



DEPARTMENT OF JUSTICE
GENERAL COUNCIL DIVISION

July 29, 2024

via E-mail

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, OR 97308-1088
PUC.FilingCenter@puc.oregon.gov

Re: UM 1930- Request to Extend Timeline for Program Financial Analysis

As permitted by Oregon Revised Statute (ORS) 756.568 and Order No. 23-321, Staff of the Public Utility Commission of Oregon (Staff) request a further extension of the timeline for filling a Program Financial Analysis in the Community Solar Program (Program or CSP). On June 28, 2024, Administrative Law Judge (ALJ) Lackey granted a 31-day extension to the timeline for submission of CSP financial analysis. Staff now seeks an additional extension of 47 days for filling its analysis, for a new due date of September 16, 2024. Staff requests expedited consideration of its request as the analysis is currently due July 31, 2024.

In Order Nos. 19-392 and 22-037 the Commission directed Staff to pause Pre-Certification and conduct a financial analysis to determine next steps if the amount of CSP capacity subscribed and billing is not sufficient to recover the Program's ongoing costs. In Order 24-026 the Commission extended CSP Pre-certification for 24 months.

Staff requests an additional 47 days to further refine the CSP financial analysis that will facilitate Commission decisions regarding future Program design changes.

Sincerely,

/s/ Natascha Smith

Natascha Smith
Assistant Attorney General
Business Activities Section