

ORDER NO. 24-437

ENTERED Dec 10 2024

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1930

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Requesting Certification of Eight Projects
and Temporary Waivers of OAR 860-088-
0050(2)(c) in the Community Solar
Program.

ORDER

DISPOSITION: STAFF'S RECOMMENDATION ADOPTED

At its public meeting on December 10, 2024, the Public Utility Commission of Oregon adopted Staff's recommendation in this matter. The Staff Report with the recommendation is attached as Appendix A.

BY THE COMMISSION:



Alison Lackey
Chief Administrative Law Judge



A party may request rehearing or reconsideration of this order under ORS 756.561. A request for rehearing or reconsideration must be filed with the Commission within 60 days of the date of service of this order. The request must comply with the requirements in OAR 860-001-0720. A copy of the request must also be served on each party to the proceedings as provided in OAR 860-001-0180(2). A party may appeal this order by filing a petition for review with the Circuit Court for Marion County in compliance with ORS 183.484.

ITEM NO. CA10

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: December 10, 2024**

REGULAR **CONSENT** X **EFFECTIVE DATE** December 11, 2024

DATE: December 2, 2024

TO: Public Utility Commission

FROM: Joseph Abraham

THROUGH: Caroline Moore, JP Batmale, and Sarah Hall **SIGNED**

SUBJECT: OREGON PUBLIC UTILITY COMMISSION STAFF:
(Docket No. UM 1930)
Requesting Certification of eight projects and temporary waivers of OAR 860-088-0050(2)(c) in the Community Solar Program.

STAFF RECOMMENDATION:

Certify Marquam Creek Solar LLC, Belvedere Solar, Gun Club Solar LLC, Cork Solar LLC, Buckner Creek Solar LLC, Zena Solar, LLC, Dover Solar, and Chapman Creek Solar in the Community Solar Program and grant four requests for temporary waivers of OAR 860-088-0050(2)(c).

DISCUSSION:

Issue

Whether the Public Utility Commission of Oregon (Commission) should certify Marquam Creek Solar LLC, Belvedere Solar, Gun Club Solar LLC, Cork Solar LLC, Buckner Creek Solar LLC, Zena Solar, LLC, Dover Solar, and Chapman Creek Solar in the Community Solar Program and grant requested waivers.

Applicable Rule or Law

Section 22 of Senate Bill 1547, codified in ORS 757.386, directs the Commission to establish a community solar program (hereinafter referred to as "Program" or "CSP").

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On June 29, 2017, the Commission adopted formal rules for the Program under OAR Division 88 of Chapter 860. OAR 860-088-0050 details the requirements for project Certification, including compliance with applicable low-income requirements. OAR 860-088-0080(2) requires at least 10 percent of the total generating capacity of the Community Solar Program to be allocated exclusively for use by low-income residential customers.

Section 5.2 of the CSP Program Implementation Manual (PIM) outlines the information and documentation that projects must submit to the CSP Program Administrator (PA) as part of the Certification application.

Section 3.16 of the PIM allows the PA to recommend a of any PIM provision on a case-by-case basis as part of the Commission's decision on Pre-certification, waiver Certification, major Project amendment, or other decision reserved to the Commission.

Analysis

Background

A Project Manager (PM) registered with CSP may submit applications for project Certification to the PA. As required by OAR 860-088-0050(3), the PA reviews applications for compliance with Program requirements and recommends projects for Certification by the Commission. Certification is an important stage gate for CSP projects. Receiving Certification means that the project meets all Program requirements and can proceed to commercial operation.

The PA recently received Certification applications from the following eight projects. After reviewing the applications and supporting documentation provided by the PMs, the PA has recommended that the Commission certify these projects in the Program. See the Certification Recommendation Forms in Attachments A, B, C, D, E, F, G, and H.

Recommended Projects

Project Name	Name of Project Manager	Utility Territory	Project Size (kW-AC)	Attachment #	Waiver Requested
Marquam Creek Solar LLC	Marquam Creek Project Manager, LLC	Portland General Electric	1,900	Attachment A	No
Belvedere Solar	Belvedere Solar PM, LLC	Portland General Electric	2,970	Attachment B	No

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Project Name	Name of Project Manager	Utility Territory	Project Size (kW-AC)	Attachment #	Waiver Requested
Gun Club Solar LLC	Conifer Community Energy 2, LLC	Portland General Electric	2,500	Attachment C	No
Cork Solar LLC	Cork Solar PM, LLC	Portland General Electric	1,260	Attachment D	No
Buckner Creek Solar LLC	Conifer Community Energy, LLC	Portland General Electric	2,500	Attachment E	Yes
Zena Solar, LLC	Zena Solar, LLC	Portland General Electric	2,500	Attachment F	Yes
Dover Solar	Solar Town	Portland General Electric	1,980	Attachment G	Yes
Chapman Creek Solar	Chapman Creek Solar PM, LLC	Pacific Power	2,990	Attachment H	Yes

Marquam Creek Solar LLC

Marquam Creek Solar LLC is a 1,900 kW-AC project located in Marquam, Oregon, in Clackamas County. Marquam Creek Project Manager, LLC is controlled by Luminace. Outreach and customer management are conducted through Arcadia Community Solar, LLC.

Marquam Creek Solar LLC project was Pre-certified on April 15, 2022. On August 26, 2023, the PA used its delegated authority granted by the Commission to recommend a twelve-month extension of the project's Certification deadline to October 31, 2024.¹ The project cited construction delays as the reason for its request for extension to the Certification deadline.

On December 2, 2024, the PA again used its delegated authority to recommend a two-month extension to the project's Certification deadline to December 31, 2024. While this was a retroactive recommendation, the PM requested the extension in advance of the project's October 31, 2024, Certification deadline. In its request for an extension, the

¹ See Order No. 24-364 for the Commission's decision to grant the PA with delegated authority, which was first initially granted for twenty four months on January 25, 2022 in Order No.22-019. <https://apps.puc.state.or.us/orders/2024ords/24-364.pdf>.

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project cited the PM needed time to complete administrative work required for the project to meet the low-income (LI) subscription requirement for Certification.

The PM submitted the necessary Certification paperwork to the PA on November 13, 2024, prior to the project's Certification deadline of December 31, 2024. The PA completed its review on November 19, 2024, and recommends Certification in CSP.

Belvedere Solar

Belvedere Solar is a 2,970 kW-AC project located in Mt. Angel, Oregon, in Marion County. Belvedere Solar PM, LLC is controlled by Luminance. Outreach and customer management for the project are conducted through Common Energy LLC.

The Belvedere Solar project was Pre-certified on April 27, 2020. On February 23, 2022, the PA used its delegated authority granted by the Commission to recommend a six-month extension of the project's Certification deadline to August 7, 2022. In its request for an extension, the project cited delays related to the COVID-19 pandemic, including supply chain disruptions and increased material costs. The PA agreed these unforeseen circumstances caused the PM to be unable to meet their certification and operational deadlines.

On July 14, 2022, the PA again used its delegated authority to recommend a six-month extension to the project's Certification deadline to February 7, 2023. In its request, the PM cited uncertainty and supply chain issues caused by the U.S. Department of Commerce's investigation into imported solar panels from certain countries, which caused significant disruption in the domestic solar industry. The PA agreed these unforeseen circumstances caused the PM to be unable to meet their certification and operational deadlines.

On July 17, 2022, the PA again used its delegated authority to recommend a PM transfer from Belvedere Solar, LLC to Solar Town, LLC, which was controlled by SPI Solar, Inc.

On November 11, 2022, the PA again used its delegated authority to recommend a six-month extension to the project's Certification deadline from to August 7, 2023. In its request the PM cited continued uncertainty and supply chain issues caused by the U.S. Department of Commerce's investigation into imported solar panels from certain countries. The PA agreed these circumstances again caused the PM to be unable to meet their certification and operational deadlines.

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On August 26, 2023, the PA again used its delegated authority to recommend a PM transfer from Solar Town, LLC to Belvedere Solar PM, LLC, which is controlled by Luminance.

On August 26, 2023, the PA again used its delegated authority to recommend a twelve-month extension to the project's Certification deadline to August 11, 2024. The PM again cited delays resulting from residual impacts of the COVID-19 pandemic and supply chain issues.

On December 2, 2024, the PA used its delegated authority to recommend a three-month extension to the project's Certification deadline to December 3, 2024. While this was a retroactive recommendation, the PM requested the extension in advance of the August 11, 2024, Certification deadline. As a result, Staff has no concerns in this situation with accepting a Certification deadline that has already passed. The PM needed time to complete the administrative work required for the project to meet the LI subscription requirement for Certification.

The PM submitted the necessary Certification paperwork to the PA on November 13, 2024, prior to the project's Certification deadline of November 19, 2024. The PA completed its review on November 19, 2024, and recommends Certification in CSP. While this timeline has led Staff to recommend the Commission to certify the project after its Certification deadline, Staff and the PA have no concerns with certifying the project at this time. The Program considers that projects submitting Certification applications to the PA by the deadline to have met the deadline, while the PA and Staff may require additional time to review applications for recommendation to the Commission.

Gun Club Solar LLC

Gun Club Solar, LLC is a 2,500 kW-AC project located in Dundee, Oregon, in Yamhill County. The PM is Conifer Community Energy 2, LLC, which is controlled by Luminance. Outreach and customer management for the project are conducted by Arcadia Community Solar, LLC.

The Gun Club Solar project was Pre-certified on April 15, 2022. On August 26, 2023, the PA used its delegated authority to recommend a twelve-month extension of the project's Certification deadline to October 31, 2024. In its request, the project cited construction delays as the reason for the request for an extension to the Certification deadline.

On December 2, 2024, the PA again used its delegated authority to recommend a two-month extension to the project's Certification deadline to December 31, 2024. While this

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was a retroactive recommendation, the PM requested the extension in advance of the October 31, 2024, Certification deadline. As a result, Staff has no concerns in this situation with accepting a Certification deadline that has already passed. The PM needed time to complete the administrative work required for the project to meet the LI subscription requirement for Certification.

The PM submitted the necessary Certification paperwork to the PA on November 13, 2024, prior to the project's Certification deadline of December 31, 2024. The PA completed its review on November 19, 2024, and recommends Certification in CSP.

Cork Solar LLC

Cork Solar is a 1,260 kW-AC project located in Molalla, Oregon, in Clackamas County. The PM is Cork Solar PM, LLC, which is controlled by Luminace. Outreach and customer management for the project are conducted through Common Energy, LLC.

The Cork Solar project was Pre-certified on April 30, 2022. On August 26, 2023, the PA used its delegated authority to recommend a twelve-month extension of the project's Certification deadline to August 31, 2024. The project cited construction delays as the reason for the request for an extension to its Certification deadline.

On August 26, 2023, the PA again used its delegated authority to recommend a PM transfer from Solar Town, LLC, to Cork Solar, LLC, which was controlled by Luminace Sunbeam Holdings, LLC.

On December 3, 2024, the PA again used its delegated authority to recommend a four-month extension of the project's Certification deadline to December 31, 2024. While this was a retroactive recommendation, the PM requested the extension in advance of the project's August 31, 2024, Certification deadline. As a result, Staff has no concerns in this situation with accepting a Certification deadline that has already passed. The PM needed time to complete the administrative work required for the project to meet the LI subscription requirement for Certification.

The PM submitted the necessary Certification paperwork to the PA on November 13, 2024, prior to the project's Certification deadline of December 31, 2024. PA completed its review on November 19, 2024, and recommends Certification in CSP.

Buckner Creek Solar LLC

Buckner Creek Solar, LLC is a 2,500 kW-AC project located in Oregon City, Oregon, in Clackamas County. The PM is Conifer Community Energy, LLC, which is controlled by Luminance. Outreach and customer management for the project are conducted by Arcadia Community Solar, LLC.

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The Buckner Creek Solar project was Pre-certified on April 15, 2022. On October 13, 2023, the PA used its delegated authority to recommend a fourteen-month and sixteen-day extension of the project's Certification deadline to December 31, 2024. In its request for a Certification deadline extension, the project cited development delays and needing more time to construct the project.

The PM submitted the necessary Certification paperwork to the PA on November 13, 2024, prior to the project's Certification deadline of December 31, 2024. The PA completed its review on November 19, 2024, and has determined the project meets all Certification requirements with the exception of the LI subscription requirement. However, the PA indicates the PM requested Low-Income Facilitator (LIF) support to meet the project's LI subscription requirement with adequate advance notice. The PM also provided adequate advance notice that it was prepared to receive LI participant referrals and complete LI enrollment.

Staff notes the LIF is experiencing a high number of projects simultaneously requesting its assistance with meeting the Program's LI subscription requirement. Despite the PM's adequate advanced notice, this has prevented the LIF from providing the project with LI participant referrals sufficient for the project to meet its LI subscription requirement. Staff notes the LIF has already increased its capacity to support projects and has begun decreasing the backlog of support requested by projects.

Given these circumstances, the PA recommends Certifying the project with a waiver of the LI subscription requirement for a period of 90 days from Certification. This will allow participants currently subscribed to begin receiving benefits now. The PA and LIF are confident that within 90 days of Certification, the project will have received all necessary LI referrals from the LIF and can reasonably execute contracts with those LIF referrals to meet the LI subscription requirement.

Zena Solar, LLC

Zena Solar, LLC is a 2,500 kW-AC project located in Salem, Oregon, in Polk County. The PM is Zena Solar, LLC, which is controlled by UGEI. Outreach and customer management are conducted through Common Energy LLC.

The Zena Solar project was Pre-certified on April 15, 2022. On November 10, 2023, the PA used its delegated authority to recommend a twelve-month extension of the project's Certification deadline to July 26, 2024. The project cited construction delays as the reason for the request for an extension to the Certification deadline.

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On February 21, 2024, the PA again used its delegated authority to recommend a PM transfer from Conifer Community Energy 6, LLC, to Zena Solar, LLC, which was controlled by UGE International.

On December 3, 2024, the PA again used its delegated authority to recommend a six-month extension of the project's Certification deadline to January 31, 2025. While this was a retroactive recommendation, the PM requested the extension in advance of the July 26, 2024, Certification deadline. As a result, Staff has no concerns in this situation with accepting a Certification deadline that has already passed. The PM needed time to complete administrative work required for the project to meet the LI subscription requirement for Certification.

The PM submitted the necessary Certification paperwork to the PA on November 13, 2024, prior to the project's Certification deadline of December 31, 2024. The PA completed its review on November 19, 2024, and has determined the project meets all Certification requirements with the exception of the LI subscription requirement. However, the PA indicates the PM requested LIF support to meet the project's LI subscription requirement with adequate advance notice. The PM also provided adequate advance notice that it was prepared to receive LI participant referrals and complete LI enrollment.

As noted previously, the LIF has been experiencing a high number of projects simultaneously requesting its assistance with meeting the Program's LI subscription requirement. Despite the PM's adequate advanced notice, this has similarly prevented the LIF from providing the project with LI participant referrals sufficient for the project to meet its LI subscription requirement.

Given these circumstances, the PA recommends Certifying Zena Solar, LLC with a waiver of the LI subscription requirement for a period of six months from Certification. This will allow participants currently subscribed to begin receiving benefits now. The PA and LIF are confident that within six months of Certification, the project will have received all necessary LI referrals from the LIF and can reasonably execute contracts with those LIF referrals to meet the LI subscription requirement.

Dover Solar

Dover Solar is a 1,980 kW-AC project located in Canby, Oregon, in Marion County. The PM is Solar Town, which is controlled by Luminance. Outreach and customer management are conducted through Common Energy LLC.

Dover Solar project was Pre-certified on April 27, 2020. On February 23, 2022, the PA used its delegated authority to recommend a six-month extension of the project's

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Certification deadline to July 1, 2022. In its request for an extension, the project cited delays related to the COVID-19 pandemic, including supply chain disruptions and increased material costs. The PA agreed these unforeseen circumstances caused the PM to be unable to meet their certification and operational deadlines.

On July 14, 2022, the PA again used its delegated authority to recommend a six-month extension of the project's Certification deadline to January 1, 2023. The PM cited uncertainty and supply chain issues caused by the U.S. Department of Commerce's investigation into imported solar panels from certain countries, which caused significant disruption in the domestic solar industry. The PA agreed these unforeseen circumstances caused the project to be unable to meet its certification deadline.

On July 27, 2022, the PA again used its delegated authority to recommend a PM transfer from Dover Solar, LLC, to Solar Town, LLC, which was controlled by SPI Solar, LLC.

On November 11, 2022, the PA again used its delegated authority to recommend a six-month extension of the project's Certification deadline to July 1, 2023. The PM cited continued uncertainty and supply chain issues caused by the U.S. Department of Commerce's investigation into imported solar panels from certain countries, which caused significant disruption in the domestic solar industry. The PA agreed these unforeseen circumstances again caused the PM to be unable to meet their certification and operational deadlines.

On August 26, 2023, the PM again used its delegated authority to recommend a project management transfer from Solar Town to a project specific LLC owned by Luminace Sunbeam Holdings LLC.

On August 26, 2023, the PM again used its delegated authority to recommend a seven-month extension to the project's Certification deadline to March 1, 2024. The PM cited interconnection and construction delays.

On April 5, 2024, the PA again used delegated authority to recommend a one-hundred-and-eighty-day extension to the project's Certification deadline to August 27, 2024. The PM requested an extension to complete general and LI customer enrollment.

On December 3, 2024, the PA again used its delegated authority to recommend a five-month extension to the project's Certification deadline to February 5, 2025. While this was a retroactive recommendation, the PM requested the extension in advance of the project's August 27, 2024, Certification deadline. As a result, Staff has no concerns in this situation with accepting a Certification deadline that has already passed. The PM

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needed time to complete administrative work required for the project to meet the LI subscription requirement for Certification.

The PM submitted the necessary Certification paperwork to the PA on November 19, 2024, prior to the project's Certification deadline of February 5, 2025. The PA completed its review on November 19, 2024, and has determined the project meets all Certification requirements with the exception of the LI subscription requirement. However, the PA indicates the PM requested LIF support to meet the project's LI subscription requirement with adequate advance notice. The PM also provided adequate advance notice that it was prepared to receive LI participant referrals and complete LI enrollment.

As noted previously, the LIF has been experiencing a high number of projects simultaneously requesting its assistance with meeting the Program's LI subscription requirement. Despite the PM's adequate advanced notice, this has similarly prevented the LIF from providing the project with LI participant referrals sufficient for the project to meet its LI subscription requirement.

Given these circumstances the PA recommends Certifying Dover Solar with a waiver of the LI subscription requirement for a period of six months from Certification. This will allow participants currently subscribed to begin receiving benefits now. The PA and LIF are confident that within six months of Certification, the project will have received all necessary LI referrals from the LIF and can reasonably execute contracts with those LIF referrals to meet the LI subscription requirement.

Chapman Creek Solar

Chapman Creek Solar is a 2,990 kW-AC project located in Cave Junction, Oregon, in Josephine County. The PM is Chapman Creek PM, LLC, which is controlled by Luminace. Outreach and customer management are conducted through Arcadia Community Solar, LLC.

Chapman Creek Solar project was Pre-certified on April 15, 2022. On November 11, 2023, the PA used its delegated authority to recommend a twelve-month extension of the project's Certification deadline to October 15, 2024. In its request for an extension, the project cited interconnection delays and the contractor's scheduling constraints as a reason for delay.

On December 3, 2024, the PA again used its delegated authority to recommend a two-month and sixteen-day extension of the project's Certification deadline to December 31, 2024. While this was a retroactive recommendation, the PM requested the extension in advance of the project's October 15, 2024, Certification deadline. As a result, Staff has no concerns in this situation with accepting a Certification deadline that has already

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passed. The PM needed time to complete administrative work required for the project to meet the low-income subscription requirement for Certification.

The PM submitted the necessary Certification paperwork to the PA on November 13, 2024. The PA completed its review on November 19, 2024, and has determined the project meets all Certification requirements with the exception of the LI subscription requirement. However, the PA indicates the PM requested LIF support to meet the project's LI subscription requirement with adequate advance notice. The PM also provided adequate advance notice that it was prepared to receive LI participant referrals and complete LI enrollment.

As noted previously, the LIF has been experiencing a high number of projects simultaneously requesting its assistance with meeting the Program's LI subscription requirement. Despite the PM's adequate advanced notice, this has similarly prevented the LIF from providing the project with LI participant referrals sufficient for the project to meet its LI subscription requirement.

Given these circumstances the PA recommends Certifying Chapman Creek Solar with a waiver of the LI subscription requirement for a period of 90 days from Certification. This will allow participants currently subscribed to begin receiving benefits now. The PA and LIF are confident that within 90 days of Certification the project will have received all necessary LI referrals from the LIF and can reasonably execute contracts with those LIF referrals to meet the LI subscription requirement.

Conclusion

Staff has discussed the project applications with the PA and reviewed CSP requirements. Staff supports the PA's recommendation that the Commission approve Certification of Marquam Creek Solar LLC, Belvedere Solar, Gun Club Solar LLC, Cork Solar LLC, Buckner Creek Solar LLC, Zena Solar, LLC, Dover Solar, and Chapman Creek Solar in the Program.

PROPOSED COMMISSION MOTION:

Certify Marquam Creek Solar LLC, Belvedere Solar, Gun Club Solar LLC, Cork Solar LLC, Buckner Creek Solar LLC, Zena Solar, LLC, Dover Solar, and Chapman Creek Solar in the Community Solar Program and grant four requests for temporary waivers of OAR 860-088-0050(2)(c).

Project Certification Review and Recommendation

The Oregon Community Solar Program Administrator (PA) has reviewed the certification request of the project described below and recommends that the project be Certified.

Project Information

Project ID: PGE-2020-53

Project Name: Marquam Creek Solar LLC

Project Manager: Marquam Creek Project Manager, LLC

Subscription Manager: Arcadia Community Solar, LLC

Utility Service Area: PGE

Project Site Address: 36140 Hwy 213 Marquam, OR 97038

Project Size (kW-AC): 1,900

Carveout-eligible: No

Date of Pre-Certification: 4/15/2022

Expected Commercial Operations Date: 11/22/2024

Project Description

Marquam Creek Solar LLC is a 1,900 kW-AC project located in Marquam, Oregon, in Clackamas County. Marquam Creek Project Manager, LLC is controlled by Luminace. Outreach and customer management are conducted through Arcadia Community Solar, LLC.

Review Summary

Date Review Completed: 11/19/2024

Project Satisfies all Certification Requirements?: Yes

PA Recommendation: Approve

Review Notes

No Review Notes.

Attachments Included

No attachments.

Project Certification Review and Recommendation

The Oregon Community Solar Program Administrator (PA) has reviewed the certification request of the project described below and recommends that the project be Certified.

Project Information

Project ID: PGE-2020-15

Project Name: Belvedere Solar

Project Manager: Belvedere Solar PM, LLC

Subscription Manager: Common Energy LLC

Utility Service Area: PGE

Project Site Address: 9526-9530 Mt Angel Highway NE, Mt. Angel, OR 97362

Project Size (kW-AC): 2,970

Carveout-eligible: No

Date of Pre-Certification: 4/27/2020

Expected Commercial Operations Date: 10/15/2024

Project Description

Belvedere Solar is a 2,970 kW-AC project located in Mt. Angel, Oregon, in Marion County.

Belvedere Solar PM, LLC is controlled by Luminance. Outreach and customer management for the project are conducted through Common Energy LLC.

Review Summary

Date Review Completed: 11/19/2024

Project Satisfies all Certification Requirements?: Yes

PA Recommendation: Approve

Review Notes

No review notes.

Attachments Included

No attachment.

Project Certification Review and Recommendation

The Oregon Community Solar Program Administrator (PA) has reviewed the certification request of the project described below and recommends that the project be Certified.

Project Information

Project ID: PGE-2020-37

Project Name: Gun Club Solar LLC

Project Manager: Conifer Community Energy 2, LLC

Subscription Manager: Arcadia Community Solar, LLC

Utility Service Area: PGE

Project Site Address: 45.267°, -123.014°, Dundee, OR 97115

Project Size (kW-AC): 2,500

Carveout-eligible: No

Date of Pre-Certification: 4/15/2022

Expected Commercial Operations Date: 11/20/2024

Project Description

Gun Club Solar LLC is a 2,500 kW-AC project located in Dundee, Oregon, in Yamhill County. Conifer Community Energy 2, LLC is controlled by Luminace. Outreach and customer management are conducted through Arcadia Community Solar, LLC.

Review Summary

Date Review Completed: 11/19/2024

Project Satisfies all Certification Requirements?: Yes

PA Recommendation: Approve

Review Notes

No review notes.

Attachments Included

No attachments.

Project Certification Review and Recommendation

The Oregon Community Solar Program Administrator (PA) has reviewed the certification request of the project described below and recommends that the project be Certified

Project Information

Project ID: PGE-2020-11

Project Name: Cork Solar LLC

Project Manager: Cork Solar PM, LLC

Subscription Manager: Common Energy LLC

Utility Service Area: PGE

Project Site Address: 33212 South Adams Road, Molalla, OR 97038

Project Size (kW-AC): 1,260

Carveout-eligible: No

Date of Pre-Certification: 4/30/2022

Expected Commercial Operations Date: 11/25/2024

Project Description

Cork Solar is a 1,260 kW-AC project located in Molalla, Oregon, in Clackamas County. Cork Solar PM, LLC is controlled by Luminace. Outreach and customer management for the project are conducted through Common Energy LLC.

Review Summary

Date Review Completed: 11/22/2024

Project Satisfies all Certification Requirements?: Yes

PA Recommendation: Approve

Review Notes

No Review notes.

Attachments Included

No attachments.

Project Certification Review and Recommendation

The Oregon Community Solar Program Administrator (PA) has reviewed the certification request of the project described below and recommends that the project be Certified with a waiver.

Project Information

Project ID: PGE-2020-21

Project Name: Buckner Creek Solar LLC

Project Manager: Conifer Community Energy, LLC

Subscription Manager: Arcadia Community Solar, LLC

Utility Service Area: PGE

Project Site Address: 15050 S Spangler Rd, Oregon City, OR 97045

Project Size (kW-AC): 2,500

Carveout-eligible: No

Date of Pre-Certification: 4/15/2022

Expected Commercial Operations Date: 12/27/2024

Project Description

Buckner Creek Solar LLC is a 2,500 kW-AC project located in Oregon City, Oregon, in Clackamas County. Conifer Community Energy, LLC is controlled by Luminance. Outreach and customer management for the project are conducted by Arcadia Community Solar, LLC.

Review Summary

Date Review Completed: 11/22/2024

Project Satisfies all Certification Requirements?: Yes, with waiver to the low-income capacity requirement.

PA Recommendation: Approve, with the condition that the 10 percent low-income capacity requirement is met within 90 days of Certification.

Review Notes

The Project has achieved all certification requirements except for the low-income subscription requirement. The PM provided the Low-Income Facilitator (LIF) with adequate advance notice, including confirming the project was requesting LIF support for meeting the LI subscription requirement, and was prepared to receive LI participant referrals and complete LI enrollment.

However, the LIF is experiencing a high number of Tier 1 and Tier 2 projects simultaneously requesting assistance with meeting the Program's LI subscription requirement. This has prevented the LIF from meeting the project's need in a timeframe that would have allowed the project to receive and process all LI participant referrals needed to meet the LI subscription requirement before Certification.

The LIF continues to work closely with the PM's SM, Arcadia Community Solar, LLC. The LIF is sufficiently confident the project can reasonably meet the LI subscription requirement within 90 days after Certification. The project is in good standing and the PA recommends certifying the project with a 90 day waiver of the LI requirement so that participants currently subscribed can

receive benefits now. If the project does not meet the 10% low-income requirement within 90 days after Certification, the PM may request an extension of the waiver before the 90 day extension ends, and the PA will then consider recommending an additional extension to the waiver at that time if warranted.

Attachments Included

Waiver requesting an extension to the low-income enrollment requirement is attached.



General Waiver Request Form

The Oregon Community Solar Program allows for Project Managers to submit a waiver to the Program Administrator for select Program Implementation Manual (PIM) project requirements on a case-by-case basis. The Program Administrator may recommend a waiver of any PIM provision as part of the pre-certification, certification, or major project amendment process, subject to final approval by the Oregon Public Utility Commission.

To request a waiver to the low-income subscription discount requirement, please fill out the Low-Income Discount Waiver Request Form at www.oregoncsp.org. This form is applicable for all other waiver requests. .

The process for requesting a waiver is as follows:

1. **The Project Manager will fill out this waiver request form and submit to the Program Administrator on the Community Solar Program Platform at www.oregoncsp.org.** Waiver requests may be submitted as part of the project pre-certification or certification submittal process. It is recommended that Project Managers submit their waiver requests early in the process in order to better inform their project planning.
2. **The Program Administrator will review the waiver request and provide a recommendation to the Oregon Public Utility Commission.** As part of this review, the Program Administrator may schedule a meeting with the Project Manager to discuss their project plans. Waiver requests will not be granted automatically but will be considered based on their merits on a case-by-case basis. The final decision to grant a waiver is made by the Commission at the time that a project is pre-certified or certified, and the recommendation provided by the Program Administrator is not binding.
3. **The Oregon Public Utility Commission will make a final determination on whether to grant the waiver request at the time of pre-certification or certification.** As part of approving a waiver, the Commission may place additional conditions on a project that must be met

Oregon Community Solar Program Waiver Request

Project Manager Entity Name: Conifer Community Energy, LLC

Point of Contact Name: Julia Peacock

Point of Contact Phone Number: 301-775-9511

Point of Contact Email: BucknerCreek@luminace.com

Please provide the specific PIM language you are requesting relief from below:

PIM Chapter: 3

PIM Section: 3.15.2

Description:

10% of low income customers will be verified at time of certification

Please provide a brief narrative that describes:

- a) The reason that you are requesting a waiver, and
- b) How this waiver would benefit the Program and/or Program Participants.

You may submit this narrative as a separate document if preferred. You may also attach documentation to this waiver request if relevant and necessary.

Buckner Creek (2.5MWAC/3MWDC)

We have 12+ MWAC of fully constructed projects that are ready to achieve COD in 2024. We are requesting relief from the OPUC for these projects, as we do not believe CEP will provide enough successful leads to fulfill the LMI requirements and give our providers enough time for outreach to reach our energization dates in 2024. The five projects (Dover, Buckner Creek, Marquam Creek, Gun Club, and Chapman Creek) representing 12+ MWAC of OR Community Solar that have had minimal movement in LMI for more than a month, in addition to over 7-13 months since the MOUs were executed.

We understand the immense pressure on the CEP, but these projects are fully built, and many have already received PTO from the respective utility. Without certification, we cannot achieve COD or energize the projects. We have given enough time for the CEP—as seen in the MOUs with more than 7 months to provide leads for our projects (some may have been more than a year now).

The newest timeline for Buckner Creek provided by CEP and our provider estimates a mid-February or early March LMI completion date which would push our energization date back to Q2 2025.

We will continue working with CEP and our subscription managers until LMI is fulfilled, but we are seeking relief here to ensure that the sites are not sitting idly for months, where customers have already been subscribed. The OPUC's relief will not only allow 90% of customers on the 12+ MWAC to start seeing the benefits of Community Solar but also relieve some of the strain in assessing CEP's timeline on these projects. This relief will also help us, as we have financed these projects to COD in 2024 but have faced constant delays.

Lastly, many of the program participants (subscribers) have been waiting up to a year (depending on when our subscription manager enrolled them). We would like to avoid losing any of these customers and provide them the benefits of Community Solar as soon as possible. We have been working closely with Program Administration, CEP, the Subscription Manager, and the Utilities to bring these projects online.

We request your approval for a waiver on Buckner Creek that will allow this project to energize and achieve COD December 2024 which is the estimated scheduled timeframe for the utility to complete the witness test and declare PTO. The waiver will also allow 90%+ of the subscribers to access Community Solar savings but also continue to enroll LMI customers in line with CEP's availability with less constraints.

Project Certification Review and Recommendation

The Oregon Community Solar Program Administrator (PA) has reviewed the certification request of the project described below and recommends that the project be Certified with a waiver.

Project Information

Project ID: PGE-2020-55

Project Name: Zena Solar, LLC

Project Manager: Zena Solar, LLC

Subscription Manager: Common Energy LLC

Utility Service Area: PGE

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

Project Size (kW-AC): 2,500

Carveout-eligible: No

Date of Pre-Certification: 4/15/2022

Expected Commercial Operations Date: 12/27/2024

Project Description

Zena Solar, LLC is a 2,500 kW-AC project located in Salem, Oregon, in Polk County. Zena Solar, LLC is controlled by UGEI. Outreach and customer management are conducted through Common Energy LLC.

Review Summary

Date Review Completed: 11/22/2024

Project Satisfies all Certification Requirements?: Yes, with waiver.

PA Recommendation: Approve with Waiver, with the condition that the 10 percent low-income capacity requirement is met within 6 months of Certification.

Review Notes

The Project has achieved all certification requirements except for the low-income subscription requirement. The PM provided the Low-Income Facilitator (LIF) with adequate advance notice, including confirming the project was requesting LIF support for meeting the LI subscription requirement, and was prepared to receive LI participant referrals and complete LI enrollment.

However, the LIF is experiencing a high number of Tier 1 and Tier 2 projects simultaneously requesting assistance with meeting the Program's LI subscription requirement. This has prevented the LIF from meeting the project's need in a timeframe that would have allowed the project to receive and process all LI participant referrals needed to meet the LI subscription requirement before Certification.

The LIF continues to work closely with the PM's SM, Common Energy LLC. The LIF is sufficiently confident the project can reasonably meet the LI subscription requirement within 6 months after Certification. The project is in good standing and the PA recommends certifying the project with a 6 months waiver of the LI requirement so that participants currently subscribed can receive benefits now. If the project does not meet the 10% low-income requirement within 6 months after

Certification, the PM may request an extension of the waiver before the 6 months extension ends, and the PA will then consider recommending an additional extension to the waiver at that time, if warranted.

Attachments Included

Waiver requesting an extension to the low-income enrollment requirement is attached.



General Waiver Request Form

The Oregon Community Solar Program allows for Project Managers to submit a waiver to the Program Administrator for select Program Implementation Manual (PIM) project requirements on a case-by-case basis. The Program Administrator may recommend a waiver of any PIM provision as part of the pre-certification, certification, or major project amendment process, subject to final approval by the Oregon Public Utility Commission.

To request a waiver to the low-income subscription discount requirement, please fill out the Low-Income Discount Waiver Request Form at www.oregoncsp.org. This form is applicable for all other waiver requests. .

The process for requesting a waiver is as follows:

- 1. The Project Manager will fill out this waiver request form and submit to the Program Administrator on the Community Solar Program Platform at www.oregoncsp.org.** Waiver requests may be submitted as part of the project pre-certification or certification submittal process. It is recommended that Project Managers submit their waiver requests early in the process in order to better inform their project planning.
- 2. The Program Administrator will review the waiver request and provide a recommendation to the Oregon Public Utility Commission.** As part of this review, the Program Administrator may schedule a meeting with the Project Manager to discuss their project plans. Waiver requests will not be granted automatically but will be considered based on their merits on a case-by-case basis. The final decision to grant a waiver is made by the Commission at the time that a project is pre-certified or certified, and the recommendation provided by the Program Administrator is not binding.
- 3. The Oregon Public Utility Commission will make a final determination on whether to grant the waiver request at the time of pre-certification or certification.** As part of approving a waiver, the Commission may place additional conditions on a project that must be met

Oregon Community Solar Program Waiver Request

Project Manager Entity Name: Conifer Community Energy, LLC

Point of Contact Name: Julia Peacock

Point of Contact Phone Number: 301-775-9511

Point of Contact Email: BucknerCreek@luminace.com

Please provide the specific PIM language you are requesting relief from below:

PIM Chapter: 3

PIM Section: 3.15.2

Description:

10% of low income customers will be verified at time of certification

Please provide a brief narrative that describes:

- a) The reason that you are requesting a waiver, and
- b) How this waiver would benefit the Program and/or Program Participants.

You may submit this narrative as a separate document if preferred. You may also attach documentation to this waiver request if relevant and necessary.

Buckner Creek (2.5MWAC/3MWDC)

We have 12+ MWAC of fully constructed projects that are ready to achieve COD in 2024. We are requesting relief from the OPUC for these projects, as we do not believe CEP will provide enough successful leads to fulfill the LMI requirements and give our providers enough time for outreach to reach our energization dates in 2024. The five projects (Dover, Buckner Creek, Marquam Creek, Gun Club, and Chapman Creek) representing 12+ MWAC of OR Community Solar that have had minimal movement in LMI for more than a month, in addition to over 7-13 months since the MOUs were executed.

We understand the immense pressure on the CEP, but these projects are fully built, and many have already received PTO from the respective utility. Without certification, we cannot achieve COD or energize the projects. We have given enough time for the CEP—as seen in the MOUs with more than 7 months to provide leads for our projects (some may have been more than a year now).

The newest timeline for Buckner Creek provided by CEP and our provider estimates a mid-February or early March LMI completion date which would push our energization date back to Q2 2025.

We will continue working with CEP and our subscription managers until LMI is fulfilled, but we are seeking relief here to ensure that the sites are not sitting idly for months, where customers have already been subscribed. The OPUC's relief will not only allow 90% of customers on the 12+ MWAC to start seeing the benefits of Community Solar but also relieve some of the strain in assessing CEP's timeline on these projects. This relief will also help us, as we have financed these projects to COD in 2024 but have faced constant delays.

Lastly, many of the program participants (subscribers) have been waiting up to a year (depending on when our subscription manager enrolled them). We would like to avoid losing any of these customers and provide them the benefits of Community Solar as soon as possible. We have been working closely with Program Administration, CEP, the Subscription Manager, and the Utilities to bring these projects online.

We request your approval for a waiver on Buckner Creek that will allow this project to energize and achieve COD December 2024 which is the estimated scheduled timeframe for the utility to complete the witness test and declare PTO. The waiver will also allow 90%+ of the subscribers to access Community Solar savings but also continue to enroll LMI customers in line with CEP's availability with less constraints.

Project Certification Review and Recommendation

The Oregon Community Solar Program Administrator (PA) has reviewed the certification request of the project described below and recommends that the project be Certified with a waiver.

Project Information

Project ID: PGE-2020-19

Project Name: Dover Solar

Project Manager: Solar Town

Subscription Manager: Common Energy LLC

Utility Service Area: PGE

Project Site Address: 45°12'34.71"N, 122°40'33.30"W Canby, OR 97038

Project Size (kW-AC): 1,980

Carveout-eligible: No

Date of Pre-Certification: 4/27/2020

Expected Commercial Operations Date: 11/5/2024

Project Description

Dover Solar is a 1,980 kW-AC project located in Canby, Oregon, in Marion County. Solar Town is controlled by Luminance. Outreach and customer management are conducted through Common Energy LLC.

Review Summary

Date Review Completed: 11/22/2024

Project Satisfies all Certification Requirements?: Yes, with waiver.

PA Recommendation: Approve, with the condition that the 10 percent low-income capacity requirement is met within six months of Certification.

Review Notes

The Project has achieved all certification requirements except for the low-income subscription requirement. The PM provided the Low-Income Facilitator (LIF) with adequate advance notice, including confirming the project was requesting LIF support for meeting the LI subscription requirement, and was prepared to receive LI participant referrals and complete LI enrollment.

However, the LIF is experiencing a high number of Tier 1 and Tier 2 projects simultaneously requesting assistance with meeting the Program's LI subscription requirement. This has prevented the LIF from meeting the project's need in a timeframe that would have allowed the project to receive and process all LI participant referrals needed to meet the LI subscription requirement before Certification.

The LIF continues to work closely with the PM's SM, Common Energy LLC. The LIF is sufficiently confident the project can reasonably meet the LI subscription requirement within 6 months after Certification. The project is in good standing and the PA recommends certifying the project with a 6 months waiver of the LI requirement so that participants currently subscribed can receive benefits now. If the project does not meet the 10% low-income requirement within 6 months after

Certification, the PM may request an extension of the waiver before the 6 months extension ends, and the PA will then consider recommending an additional extension to the waiver at that time if warranted.

Attachments Included

Waiver requesting an extension to the low-income enrollment requirement is attached.



General Waiver Request Form

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To request a waiver to the low-income subscription discount requirement, please fill out the Low-Income Discount Waiver Request Form at www.oregoncsp.org. This form is applicable for all other waiver requests. .

The process for requesting a waiver is as follows:

1. **The Project Manager will fill out this waiver request form and submit to the Program Administrator on the Community Solar Program Platform at www.oregoncsp.org.** Waiver requests may be submitted as part of the project pre-certification or certification submittal process. It is recommended that Project Managers submit their waiver requests early in the process in order to better inform their project planning.
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3. **The Oregon Public Utility Commission will make a final determination on whether to grant the waiver request at the time of pre-certification or certification.** As part of approving a waiver, the Commission may place additional conditions on a project that must be met

Oregon Community Solar Program Waiver Request

Project Manager Entity Name: Conifer Community Energy, LLC

Point of Contact Name: Julia Peacock

Point of Contact Phone Number: 301-775-9511

Point of Contact Email: BucknerCreek@luminace.com

Please provide the specific PIM language you are requesting relief from below:

PIM Chapter: 3

PIM Section: 3.15.2

Description:

10% of low income customers will be verified at time of certification

Please provide a brief narrative that describes:

- a) The reason that you are requesting a waiver, and
- b) How this waiver would benefit the Program and/or Program Participants.

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Buckner Creek (2.5MWAC/3MWDC)

We have 12+ MWAC of fully constructed projects that are ready to achieve COD in 2024. We are requesting relief from the OPUC for these projects, as we do not believe CEP will provide enough successful leads to fulfill the LMI requirements and give our providers enough time for outreach to reach our energization dates in 2024. The five projects (Dover, Buckner Creek, Marquam Creek, Gun Club, and Chapman Creek) representing 12+ MWAC of OR Community Solar that have had minimal movement in LMI for more than a month, in addition to over 7-13 months since the MOUs were executed.

We understand the immense pressure on the CEP, but these projects are fully built, and many have already received PTO from the respective utility. Without certification, we cannot achieve COD or energize the projects. We have given enough time for the CEP—as seen in the MOUs with more than 7 months to provide leads for our projects (some may have been more than a year now).

The newest timeline for Buckner Creek provided by CEP and our provider estimates a mid-February or early March LMI completion date which would push our energization date back to Q2 2025.

We will continue working with CEP and our subscription managers until LMI is fulfilled, but we are seeking relief here to ensure that the sites are not sitting idly for months, where customers have already been subscribed. The OPUC's relief will not only allow 90% of customers on the 12+ MWAC to start seeing the benefits of Community Solar but also relieve some of the strain in assessing CEP's timeline on these projects. This relief will also help us, as we have financed these projects to COD in 2024 but have faced constant delays.

Lastly, many of the program participants (subscribers) have been waiting up to a year (depending on when our subscription manager enrolled them). We would like to avoid losing any of these customers and provide them the benefits of Community Solar as soon as possible. We have been working closely with Program Administration, CEP, the Subscription Manager, and the Utilities to bring these projects online.

We request your approval for a waiver on Buckner Creek that will allow this project to energize and achieve COD December 2024 which is the estimated scheduled timeframe for the utility to complete the witness test and declare PTO. The waiver will also allow 90%+ of the subscribers to access Community Solar savings but also continue to enroll LMI customers in line with CEP's availability with less constraints.

Project Certification Review and Recommendation

The Oregon Community Solar Program Administrator (PA) has reviewed the certification request of the project described below and recommends that the project be Certified with a waiver.

Project Information

Project ID: PP-2021-113

Project Name: Chapman Creek Solar

Project Manager: Chapman Creek PM, LLC

Subscription Manager: Arcadia Community Solar, LLC

Utility Service Area: PAC

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

Project Size (kW-AC): 2,990

Carveout-eligible: No

Date of Pre-Certification: 4/15/2022

Expected Commercial Operations Date: 12/18/2024

Project Description

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

Review Summary

Date Review Completed: 11/22/2024

Project Satisfies all Certification Requirements?: Yes, with waiver.

PA Recommendation: Approve, with the condition that the 10 percent low-income capacity requirement is met within 90 days of Certification.

Review Notes

The Project has achieved all certification requirements except for the low-income subscription requirement. The PM provided the Low-Income Facilitator (LIF) with adequate advance notice, including confirming the project was requesting LIF support for meeting the LI subscription requirement, and was prepared to receive LI participant referrals and complete LI enrollment.

However, the LIF is experiencing a high number of Tier 1 and Tier 2 projects simultaneously requesting assistance with meeting the Program's LI subscription requirement. This has prevented the LIF from meeting the project's need in a timeframe that would have allowed the project to receive and process all LI participant referrals needed to meet the LI subscription requirement before Certification.

The LIF continues to work closely with the PM's SM, Arcadia Community Solar, LLC. The LIF is sufficiently confident the project can reasonably meet the LI subscription requirement within 90 days after Certification. The project is in good standing and the PA recommends certifying the project with a 90-day waiver of the LI requirement so that participants currently subscribed can receive benefits now. If the project does not meet the 10% low-income requirement within 90 days

after Certification, the PM may request an extension of the waiver before the 90-day extension ends, and the PA will then consider recommending an additional extension to the waiver at that time if warranted.

Attachments Included

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General Waiver Request Form

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Oregon Community Solar Program Waiver Request

Project Manager Entity Name: Conifer Community Energy, LLC

Point of Contact Name: Julia Peacock

Point of Contact Phone Number: 301-775-9511

Point of Contact Email: BucknerCreek@luminace.com

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PIM Section: 3.15.2

Description:

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