



Program Administrator's Project Recommendation

June 8, 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 a twelve-month certification deadline extension for the following project:

IP-2020-72 (Verde Light Community Solar)

The PA has reviewed the project certification deadline extension request for the project and has recommended granting the extension. 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 June 22, 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 one year.

Project Information

Project ID: IP-2020-72

Project Name: Verde Light Community Solar

Project Manager: Fleet Development, LLC

Subscription Manager: Fleet Development, LLC

Utility Service Area: Idaho Power

Project Site Address: 1900 Malheur Dr, Ontario, OR 97914

Project Size (kW-AC): 2,950

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-certified, 06/16/20

Project Description

Verde Light Community Solar is a 2,950 kW-AC project located in Ontario Oregon in Malheur County. This is the only project currently located in Idaho Power territory. Fleet Development, LLC will handle subscription management.

Review Summary

Date Review Completed: 06/06/22

Nature of the Amendment Request: Extend Certification deadline to 06/16/23

PA Recommendation: Approve

Review Notes

Current Certification Deadline: June 16, 2022

Recommended Certification Deadline: June 16, 2023

The Verde Light project was pre-certified on June 16, 2020, with an original certification deadline of December 16, 2021. In Order 21-388, the Commission granted an extension of the project's Certification deadline by six months to June 16, 2022, as part of a series of extensions that were granted to projects in light of supply chain disruption related to the COVID-19 pandemic.

The project manager, Fleet Development, is requesting an additional extension of one year, to June 16, 2023. Fleet Development cites continued supply chain disruptions related to the US Commerce investigation of imported solar panels as a reason for the extension. The project also cites its ongoing effort to apply for ODOE CREP grant funding in partnership with the City of Ontario, which would provide funding certainty for the project.

The PA supports granting this extension. The PA has already recommended granting extensions to projects facing delays related to the US Commerce solar investigation. While the federal government has recently taken action to pause import tariffs related to the Commerce investigation,

the PA acknowledges that it will take time for the industry supply chain to fully recover. The PA has also supported granting extensions to projects that are awaiting funding decisions or other approvals from other government entities that are necessary to move forward, in this case ODOE's CREP grant program. Finally, the PA notes this project's unique position as the only pre-certified project in Idaho Power service area. There is no capacity waitlist in Idaho Power service area and the PA is not aware of other potential projects planned in that utility service area. The PA also takes the unique nature of the project and the lack of alternative projects available to serve Idaho Power customers into account in recommending this longer extension.

Attachments Included

None.



18 May, 2022

Oregon Community Solar Program Administrator
Attn: Ryan Cook

Dear Program Administrator,

Fleet Development formally requests a Certification Extension for IP-2020-72 Verde Light Power Project. We have been developing the Verde Light Community Solar project since April 11th, 2019. The project is a 2.95 MW project located in Ontario, OR and is the only project within the Idaho Power Service territory. The project was pre-certified on June 16th, 2020. The project has been in consistent development ever since and its rate of progress in the early years was largely controlled by the steady maturation of the Community Solar rules and policies. The project originally had a Certification Deadline in December 2021 which became untenable due to slow progress on land developments and the sale of the proposed site to a new private owner.

On October 25th, 2021, Fleet Development requested an extension of the Certification deadline to June 16th, 2022, which was approved. We initially determined that this would be more than enough time to complete the design of the project and sourcing of equipment to achieve milestones that would make us comfortable pre-subscribing the project's output. What we did not realize is that the global pandemic would induce supply chain concerns that would create delays in sourcing specific components for the project. We moved quickly to place an order for our solar modules to meet our construction deadline, only to face a new issue.

Currently, the Federal Trade Commission has an open investigation on imported solar modules for bypassing anti-dumping laws. To our surprise, our module supplier has cancelled our order. According to SEIA, we are not alone. Approximately 83% of all solar projects in development in the US right now are either experiencing delays or cancelled. We have had to pause the project until the supply issues get sorted out.

Fleet Development respectfully requests and extension of the Certification deadline for IP-2020-72 Verde Light Power Project to June 16th, 2023 (one-year from the current date). We believe we will be able to purchase modules within 2-3 months, which will allow us to complete the final engineering steps needed to begin construction in October 2022 and complete construction by April 2023. We have demonstrated continuous progress on this project to include: review set plans, interconnection design and placement, wetlands study, tax determinations, landlord agreements, and we have invested over \$238,000 of development money into the project. It is in the best interest of our team to complete this project. Additionally, the City of Ontario is invested in this project with us by serving as a partner for a CREP grant application and by offering the City as a subscriber. We are also working with low-income housing providers in the area to serve as a resource for them. We have weathered unexpected headwinds such as a global pandemic and unprecedented supply chain issues and feel that this project deserves a chance to succeed.

If you have any questions or would like to further discuss the elements of our project, I can be reached at ryan.sheehy@fleetdevelopment.org or (541) 263-7684. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Ryan Sheehy". The signature is written in a cursive, flowing style.

Ryan Sheehy
200 E. Main St
Enterprise, OR 97828