



Program Administrator's Project Recommendation

August 8, 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 waiver of the requirement to register in WREGIS and retire RECs for the following project:

PP-2020-35 (Wallowa Community Solar)

The PA has reviewed the Project Manager's WREGIS registration waiver request for the project listed above and has recommended granting the waiver. Staff finds the PA's recommendations to be noncontroversial and that granting the waiver may be delegated to the PA. Stakeholders in opposition of the PA's recommendation should post comments to UM 1930 by August 22, 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 granted a waiver of the requirement to register in WREGIS and retire RECs.

Project Information

Project ID: PP-2020-35

Project Name: Wallowa County Community Solar

Project Manager: Fleet Development, LLC

Subscription Manager: Fleet Development, LLC

Utility Service Area: Pacific Power

Project Site Address: 81855 Homan Ln., Enterprise, OR 97828

Project Size (kW-AC): 360 kW-AC

Carveout-eligible: Yes, project was pre-certified under Tier 1 rules and is less than or equal to 360 kW-AC

Current Program Status and Date Achieved: Certified, 2/9/22

Project Description

Wallowa County Community Solar is a 360-kW-AC project located in Enterprise, Oregon, in Wallowa County. Fleet Development is working with Viridian Management to recruit subscribers.

Review Summary

Date Review Completed: 7/25/22

Nature of the Amendment Request: Remove WREGIS registration requirement

PA Recommendation: Approve

Review Notes

The project manager, Fleet Development LLC, has requested a waiver of the program requirement that projects register with WREGIS and retire Renewable Energy Certificates (RECs) on behalf of participants for the subscribed portion of generation from the project. The program's administrative rules allow projects that are sized 360 kW-AC or smaller to request this waiver at the time of pre-certification. The PIM clarifies that a project manager may make this request through the project amendment process after pre-certification.

The Wallowa County Community Solar project is eligible to request this waiver on the basis of size. The project manager did not make this request at the time of pre-certification, and is doing so now as a project amendment. Fleet Development has indicated that their subscribers do not require documentation of REC requirement and that as a result they prefer to avoid the administrative cost of managing RECs in WREGIS.

The PA has no concerns with this this waiver request, has supported the same waiver for other eligible projects at the time of pre-certification, and recommends that the request be granted.

Attachments Included

The WREGIS registration waiver request received from the Project Manager is attached.



12 July, 2022

Oregon Community Solar Program Administrator
Attn: Ryan Cook

Dear Program Administrator,

Fleet Development respectfully requests approval of a Project Amendment for Wallowa County Community Solar (WCCS) (PP-2020-35) to waive the requirement to register RECs in WREGIS. WCCS is a 360-kW project and the program allows projects of this size and smaller to choose to waive the WREGIS registration requirement in the Pre-Certification process.

During precertification in 2020, the project manager voluntarily selected the WREGIS registration option to retire the project's RECs. WCCS is a frontrunner project and one of the first to achieve Pre-Certification in PacifiCorp territory. Since that time the project became subscribed and Certified and has learned more about its subscribers, WREGIS reporting process, and the potential value of RECs. The project manager has decided that WREGIS registration is not in the best interest of the project or its subscribers for the following reasons:

- 1) Subscribers insist they have no need to claim the environmental attributes or prove the retirement of the RECs they generate.
- 2) REC reporting and fees require an undue administrative burden to the project which is trying to achieve financial solvency.
- 3) The value of unsubscribed kWh RECs sold in the WREGIS marketplace is insignificant for a project this size and less than the cost of administration.

WCCS currently is required to register with WREGIS by the end of July 2022 to remain compliant with program rules. We respectfully request to opt out of the REC program now that we understand the needs of our project more deeply. Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. P. Sheehy".

Ryan Sheehy
200 E. Main St
Enterprise, OR 97828