

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: October 29, 2024**

REGULAR **CONSENT** **EFFECTIVE DATE** October 30, 2024

DATE: October 21, 2024

TO: Public Utility Commission

FROM: Kiran Ambreen Ayub

THROUGH: Caroline Moore, JP Batmale, and Sarah Hall **SIGNED**

SUBJECT: OREGON PUBLIC UTILITY COMMISSION STAFF:
(Docket No. UM 1930)
Certification of Goodling Annex, Sunset Ridge Solar, Orchard Knob Solar,
and Clayfield Solar LLC projects in the Community Solar Program.

STAFF RECOMMENDATION:

Certify Goodling Annex, Sunset Ridge Solar, Orchard Knob Solar, and Clayfield Solar LLC projects in the Community Solar Program.

DISCUSSION:

Issue

Whether the Public Utility Commission of Oregon (Commission) should certify Goodling Annex, Sunset Ridge Solar, Orchard Knob Solar, and Clayfield Solar LLC projects in the Community Solar Program.

Applicable Rule or Law

Section 22 of Senate Bill 1547, codified in ORS 757.386, directs the Commission to establish a community solar program (hereinafter referred to as "Program" or "CSP").

On June 29, 2017, the Commission adopted formal rules for the Program under OAR Division 88 of Chapter 860. OAR 860-088-0050 details the requirements for project Certification.

Section 5.2 of the CSP Program Implementation Manual (PIM) outlines the information and documentation that projects must submit to the CSP Program Administrator (PA) as part of the Certification application.

Analysis

Background

A Project Manager (PM) registered with CSP may submit applications for project Certification to the PA. As required by OAR 860-088-0050(3), the PA reviews applications for compliance with Program requirements and recommends projects for Certification by the Commission. Certification is an important stage gate for CSP projects. Receiving Certification means that the project meets all Program requirements and can proceed to commercial operation.

The PA recently received a Certification application from the following four projects. After reviewing the applications and supporting documentation provided by the PMs, the PA has recommended that the Commission certify the projects in the Program. See the Certification Recommendation Forms in Attachments A, B, C, and D.

Recommended Projects

Project Name	Name of Project Manager	Utility Territory	Project Size (kW-AC)	Attachment #
Goodling Annex	Bonneville Environmental Foundation	Pacific Power	1,000	Attachment A
Sunset Ridge Solar	Sunset Ridge Project Manager, LLC	Pacific Power	2,250	Attachment B
Orchard Knob Solar	Orchard Knob PM, LLC	Pacific Power	2,250	Attachment C
Clayfield Solar LLC	Clayfield Solar PM, LLC	Portland General Electric	2,565	Attachment D

Goodling Annex

Goodling Annex is a 1,000 kW-AC project located in Portland, Oregon, in Multnomah County. Bonneville Environmental Foundation (BEF) is the PM and will conduct customer management for the project.

The Goodling Annex project was Pre-certified with Tier 1 Carve-Out capacity on April 21, 2020, with an original Certification deadline of October 21, 2021. In Order

No. 21-294, the Commission granted an extension of the project's Certification deadline to April 1, 2023, conditional on an interim deadline of June 1, 2022, for the PM to provide a financing plan. The PM received funding through the Portland Clean Energy Fund (PCEF).

On June 6, 2022, the PA used authorities delegated by the Commission in Order No. 22-007 (delegated authority) to recommend a three-month extension of the interim deadline to September 1, 2022. The June 2022 interim deadline was set based on the timing of PCEF's 2021 award cycle, along with a forecast in which the timing of awards would be made available in 2022. PCEF's 2022 award announcements had not yet been made before the June 2022 interim deadline, so the project had not satisfied its interim deadline. To accommodate the timing of PCEF award announcements, the PA recommended extending the interim deadline three months to September 2022, to confirm the PM's financial plan. The PA also recommended a three-month extension of the project's Certification deadline to June 1, 2023, to preserve the ten-month period between when the PM was to provide a financial plan and request Certification.

On June 9, 2023, the PA again used its delegated authority to recommend a nine-month Certification deadline extension to February 28, 2024. The PM requested an extension to provide the time needed to receive the PCEF award and complete development.

On March 9, 2024, the PA again used its delegated authority to recommend a six-month Certification deadline extension to September 1, 2024. The PM requested the extension to allow for additional time for equipment delivery, begin construction, and begin participant outreach and subscriber enrollment.

The PM submitted the necessary Certification paperwork to the PA on August 26, 2024, prior to the project's Certification deadline of September 1, 2024. PA completed its review on September 17, 2024, and recommends Certification in CSP. While this timeline has led Staff to recommend the Commission certify the project after its Certification deadline, Staff and the PA have no concerns with certifying the project at this time. The Program considers that projects submitting Certification applications to the PA by the deadline to have met the deadline, while the PA and Staff may require additional time to review applications for recommendation to the Commission.

Sunset Ridge Solar

Sunset Ridge Solar is a 2,250 kW-AC project in Klamath Falls, Oregon, in Klamath County. The project manager entity is controlled by Luminance. Outreach and customer management for the project will be conducted through Arcadia Community Solar, LLC.

The Sunset Ridge Solar project was Pre-certified on April 20, 2021. On June 8, 2022, the PA used its delegated authority to recommend a six-month extension of the project's Certification deadline to April 20, 2023. In its request for a Certification deadline extension, the project cited uncertainty and supply chain issues caused by the US Department of Commerce's investigation into imported solar panels from certain countries, which caused significant disruption in the domestic solar industry. The PA agreed these unforeseen circumstances caused the PM to be unable to meet their certification and operational deadlines.

On May 24, 2023, the PA again used its delegated authority to recommend a four-month extension to the project's Certification deadline to October 15, 2023. The PM requested the extension to complete the Power Purchase Agreement with the utility.

On November 11, 2023, the PA again used its delegated authority to recommend a 60-day extension to the project's Certification deadline to December 14, 2023. The PM requested the extension because of utility interconnection delays that delayed the Commercial Operation Date.

On February 22, 2024, the PA again used its delegated authority to recommend a six-month extension to the project's Certification deadline to June 11, 2024. The PM requested the extension because of utility interconnection delays, including replacing a capacitor bank, completing the fiber optic design, and ordering the fiber optic material. The project had executed all construction contracts, built permits, and required interconnection documents.

On July 25, 2024, the PA again used its delegated authority to recommend a 60-day extension to the project's Certification deadline to August 11, 2024. The PM requested the extension because of additional interconnection delays, including the utility needing additional time to finalize inspections and complete interconnection work.

On October 23, 2024, the PA again used its delegated authority to recommend an eleven-day extension to the project's Certification deadline of August 11, 2024, to August 22, 2024. While this was a retroactive recommendation, the PM requested the extension in advance of the August 11, 2024, deadline. As a result, Staff has no concerns in this situation with accepting a Certification deadline that has already passed. The PM needed time to complete administrative work required for the project to meet the low-income subscription requirement for Certification. Staff recognizes the PA may require additional time to review project requests for deadline extensions.

The PM submitted the necessary Certification paperwork to the PA on August 22, 2024, The PA completed its review on October 2, 2024, and recommends Certification in

CSP. While this timeline has led Staff to recommend the Commission certify the project after its Certification deadline, Staff and the PA have no concerns with certifying the project at this time. The Program considers that projects submitting Certification applications to the PA by the deadline to have met the deadline, while the PA and Staff may require additional time to review applications for recommendation to the Commission.

Orchard Knob Solar

Orchard Knob Solar is a 2,250 kW-AC project located in Dallas, Oregon, in Polk County. The Project Manager entity is controlled by Luminace. Outreach and customer management will be conducted by Arcadia Community Solar, LLC.

The Orchard Knob Solar project was Pre-certified on April 15, 2022. On November 15, 2023, the PA used its delegated authority to recommend a three-month extension to the project's Certification deadline to January 15, 2024. The PM requested the extension because it needed additional time to compile documents required for Certification.

On March 8, 2024, the PA again used its delegated authority to recommend a 240-day extension to the project's Certification deadline to September 11, 2024. The PM requested the extension to align its Certification deadline with the project's interconnection timeline, which had been delayed, and to complete low-income enrollment. At the time of its request, the PM stated that the utility had not yet completed interconnection work for the project, including ordering necessary materials. The PM also stated it was waiting for an official construction schedule and confirmation of any outstanding easements from the utility.

On October 23, 2024, the PA again used its delegated authority to recommend a one-month extension to the project's Certification deadline of September 11, 2024, to October 11, 2024. While this was a retroactive recommendation, the PM requested the extension in advance of the October 11, 2024, deadline. As a result, Staff has no concerns in this situation with accepting a Certification deadline that has already passed. The PM needed time to complete administrative work required for the project to meet the low-income subscription requirement for Certification. Staff recognizes the PA may require additional time to review project requests for deadline extensions.

The PM submitted the necessary Certification paperwork to the PA on September 25, 2024, prior to the project's Certification deadline of October 11, 2024. The PA completed its review on October 3, 2024, and recommends Certification in CSP. While this timeline has led Staff to recommend the Commission to certify the project after its Certification deadline, Staff and the PA have no concerns with certifying the project at this time. The Program considers that projects submitting Certification applications to

the PA by the deadline to have met the deadline, while the PA and Staff may require additional time to review applications for recommendation to the Commission.

Clayfield Solar, LLC

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

Clayfield Solar project was Pre-certified on April 27, 2020. On February 24, 2022, the PA used its delegated authority to recommend a six-month extension of the project's Certification deadline to July 17, 2022, due to delays related to the COVID-19 pandemic.

On July 14, 2022, the PA again used its delegated authority to recommend a six-month extension to the project's Certification deadline to January 17, 2023. The PM cited the uncertainty and supply chain issues caused by the US Department of Commerce's investigation into imported solar panels from certain countries. The PA concurred that the investigation resulted in significant challenges for developers to secure and install solar modules.

On November 11, 2022, the PA again used its delegated authority to recommend a six-month extension to the project's Certification deadline to July 17, 2023. The PM cited that it needed time to change their project development plans to accommodate the Inflation Reduction Act federal investment tax credit. The project also cited construction delays based on the rainy season. The PA noted that given available regular market capacity at the time and the lack of a project waitlist, there was no advantage to the Program or participants to oppose the extension.

On August 26, 2023, the PA again used its delegated authority to recommend a PM transfer from Solar Town to Clayfield Solar PM, LLC, which is controlled by Luminace.

Also on August 26, 2023, the PA again used its delegated authority to recommend a seven month and thirteen-day extension of the project's Certification deadline to June 30, 2024. The PM cited interconnection and construction delays as the reason for the request.

On September 20, 2024, the PA again used its delegated authority to recommend a three-month extension of the project's Certification deadline to September 30, 2024. The PM cited a need for more time to complete low-income enrollment.

The PM submitted the necessary Certification paperwork to the PA on September 27, 2024, prior to the project's Certification deadline of September 30, 2024. The PA completed its review on October 3, 2024, and recommends Certification in CSP. While this timeline has led Staff to recommend the Commission to certify the project after its Certification deadline, Staff and the PA have no concerns with certifying the project at this time. The Program considers that projects submitting Certification applications to the PA by the deadline to have met the deadline, while the PA and Staff may require additional time to review applications for recommendation to the Commission.

Conclusion

Staff has discussed the project applications with the PA and reviewed CSP requirements. Staff supports the PA's recommendation that the Commission approve Certification of Goodling Annex, Sunset Ridge Solar, Orchard Knob Solar, and Clayfield Solar LLC projects in the Program.

PROPOSED COMMISSION MOTION:

Certify Goodling Annex, Sunset Ridge Solar, Orchard Knob Solar, and Clayfield Solar LLC projects in the Community Solar Program.

Project Certification Review and Recommendation

The Oregon Community Solar Program Administrator (PA) has reviewed the certification request of the project described below and recommends that the project be Certified.

Project Information

Project ID: PP-2020-63

Project Name: Goodling Annex

Project Manager: Bonneville Environmental Foundation

Subscription Manager: Verde

Utility Service Area: Pacific Power

Project Site Address: 9138 NE Sunderland Avenue, Portland, OR 97211

Project Size (kW-AC): 1,000

Carveout-eligible: Yes, at least 50% of the project is reserved for low-income Participants

Current Program Status and Date Achieved: Pre-Certified, 04/27/20

Expected Commercial Operations Date: 10/07/2024

Project Description

Goodling Annex is a 1,000 kW-AC project located in Portland, Oregon, in Multnomah County. The project is in the designated Carve-out section of the program, with the intent of reserving at least 50% of the project's capacity for low-income subscribers. Verde is the outreach manager for the project. Bonneville Environmental Foundation is the subscription manager.

Review Summary

Date Review Completed: 9/20/2024

Project Satisfies all Certification Requirements?: Yes

PA Recommendation: Approve

Review Notes

No special comments.

Attachments Included

No attachments.

Project Certification Review and Recommendation

The Oregon Community Solar Program Administrator (PA) has reviewed the certification request of the project described below and recommends that the project be Certified.

Project Information

Project ID: PP-2021-93

Project Name: Sunset Ridge Solar

Project Manager: Sunset Ridge Project Manager, LLC

Subscription Manager: Arcadia Community Solar, LLC.

Utility Service Area: PAC

Project Site Address: 42.281127°N, 121.812410°W, Klamath Falls, OR 97601

Project Size (kW-AC): 2,250

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-certified, 04/20/2021

Expected Commercial Operations Date: 10/19/2024

Project Description

Sunset Ridge Solar is a 2,250 kW-AC project located in Klamath Falls, Oregon, in Klamath County. The project manager entity is controlled by Luminace. Outreach and customer management for the project will be conducted through Arcadia Community Solar, LLC.

Review Summary

Date Review Completed: 9/30/2024

Project Satisfies all Certification Requirements?: Yes

PA Recommendation: Approve

Review Notes

No special comments.

Attachments Included

No attachments.

Project Certification Review and Recommendation

The Oregon Community Solar Program Administrator (PA) has reviewed the certification request of the project described below and recommends that the project be Certified.

Project Information

Project ID: PP-2021-111

Project Name: Orchard Knob Solar

Project Manager: Orchard Knob PM, LLC

Subscription Manager: Arcadia Community Solar, LLC

Utility Service Area: PAC

Project Site Address: 44°56'43.15"N, 123°18'38.53"W, Dallas, OR 97338

Project Size (kW-AC): 2,250

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-certified, 4/15/2022

Expected Commercial Operations Date: 10/28/2024

Project Description

Orchard Knob Solar is a 2,250 kW-AC project located in Dallas, Oregon, in Polk County. The Project Manager entity is controlled by Luminace. Outreach and customer management will be conducted by Arcadia Community Solar, LLC.

Review Summary

Date Review Completed: 9/30/2024

Project Satisfies all Certification Requirements?: Yes

PA Recommendation: Approve

Review Notes

No special comments.

Attachments Included

No attachments.

Project Certification Review and Recommendation

The Oregon Community Solar Program Administrator (PA) has reviewed the certification request of the project described below and recommends that the project be Certified.

Project Information

Project ID: PGE-2020-17

Project Name: Clayfield Solar LLC

Project Manager: Clayfield Solar PM, LLC

Subscription Manager: Common Energy

Utility Service Area: PGE

Project Site Address: 23741 S Springwater Rd. Estacada, OR 97023

Project Size (kW-AC): 2,565

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-certified, 4/27/2020

Expected Commercial Operations Date: 10/29/2024

Project Description

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

Review Summary

Date Review Completed: 10/7/2024

Project Satisfies all Certification Requirements?: Yes

PA Recommendation: Approve

Review Notes

No special comments.

Attachments Included

No attachments.