



Program Administrator's Project Recommendation

July 12, 2022

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 transfer of Project Manager for the following projects:

PGE-2020-15 (Belvedere Solar)
PGE-2020-19 (Dover Solar)

The PA has reviewed the project certification deadline extension requests for the two projects and has recommended granting the transfer of Project Manager. The extension requests for both projects is included at the bottom of this document. Staff finds the PA's recommendations to be noncontroversial and that granting pre-certification may be delegated to the PA. Stakeholders in opposition of the PA's recommendation should post comments to UM 1930 by July 26, 2022.

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.



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 project be transferred to Solar Town.

Project Information

Project ID: PGE-2020-15

Project Name: Belvedere Solar

Current Project Manager: Belvedere Solar, LLC

Proposed Project Manager: Solar Town, LLC

Subscription Manager: Solar Town

Utility Service Area: PGE

Project Site Address: 9526-9530 Mt Angel Highway NE

Project Size (kW-AC): 2,970

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-certified, 8/7/20

Project Description

Belvedere Solar is a 2,970 kW-AC project located in Mt. Angel, Oregon, in Marion County. Solar Town has not contracted with a subscription manager.

Review Summary

Date Review Completed: 7/1/22

Nature of the Amendment Request: Project Manager Transfer

PA Recommendation: Approve

Review Notes

Belvedere Solar is one of four Tier 1 projects managed by entities controlled by SPI Solar, Inc in PGE service area. SPI is requesting to transfer project management of the Dover Solar project from Belvedere Solar, LLC to Solar Town, LLC, two entities that it controls. A transfer in project management is considered a major revision under the PIM that requires a project amendment.

Solar Town previously requested that project management for the Belvedere and Dover projects be transferred from Solar Town to Belvedere Solar, LLC and Dover Solar, LLC respectively. This original request was related to SPI's strategy to comply with program requirements that the designated project manager be the entity that enters into a CSP PPA with the utility. The project amendment related to this transfer was granted by the Commission in June 2021, but the transfer was not completed by the project manager in the program platform, where the project is still listed as being managed by Solar Town. The PA has informed SPI that this disconnect must be resolved.

SPI now requests transferring the Belvedere and Dover projects back to their original project manager, Solar Town, and notes that the original transfers are no longer needed. The PA confirms that the original reason for the transfer, compliance with rules regarding PPA signatory authority, is no longer relevant due to recent revisions in the PIM. The PA has no concerns with this transfer and notes that no customer contracts will be impacted and that the projects will remain under the

control of the same parent entity. The PA recommends granting this amendment request and transferring the projects.

Attachments Included

The transfer request received from the Project Manager is attached.



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 project be transferred to Solar Town.

Project Information

Project ID: PGE-2020-19

Project Name: Dover Solar

Current Project Manager: Dover Solar, LLC

Proposed Project Manager: Solar Town, LLC

Subscription Manager: Solar Town

Utility Service Area: PGE

Project Site Address: NE of Gribble Rd and Canby Marquam Hwy

Project Size (kW-AC): 1,980

Carveout-eligible: No

Current Program Status and Date Achieved: Pre-certified, 7/1/20

Project Description

Dover Solar is a 1,980 kW-AC project located in Canby, Oregon, in Marion County. Solar Town has not contracted with a subscription manager.

Review Summary

Date Review Completed: 7/1/22

Nature of the Amendment Request: Project Manager Transfer

PA Recommendation: Approve

Review Notes

Dover Solar is one of four Tier 1 projects managed by entities controlled by SPI Solar, Inc in PGE service area. SPI is requesting to transfer project management of the Dover Solar project from Dover Solar, LLC to Solar Town, LLC, two entities that it controls. A transfer in project management is considered a major revision under the PIM that requires a project amendment.

Solar Town previously requested that project management for the Belvedere and Dover projects be transferred from Solar Town to Belvedere Solar, LLC and Dover Solar, LLC respectively. This original request was related to SPI's strategy to comply with program requirements that the designated project manager be the entity that enters into a CSP PPA with the utility. The project amendment related to this transfer was granted by the Commission in June 2021, but the transfer was not completed by the project manager in the program platform, where the project is still listed as being managed by Solar Town. The PA has informed SPI that this disconnect must be resolved.

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control of the same parent entity. The PA recommends granting this amendment request and transferring the projects.

Attachments Included

The transfer request received from the Project Manager is attached.

6/28/2022

Oregon Community Solar Program
c/o Program Administrator

Re: Amendment Request for Solar Town to Remain as Project Manager

Dear Program Administrator,

We are writing on behalf of Solar Town, LLC, a registered Project Manager, Dover Solar LLC, and Belvedere Solar LLC in the Oregon Community Solar Program (the "CSP").

We have recently become aware of a requested change previously made by Matt Chou, a prior employee of SPI Solar, Inc., the owner of Solar Town LLC, Dover Solar LLC and Belvedere Solar LLC who submitted a request to the Program Administrator to transfer the Project Manager responsibilities of the Dover Solar project and Belvedere Solar project from Solar Town LLC to the respective project LLCs. This change had not been approved internally at SPI and Matt Chou is no longer an employee of the Company. Based on our understanding of the situation, there was no reason for the change to occur.

On behalf of Dover Solar LLC and Belvedere Solar LLC, and through this Letter, we hereby submit an Amendment Request that Solar Town LLC be reinstated as the Project Manager for the Dover Solar and Belvedere Solar projects. Solar Town LLC will continue to act as Project Manager as it has been. We appreciate your consideration in this matter.

We respectfully request that the Commission grant the Amendment Request for the projects.

Sincerely,

Peter Coughlin
Solar Town LLC