



Program Administrator's Project Recommendation

January 24, 2025

Community Solar Program - Docket No. UM 1930

On October 30, 2024, in Order No. 24-364, 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 ten-month Certification deadline extension for the following project:

PGE-2020-18 (Waterford Solar)

The PA has reviewed the project Certification deadline extension request and has recommended granting the extensions. Those extension requests are included below. 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 February 7, 2025.

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 10 months.

Project Information

Project ID: PGE-2020-18

Project Name: Waterford Solar

Project Manager: Waterford Solar PM, LLC

Subscription Manager: Common Energy

Utility Service Area: PGE

Project Site Address: 9040 Fort Hill Road, (45° 3'39.99"N, 123°33'10.46"W), Willamina, OR 97396

Project Size (kW-AC): 2,565

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-certified, 4/30/2022

Project Description

Waterford Solar is a 2,565 kW-AC project located in Willamina, Oregon, in Polk County. The Project Manager entity is controlled by Luminace. Outreach and customer management for the project is conducted through Common Energy.

Review Summary

Date Review Completed: 12/24/2024

Nature of the Amendment Request: Extend Certification Deadline

PA Recommendation: Approve

Review Notes

Current Certification Deadline: August 31, 2024

Recommended Certification Deadline: June 31, 2025

On May 29, 2024, the Project Manager (PM) reached out to the PA team to inform the team of interconnection updates brought by PGE. The PM stated that PGE alerted them that a higher queue project dropped out of the interconnection queue and infrastructural upgrades would be required before Waterford would be allowed to interconnect. These upgrades would necessitate a longer timeline for the entire project to become operational. PGE additionally informed the PM that the project would be permitted to pursue partial energization before the upgrades would need to be completed. The PM was informed that the project would be permitted to energize 1,443 kW-AC on 7/30/2024 and the remaining 1,122 kW-AC capacity could energize in 2026 after all upgrades are complete. The PM sought Program guidance on whether the project would be permitted to become Certified and partially operational if all Certification requirements for the entire capacity were met within the 1,443 kW-AC that PGE permitted to energize. The PM has proposed that they would fill 256.5 kW-AC of the capacity coming online with low-income subscribers (10% of the project's total)

and 1,065 kW-AC of the capacity with residential participants (40% of the project's total capacity) before requesting Certification. The PA supports Waterford's plan for Certification and partial operations.

The PM has met all the requirements for the Certification except for low-income and residential enrollment. Due to the uncertainty of the project's Certification plan, the low-income facilitator (LIF) did not prioritize the project until the OPUC confirmed that the project would be allowed to request Certification and partial energization. The PA team also notes that the LIF is experiencing a high number of projects requesting their assistance with filling the Program's low-income capacity requirement in a short period of time, slowing the rate at which they can fill the projects with low-income leads. This is due to previously delayed Tier 1 Projects reaching Certification at the same time as Tier 2 Projects. The LIF is working with Subscription Managers to fill the projects as quickly as they can. The Project Manager is requesting an extension to work with the LIF to complete low-income enrollment. To ensure the LIF has sufficient time to fill the low-income capacity for the project, the PA is extending the Certification deadline to June 31, 2025.

Attachments Included

The extension request received from the Project Manager is attached.



November 7, 2024

Program Administrator
Oregon Community Solar Program

administrator@oregoncsp.org

RE: Community Solar Program Extension of the Certification Deadline

Dear Program Administrator,

On behalf of Waterford Solar PM, LLC (“Luminace”), as owner of the Project Manager listed below, we hereby submit this letter requesting an extension of the Certification period to correspond with the utility’s interconnection schedule.

Project	Project Manager
Waterford	Waterford Solar PM, LLC

This project is on track to achieve COD around 7/30/2024 however I am requesting a certification extension to allow for CEP to finish LMI verification. Their estimated date of completion is 9/30. We are requesting a 200-day extension.

Current certification deadline: October 1, 2024

Requested extension certification deadline: April 19, 2025

Thank you for your consideration of our request for an extension. Please contact my colleague Julia Peacock at 301-775-9511 or Julia.peacock@luminace.com if you have any questions.

Sincerely,

Mohammed Habul
Vice President

cc: John Drexinger, Julia Peacock (Luminace)