <Mackenzie.Pino@pacificorp.com>  
**Sent:** Tuesday, August 23, 2022 10:46 AM  
**To:** Billy Rowse <B.Rowse@KonistoCo.com>  
**Cc:** Brandon Conard <brandon@solrivercapital.com>; Christopher Sill <C.Sill@KonistoCo.com>; grace@solrivercapital.com; John Brown <projects@solrivercapital.com>; Martin, Jarrod (PacifiCorp) <Jarrod.Martin@pacificorp.com>; Cook, Steven (PacifiCorp) <Steven.Cook@pacificorp.com>; Hoffman, Tami (PacifiCorp) <Tami.Hoffman@pacificorp.com>  
**Subject:** RE: [INTERNET] Green Solar

Billy, see below in red the comments returned from our engineering teams. Let me know if you have any questions.

Thanks,

Mackenzie

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**From:** Billy Rowse <B.Rowse@KonistoCo.com>  
**Sent:** Thursday, August 18, 2022 1:43 PM  
**To:** Pino, Mackenzie (PacifiCorp) <Mackenzie.Pino@pacificorp.com>  
**Cc:** Brandon Conard <brandon@solrivercapital.com>; Christopher Sill <C.Sill@KonistoCo.com>; grace@solrivercapital.com; John Brown <projects@solrivercapital.com>; Martin, Jarrod (PacifiCorp) <Jarrod.Martin@pacificorp.com>; Cook, Steven (PacifiCorp) <steven.cook@pacificorp.com>; Hoffman, Tami (PacifiCorp) <tami.hoffman@pacificorp.com>  
**Subject:** [INTERNET] Green Solar

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Mackenzie,

Per that PAC call yesterday, below is our synopsis of the changes from the SGIA to what we are proposing:

- Inverters
  - SGIA shows (23) 125kVA string inverters, we propose (1) 3.425MVA (de-rated to 2.875MWac max) central inverter – **Approved as long as the as long as the new inverters meet the generation MW's, power factor and voltage requirements listed in the study**
- Grounding Transformer – **Not approved, there needs to be a grounding transformer as originally spec'd**
  - SGIA shows a 200kVA YG/d (5.5% Z, X/R = 4) grounding transformer. We propose a neutral grounding reactor connected to neutral of high-side of step-up transformer on the skid, specs as follows:
    - $X_{nr} = 9.375 \text{ ohm (+/- 10\%)}$
    - $X_o/R_o > 4$
    - $I_{nr} = 26.6\text{A (min.)}$
    - 5-sec fault withstand = 320A (min.)

I am also attaching to this email slightly updated drawings showing the revised pole/utility-entrance configuration, along w/ the kmz's showing the pole locations. Let me know if anything else needed on this at the moment.

Thanks,

Billy Rowse

Business Development

[b.rowse@konistoco.com](mailto:b.rowse@konistoco.com)

970-403-8731

970-749-7850

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**CHARLES BUZZELLI**

Investment Analyst – **SolRiver LLC**

o: (720) 400-8466 | [www.solriver.com](http://www.solriver.com)

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**CHARLES BUZZELLI**

Investment Analyst – **SolRiver LLC**

o: (720) 400-8466 | [www.solriver.com](http://www.solriver.com)

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**2 attachments**

 **Pages from 2022.10.14 GREEN ELE\_IFP\_R1.pdf**  
484K

 **RE: [INTERNET] Green Solar.eml**  
730K

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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**Docket No. UM 2305**

GREEN SOLAR, LLC,

Complainant,

v.

PACIFICORP d/b/a PACIFIC POWER,

Defendant.

**EXHIBIT GREEN SOLAR/102**

**EMAILS BETWEEN GREEN SOLAR AND PACIFICORP REGARDING  
TRANSMISSION UPGRADE**

**April 15, 2024**

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**CHARLES BUZZELLI**

Investment Associate – **SolRiver LLC**

o: (720) 400-8466 | [www.solriver.com](http://www.solriver.com)

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**CHARLES BUZZELLI**

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o: (720) 400-8466 | [www.solriver.com](http://www.solriver.com)

---

**Bremer, Kristopher (PacifiCorp)** <Kristopher.Bremer@pacificorp.com> Fri, Feb 17, 2023 at 10:08 AM  
To: Brandon Conard <brandon@solrivercapital.com>, "Jeschke, Jordan (PacifiCorp)" <Jordan.Jeschke@pacificorp.com>, "Martin, Jarrod (PacifiCorp)" <Jarrod.Martin@pacificorp.com>, Michael Jackson <M.Jackson@konistoco.com>, "Pino, Mackenzie (PacifiCorp)" <Mackenzie.Pino@pacificorp.com>, John Brown <projects@solrivercapital.com>

I have no availability today. Are there questions that Joey is unable to answer that need my input? If so, please provide and I'll try to respond via email.

Kris Bremer

[Quoted text hidden]

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**Brandon Conard** <brandon@solrivercapital.com> Fri, Feb 17, 2023 at 11:15 AM  
To: "Bremer, Kristopher (PacifiCorp)" <Kristopher.Bremer@pacificorp.com>  
Cc: "Jeschke, Jordan (PacifiCorp)" <Jordan.Jeschke@pacificorp.com>, "Martin, Jarrod (PacifiCorp)" <Jarrod.Martin@pacificorp.com>, Michael Jackson <M.Jackson@konistoco.com>, "Pino, Mackenzie (PacifiCorp)" <Mackenzie.Pino@pacificorp.com>, John Brown <projects@solrivercapital.com>

Kris -

Thanks for the response. On our last call with Joey, many of our most important questions received the answer of "We'll need Kris to answer that."

I'll try to summarize them here, but a phone call may be needed to provide the full context.

1. For Green - PacificCorp recently mentioned its substation work (unrelated to our project) will delay energization of our system by over 1 year. As PAC knows, the Green project is nearing completion. We are seeking to energize in April of 2023. Apparently, it will be annoying to PAC's IT department to connect the Green project before PAC completes unrelated transmission upgrades. It's not clear how that logistical preference is a valid basis for delay under the interconnection procedures or agreement. Moreover, the delay creates a massive hardship for us since we'll have a fully built system sitting dark for over a year. It may even mean the project breaches the Oregon Community Solar Program rules which requires us to get the project in service this year. Could you please help us work with PAC to obtain energization in April of 2023?
2. For Canyonville - We are awaiting your comment on the consolidated Canyonville impact study. We are also waiting to receive feedback on whether we could use radio instead of DTT for that site. Could you comment on either point?
3. For all projects - we are awaiting your comment on the inverter modification we proposed. We submitted designs showing the new inverters months ago. In order to meet ORCS schedule requirements, we had to go ahead and purchase those inverters. Now, before we can install them, we need PAC to approve them. Could we get comments or approval?

Thanks,

Brandon

**BRANDON CONARD**  
Managing Partner – **SolRiver Capital LLC**  
o: 720-593-1158 | [www.solrivercapital.com](http://www.solrivercapital.com)

[Quoted text hidden]

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**Bremer, Kristopher (PacifiCorp)** <Kristopher.Bremer@pacificorp.com> Fri, Feb 17, 2023 at 11:19 AM  
To: Brandon Conard <brandon@solrivercapital.com>  
Cc: "Jeschke, Jordan (PacifiCorp)" <Jordan.Jeschke@pacificorp.com>, "Martin, Jarrod (PacifiCorp)" <Jarrod.Martin@pacificorp.com>, Michael Jackson <M.Jackson@konistoco.com>, "Pino, Mackenzie (PacifiCorp)" <Mackenzie.Pino@pacificorp.com>, John Brown <projects@solrivercapital.com>

I have no further updates on the delay to Green. I'll try to tee that up to our Operations staff but will ask Joey to push that along.

The Canyonville study is ongoing. Will defer to Jarrod on current schedule.

I will also defer to Jarrod on the current status of the inverter updates.

[Quoted text hidden]

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**Martin, Jarrod (PacifiCorp)** <Jarrod.Martin@pacificorp.com> Fri, Feb 17, 2023 at 11:46 AM  
To: "Bremer, Kristopher (PacifiCorp)" <Kristopher.Bremer@pacificorp.com>  
Cc: "Jeschke, Jordan (PacifiCorp)" <Jordan.Jeschke@pacificorp.com>, Michael Jackson <M.Jackson@konistoco.com>, "Pino, Mackenzie (PacifiCorp)" <Mackenzie.Pino@pacificorp.com>, John Brown <projects@solrivercapital.com>, "Engle, Ty (PacifiCorp)" <Ty.Engle@pacificorp.com>

Kris,

See attached email. I see that we were working on an amendment for OCS045 to update inverters and a draft was started. However, I do not see other requests for updated inverters for any other projects for this customer. Ty or Mackenzie can correct if I'm wrong, but I don't show inverter requests except for OCS045. Do you want me to ask the customer to forward their other requests for updated inverters?

Thanks,

**Jarrod Martin**

Project Manager

Generation Interconnection

760.710.1554



[Quoted text hidden]

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**Pino, Mackenzie (PacifiCorp)** <Mackenzie.Pino@pacificorp.com> Fri, Feb 17, 2023 at 11:56 AM  
To: "Martin, Jarrod (PacifiCorp)" <Jarrod.Martin@pacificorp.com>, "Bremer, Kristopher (PacifiCorp)" <Kristopher.Bremer@pacificorp.com>  
Cc: "Jeschke, Jordan (PacifiCorp)" <Jordan.Jeschke@pacificorp.com>, Michael Jackson <M.Jackson@konistoco.com>, John Brown <projects@solrivercapital.com>, "Engle, Ty (PacifiCorp)" <Ty.Engle@pacificorp.com>

Jarrold, on our last call with them, the only ones I recall them asking about were the 045 Green Inverters. I think they were wanting us to give them a informal "go ahead" for the Green inverters because they feel they don't have time to wait for the formal amendment to come through. Is this something we can do?

Kris, as the latest on the Green delays. There was some internal conversation that there was a communication update that needed to happen in Culver substation before we can energize their site. Its not part of this project, it sounds like another project. I don't have email about it that I can find.

Joey, can you pass along the correspondence you have about this change in the substation?

Thanks,

Mackenzie

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**Docket No. UM 2305**

GREEN SOLAR, LLC,

Complainant,

v.

PACIFICORP d/b/a PACIFIC POWER,

Defendant.

**EXHIBIT GREEN SOLAR/103**

**EMAILS BETWEEN GREEN SOLAR AND PACIFICORP REGARDING EASEMENT**

**April 15, 2024**



John Brown <[john@solrivercapital.com](mailto:john@solrivercapital.com)>

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**RE: Green Solar**

5 messages

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**Jeschke, Jordan (PacifiCorp)** <[Jordan.Jeschke@pacificorp.com](mailto:Jordan.Jeschke@pacificorp.com)>

Wed, Apr 5, 2023 at 11:09 AM

To: John Brown <[projects@solrivercapital.com](mailto:projects@solrivercapital.com)>, Charles Buzzelli <[charles@solrivercapital.com](mailto:charles@solrivercapital.com)>

Cc: "Taylor, Imogen (PacifiCorp)" <[Imogen.Taylor@pacificorp.com](mailto:Imogen.Taylor@pacificorp.com)>

Solriver Capital team,

I could have sworn I brought this up in one of our previous meetings, I apologize if I didn't. To recap, Imogen (our Sr Property Agent) doesn't have a recent copy of the vesting deed for the property or a title report. The pro forma she has on file shows who is insured (Green Solar LLC), it doesn't show who owns the property. The deed she received is a deed of trust, not a vesting deed. She reached out to a title company and asked for a copy of the vesting deed, but has not heard back.

Can one of you guys send over a recent title report and vesting deed for the property on the west side of SW Green Drive? It's parcel no. 1212350000400. Alt APN is 3608.

Please and thank you,

-Joey

---

**From:** Taylor, Imogen (PacifiCorp) <[Imogen.Taylor@Pacificorp.com](mailto:Imogen.Taylor@Pacificorp.com)>

**Sent:** Wednesday, April 5, 2023 9:45 AM

**To:** Jeschke, Jordan (PacifiCorp) <[Jordan.Jeschke@pacificorp.com](mailto:Jordan.Jeschke@pacificorp.com)>

**Subject:** FW: Green Solar

Hi, Joey. It looks like we need two easements for Green Solar. Can you ask the developers please for a recent title report and vesting deed for the property on the west side of SW Green Drive?

It's parcel no. 1212350000400. Alt APN is 3608.

**Imogen Taylor** | *Sr. Property Agent*

Pronouns: she/her

**Pacific Power, Right of Way Department**

825 NE Multnomah Street | Suite 1700 | Portland, Oregon 97232

**Phone:** 503.813.6253

**Email:** [imogen.taylor@pacificorp.com](mailto:imogen.taylor@pacificorp.com)

**From:** Taylor, Imogen (PacifiCorp)  
**Sent:** Wednesday, March 22, 2023 8:13 AM  
**To:** Jeschke, Jordan (PacifiCorp) <[Jordan.Jeschke@pacificorp.com](mailto:Jordan.Jeschke@pacificorp.com)>  
**Subject:** FW: Green Solar

Hi, Joey. Looks like we need two easements. Can you ask the developers please for a recent title report and vesting deed for the property on the west side of SW Green Drive?

It's parcel no. 1212350000400. Alt APN is 3608.

**Imogen Taylor** | *Sr. Property Agent*

Pronouns: she/her

**Pacific Power, Right of Way Department**

825 NE Multnomah Street | Suite 1700 | Portland, Oregon 97232

**Phone:** 503.813.6253

**Email:** [imogen.taylor@pacificorp.com](mailto:imogen.taylor@pacificorp.com)

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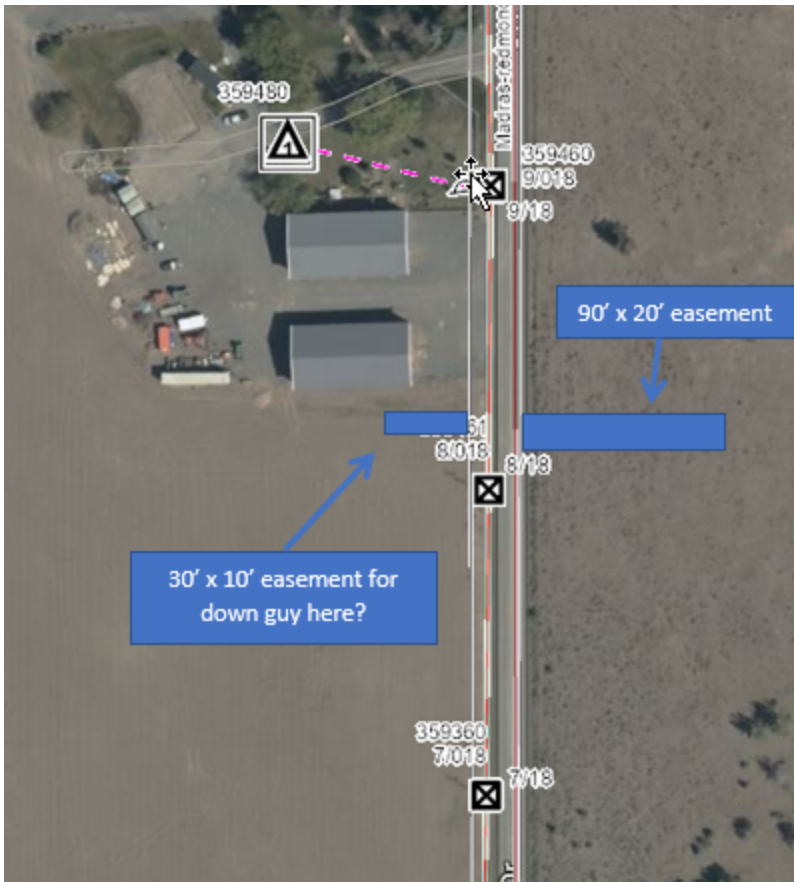
**From:** Hoffman, Tami (PacifiCorp) <[Tami.Hoffman@pacificorp.com](mailto:Tami.Hoffman@pacificorp.com)>  
**Sent:** Wednesday, March 22, 2023 7:34 AM  
**To:** Taylor, Imogen (PacifiCorp) <[Imogen.Taylor@Pacifcorp.com](mailto:Imogen.Taylor@Pacifcorp.com)>  
**Subject:** RE: Green Solar

That is correct. For the downguy/anchor.

---

**From:** Taylor, Imogen (PacifiCorp) <[Imogen.Taylor@Pacifcorp.com](mailto:Imogen.Taylor@Pacifcorp.com)>  
**Sent:** Tuesday, March 21, 2023 5:36 PM  
**To:** Hoffman, Tami (PacifiCorp) <[Tami.Hoffman@pacificorp.com](mailto:Tami.Hoffman@pacificorp.com)>  
**Cc:** Jeschke, Jordan (PacifiCorp) <[Jordan.Jeschke@pacificorp.com](mailto:Jordan.Jeschke@pacificorp.com)>  
**Subject:** RE: Green Solar

We need an easement over the parcel on the west side of SW Green Drive too?



**Imogen Taylor** | Sr. Property Agent

Pronouns: she/her

**Pacific Power, Right of Way Department**

825 NE Multnomah Street | Suite 1700 | Portland, Oregon 97232

**Phone:** 503.813.6253

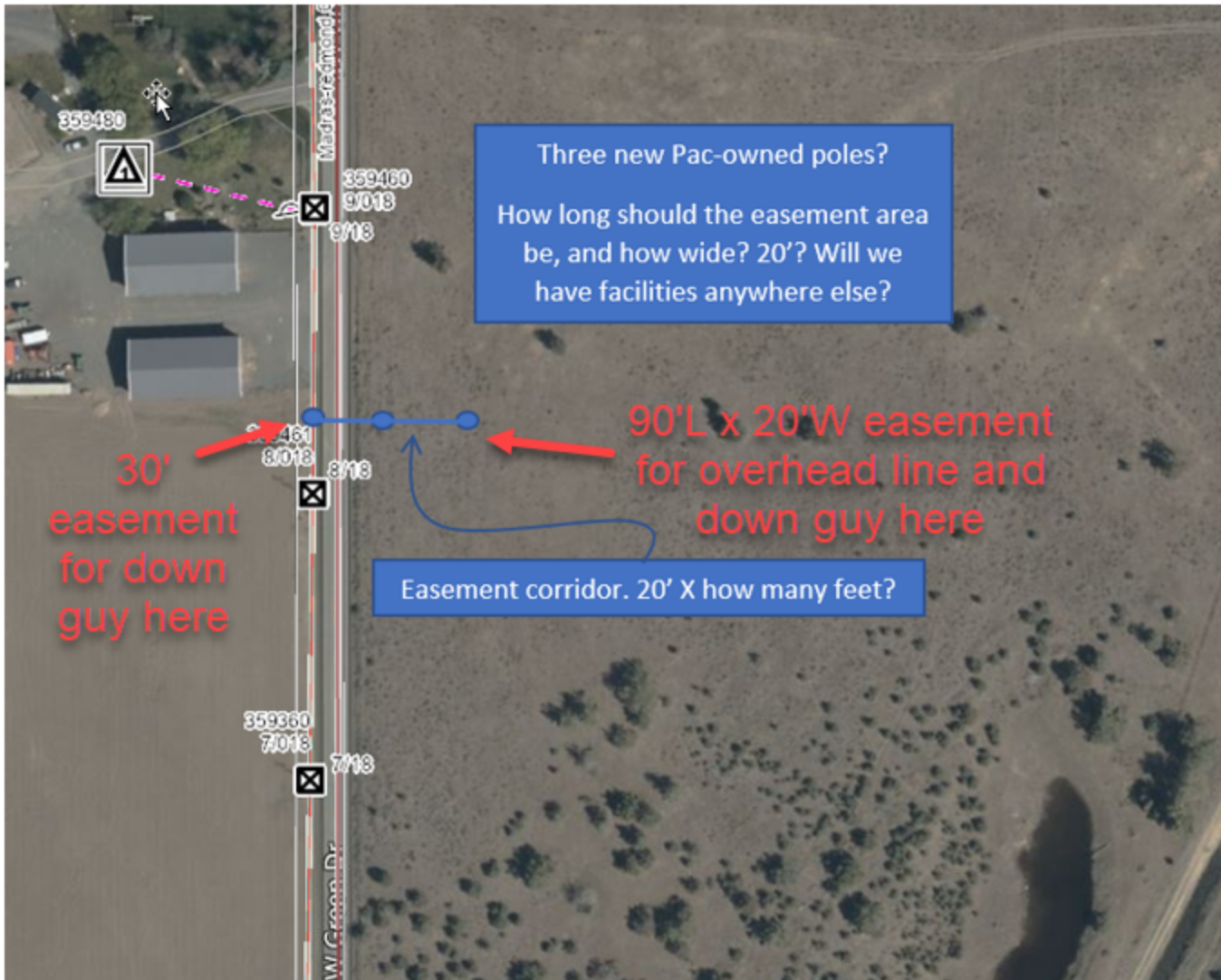
**Email:** [imogen.taylor@pacificorp.com](mailto:imogen.taylor@pacificorp.com)

---

**From:** Hoffman, Tami (PacifiCorp) <[Tami.Hoffman@pacificorp.com](mailto:Tami.Hoffman@pacificorp.com)>  
**Sent:** Tuesday, March 14, 2023 10:48 AM  
**To:** Taylor, Imogen (PacifiCorp) <[Imogen.Taylor@PacifiCorp.com](mailto:Imogen.Taylor@PacifiCorp.com)>  
**Cc:** Jeschke, Jordan (PacifiCorp) <[Jordan.Jeschke@pacificorp.com](mailto:Jordan.Jeschke@pacificorp.com)>  
**Subject:** RE: Green Solar

This is all we need.





**From:** Taylor, Imogen (PacifiCorp) <Imogen.Taylor@PacifiCorp.com>  
**Sent:** Tuesday, March 14, 2023 10:40 AM  
**To:** Hoffman, Tami (PacifiCorp) <Tami.Hoffman@pacifiCorp.com>  
**Cc:** Jeschke, Jordan (PacifiCorp) <Jordan.Jeschke@pacifiCorp.com>  
**Subject:** Green Solar

Hi, Tami.

I need some help please in figuring out where we need an easement (i.e. where there will be PacifiCorp-owned facilities) for the Green Solar project. Is my diagram below accurate? Do we just need a 20'-wide corridor in the location shown below? If so, how long should it be? Will there be PacifiCorp-owned facilities anywhere else?



**Imogen Taylor** | Sr. Property Agent

Pronouns: she/her

**Pacific Power, Right of Way Department**

825 NE Multnomah Street | Suite 1700 | Portland, Oregon 97232

**Phone:** 503.813.6253

**Email:** [imogen.taylor@pacificcorp.com](mailto:imogen.taylor@pacificcorp.com)

---

**Taylor, Imogen (PacifiCorp)** <[Imogen.Taylor@pacificcorp.com](mailto:Imogen.Taylor@pacificcorp.com)>

Wed, Apr 5, 2023 at 11:26 AM

To: "Jeschke, Jordan (PacifiCorp)" <[Jordan.Jeschke@pacificcorp.com](mailto:Jordan.Jeschke@pacificcorp.com)>, John Brown <[projects@solrivercapital.com](mailto:projects@solrivercapital.com)>, Charles Buzzelli <[charles@solrivercapital.com](mailto:charles@solrivercapital.com)>

Sorry – slight miscommunication on my part. That initial issue is resolved – I did get the vesting deed for the Ralph Lewis property (12 12 36 TL 500). What I need now is a title report and vesting deed for the property on the west side of SW Green Drive, as we will need an easement on that property for a down guy. This is property 12 12 35 TL 400, owned by Alley Homestead LLC.

Imogen Taylor | Sr. Property Agent

Pronouns: she/her

Pacific Power, Right of Way Department

825 NE Multnomah Street | Suite 1700 | Portland, Oregon 97232

Phone: 503.813.6253

Email: [imogen.taylor@pacificcorp.com](mailto:imogen.taylor@pacificcorp.com)

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**Brandon Conard** <[brandon@solrivercapital.com](mailto:brandon@solrivercapital.com)>

Wed, Apr 5, 2023 at 11:51 AM

To: "Taylor, Imogen (PacifiCorp)" <[Imogen.Taylor@pacificcorp.com](mailto:Imogen.Taylor@pacificcorp.com)>

Cc: "Jeschke, Jordan (PacifiCorp)" <[Jordan.Jeschke@pacificcorp.com](mailto:Jordan.Jeschke@pacificcorp.com)>, John Brown <[projects@solrivercapital.com](mailto:projects@solrivercapital.com)>, Charles Buzzelli <[charles@solrivercapital.com](mailto:charles@solrivercapital.com)>

Could we get on a call to discuss alternatives to this plan?

The Interconnection Agreement never required we obtain property rights from this landowner. We have now completed construction of the system and are simply waiting for PacificCorp to energize the system. Asking us at this late stage to secure land rights from an unknown site owner puts us in an impossible position. Surely there is a means for installing and securing PAC's poles within real estate already under control by Green Solar or PAC.

**BRANDON CONARD**

Managing Partner – **SolRiver Capital LLC**

o: 720-593-1158 | [www.solrivercapital.com](http://www.solrivercapital.com)

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**Jeschke, Jordan (PacifiCorp)** <[Jordan.Jeschke@pacificcorp.com](mailto:Jordan.Jeschke@pacificcorp.com)>

Wed, Apr 5, 2023 at 1:20 PM

To: Brandon Conard <[brandon@solrivercapital.com](mailto:brandon@solrivercapital.com)>, "Taylor, Imogen (PacifiCorp)" <[Imogen.Taylor@pacificcorp.com](mailto:Imogen.Taylor@pacificcorp.com)>

Cc: John Brown <[projects@solrivercapital.com](mailto:projects@solrivercapital.com)>, Charles Buzzelli <[charles@solrivercapital.com](mailto:charles@solrivercapital.com)>

Brandon,

I looked into it a little deeper and asked Tami to confirm if slack spanning over the roadway is possible so we can eliminate the need for down guying into the adjacent property. If that idea gets rejected and she has no other alternate solutions, ill set up a call to discuss in further detail.

Thanks,

-Joey

---

**From:** Brandon Conard <[brandon@solrivercapital.com](mailto:brandon@solrivercapital.com)>

**Sent:** Wednesday, April 5, 2023 10:51 AM

**To:** Taylor, Imogen (PacifiCorp) <[Imogen.Taylor@pacificcorp.com](mailto:Imogen.Taylor@pacificcorp.com)>

**Cc:** Jeschke, Jordan (PacifiCorp) <[Jordan.Jeschke@pacificcorp.com](mailto:Jordan.Jeschke@pacificcorp.com)>; John Brown <[projects@solrivercapital.com](mailto:projects@solrivercapital.com)>; Charles Buzzelli <[charles@solrivercapital.com](mailto:charles@solrivercapital.com)>

**Subject:** [INTERNET] Re: Green Solar

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**Brandon Conard** <brandon@solrivercapital.com>

Wed, Apr 5, 2023 at 1:53 PM

To: "Jeschke, Jordan (PacifiCorp)" <Jordan.Jeschke@pacificorp.com>

Cc: "Taylor, Imogen (PacifiCorp)" <Imogen.Taylor@pacificorp.com>, John Brown <projects@solrivercapital.com>, Charles Buzzelli <charles@solrivercapital.com>

Joey - Thank you. We look forward to hearing the response.

**BRANDON CONARD**

Managing Partner – **SolRiver Capital LLC**

o: 720-593-1158 | [www.solrivercapital.com](http://www.solrivercapital.com)

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----- Forwarded message -----

From: **Jeschke, Jordan (PacifiCorp)** <[Jordan.Jeschke@pacificorp.com](mailto:Jordan.Jeschke@pacificorp.com)>

Date: Fri, Jun 2, 2023 at 10:33 AM

Subject: RE: [INTERNET] Re: PAC - SolRiver - Green Easement / Right-of-Way

To: Jim Goldmann <[jim@solrivercapital.com](mailto:jim@solrivercapital.com)>

Jim,

As mentioned over phone, we don't have a defined right of way that is documented. The power lines and infrastructure were installed somewhere back in the 1920's-40's and the land was pretty much taken over to provide power to the community without easements or public right of way documented. Without surveying that specific location to see where the property owners land truly ends (or getting answers from the city), I don't think we will get that information.

Attached is our current franchise agreement that gives us the right to maintain and upgrade our facilities and infrastructure. It expires at the end of this year and the new agreement is to be released sometime in early 2024.

If it helps, these are the folks over at the city that I'm trying to get ahold of for additional clarification  
<https://www.culvercity.org/City-Hall/Departments/Public-Works>

**Engineering:** [\(310\) 253-5600](tel:3102535600)

Thanks,

-Joey

---

**From:** Jim Goldmann <[jim@solrivercapital.com](mailto:jim@solrivercapital.com)>

**Sent:** Thursday, June 1, 2023 4:28 PM

**To:** Hoffman, Tami (PacifiCorp) <[Tami.Hoffman@pacificorp.com](mailto:Tami.Hoffman@pacificorp.com)>

**Cc:** Taylor, Imogen (PacifiCorp) <[Imogen.Taylor@pacificorp.com](mailto:Imogen.Taylor@pacificorp.com)>; Jeschke, Jordan (PacifiCorp) <[Jordan.Jeschke@pacificorp.com](mailto:Jordan.Jeschke@pacificorp.com)>; John Brown <[projects@solrivercapital.com](mailto:projects@solrivercapital.com)>; Riley Sullivan <[riley@solrivercapital.com](mailto:riley@solrivercapital.com)>; Brandon Conard <[brandon@solrivercapital.com](mailto:brandon@solrivercapital.com)>; Charles Buzzelli <[charles@solrivercapital.com](mailto:charles@solrivercapital.com)>; Caroline Gaffney <[caroline@solrivercapital.com](mailto:caroline@solrivercapital.com)>

**Subject:** Re: [INTERNET] Re: PAC - SolRiver - Green Easement / Right-of-Way

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Tami -

When we spoke on May 23, 2023, we discussed two separate re-design options and potential lead times related to each. Of specific concern was the material lead times and additional costs this presented as it delays the project; it was stated that the self-supporting steel poles would take 36 weeks where the underground option would be approximately 24-32 weeks. It was further stated that we would have material lead times and costs by the end of that week (May 26, 2023) so we could timely evaluate how to proceed forward. The underlying issue is the need for the easement from an uncooperative landowner. Relevant to that discussion is the ROW of which we would like to review as part of deciding how best to proceed. Please provide a copy of the ROW for our review.

Thank you.

Jim Goldmann

On Thu, Jun 1, 2023 at 4:07 PM Hoffman, Tami (PacifiCorp) <[Tami.Hoffman@pacificorp.com](mailto:Tami.Hoffman@pacificorp.com)> wrote:

The last I heard, that is correct, we will not need the easement for the down guy/anchor across from the site. We will go underground across the street to serve the customer instead.

Tami



**From:** Taylor, Imogen (PacifiCorp) <[Imogen.Taylor@Pacifcorp.com](mailto:Imogen.Taylor@Pacifcorp.com)>  
**Sent:** Thursday, June 1, 2023 2:55 PM  
**To:** Jim Goldmann <[jim@solrivercapital.com](mailto:jim@solrivercapital.com)>; Jeschke, Jordan (PacifiCorp) <[Jordan.Jeschke@pacifcorp.com](mailto:Jordan.Jeschke@pacifcorp.com)>; Hoffman, Tami (PacifiCorp) <[Tami.Hoffman@pacifcorp.com](mailto:Tami.Hoffman@pacifcorp.com)>  
**Cc:** John Brown <[projects@solrivercapital.com](mailto:projects@solrivercapital.com)>; Riley Sullivan <[riley@solrivercapital.com](mailto:riley@solrivercapital.com)>; Brandon Conard <[brandon@solrivercapital.com](mailto:brandon@solrivercapital.com)>; Charles Buzzelli <[charles@solrivercapital.com](mailto:charles@solrivercapital.com)>; Caroline Gaffney <[caroline@solrivercapital.com](mailto:caroline@solrivercapital.com)>  
**Subject:** RE: [INTERNET] Re: PAC - SolRiver - Green Easement / Right-of-Way

Hi, Jim.

I wasn't part of that discussion so I'm not totally following, but I believe the design is being changed to avoid the need for that guy anchor. Joey and Tami should be able to provide more information on that.

**Imogen Taylor** | *Sr. Property Agent*

Pronouns: she/her

Pacific Power, Right of Way Department

825 NE Multnomah Street | Suite 1700 | Portland, Oregon 97232

**Phone:** 503.813.6253

**Email:** [imogen.taylor@pacifcorp.com](mailto:imogen.taylor@pacifcorp.com)

---

**From:** Jim Goldmann <[jim@solrivercapital.com](mailto:jim@solrivercapital.com)>  
**Sent:** Wednesday, May 31, 2023 12:33 PM  
**To:** Taylor, Imogen (PacifiCorp) <[Imogen.Taylor@pacifcorp.com](mailto:Imogen.Taylor@pacifcorp.com)>; Jeschke, Jordan (PacifiCorp) <[Jordan.Jeschke@pacifcorp.com](mailto:Jordan.Jeschke@pacifcorp.com)>  
**Cc:** John Brown <[projects@solrivercapital.com](mailto:projects@solrivercapital.com)>; Riley Sullivan <[riley@solrivercapital.com](mailto:riley@solrivercapital.com)>; Brandon Conard <[brandon@solrivercapital.com](mailto:brandon@solrivercapital.com)>; Charles Buzzelli <[charles@solrivercapital.com](mailto:charles@solrivercapital.com)>; Caroline Gaffney <[caroline@solrivercapital.com](mailto:caroline@solrivercapital.com)>  
**Subject:** [INTERNET] Re: PAC - SolRiver - Green Easement / Right-of-Way

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Jordan / Imogen -

I did not see if you had a chance to respond yet to my previous email. Please send us a copy of the ROW for Green.

Regards,

On Wed, May 24, 2023 at 9:11 AM Jim Goldmann <[jim@solrivercapital.com](mailto:jim@solrivercapital.com)> wrote:

Jordan / Imogen -

I wanted to follow up on the Green easement discussion from yesterday. In our discussion, you had indicated that the wire would be in the ROW, but that since the ROW did not have a width identified, an easement was required. Please send us a copy of the ROW as it relates to Green for our review.

Regards,

--

**Jim Goldmann, Jr.**

SOLRIVER | [www.solrivercapital.com](http://www.solrivercapital.com)

**o:** (720) 779-3276 | **c:** (414) 639-6378 | **e:** [jim@solrivercapital.com](mailto:jim@solrivercapital.com)

--

**Jim Goldmann**

**o:** (720) 779-3276 | **c:** (414) 639-6378 | **e:** [jim@solrivercapital.com](mailto:jim@solrivercapital.com)



**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**Docket No. UM 2305**

GREEN SOLAR, LLC,

Complainant,

v.

PACIFICORP d/b/a PACIFIC POWER,

Defendant.

**EXHIBIT GREEN SOLAR/104**

**EMAILS BETWEEN GREEN SOLAR AND PACIFICORP REGARDING FIRST IA  
AMENDMENT**

**April 15, 2024**



John Brown <john@solrivercapital.com>

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## OCS045 Green Solar LLC - Green Solar / Agreement to Amend Interconnection Agreement

4 messages

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**Martin, Jarrod (PacifiCorp)** <Jarrod.Martin@pacificorp.com> Fri, May 19, 2023 at 1:11 PM  
To: "projects@solrivercapital.com" <projects@solrivercapital.com>  
Cc: \_Transmission Contracts <TransmissionContracts@pacificorp.com>, Charles Buzzelli <charles@solrivercapital.com>

Dear Mr. Conard:

Please see attached for an Agreement to Amend Small Generator Interconnection Agreement (“Amendment”) for Green Solar LLC (“Interconnection Customer”).

Please **sign and email the Amendment to PacifiCorp**, no later than fifteen (15) Business Days (or by June 9, 2023).

Please note that **PacifiCorp will complete the month, day, and year sections on the first page** of the Amendment upon receipt.

Best Regards,

**Jarrold Martin**

Project Manager, Generation Interconnection

760.710.1554



**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**Docket No. UM 2305**

GREEN SOLAR, LLC,

Complainant,

v.

PACIFICORP d/b/a PACIFIC POWER,

Defendant.

**EXHIBIT GREEN SOLAR/105**

**EMAILS BETWEEN GREEN SOLAR AND PACIFICORP REGARDING  
DISTRIBUTION POLE SURVEY**

**April 15, 2024**



John Brown <john@solrivercapital.com>

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## Canyonville Easement & Study / Green Ground Study

4 messages

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**Jim Goldmann** <jim@solrivercapital.com>

Mon, Aug 21, 2023 at 6:10 PM

To: "Jeschke, Jordan (PacifiCorp)" <Jordan.Jeschke@pacificorp.com>, John Brown <projects@solrivercapital.com>

Joey -

When we discussed Canyonville in last week's meeting, you had indicated you would provide the language from PAC for the easement on Canyonville. Can you confirm when we should expect to receive that information? Additionally, you had indicated that you would confirm the need for a study by Monday. Can you confirm the need for completing that new study? Lastly, the ground survey for Green should be completed as it was requested on August 1. Can you confirm that status of the ground study?

Thank you.

Regards,

Jim Goldmann

---

**Jim Goldmann** <jim@solrivercapital.com>

Thu, Aug 24, 2023 at 8:42 AM

To: "Jeschke, Jordan (PacifiCorp)" <Jordan.Jeschke@pacificorp.com>, John Brown <projects@solrivercapital.com>

Joey - following up on my previous email. Please provide the general language for the location of the Canyonville Utility Easement, confirm need for new study, confirm what you said in the meeting regarding the intended design for Canyonville is now 2 meters onsite without the third master meter, and provide an update on Green (was the ground survey completed, if not completed, when is it scheduled, design and costing (either the details or the schedule to provide those details), etc.

Regards,

Jim Goldmann

[Quoted text hidden]

---

**Jim Goldmann** <jim@solrivercapital.com>

Mon, Aug 28, 2023 at 10:38 AM

To: "Jeschke, Jordan (PacifiCorp)" <Jordan.Jeschke@pacificorp.com>, John Brown <projects@solrivercapital.com>

Joey - please see previous questions/clarifications and update status with respect to Green and Canyonville items.

Regards,

Jim Goldmann

[Quoted text hidden]

---

**Jeschke, Jordan (PacifiCorp)** <Jordan.Jeschke@pacificorp.com>

Tue, Aug 29, 2023 at 10:13 AM

To: Jim Goldmann <jim@solrivercapital.com>, John Brown <projects@solrivercapital.com>

Jim,

Sorry I thought I thought I hit send on this one yesterday.

Canyonville: I spoke with our metering engineer there are 3 potential scenarios. Ultimately I need Kris to make a call on how we can approach the pole configuration. Regarding the easements, our estimator said she cannot confidently give us any feedback without having drawings that show our pole pathing.

Green: I got confirmation, "survey should be delivered by week of 8/21". We have our meeting regarding the project every Tuesday right before our meeting. Our latest scheduling estimates show Construction to begin Dec/Jan and ISD Feb/Mar 2024. I understand these timeframes are not ideal. In the meeting with the transmission group ill make a clear point that we need to further explore any creative options to expedite the process to get an earlier In-service date.

Thanks,

-Joey

---

**From:** Jim Goldmann <[jim@solrivercapital.com](mailto:jim@solrivercapital.com)>

**Sent:** Monday, August 28, 2023 9:39 AM

**To:** Jeschke, Jordan (PacifiCorp) <[Jordan.Jeschke@pacificorp.com](mailto:Jordan.Jeschke@pacificorp.com)>; John Brown <[projects@solrivercapital.com](mailto:projects@solrivercapital.com)>

**Subject:** [INTERNET] Re: Canyonville Easement & Study / Green Ground Study

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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**Docket No. UM 2305**

GREEN SOLAR, LLC,

Complainant,

v.

PACIFICORP d/b/a PACIFIC POWER,

Defendant.

**EXHIBIT GREEN SOLAR/106**

**EMAILS BETWEEN GREEN SOLAR AND PACIFICORP REGARDING MARCH 2024  
ENERGIZATION DATE AND VARIOUS DELAYS**

**April 15, 2024**

----- Forwarded message -----

From: **Bremer, Kristopher (PacifiCorp)** <[Kristopher.Bremer@pacificorp.com](mailto:Kristopher.Bremer@pacificorp.com)>  
Date: Wed, Apr 3, 2024, 1:16 PM  
Subject: RE: [INTERNET] SR | PAC - Green Interconnection Completion Date  
To: Brandon Conard <[brandon@solrivercapital.com](mailto:brandon@solrivercapital.com)>  
Cc: Edward Shogry <[edward@solrivercapital.com](mailto:edward@solrivercapital.com)>, John Brown <[projects@solrivercapital.com](mailto:projects@solrivercapital.com)>, Jeschke, Jordan (PacifiCorp) <[Jordan.Jeschke@pacificorp.com](mailto:Jordan.Jeschke@pacificorp.com)>, Moore, Robin (PacifiCorp) <[Robin.Moore@pacificorp.com](mailto:Robin.Moore@pacificorp.com)>, Jim Goldmann <[jim@solrivercapital.com](mailto:jim@solrivercapital.com)>, Tom Firstbrook <[tom.firstbrook@meridiem-eng.com](mailto:tom.firstbrook@meridiem-eng.com)>, Michael Jackson <[M.Jackson@konistoco.com](mailto:M.Jackson@konistoco.com)>, Billy Rowse <[B.Rowse@konistoco.com](mailto:B.Rowse@konistoco.com)>

SolRiver Team,

I'm writing to provide a status update on PacifiCorp construction in support of the Green Solar project. Unfortunately the news is not great.

First, as I mentioned in my email below, PacifiCorp has run into some significant rock in its Culver substation that is severely slowing down the process for the installation of the required conduit. The contractor performing the work is doing what they can to mitigate the timing while maintaining safety and reliability for the substation but it's likely to be another week before that work will be complete.

In addition, it has also been discovered that some communications equipment needed to be installed in support of the fiber optic cable and microwave links for the transfer trip requirements for the project may not have been ordered. PacifiCorp is working feverishly to determine if the material was actually ordered and received or not. PacifiCorp is also simultaneously attempting to determine if the missing material is available in other locations if it turns out it was not ordered. As it stands at this moment, those questions have not been answered so PacifiCorp will follow up as it gets more clarity. Worst case scenario appears to be that the longest lead item could be three weeks out if it needs to be ordered meaning energization of the project could push to the end of April.

To be clear, these issues have absolutely nothing to do with the request to sign an interconnection agreement amendment. PacifiCorp does not intend to hold up energization of the project if the amendment is not executed in its currently proposed draft.

PacifiCorp is doing everything it can to finalize the project and will provide status updates as soon as anything substantive is known but Green Solar will not be ready for energization this week.

Thank you.

Kris Bremer

---

**From:** Bremer, Kristopher (PacifiCorp) <[Kristopher.Bremer@pacificorp.com](mailto:Kristopher.Bremer@pacificorp.com)>  
**Sent:** Wednesday, March 27, 2024 7:23 AM  
**To:** Brandon Conard <[brandon@solrivercapital.com](mailto:brandon@solrivercapital.com)>  
**Cc:** Edward Shogry <[edward@solrivercapital.com](mailto:edward@solrivercapital.com)>; John Brown <[projects@solrivercapital.com](mailto:projects@solrivercapital.com)>; Jeschke, Jordan (PacifiCorp) <[Jordan.Jeschke@pacificorp.com](mailto:Jordan.Jeschke@pacificorp.com)>; Moore, Robin (PacifiCorp) <[Robin.Moore@pacificorp.com](mailto:Robin.Moore@pacificorp.com)>; Jim Goldmann <[jim@solrivercapital.com](mailto:jim@solrivercapital.com)>; Tom Firstbrook <[tom.firstbrook@meridiem-eng.com](mailto:tom.firstbrook@meridiem-eng.com)>; Michael Jackson <[M.Jackson@konistoco.com](mailto:M.Jackson@konistoco.com)>; Billy Rowse <[B.Rowse@konistoco.com](mailto:B.Rowse@konistoco.com)>  
**Subject:** RE: [INTERNET] SR | PAC - Green Interconnection Completion Date

Brandon,

Attached are the following documents:

1. Agreement to Amend SGIA. The amended SGIA contains a comprehensive update of everything that has changed with Green Solar since the original interconnection agreement was executed. It includes proposed changes from both SolRiver and PacifiCorp. This amendment agreement must be executed in order to allow energization of the Green Solar facility as the current agreement does not contain the equipment that is set to be energized. The amendment contains the following updates.
  - a. Updated contact information that shows SolRiver as the owner of the project.
  - b. A minor correction to PacifiCorp's contact information.



- c. Updated description of the equipment that SolRiver changed for the solar facility as well as an updated one line diagram.
  - d. Updated cost estimates for PacifiCorp's interconnection facilities and system upgrades.
  - e. Updated scope of work with revisions including the change to the line extension that PacifiCorp had to construct underground.
  - f. Update milestone schedule that aligns with actual dates.
2. A redline of the items proposed to be updated by SolRiver and PacifiCorp in the agreement.
  3. A cost estimate variance summary.

PacifiCorp is currently still targeting energization of the project next week but it has run into some issues with its fiber installation in the Culver substation due to unexpected rock in the area assumed to have conduit installed. PacifiCorp will keep SolRiver updated as progress is made.

Please let me know if you have any questions or concerns with the proposed updates to the agreement. If not, please sign and return the agreement as soon as possible. Thank you.

Kris Bremer

---

**From:** Brandon Conard <[brandon@solrivercapital.com](mailto:brandon@solrivercapital.com)>  
**Sent:** Monday, February 26, 2024 3:24 PM  
**To:** Jeschke, Jordan (PacifiCorp) <[jordan.jeschke@pacificorp.com](mailto:jordan.jeschke@pacificorp.com)>  
**Cc:** Edward Shogry <[edward@solrivercapital.com](mailto:edward@solrivercapital.com)>; Bremer, Kristopher (PacifiCorp) <[Kristopher.Bremer@pacificorp.com](mailto:Kristopher.Bremer@pacificorp.com)>; Martin, Jarrod (PacifiCorp) <[Jarrod.Martin@pacificorp.com](mailto:Jarrod.Martin@pacificorp.com)>; John Brown <[projects@solrivercapital.com](mailto:projects@solrivercapital.com)>  
**Subject:** Re: [INTERNET] SR | PAC - Green Interconnection Completion Date

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Kris,

We appreciate PacifiCorp confirming it will complete the work it must do to interconnect Green Solar by the end of the month. At the same time, to be clear, Green Solar cannot specifically opine on the cost estimates provided by PacifiCorp as explained below.

Nevertheless, Green Solar requests that PacifiCorp move forward to interconnect Green Solar as early as possible and no later than by April 1, 2024 and at the lowest cost possible.

Despite repeated requests, Green Solar has not received sufficient information to evaluate the potential change in interconnection costs. On the December 12, 2023 call with PacifiCorp, your team introduced for the first time a potential increase in the interconnection costs. At that time, we asked for more information on the potential cost change, a breakdown of the costs already spent for work done, and comparison of the work and cost estimate identified in the Interconnection Agreement with the new work scope and cost estimates. PacifiCorp stated it would provide this information, yet it has not done so. We received an email on January 31, 2024 with an estimate of the remaining costs, but not the rest of information we need. For example, that email did not speak to the scope of the new work versus the scope of work identified in the Interconnection Agreement. In addition, the information of costs already spent is not specific or clear. Therefore, Green Solar cannot evaluate PacifiCorp's new cost estimate or make informed business decisions if it does not have all the information.

Green Solar also understands that PacifiCorp believes that it can interconnect the project by April 1, 2024, which we request be completed without further delay at the lowest cost. The end of March 2024 is 18 months after the October 7 2022 commissioning date in the Interconnection Agreement. Further, it is four (4) months after the November 2023 in service date you committed to last April. We request that PacifiCorp honor the April 1, 2024 deadline, as time is of the essence with each day causing Green Solar substantial and increasing damage.

In requesting that PacifiCorp complete the interconnection at the lowest reasonable cost, Green Solar is explicitly not agreeing that the new total estimated cost or the completion date is reasonable or consistent with PacifiCorp's obligations. Moreover, Green Solar reserves all legal and contractual rights under the law, including but not limited to its rights under the Interconnection Agreement and the PPA, including the right to challenge the actual costs and completion date for the interconnection. Green Solar is expressly not agreeing that proceeding with interconnection discharges, in full or in part, permanently or temporarily, any of the current or past-due obligations of PacifiCorp, PacifiCorp's past and present parents, subsidiaries, affiliates, employees, officers, directors, shareholders, or assigns, nor discharges any of Green Solar's rights, including but not limited to, under an accord and satisfaction, substituted performance, suspension of performance, modification, waiver, release, or any other theory of law. Green Solar also reserves all its legal and contractual rights as noted in its Notice of Complaint from Docket No. UM 2305.

Please confirm that PacifiCorp is moving forward with the interconnection, its total estimated project cost, and completion date. Let us know if you have any questions or want to discuss.

Thank you,

Brandon Conard

on behalf of Green Solar

**BRANDON CONARD**

Managing Partner – **SolRiver Capital LLC**

o: 720-593-1158 | [www.solrivercapital.com](http://www.solrivercapital.com)

On Mon, Feb 19, 2024 at 1:51 PM Jeschke, Jordan (PacifiCorp)  
<[jordan.jeschke@pacificorp.com](mailto:jordan.jeschke@pacificorp.com)> wrote:

Edward,

Yes, we fully intend on having the site energized by the end of March 2024.

Thanks,

-Joey

---

**From:** Edward Shogry <[edward@solrivercapital.com](mailto:edward@solrivercapital.com)>

**Sent:** Friday, February 16, 2024 3:58 PM

**To:** Jeschke, Jordan (PacifiCorp) <[jordan.jeschke@pacificorp.com](mailto:jordan.jeschke@pacificorp.com)>; Bremer, Kristopher (PacifiCorp) <[Kristopher.Bremer@pacificorp.com](mailto:Kristopher.Bremer@pacificorp.com)>; Martin, Jarrod (PacifiCorp) <[Jarrod.Martin@pacificorp.com](mailto:Jarrod.Martin@pacificorp.com)>

**Cc:** John Brown <[projects@solrivercapital.com](mailto:projects@solrivercapital.com)>

**Subject:** [INTERNET] SR | PAC - Green Interconnection Completion Date

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Joey,

On the call today, you said PAC could confirm in writing that it will complete its work at Green and energize the system by the end of March 2024. Could you please send us that email confirmation this afternoon?

Thank you,

Edward Shogry

Analyst | SolRiver Capital  
(505) 379-0227



**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**Docket No. UM 2305**

GREEN SOLAR, LLC,

Complainant,

v.

PACIFICORP d/b/a PACIFIC POWER,

Defendant.

**EXHIBIT GREEN SOLAR/107**

**EMAILS BETWEEN GREEN SOLAR AND PACIFICORP REGARDING SECOND IA  
AMENDMENT**

**April 15, 2024**

**From:** Irion Sanger <irion@sanger-law.com>  
**Date:** Tuesday, April 9, 2024 at 8:17 PM  
**To:** "Eckenrod, Robert (PacifiCorp)" <Robert.Eckenrod@pacificorp.com>  
**Cc:** Ellie Hardwick <ellie@sanger-law.com>  
**Subject:** Green Solar Complaint

Rob,

Green Solar previously stated it may file a complaint if Green Solar was not interconnected by last Wednesday, April 3. From our understanding, Green Solar has not been interconnected. Green Solar intends to file a limited complaint regarding finalizing interconnection of Green Solar. Green Solar may later amend its complaint to include the additional items identified in its notice of intent and any other claims. The complaint will request that the Commission: 1) PacifiCorp to interconnection the facility by May 10 and PacifiCorp pay fines for interconnection delays, and 2) to execute the IA Amendment with the three agreed-upon changes and Green Solar's Reservation of Rights language for the single-line diagram in the IA Amendment, or include in the Commission order that Green Solar has a reservation of rights for the single-line diagram.

Green Solar is going to ask for expedited consideration, and we wanted to check in regarding PacifiCorp's position on the request for expedited consideration. Expedited consideration is necessary to ensure that the Commission can issue an order quickly to require PacifiCorp to interconnect the project.

Green Solar proposes the following schedule:

- Green Solar files Complaint – April 11, 2024
- PacifiCorp files Answer – April 18, 2024
- Green Solar files Motion for Summary Judgment – April 22, 2024
- PacifiCorp files Response to Green Solar’s Motion for Summary Judgment – April 29, 2024
- Green Solar files Reply to PacifiCorp’s Response to Green Solar’s Motion for Summary Judgment – May 2, 2024
- Commission Order by May 9, 2024.

Let us know if you have any questions or wish to discuss.

**Irion Sanger**

Sanger Law PC  
4031 SE Hawthorne Blvd.  
Portland, OR 97214

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Pronouns: he/him/his

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