



Program Administrator's Project Recommendation

June 29, 2022

Community Solar Program - Docket No. UM 1930

On January 11, 2022, in Order No. 22-007, the Commission permitted the delegation of Commission authority to the Community Solar Program Administrator (PA) to grant noncontroversial project pre-certifications, waivers, extensions, and amendments. Under the permitted delegation of authority, Staff will post the PA's project recommendation to UM 1930 with a comment period of two weeks. If no comments in opposition are received prior to the end of the comment period, the recommendation will go into effect. If comments in opposition are received prior to the end of the comment period, the recommendation will not go into effect and the matter will be referred to the Commission for a decision at the next available public meeting.

Staff posts the PA's recommendation to grant six-month certification deadline extensions for the following projects:

PGE-2020-15 (Belvedere Solar)
PGE-2020-17 (Clayfield Solar)
PGE-2020-19 (Dover Solar)
PGE-2020-16 (Manchester Solar)

The PA has reviewed the project certification deadline extension requests for the projects and has recommended granting the extensions. The extension request is included at the bottom of this document. Staff finds the PA's recommendations to be noncontroversial and that granting pre-certification may be delegated to the PA. Stakeholders in opposition of the PA's recommendation should post comments to UM 1930 by July 13, 2022.

To Submit Public Comment:

Stakeholders can submit written comments on the PA's recommendation by email to puc.filingcenter@puc.oregon.gov. Please email puc.hearings@puc.oregon.gov to be added to the UM 1930 docket service list and receive notifications in the UM 1930 docket.



Project Amendment Review and Recommendation

The Oregon Community Solar Program Administrator (PA) has reviewed the amendment request of the project described below and recommends that the Certification deadline be extended by 6 months.

Project Information

Project ID: PGE-2020-15

Project Name: Belvedere Solar

Project Manager: Solar Town

Subscription Manager: Solar Town

Utility Service Area: PGE

Project Site Address: 9526-9530 Mt Angel Highway NE

Project Size (kW-AC): 2,970

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-certified, 8/7/20

Project Description

Belvedere Solar is a 2,970 kW-AC project located in Mt. Angel, Oregon, in Marion County. Solar Town has not contracted with a subscription manager.

Review Summary

Date Review Completed: 6/22/22

Nature of the Amendment Request: Extend Certification Deadline

PA Recommendation: Approve

Review Notes

Current Certification Deadline: August 7, 2022

Recommended Certification Deadline: February 7, 2023

Belvedere Solar is one of four Tier 1 projects managed by Solar Town in PGE service area. The project had an original certification deadline of February 7, 2022, which was extended by six months to August 7, 2022 due to COVID-19 related market disruption.

Solar Town has requested that all four of their Tier 1 projects receive a six-month extension of their certification deadlines. Solar Town manages four Tier 1 projects and two Tier 2 projects. It is the PA's understanding that Solar Town will be partnering with a Subscription Manager to assist with recruitment and ongoing customer management prior to project Certification.

The projects cite uncertainty and supply chain issues caused by the US Department of Commerce investigation into imported solar panels from certain countries, which has caused significant disruption in the domestic solar industry. The PA concurs that this investigation has led to great challenges for developers in securing and installing solar modules, and that in the current situation project managers may be unable to meet their certification and operational deadlines due to unforeseen circumstances beyond their control. While the Federal government has recently suspended tariff penalties related to this investigation and this is anticipated to ease supply chain

challenges, the PA agrees that this project's timelines have been reasonably impacted by the disruption.

The PA has previously recommended granting six-month extensions to projects that were unable to meet certification deadlines related to COVID-19 delays and shutdowns. The PA recognizes the current circumstances would similarly warrant extensions of certification deadlines.

Solar Town is in good standing within the program and has shown efforts in recruitment and project development. Because of this, the PA supports extending the certification deadline of these four projects by six months.

Attachments Included

The extension request received from the Project Manager is attached.



Project Amendment Review and Recommendation

The Oregon Community Solar Program Administrator (PA) has reviewed the amendment request of the project described below and recommends that the Certification deadline be extended by 6 months.

Project Information

Project ID: PGE-2020-17

Project Name: Clayfield Solar

Project Manager: Solar Town

Subscription Manager: Solar Town

Utility Service Area: PGE

Project Site Address: 23741 S Springwater Rd.

Project Size (kW-AC): 2,565

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-certified, 7/17/20

Project Description

Clayfield Solar is a 2,565 kW-AC project located in Estacada, Oregon, in Clackamas County. Solar Town has not contracted with a subscription manager.

Review Summary

Date Review Completed: 6/22/22

Nature of the Amendment Request: Extend Certification Deadline

PA Recommendation: Approve

Review Notes

Current Certification Deadline: July 17, 2022

Recommended Certification Deadline: January 17, 2023

Clayfield Solar is one of four Tier 1 projects managed by Solar Town in PGE service area. The project had an original certification deadline of January 17, 2022, which was extended by six months to July 17, 2022 due to COVID-19 related market disruption.

Solar Town has requested that all four of their Tier 1 projects receive a six-month extension of their certification deadlines. Solar Town manages four Tier 1 projects and two Tier 2 projects. It is the PA's understanding that Solar Town will be partnering with a Subscription Manager to assist with recruitment and ongoing customer management prior to project Certification.

The projects cite uncertainty and supply chain issues caused by the US Department of Commerce investigation into imported solar panels from certain countries, which has caused significant disruption in the domestic solar industry. The PA concurs that this investigation has led to great challenges for developers in securing and installing solar modules, and that in the current situation project managers may be unable to meet their certification and operational deadlines due to unforeseen circumstances beyond their control. While the Federal government has recently suspended tariff penalties related to this investigation and this is anticipated to ease supply chain

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Solar Town is in good standing within the program and has shown efforts in recruitment and project development. Because of this, the PA supports extending the certification deadline of these four projects by six months.

Attachments Included

The extension request received from the Project Manager is attached.



Project Amendment Review and Recommendation

The Oregon Community Solar Program Administrator (PA) has reviewed the amendment request of the project described below and recommends that the Certification deadline be extended by 6 months.

Project Information

Project ID: PGE-2020-19

Project Name: Dover Solar

Project Manager: Solar Town

Subscription Manager: Solar Town

Utility Service Area: PGE

Project Site Address: NE of Gribble Rd and Canby Marquam Hwy

Project Size (kW-AC): 1,980

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-certified, 7/1/20

Project Description

Dover Solar is a 1,980 kW-AC project located in Canby, Oregon, in Marion County. Solar Town has not contracted with a subscription manager.

Review Summary

Date Review Completed: 6/22/22

Nature of the Amendment Request: Extend Certification Deadline

PA Recommendation: Approve

Review Notes

Current Certification Deadline: July 1, 2022

Recommended Certification Deadline: January 1, 2023

Dover Solar is one of four Tier 1 projects managed by Solar Town in PGE service area. The project had an original certification deadline of January 1, 2022, which was extended by six months to July 1, 2022 due to COVID-19 related market disruption.

Solar Town has requested that all four of their Tier 1 projects receive a six-month extension of their certification deadlines. Solar Town manages four Tier 1 projects and two Tier 2 projects. It is the PA's understanding that Solar Town will be partnering with a Subscription Manager to assist with recruitment and ongoing customer management prior to project Certification.

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Attachments Included

The extension request received from the Project Manager is attached.



Project Amendment Review and Recommendation

The Oregon Community Solar Program Administrator (PA) has reviewed the amendment request of the project described below and recommends that the Certification deadline be extended by 6 months.

Project Information

Project ID: PGE-2020-16

Project Name: Manchester Solar

Project Manager: Solar Town

Subscription Manager: Solar Town

Utility Service Area: PGE

Project Site Address: 18100 SE Neck Rd.

Project Size (kW-AC): 1,800

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-certified, 7/1/20

Project Description

Manchester Solar is an 1,800 kW-AC project located in Dayton, Oregon, in Yamhill County. Solar Town has not contracted with a subscription manager.

Review Summary

Date Review Completed: 6/22/22

Nature of the Amendment Request: Extend Certification Deadline

PA Recommendation: Approve

Review Notes

Current Certification Deadline: July 1, 2022

Recommended Certification Deadline: January 1, 2023

Manchester Solar is one of four Tier 1 projects managed by Solar Town in PGE service area. The project had an original certification deadline of January 1, 2022, which was extended by six months to July 1, 2022 due to COVID-19 related market disruption.

Solar Town has requested that all four of their Tier 1 projects receive a six-month extension of their certification deadlines. Solar Town manages four Tier 1 projects and two Tier 2 projects. It is the PA's understanding that Solar Town will be partnering with a Subscription Manager to assist with recruitment and ongoing customer management prior to project Certification.

The projects cite uncertainty and supply chain issues caused by the US Department of Commerce investigation into imported solar panels from certain countries, which has caused significant disruption in the domestic solar industry. The PA concurs that this investigation has led to great challenges for developers in securing and installing solar modules, and that in the current situation project managers may be unable to meet their certification and operational deadlines due to unforeseen circumstances beyond their control. While the Federal government has recently suspended tariff penalties related to this investigation and this is anticipated to ease supply chain

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6/14/2022

Oregon Community Solar Program
c/o Program Administrator

Re: Request for Extension of Time to Achieve Certification

Dear Program Administrator,

We are writing on behalf of Solar Town, LLC, a registered Project Manager in the Oregon Community Solar Program (the "CSP"). The Project Manager is developing four projects that are pre-certified in the CSP, each of which is seeking a six-month extension of time to achieve certification. The four projects are:

	Date Pre-Certified	Existing Certification Deadline	Requested Extension
Belvedere Solar, LLC	August 7, 2020	August 7, 2022	Six Months
Clayfield Solar, LLC	July 17, 2020	July 17, 2022	Six Months
Dover Solar, LLC	July 1, 2020	July 1, 2022	Six Months
Manchester Solar, LLC	July 1, 2020	July 1, 2022	Six Months

OAR 860-088-0040(5) provides that "[a] project remains pre-certified for a period of 18 months, unless granted an extension by Commission order." The rules do not address extensions, but the *CSP Program Implementation Manual* (the "PIM") indicates that "requests to extend a Project's Certification deadline[] are considered amendments to a Project's Pre-Certification."¹ Section 4.7.4 of the PIM provides the following guidance:

Major revisions require the submission of a written request. This request is submitted through the Community Solar Program Platform and accompanies the details of the proposed revision.

The written request for major revisions should detail the Project's progress, the reasons for the requested change and, in the case of extension requests, a realistic timeline for the completion of Certification requirements and the achievement of commercial operation.²

In brief, these four projects have all made substantial progress toward certification and are expected to succeed. However, all four projects had suffered prior unexpected delays due to

¹ PIM at 68.

² PIM at 70.

COVID-19, natural disasters, supply chain disruptions and material cost increases. Early this year on March 28, 2022, the US Department of Commerce (the “DOC”) announced that it would launch an investigation into the alleged circumvention of duties for solar panels imported into the United States from Cambodia, Malaysia, Thailand, and Vietnam, which currently account for approximately 80% of overall solar panels imported into the U.S. Because any new tariffs imposed as a result of the investigation can be applied retroactively, the investigation is already reaping havoc across the industry, with many module manufacturers no longer willing to import modules into the U.S. while the extent of this risk is unknown. Further, following the DOC’s announcement, many module manufacturers cancelled or delayed existing orders, creating uncertainty with many projects that believed they had secured modules.

Just last week, on June 6th President Joe Biden declared a two-year tariff exemption on panels from Southeast Asia, while the DOC Investigation continues. This positive news will allow the projects to begin the process of procurement of solar modules but we are not able to overcome the past delays experienced because of the investigation. The Projects’ Certification Dates will need to be extended.

The Four Projects Have Made Good Progress

The Projects are ready for construction and upon finding a solar module solution, will begin work on site.

Six-Month Extensions Would Provide a Reasonable Amount of Time for Development

We recognize that we do not have perfect information at this time. However, based on the information available, we are optimistic that six-month extensions to achieve certification will enable all four projects to meet CSP deadlines. This understanding is based in part on our understanding that projects have up to six months to complete interconnection and achieve commercial operations after being certified.³ If we encounter additional unexpected delays, we may need to request further extensions in the future.

We respectfully request that the Commission grant the requested extensions for all four projects.

Sincerely,

Peter Coughlin
Solar Town LLC
