



Program Administrator's Project Recommendation

October 25, 2024

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 Certification deadline extensions for two projects:

21 months for PP-2021-94 (Canyonville Solar 1)
21 months for PP-2021-142 (Canyonville Solar 2)

The PA has reviewed the two project Certification deadline extension requests and has recommended granting the extensions. Those extension requests are included below. While Staff is concerned about the duration of the recommended extensions, Staff finds the PA's recommendations to be noncontroversial and that granting the extensions may be delegated to the PA. Stakeholders in opposition of the PA's recommendations should post comments to UM 1930 by November 8, 2024.

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.

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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 twenty-one-months.

Project Information

Project ID: PP-2021-94

Project Name: Canyonville Solar 1

Project Manager: Canyonville Solar 1 LLC

Subscription Manager: Arcadia Community Solar, LLC

Utility Service Area: Pacific Power

Project Site Address: Gazley Road, Canyonville, OR 97417

Project Size (kW-AC): 1,000

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-certified, 5/11/2022

Project Description

Canyonville Solar 1 is a 1,000 kW-AC project located in Canyonville, Oregon, in Douglas County. The Project Manager entity is controlled by SolRiver Capital, LLC. Arcadia Community Solar, LLC is the outreach and subscription manager.

Review Summary

Date Review Completed: 9/25/2024

Nature of the Amendment Request: Extend Certification Deadline

PA Recommendation: Approve

Review Notes

Current Certification Deadline: September 11, 2024

Recommended Certification Deadline: June 26, 2026

The Project Manager requests a twenty-one-month extension to the Certification deadline to correspond with the utility's interconnection schedule associated with the latest utility interconnection study and to finish participant enrollment.

The PA previously granted a request to extend the Certification deadline by 10 months from November 11, 2023, to September 11, 2024. That extension was requested due to the need for a utility restudy of a revised point of interconnection plan for Canyonville Solar 1 and Canyonville Solar 2.

The PM has stated that when they acquired the Canyonville 1 project, they did not have all the necessary real estate rights to deliver power to the POIs in the original study. The PM said they unsuccessfully tried to obtain all the necessary easements for the original interconnection paths. The PM states that they were told they needed an interconnection restudy by Pacific Power as opposed to amending the existing interconnection agreement.

Since the last extension was granted in May 2023, the PM has requested an updated interconnection study three times. They received updated interconnection studies from Pacific Power in October 2023, April 2024, and July 2024. The first restudy unnecessarily reduced the total capacity of the projects and the second restudy placed utility poles outside of the lease and easement area on land that extended down a steep slope and was not feasible to access. Details of these requests for restudies are described in the attached letter from the PM.

The PM states that the latest interconnection study appears to be feasible pending an additional easement with the landowner. The proposed commercial operation date in the latest study is May 2026. With the new possible COD in 2026, the subscription manager has deprioritized the projects and is not enrolling participants at this time.

Given the project's demonstrated progress toward operation and reasons for delay beyond their control, the PA recommends granting this amendment request and extending the Certification deadline by twenty-one-months.

Attachments Included

The extension request 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 twenty-one-months.

Project Information

Project ID: PP-2021-142

Project Name: Canyonville Solar 2

Project Manager: Canyonville Solar 2 LLC

Subscription Manager: Arcadia Community Solar, LLC

Utility Service Area: Pacific Power

Project Site Address: Gazley Road, Canyonville, OR 97417

Project Size (kW-AC): 1,500

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-certified, 5/11/2022

Project Description

Canyonville Solar 2 is a 1,500 kW-AC project located in Canyonville, Oregon, in Douglas County. The Project Manager entity is controlled by SolRiver Capital, LLC. Arcadia Community Solar, LLC is the outreach and subscription manager.

Review Summary

Date Review Completed: 9/25/2024

Nature of the Amendment Request: Extend Certification Deadline

PA Recommendation: Approve

Review Notes

Current Certification Deadline: September 11, 2024

Recommended Certification Deadline: June 26, 2026

The Project Manager (PM) requests a twenty-one-month extension to the Certification deadline to correspond with the utility's interconnection schedule and to finish participant enrollment.

Since May 2023, the PM stated they requested an updated interconnection study three times. Only the interconnection study completed in July 2024 has proven feasible for the project.

The PM cites that when they acquired the Canyonville 2 project, several development items needed to be completed. The PM said they did not have all the necessary real estate rights to deliver power to the POIs in the original study. The PM said they unsuccessfully tried to obtain all the necessary easements for the original interconnection paths. The PM cites that they were told they needed an interconnection restudy by Pacific Power due to not having the necessary easements. The PM requested updated studies in July of 2023. These studies were received in October 2023. However, these studies unnecessarily reduced the total capacity of the projects. The PM requested new studies in October 2023. They received the updated interconnection studies in April 2024. However, these

studies placed the utility poles on land that extended down a steep slope that was impossible to access and was outside the lease/easement area. The PM requested updated studies in May 2024. They received these studies in July 2024. The latest study appears feasible, pending an additional easement from the landowner. The proposed energization date in the newest interconnection study is May 2026.

With the new possible COD in 2026, their SM (Arcadia) has deprioritized the projects and is not working on enrolling participants at this time. Given the project's demonstrated progress toward operation and reasons for delay beyond their control, the PA recommends granting this amendment request and extending the Certification deadline by twenty-one-months.

Attachments Included

The extension request from the Project Manager is attached.



Brandon Conard
SolRiver Capital, LLC
1290 Broadway St, Suite 520
Denver, CO 80203

October 14, 2024

VIA EMAIL (administrator@oregoncsp.org)

Program Administrator
Oregon Community Solar Program

RE: Community Solar Program Extension of the Pre-certification period

Dear Program Administrator,

SRS Solar, LLC, a Colorado limited liability company (“SolRiver”), on behalf of the following Projects and Project Managers listed below (collectively the “Developers”), hereby kindly submits this letter to request an approximately twenty-one (21) month extension of the Pre-certification period for the Canyonville 1 & 2 projects to account for delays caused by the utility interconnection process and wetlands permitting.

Project	Project Manager	Pre-Certification Date	Certification Deadline	Requested Extension
Canyonville 1	Canyonville Solar 1 LLC	05/11/2022	09/11/2024	06/11/2026
Canyonville 2	Canyonville Solar 2 LLC	05/12/2020	09/11/2024	06/11/2026

The requested extensions are reasonable because (i) the Developers have experienced lengthy delays due to interconnection issues beyond their control, and (ii) continued development and financial commitment towards the Projects by SolRiver, including spending \$2.2 MM on the development of the Projects to date. These aspects are explained in further detail below.

Utility Interconnection Delays

As discussed previously, the Projects have experienced general interconnection delays. Despite these delays, we have continued to work diligently with PacifiCorp to create a feasible interconnection plan for these projects. Since May of 2023, we have requested updated interconnection studies three times. We have received studies back three times. Only the most recent study has proven feasible. A discussion of each round of requests and the results are below:

1. We requested updated studies in July of 2023. These studies were received in October 2023. However, these studies unnecessarily reduced the total capacity of the projects.
2. We requested new studies in October 2023. We received the updated interconnection studies in April 2024. However, these studies placed the utility poles on land that extended down a steep slope that is impossible to access and was outside of our lease/easement area.
3. We requested updated studies in May 2024. We received these studies in July 2024. The latest study appears to be feasible, pending an additional easement from the landowner. Unfortunately, the proposed energization date in the latest interconnection study is May of 2026.

A twenty-one month extension is reasonable because the utility timeline does not support energizing the project any earlier than May of 2026.

Material Progress and Investment

The Projects continue to address interconnection delays and are working towards an acceptable interconnection strategy. In addition, significant progress has been made in the development of these Projects. This progress includes but is not limited to the following:

- **Subscriber Enrollment**. The Projects have engaged with Arcadia Power, Inc. to procure and manage subscribers. However, given the timeline to energization, we have fallen off on subscriber acquisition and prioritized our other PacifiCorp projects first.
- **Material Investment**. SolRiver has spent more than \$2.2 MM to date on the Projects.

Closing Request

We respectfully ask the Program to grant the extension to the Pre-certification period described herein in recognition of the continued investment made by SolRiver and the lengthy delay related to utility interconnection work.

Brandon Conard

As Manager, on behalf of

Canyonville Solar 1 LLC, an Oregon limited liability company

Canyonville Solar 2 LLC, an Oregon limited liability company