



Program Administrator's Project Recommendation

February 20, 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 a six-month Certification deadline extension, with conditions for the following project:

PGE-2020-16 (Manchester Solar, LLC)

The PA has reviewed the project Certification deadline extension request for the project, which is included at the bottom of this document. The PA has recommended granting a six-month extension with the following conditions:

1. The controlling entity, SPI Solar, Inc., provide a detailed funding plan, as requested by the PA, by March 31st that explains how it plans to finance the project, and
2. the Project Manager demonstrates that financing has been secured and progress has been made on project development based on the funding plan by the end of the six-month period.

Staff shares the PA's concern that the project will not make adequate progress towards Certification in six months, and would also not likely support an additional extension if that is the case. However, Staff finds the PA's recommendation to be noncontroversial and that granting an extension, with conditions, may be delegated to the PA. Stakeholders in opposition of the PA's recommendation should post comments to UM 1930 by March 5, 2024.

To Submit Public Comment:

Stakeholders can submit written comments on the PA's recommendation by email to

Program Notice

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 6 months.

Project Information

Project ID: PGE-2020-16

Project Name: Manchester Solar LLC

Project Manager: Manchester Solar LLC

Subscription Manager: Manchester Solar LLC

Utility Service Area: PGE

Project Site Address: 18100 SE Neck Rd. Dayton, OR 97114

Project Size (kW-AC): 1,800

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-certified, 7/1/2020

Project Description

Manchester Solar is an 1,800 kW-AC project located in Dayton, Oregon, in Yamhill County. The Project Manager entity is controlled by SPI Solar, Inc. Outreach and customer management are conducted by Manchester Solar LLC.

Review Summary

Date Review Completed: 02/08/2024

Nature of the Amendment Request: Extend Certification Deadline

PA Recommendation: Approve, with conditions

Review Notes

Current Certification Deadline: January 1, 2024

Recommended Certification Deadline: July 1, 2024

The Project Manager cites that Manchester Solar LLC needs more time to close on financing. Manchester Solar had an original certification deadline of January 1, 2022, which was extended due to COVID-19 related market disruption and received a second extension due to supply chain issues caused by the US Department of Commerce investigation. Most recently, a third extension was granted on August 28, 2023, to make progress toward construction. Manchester Solar LLC is in good standing within the Program. However, the project has not made progress toward construction and the PA is concerned that the project will not make adequate progress toward Certification in six months. The PA would likely not support an additional extension and would consider disciplinary probation if progress hasn't been made by the July 2024 deadline. The PA supports extending the Certification deadline by six months with the conditions that SPI Solar, Inc 1) provide a detailed funding plan, as requested by the PA, to the PA team by March 31st that explains how SPI Solar, Inc plans to finance the project and 2) the Project Manager demonstrates

that financing has been secured and progress has been made on project development based on the funding plan by the end of the six-month period.

Attachments Included

The extension request received from the Project Manager is attached.

12/12/2023

Oregon Community Solar Program
c/o Program Administrator

Re: Request for Extension of Time to Achieve Certification

Dear Program Administrator,

We are writing on behalf of Manchester Solar, LLC, a registered Project Manager in the Oregon Community Solar Program (the “CSP”). The Project Manager is seeking a six-month extension of time to achieve certification. The project is:

	Date Pre-Certified	Existing Certification Deadline	Requested Extension
Manchester Solar, LLC	July 1, 2020	January 1, 2023	Six Months

OAR 860-088-0040(5) provides that “[a] project remains pre-certified for a period of 18 months, unless granted an extension by Commission order.” The rules do not address extensions, but the *CSP Program Implementation Manual* (the “PIM”) indicates that “requests to extend a Project’s Certification deadline[] are considered amendments to a Project’s Pre-Certification.”¹ Section 4.7.4 of the PIM provides the following guidance:

Major revisions require the submission of a written request. This request is submitted through the Community Solar Program Platform and accompanies the details of the proposed revision.

The written request for major revisions should detail the Project’s progress, the reasons for the requested change and, in the case of extension requests, a realistic timeline for the completion of Certification requirements and the achievement of commercial operation.²

In brief, the project has made substantial progress toward certification and is expected to succeed.

¹ PIM at 68.

² PIM at 70.

Development Status

The Project continues to make progress through development to construction. The Interconnection Agreement with PGE has been completed. The project had a previously approved Conditional Use Permit from Yamhill County and plans to begin subscribing community solar customers shortly. We hope to start construction on the project within a reasonable timeframe following the closing of financing with our finance partner. SPI Solar, Inc., the Manchester Solar project developer, has invested more than \$1MM in the project to date.

Because financing has not closed yet, we respectfully request that an extension of the Certification Date be extended for a Six-Month period.

Six-Month Extensions Would Provide a Reasonable Amount of Time for Development

We recognize that we do not have perfect information at this time. However, based on the information available, we are optimistic that six-month extensions to achieve certification will enable the project to meet CSP deadlines. This understanding is based in part on our understanding that projects have up to six months to complete interconnection and achieve commercial operations after being certified.³ If we encounter additional unexpected delays, we may need to request further extensions in the future.

We respectfully request that the Commission grant the requested extension for this project.

Sincerely,

Jack Lee
Manchester Solar LLC
