



April 30, 2020

Oregon Public Utility Commission
Attn: Chair Decker
201 High St. SW, Suite 100
Salem, OR 97301

RE: Community Solar Pre-Certification & Waivers

Dear Chair Decker,

I am writing to provide comments pertaining to the pre-certification and waivers that Commission Staff has recommended. These waiver requests total approximately 20% of Portland General Electric's initial non-carve-out tier and 25% if the waitlisted project moved forward as well. Given the magnitude that these waivers will have on other projects and the program as a whole, this matter requires thoughtful consideration by the Commission. TLS Capital's interest is in the fair administration of the program rules to preserve the long-term integrity of the program.

After reading the Staff Recommendation regarding the waiver requests, I disagree with many of the stated reasons for approving the waivers, especially when considering the guidance provided in Order No. 19-438. When waivers are granted, the waivers must align with the intent and purpose of the waiver process and should further the goals of the program. Otherwise, the long-term integrity of the program will be damaged.

Similar to what has already been shared by other stakeholders, if the Commission approves these waivers, then the Commission must also consider offsetting measures to ensure that no projects are unfairly and unnecessarily disadvantaged as a result of the waivers. The Commission must ensure that all qualified projects have a fair chance at gaining pre-certification. Granting the waivers without such offsetting measures would undermine the program goals and invalidate prior policy that has already been adopted by the Commission.

I understand that your decision in this matter will be difficult, but I thank you for your thoughtful consideration and its impacts on all projects.

Thank you.

A handwritten signature in dark ink, appearing to read "Troy Snyder".

Troy Snyder
TLS Capital Inc.