

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: December 9, 2025**

REGULAR CONSENT EFFECTIVE DATE December 10, 2025

DATE: December 2, 2025

TO: Public Utility Commission

FROM: Joseph Abraham

THROUGH: Sarah Hall **SIGNED**

SUBJECT: OREGON PUBLIC UTILITY COMMISSION STAFF:
(Docket No. UM 1930)
Requesting waiver extensions for Waterford Solar in the Community Solar Program.

STAFF RECOMMENDATION:

Grant waivers of OAR 860-088-0050(2)(c) and PIM section 5.4.1 requirements for a period of nine-months for the Waterford Solar project in the Community Solar Program.

DISCUSSION:

Issue

Whether the Public Utility Commission of Oregon (Commission) should grant requested nine-month waivers for the Waterford Solar project 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 (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.

OAR 860-088-0080(2) requires at least 10 percent of the total generating capacity of the Community Solar Program to be allocated exclusively for use by Low-Income (LI) residential customers.

OAR 860-088-0005(2) permits the Commission to waive CSP rules for good cause shown.

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.

The Commission may waive any PIM provision on a case-by-case basis as part of the Commission's decision.

Section 5.4.1 of the PIM requires projects to submit information related to its commercial operation to the CSP platform prior to the Program Administrator processing billing for the project.

Analysis

Background

In Order No. 25-210 the Commission certified the Waterford Solar project in CSP with waivers of OAR 860-088-0050(2)(c) and PIM section 5.4.1 requirements for a period of six months.¹ Staff recommended the two waivers because the project sought to energize shortly after Certification and begin providing benefits to its subscribers. However, Portland General Electric (PGE) needed additional time to conduct infrastructure upgrades required for Waterford to fully energize. The project partially energized up to 1,443 of its 2,565 kW-AC capacity on July 1, 2025.

In Order No. 25-210, Staff indicated the project will need to request additional temporary waivers if it cannot achieve commercial operation within six months of Certification. Staff was hopeful that within six months of Certification PGE would have a confident timeline for completing all necessary infrastructure upgrades. This would allow Staff to recommend additional waivers adequate for the project to achieve commercial operation.

The project has requested, and the PA recommends granting additional waivers to allow PGE time to complete all necessary upgrades. See the PA's recommendation in

¹ See Order No. 25-210 on June 11, 2025 in Docket No. UM 1930, <https://apps.puc.state.or.us/orders/2025ords/25-210.pdf>.

Attachment A. Staff has also confirmed with PGE that it expects to complete all necessary upgrades by July 1, 2026. Staff recommends granting additional waivers of OAR 860-088-0050(2)(c) and PIM section 5.4.1 for a period of nine-months beginning December 11, 2025. This would effectively extend the current waivers until September 11, 2026. Staff and PGE agree this should provide sufficient time for the project to achieve commercial operation, including any unforeseen delays in completing the upgrades.

Conclusion

Staff supports the PA's recommendation to grant additional nine-month waivers of OAR 860-088-0050(2)(c) and PIM section 5.4.1 for the Waterford Solar project. PGE has also indicated it can complete all necessary infrastructure upgrades within this timeframe, allowing the project to achieve commercial operation.

PROPOSED COMMISSION MOTION:

Grant waivers of OAR 860-088-0050(2)(c) and PIM section 5.4.1 requirements for a period of nine-months for the Waterford Solar project in the Community Solar Program.

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 waiver to PIM Section 5.4.1 and the operational deadline be extended by nine months.

Project Information

Project ID: PGE-2020-18

Project Name: Waterford Solar

Project Manager: Waterford Solar PM, LLC

Subscription Manager: Common Energy LLC

Utility Service Area: PGE

Project Site Address: 9040 Fort Hill Road Willamina, OR 97396

Project Size (kW-AC): 2,565

Carveout-eligible: No

Current Program Status and Date Achieved: Certified, 6/11/2025

Project Description

Waterford Solar is a 2,565 kW-AC project located in Willamina, Oregon, in Polk County. Waterford Solar PM, LLC is controlled by Luminace. Outreach and customer management are conducted through Common Energy LLC.

Review Summary

Date Review Completed: 11/13/2025

Nature of the Amendment Request: Extend Operational Deadline

PA Recommendation: Approve

Review Notes

Current Operation Deadline: December 19, 2025

Recommended Operation Deadline: September 19, 2026

The Project Manager (PM) requests a nine-month waiver extension to the operational deadline. When the project requested Certification, it was granted two waivers. The first was a waiver for PIM Section 3.15.2, which requires that 10% of a project capacity is subscribed to low-income participants at the time of Certification. The second was a waiver to PIM Section 5.4.1, which requires that projects submit documentation related to their commercial operation date to the CSP platform prior to the Program Administrator for processing billing for the project. This waiver allowed the project to become partially operational and provide bill credits to customers prior to achieving full commercial operation.

While the project has completed the 10% low-income enrollment requirement, the project will need to extend the operational deadline and the waiver to Section 5.4.1 due to additional delays in interconnection. PGE has allowed the project to energize 1,443 kW-AC and the project will be able

to energize the remaining 1,122 kW-AC capacity after PGE completes all infrastructure upgrades in 2026.

The PA recommends extending the waiver to PIM Section 5.4.1 and the operational deadline by nine months so that the project can continue to provide bill credits to participants for the capacity that is operational prior to achieving full commercial operation.

Attachments Included

Project Manager's waiver extension included.

November 7, 2025

Program Administrator
Oregon Community Solar Program
administrator@oregoncsp.org



RE: Community Solar Program Operational Extension Request

Dear Program Administrator,

On behalf of Waterford PM, LLC (the “Project Manager”), Luminace Sunbeam Development Holdings, LLC (“Luminace”), as owner of Project Manager, hereby submits this letter to request an extension of the Certification waiver of PIM Section 5.4.1 to account for utility interconnection delays outside of the Project Manager’s control.

The current back feed date set by the utility is scheduled for Mid 2026. The project has encountered delays due to point of interconnection redesign and supply chain procurement of materials. We hereby request a 274-day operational period extension to allow the PGE to finalize interconnection work. Luminace will work with Common to send out communications to customers notifying them of the latest energization date.

Current six-month operational deadline: December 19, 2025

Requested operational deadline: September 19, 2026

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
VP, Power Markets

cc: John Drexinger, Julia Peacock (Luminace)