



Program Administrator's Project Recommendation

October 5, 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 an eight-month certification deadline for the following projects:

PP-2020-84 (Pine Grove Solar)
PP-2020-86 (Round Lake Solar)

The PA has reviewed the project certification deadline extension requests for the projects and has recommended granting the extension. The extension requests are 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 October 19, 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 project certification date be extended by eight months.

Project Information

Project ID: PP-2020-84

Project Name: Pine Grove Solar

Project Manager: Pine Grove PM, LLC

Subscription Manager: Oregon Shines

Utility Service Area: Pacific Power

Project Site Address: 42°11'7.70"N, 121°41'12.42"W, Klamath Falls, OR 97621

Project Size (kW-AC): 1400

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-certified, 12/29/2020

Project Description

Pine Grove Solar is a 1400 kW-AC project located in Klamath Falls, Oregon, in Klamath County. The project manager entity is controlled by TLS Capital, which currently manages 9 projects in the program. Outreach and customer management for the project will be conducted through Oregon Shines, an entity formed by several ORCSP project managers to conduct customer management in the community solar program.

Review Summary

Date Review Completed: 09/27/22

Nature of the Amendment Request: Extend Certification Deadline

PA Recommendation: Approve

Review Notes

Current Certification Deadline: 12/29/22

Recommended Certification Deadline: 08/25/23

Two projects, Pine Grove Solar and Round Lake Solar, have requested eight-month extensions of their certification deadlines. These projects are managed by TLS Capital Inc, and the subscription manager for both projects is Oregon Shines. Currently, both projects have certification deadlines in December 2022. Granting this request would extend these deadlines to August 2023.

Pine Grove Solar was pre-certified on 12/29/2020, with an original 18-month certification deadline of 6/29/2022. In May 2022, the Commission extended the project's certification deadline to 12/29/2022 as part of a series of extensions recognizing critical supply shortages impacting the industry at that time.

In tandem with this program extension, Pine Grove Solar also requested an extension of its interconnection Commercial Operation Date (COD) with Pacific Power. The project's original COD

was scheduled for August 2022, and the project requested an extension until March 2023. Pacific Power has offered a later interconnection COD of August 2023. Project managers must attest at the time of certification that they are on schedule to achieve COD within six months. As a result, the project will be unable to meet its current December 2022 certification deadline due to its expected COD.

The project has documented that it had requested a May 2023 interconnection COD date that is within six months of its certification date which would allow it to become certified within program deadlines. The PA's understanding is that the later August 2023 interconnection date is driven primarily by utility interconnection scheduling needs. The program has previously set a precedent that it would grant extensions for projects, when needed, to accommodate utility interconnection timelines that stretch beyond program deadlines in situations where the project is not at fault for the delay. We believe that precedent applies here, and we support granting an additional eight-month extension to the project to accommodate the interconnection timeline offered by the utility.

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 project be extended by eight months.

Project Information

Project ID: PP-2020-86

Project Name: Round Lake Solar

Project Manager: Round Lake PM, LLC

Subscription Manager: Oregon Shines

Utility Service Area: Pacific Power

Project Site Address: 42° 7'37.12"N, 121°54'24.14"W, Klamath Falls, OR 97621

Project Size (kW-AC): 978

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-certified, 12/29/2020

Project Description

Round Lake Solar is a 978 kW-AC project located in Klamath Falls, Oregon, in Klamath County. The project manager entity is controlled by TLS Capital, which currently manages 9 projects in the program. Outreach and customer management for the project will be conducted through Oregon Shines, an entity formed by several ORCSP project managers to conduct customer management in the community solar program.

Review Summary

Date Review Completed: 09/27/22

Nature of the Amendment Request: Extend Certification Deadline

PA Recommendation: Approve

Review Notes

Current Certification Deadline: 12/29/22

Recommended Certification Deadline: 08/25/23

Two projects, Pine Grove Solar and Round Lake Solar, have requested eight-month extensions of their certification deadlines. These projects are managed by TLS Capital Inc, and the subscription manager for both projects is Oregon Shines. Currently, both projects have certification deadlines in December 2022. Granting this request would extend these deadlines to August 2023.

Round Lake Solar was pre-certified on 12/29/2020, with an original 18-month certification deadline of 6/29/2022. In May 2022, the Commission extended the project's certification deadline to 12/29/2022 as part of a series of extensions recognizing critical supply shortages impacting the industry at that time.

In tandem with this program extension, Round Lake Solar also requested an extension of its interconnection Commercial Operation Date (COD) with Pacific Power. The project's original COD was scheduled for August 2022, and the project requested an extension until March 2023. Pacific

Power has offered a later interconnection COD of August 2023. Project managers must attest at the time of certification that they are on schedule to achieve COD within six months. As a result, the project will be unable to meet its current December 2022 certification deadline due to its expected COD.

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Attachments Included

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September 23, 2022

VIA EMAIL (administrator@oregoncsp.org)

Program Administrator
Oregon Community Solar Program

RE: Community Solar Program Extension of the Certification Deadline

Dear Program Administrator,

On behalf the following owners of Projects and Project Managers listed below (collectively the “**Developers**”), we hereby submit this letter requesting an extension of the Pre-certification period to correspond with the utility’s interconnection schedule.

Project	Project Manager
Pine Grove Solar	Pine Grove PM, LLC
Round Lake Solar	Round Lake PM, LLC

In March 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. Because of the uncertainty at that time with how this would affect the availability of solar panels and ultimately the timing of when these Projects could be constructed, a representative of the Projects requested that PacifiCorp modify the Interconnection Agreements to have a revised Interconnection Commercial Operation Dates (“CODs”) of March 2023. A copy of this request made on April 29, 2022, is attached to this letter. The previous request for an Extension of the Certification Deadline was in line with this timeframe.

On July 27, 2022, PacifiCorp finally responded to this request by sending an Amended Interconnection Agreement for each of the Projects. The revised Interconnection CODs per the Amendments were August 25, 2023, for Pine Gove Solar and August 11, 2023 for Round Lake Solar. Copies of these Amendments are attached to this letter.

Because these new Interconnection CODs do not allow the Projects to reach COD within 6 months after they become Certified, we are requesting an extension of the Certification Deadline to align with the Interconnection CODs as provided by PacifiCorp. The Projects have executed construction contracts, building permits are in hand, major equipment has been ordered, all required interconnection deposit payments to date have been made, and they approximately 90% subscribed at this time.

Program Administrator
September 23, 2022
2 | Page

Thank you for your time and consideration.

A handwritten signature in black ink, appearing to read 'Troy Snyder', with a stylized flourish at the end.

Troy Snyder
on Behalf of
Pine Grove PM, LLC
Round Lake PM, LLC

cc: Pine Grove Solar, LLC
Round Lake Solar, LLC
Oregon Shines, LLC