

September 28, 2026

Department of Land Conservation & Development
635 Capital St NE, Suite 150
Salem, OR 97301

Dear Director & Commission,

Thank you for giving me the opportunity to comment on Sun Power's request for rulemaking. To be honest I got to the second paragraph of the cover letter and stopped reading the document when I discovered that OAR 660-033-0130 gives these companies six years from the time the permit is issued to begin construction.

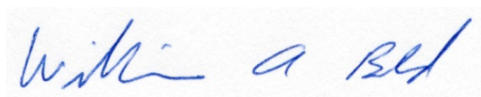
I am a professional engineer who did design and due diligence reviews on renewable energy projects for about a decade before retiring. Solar is not a new technology any longer, the requirements are known, especially to experienced developers like Sun Power. Developers shouldn't need six years to construct a project, much less six years after the permit is issued. My experience with these companies is they speculate with sites, hoping to lock down a site from the competition on speculation they will be able to get a contract from a utility at some point in the future and build a plant. It wouldn't surprise me that they only expect to build on 10% or less of the sites they have identified and permitted.

In my opinion the state of Oregon should not be issuing permits for major power projects unless:

1. There is an immediate demand for power e.g. the company has a power purchase agreement from an appropriate Oregon entity.
2. The applicant has the financing, engineering and other contracts lined up when they submit the application.
3. The company should have 6 MONTHS from the time the permit is issued to begin construction or lose the permit. With this rule there is no need for extensions.

Please reject this ridiculous request from Sun Power. Oregon is wasting their time issuing permits without a demand for power. And the industry needs to shift to a more conservative business model.

Sincerely,



William A. Bold