

**From:** Gavin Tenold  
**To:** [UTC DL Records Center](#)  
**Subject:** UE-171033  
**Date:** Wednesday, March 21, 2018 5:05:57 PM  
**Attachments:** [UE171033 COMMENTS\\_21March2018.pdf](#)

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Please find attached our input for the Community Solar Docket.

Thank you,

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Gavin Tenold  
CPHC | PHIUS Certified Builder  
Owner & General Contractor  
**Northwest Renewables**  
[www.northwestrenewables.com](http://www.northwestrenewables.com)  
[www.facebook.com/northwestrenewables](https://www.facebook.com/northwestrenewables)  
(509) 570-4449 cell

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UTIL. AND TRANSP.  
COMMISSION

Gavin Tenold  
Northwest Renewables  
1208 S Elm  
Spokane WA 99204

March 21, 2018

Executive Director and Secretary  
Washington State Utilities and Transportation Commission  
1300 S Evergreen Park Dr SW  
PO Box 47250  
Olympia WA 98504-7250

REG: Docket UE-171033

Dear Commissioners and Staff,

Regarding Informal Draft Community Solar Rules

**480-xxx-006 definitions:** Northwest Renewables recommends language allowing for the utilization of investments from passive owners (for tax equity). Some clarity about passive owners not being subject to regulation is needed.


**480-xxx-030 Registration as a community solar company:** Northwest Renewables does agree with the requirement for performance bonding for registration in the interest of protecting subscribers to Community Solar projects.

**480-xxx-030 Registration as a community solar company:** In the interest of protecting subscribers to Community Solar projects, Northwest Renewables does agree with the draft language requiring technical expertise on part of the Community Solar Company prior to registration. Technical expertise ought to include a minimum 6,000 hours in the solar-energy-industry by a full-time employee or Owner, recorded in process as per Labor and Industries' Master Electrician licensing process, and a National American Board of Certified Energy Practitioners (NABCEP) accreditation by a full-time employee or Owner.

**480-xxx-030 Disposition or transfer:** Northwest Renewables recommends edits allowing a Community Solar Company to define the transportability or portability of its Community Solar Project's shares on a per-project basis. Disposition or transfer clauses must be addressed in the subscription contract, and in the interest of protecting subscribers, may not be changed for the lifetime of the project.

Thank you for opportunity to provide the above input.

Regards,

  
Gavin G. Tenold  
Northwest Renewables  
[gavin@northwestrenewables.com](mailto:gavin@northwestrenewables.com)  
509.570.4449