

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1930

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Community Solar Program
Implementation.

ORDER

DISPOSITION: STAFF'S RECOMMENDATION ADOPTED

At its public meeting on December 9, 2025, 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. CA5

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: December 9, 2025**

REGULAR **CONSENT** X **EFFECTIVE DATE** December 10, 2025

DATE: December 2, 2025

TO: Public Utility Commission

FROM: Joseph Abraham

THROUGH: Sarah Hall **SIGNED**

SUBJECT: OREGON PUBLIC UTILITY COMMISSION STAFF:
(Docket No. UM 1930)
Certification of Burlingame Solar LLC and Kelly Creek Solar projects in the
Community Solar Program.

STAFF RECOMMENDATION:

Certify Burlingame Solar LLC and Kelly Creek Solar projects in the Community Solar Program.

DISCUSSION:

Issue

Whether the Public Utility Commission of Oregon (Commission) should certify the Burlingame Solar LLC and Kelly Creek Solar projects in the Community Solar Program.

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").

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.

Docket No. UM 1930
 December 2, 2025
 Page 2

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.

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 two projects. After reviewing the applications and supporting documentation provided by the PM, the PA has recommended that the Commission certify the projects in the Program. See the Certification Recommendation Forms in Attachments A and B.

Recommended Projects

| Project Name | Name of Project Manager | Utility Territory | Project Size (kW-AC) | Attachment # |
|----------------------|--------------------------------|--------------------------|-----------------------------|---------------------|
| Burlingame Solar LLC | GreenKey Solar | PacifiCorp | 2,125 | Attachment A |
| Kelly Creek Solar | Coast Energy, LLC | PacifiCorp | 2,250 | Attachment B |

Burlingame Solar LLC

Burlingame Solar LLC is a 2,125 kW-AC project located in Brownsville, Oregon, in Linn County. The PM entity is controlled by TLS Capital. Outreach and customer management for the project are conducted by OR Subscription Manager.

Burlingame Solar LLC was Pre-certified on December 29, 2020. On June 2, 2022, the PA used its delegated authority granted by the Commission to recommend a PM transfer from Sulus Solar to Burlingame Solar LLC, which is controlled by SolRiver.¹

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>.

Docket No. UM 1930
December 2, 2025
Page 3

On July 27, 2022, the PA again used its delegated authority to recommend a 15-month extension to the project's Certification deadline from June 29, 2022, to September 30, 2023. While this was a retroactive recommendation, the PM requested the extension in advance of the June 29, 2022, Certification deadline. The PM cited uncertainty related to supply chain issues caused by the US Department of Commerce's investigation into imported solar panels from certain countries, which caused significant disruption in the domestic solar industry. The PM also cited the need for additional time due to its acquisition of a portfolio of CSP projects.

SolRiver purchased Sulus Solar's portfolio, which included projects on the waitlist for Tier 2 capacity. The sale was contingent upon the Pre-certification of the Tier 2 projects in the portfolio. The relevant Tier 2 projects were Pre-certified in May 2022, following the release of the additional capacity. The Sulus Solar portfolio sale was agreed upon after the projects were Pre-certified. While the PA would not support extending project certification deadlines solely because of the sale of a project portfolio in the absence of other factors, the PA considered the timing uncertainty related to the release of new program capacity to be a complicating factor that warranted flexibility.

On September 27, 2023, the PA again used its delegated authority to recommend a twelve-month extension to the project's Certification deadline from September 30, 2023, to September 30, 2024. The PM cited construction delays related to long lead times for equipment including transformers.

On March 29, 2025, the PA again used its delegated authority to recommend a 13-month extension to the project's Certification deadline from September 30, 2024, to November 1, 2025. While this was a retroactive recommendation, the PM requested the extension in advance of the September 30, 2024, Certification deadline. The PM required an extension to ensure the COD was within six months of Certification, to execute a Power Purchase Agreement (PPA), and to complete Project enrollment capacity requirements, including the low-income enrollment capacity requirement. The PM cited interconnection delays and uncertainty in the interconnection schedule as a cause for delay, which prevented the PM from securing a construction loan to start construction on the project.

The PM submitted the necessary Certification paperwork to the PA on October 29, 2025, prior to the project's Certification deadline of November 1, 2025. The PA completed its review on November 7, 2025, and recommends Certification in CSP. While this timeline has led Staff to recommend the Commission certify the project after its Certification deadline, Staff and the PA have no concerns with certifying the project. The Program considers projects submitting Certification applications to the PA by the

Docket No. UM 1930
December 2, 2025
Page 4

deadline to have met the deadline, while the PA and Staff may require additional time to review applications for recommendation to the Commission.

Kelly Creek Solar

Kelly Creek Solar is a 2,250 kW-AC project located in Cave Junction, Oregon, in Josephine County. The PM is controlled by Coast Energy. Outreach and customer management is conducted through Helios Arcadia New Energy, LLC.

Kelly Creek Solar project was Pre-certified on April 15, 2022. On November 11, 2023, the PA used its delegated authority granted by the Commission to recommend a 12-month extension to the project's Certification deadline from October 15, 2023, to October 30, 2024. While this was a retroactive recommendation, the PM requested the extension in advance of the October 15, 2023, Certification deadline. The PM cited the contractor's inability to complete construction during the winter months.

On February 22, 2025, the PA again used its delegated authority to recommend a six-month extension to the project's Certification deadline from October 30, 2024, to April 30, 2025. While this was a retroactive recommendation, the PM requested the extension in advance of the October 30, 2024, Certification deadline. The PM cited moving the Certification deadline to be within six months of the COD, completing low-income enrollment, and executing a PPA.

On June 20, 2025, the PA again used its delegated authority to recommend a three-month extension to the project's Certification deadline from April 30, 2025 to July 1, 2025. While this was a retroactive recommendation, the PM requested the extension in advance of the April 30, 2025, Certification deadline. The PM cited delays in completing the PPA. The PM stated that the PPA could not be finalized until the interconnection agreement was signed, and PacifiCorp was prioritizing wildfire-mitigation upgrades to the grid, which extended the COD timeline.

On August 23, 2025, the PA again used its delegated authority to recommend a four-month extension to the project's Certification deadline from July 1, 2025, to October 31, 2025. While this was a retroactive recommendation, the PM requested the extension in advance of the July 1, 2025, Certification deadline. The PM cited delays in completing the PPA. The PM stated that the PPA could not be finalized until the COD was finalized.

The PM submitted the necessary Certification paperwork to the PA on October 23, 2025, prior to the project's Certification deadline of October 31, 2025. The PA completed its review on November 7, 2025, and recommends Certification in CSP. While this timeline has led Staff to recommend the Commission certify the project after

Docket No. UM 1930
December 2, 2025
Page 5

its Certification deadline, Staff and the PA have no concerns with certifying the project at this time.

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 the Burlingame Solar LLC and Kelly Creek Solar projects in the Program.

PROPOSED COMMISSION MOTION:

Certify Burlingame Solar LLC and Kelly Creek Solar projects in the Community Solar Program.

CA5 – UM 1930

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: PP-2020-76

Project Name: Burlingame Solar LLC

Project Manager: Burlingame Solar LLC

Subscription Manager: OR Subscription Manager

Utility Service Area: PAC

Project Site Address: 44°23'16.00"N, 123° 0'46.41"W Brownsville, OR 97327

Project Size (kW-AC): 2,125

Carveout-eligible: No

Date of Pre-Certification: 12/29/2020

Expected Commercial Operations Date: 12/31/2025

Project Description

Burlingame Solar LLC is a 2,125 kW-AC project located in Brownsville, Oregon, in Linn County. The Project Manager entity is controlled by TLS Capital. Outreach and customer management for the project are conducted by OR Subscription Manager.

Review Summary

Date Review Completed: 11/7/2025

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 is Certified.

Project Information

Project ID: PP-2021-97

Project Name: Kelly Creek Solar

Project Manager: Kelly Creek Project Manager, LLC

Subscription Manager: Helios Arcadia New Energy, LLC

Utility Service Area: PAC

Project Site Address: 42°8'2.13" N, 123°37'51.98" W Cave Junction, OR 97523

Project Size (kW-AC): 2,250

Carveout-eligible: No

Date of Pre-Certification: 4/15/2022

Expected Commercial Operations Date: 12/5/2025

Project Description

Kelly Creek Solar is a 2,250 kW-AC project located in Cave Junction, Oregon, in Josephine County. Kelly Creek Project Manager, LLC, is controlled by Coast Energy. Outreach and customer management are conducted through Helios Arcadia New Energy, LLC.

Review Summary

Date Review Completed: 11/7/2025

Project Satisfies all Certification Requirements?: Yes

PA Recommendation: Approve

Review Notes

No Review Notes

Attachments Included

No attachments.