

# **Exhibit D**

## **Applicant's Organizational Expertise**

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**West End Solar Project  
October 2022**

**Prepared for  
EE West End Solar LLC**

**Prepared by**



**Tetra Tech, Inc.**

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## Acronyms and Abbreviations

Applicant	EE West End Solar LLC
ISO	International Organization for Standardization
MW	megawatts
OAR	Oregon Administrative Rules
Project	West End Solar Project

## 1.0 Introduction

EE West End Solar LLC (Applicant) proposes to construct the West End Solar Project (Project), a solar energy generation facility and related or supporting facilities in Umatilla County, Oregon. This Exhibit D was prepared to meet the submittal requirements of Oregon Administrative Rules (OAR) 345-021-0010(1)(d). This exhibit provides evidence of compliance with the Organizational Expertise standard of OAR 345-022-0010.

## 2.0 Applicant's Previous Experience – OAR 345-021-0010(1)(d)(A)

*OAR 345-021-0010(1)(d) Information about the organizational expertise of the applicant to construct and operate the proposed facility, providing evidence to support a finding by the Council as required by OAR 345-022-0010, including:*

*(A) The applicant's previous experience, if any, in constructing and operating similar facilities.*

The Applicant is a project development company directly owned and controlled by Eurus Solar Holdings, LLC, which is a subsidiary of Eurus Energy America, LLC, which is a subsidiary of Eurus Energy America Corporation. Therefore, the Applicant benefits from the organizational expertise and comprehensive support of Eurus Energy America Corporation. The Applicant and its parent companies and affiliates are able to demonstrate previous experience constructing and operating renewable energy generation facilities. The Applicant is based in San Diego, California and its personnel have extensive experience developing and operating renewable energy facilities throughout the United States. The experience, resources, and staff associated with Eurus Energy America Corporation are the same for its associated subsidiary LLCs including Eurus Solar Holdings, LLC and EE West End Solar LLC (the Applicant). Eurus Energy America has been actively involved in the development of solar generation facilities for well over a decade. Cumulatively, Eurus Energy America companies have developed over 700 megawatts (MW) of renewable energy generation in the United States (Table D-1), and Eurus Energy affiliates have developed more than 3,100 megawatts (MW) of renewable energy generation worldwide. The solar facilities listed in Table D-1 were developed by and currently operated by project companies owned by Eurus Solar Holdings, LLC. The wind facilities listed in Table D-1 were developed by and currently operated by other Eurus Energy project companies. No contractor issues occurred with these projects. The facilities listed in Table D-1 are listed and described on the Eurus Energy America Corp's website:

<https://eurusenergy.com/solar/solar-power-projects/>

<https://eurusenergy.com/wind/wind-power-projects/>

Furthermore, the projects that make up Eurus Energy’s 3,100 MW of renewable energy development worldwide can be reviewed at the Eurus Energy website:

<https://www.eurus-energy.com/en/project/>

**Table D-1. Summary of Projects Developed and/or Operated by the Applicant’s Parent Company in the United States**

Facility Name	Type	Location	Capacity	Operational Year
Waianae	Solar	Waianae, HI	27.6 MW	2017
Avenal	Solar	Avenal, CA	45 MW	2011
Spearville 3	Wind	Dodge City, KS	100.8 MW	2012
Combine Hills II	Wind	Milton-Freewater, OR	63 MW	2009
Bull Creek	Wind	Borden County, TX	180 MW	2009
Combine Hills I	Wind	Milton-Freewater, OR	41 MW	2003
California Desert	Wind	Tehachapi and Mojave, CA	250 MW	1987-2004

### 3.0 Qualifications of Applicant’s Personnel – OAR 345-021-0010(1)(d)(B)

*OAR 345-021-0010(1)(d)(B) The qualifications of the applicant's personnel who will be responsible for constructing and operating the facility, to the extent that the identities of such personnel are known when the application is submitted.*

The project will be guided by the cumulative and comprehensive expertise, experience, resources, and staff of Eurus Energy America Corporation; Eurus Energy America personnel are directly involved in the development and operations of all Eurus Energy facilities developed and operating in North America.

#### **Hidenori Mitsuoka, President and Chief Executive Officer**

Mr. Mitsuoka joined Eurus Energy America as President and CEO in September 2021. Prior to this role, Mr. Mitsuoka served as Managing Director of Eurus Energy Europe. Previously, Mr. Mitsuoka served as General Manager, Overseas Business Development of Eurus Energy Holdings Corporation (Eurus Energy Europe’s parent company and a joint venture between Tokyo Electric Power Company and Toyota Tsusho Corporation), and has worked for wind and solar projects in Asia, Oceania, and Africa. Mr. Mitsuoka has 20 years of experience in the wind energy industry from all over the world. In 1999, he served 5 years as the vice president of wind power development in the United States for Tomen Power Corporation in San Diego. In 2008, he served as director wind

power developments in Europe for Eurus Energy UK in London for another 4.5 years. Mr. Mitsuoka graduated from Waseda University in Japan in 1989 with a degree in law.

**Nick Henriksen, Vice President, Development**

Nick Henriksen joined Eurus Energy America in May 2015 as Vice President, Development. He is responsible for managing the project development team, strategic direction, existing project execution, and new business development for both wind and solar opportunities. Mr. Henriksen also worked at Eurus Energy America from 2007-2010.

Prior to his current position, Mr. Henriksen worked for Gamesa, a Spanish wind turbine manufacturer in both turbine sales and project development roles. As a sales engineer, Mr. Henriksen was responsible for relationship management for key sales accounts throughout the United States. As part of Gamesa's development arm, Gamesa Energy, Mr. Henriksen also led a multifunction team developing projects within the United States, Mexico, and Canada. Mr. Henriksen graduated from Haverford College in 2002 where he received his Bachelor of Arts in History and Psychology. He earned a Master of Arts in International Affairs at Johns Hopkins University's Paul H. Nitze School of Advanced International Studies (SAIS), concentrating in International Economics and Japan Studies. While at SAIS, Mr. Henriksen worked at Tokyo Electric Power Company, one of Eurus' shareholders.

**Sergio Moya, Assistant Vice President, Development Engineering**

Mr. Moya's responsibilities as Assistant Vice President, Development Engineering at Eurus Energy include coordinating and managing project engineering, interconnection applications, procurement, permits, BOP contracting, construction management, and project planning and scheduling for both wind and solar projects.

Mr. Moya has 15 years of construction management experience. Before joining Eurus Energy, Mr. Moya worked in the Energy Division of Mortenson Construction where he provided pre-construction, construction and equipment management support for 27 wind projects across the United States. Previously, Mr. Moya performed different project management and estimating roles in connection with the construction of several large commercial buildings, industrial facilities, hospitals, and stadiums. Mr. Moya received a Bachelor of Science in Civil Engineering from the Autonomous University of Guadalajara in Mexico. Mr. Moya also received a Master of Science degree in Construction Management from Arizona State University and a Master of Engineering degree from Stanford University.

**Anthony Cresap, Senior Counsel**

Mr. Cresap manages the company's matters relating to regulatory compliance, permitting, real estate, and environmental law. He also works in general corporate compliance and all project transactional matters. Mr. Cresap joined Eurus in 2007, bringing more than 15 years of experience as a land use attorney and planner and a substantial working knowledge of project development and public agency operating processes. He has worked in both the public and private sectors.

From 2015 to 2018, Mr. Cresap was assigned to work in the Amsterdam offices of Eurus Energy Europe, where he managed general corporate legal matters, and also acted as lead in-house counsel in the acquisition of 12 windfarms. Mr. Cresap received his law degree from the University of Wisconsin Law School (emphasizing public, environmental and administrative law), and a Bachelor of Arts from Columbia University (majoring in geography and environmental planning), and studied geography, planning and economics at the London School of Economics in the UK.

#### **4.0 Qualifications of Known Contractors – OAR 345-021-0010(1)(d)(C)**

*OAR 345-021-0010(1)(d)(C) The qualifications of any architect, engineer, major component vendor, or prime contractor upon whom the applicant will rely in constructing and operating the facility, to the extent that the identities of such persons are known when the application is submitted.*

The Applicant has not yet selected engineers, manufactures, or contractor. However, the Applicant has relationships with premier civil and electrical engineers, solar module and battery manufacturers, and contractor firms. Vendors and contractors will be selected from a highly qualified pool of candidates for final engineering and construction of the Project.

#### **5.0 Applicant's Past Performance – OAR 345-021-0010(1)(d)(D)**

*OAR 345-021-0010(1)(d)(D) The past performance of the applicant, including but not limited to the number and severity of any regulatory citations in constructing or operating a facility, type of equipment, or process similar to the proposed facility.*

Eurus Energy takes its permit obligations and commitments very seriously and strives to be a good citizen in all communities in which it operates. Neither the Applicant nor the solar project development entities controlled by its parent company Eurus Solar Holdings, LLC has received any complaints or citations in connection with the development, construction, or operation of any of its projects.

Unrelated to compliance with project permits, a Eurus wind project company, Bull Creek Wind LLC, received a notice of violation (“NOV”) from the Texas Public Utility Commission (“PUC”) in December 2021. The NOV related to a newly enacted administrative filing requirement that Bull Creek Wind inadvertently filed 7 days after it was due. Bull Creek Wind coordinated closely with the PUC on the issue, and Bull Creek Wind and PUC staff have since reached a mutually accepted settlement of the NOV that is now pending final approval by the full Texas Public Utility Commission (Texas Public Utility Commission Docket No. 52925.) Applicant notes it takes all regulatory obligations, including those not related to permits, very seriously.



## **6.0 Warranty to Secure Necessary Expertise – OAR 345-021-0010(1)(d)(E)**

*OAR 345-021-0010(1)(d)(E) If the applicant has no previous experience in constructing or operating similar facilities and has not identified a prime contractor for construction or operation of the proposed facility, other evidence that the applicant can successfully construct and operate the proposed facility. The applicant may include, as evidence, a warranty that it will, through contracts, secure the necessary expertise.*

As demonstrated above, Eurus Energy has extensive experience constructing and operating large scale solar facilities. As a subsidiary of Eurus Energy America, Eurus Solar Holdings, LLC and its subsidiary EE West End Solar (the Applicant) will have the same experience, resources, and staff associated with the parent company and therefore will benefit from Eurus Energy America's technical expertise and financial assurance. Therefore, this rule is not applicable.

## **7.0 ISO Certified Program – OAR 345-021-0010(1)(d)(F)**

*If the applicant has an ISO 9000 or ISO 14000 certified program and proposes to design, construct and operate the facility according to that program, a description of the program.*

The Applicant does not propose to design, construct, and operate the Project according to an International Organization for Standardization (ISO) 9000 or ISO 14000 certified program.

## **8.0 Mitigation – OAR 345-021-0010(1)(d)(G)**

*OAR 345-021-0010(1)(d)(G) If the applicant relies on mitigation to demonstrate compliance with any standards of Division 22 or 24 of this chapter, evidence that the applicant can successfully complete such proposed mitigation, including past experience with other projects and the qualifications and experience of personnel upon whom the applicant will rely, to the extent that the identities of such persons are known at the date of submittal.*

Mitigation for the construction, operation, and maintenance of the Project may be required, in particular for potential impacts to wildlife habitat.

Eurus Energy America project companies have extensive and ongoing experience coordinating with agencies and stakeholders and implementing solutions to satisfy the needs of multiple stakeholder groups. This experience has included successfully implementing avoidance and minimization measures, mitigation projects, and project commitments at wind and solar project sites in the United States. As an illustration of such experience, a description of successfully completed projects

and associated project commitments is provided below. The Applicant) will have the same experience, resources, and staff associated with the parent company and therefore will benefit from Eurus Energy America's experience implementing mitigation projects and project commitments to regulatory authorities and the community. The Applicant will develop and implement meaningful mitigation projects for the West End Solar Project and will engage with third parties with specific mitigation experience to design and execute these projects.

The below project descriptions, including the project design measures, mitigation projects, and community benefit projects, demonstrate Eurus Energy America project companies' ability to manage compliance with conditions of permit approval during construction and operation of large projects, as well as the company's commitment to the communities in which it operates its projects.

- 1) **Combine Hills Wind Farm:** The Combine Hills Wind Farm, which was developed in two phases (Combine Hills I and Combine Hills II) is a combined 104-MW wind farm facility in Umatilla County, Oregon. Development of both phases was preceded by substantial environmental impact analysis, and the projects were designed and constructed with the input of and consultation with the Oregon Department of Fish and Wildlife (ODFW). A Technical Advisory Group consisting of representatives from ODFW, the Umatilla County Planning Department, and others, was formed to monitor compliance with the project's Conditional Use Permit (CUP). The Group held meetings following construction, and ultimately disbanded after determining with the County that all conditions were satisfied. Significant and relevant project mitigation and benefits features included:
  - a. Installation of anti-perching devices and other methods consistent with the Avian Power Line Interaction Committee.
  - b. Three years of field monitoring of avian and bat species at the project site by a biologist with the WEST consulting group (one full year following construction of Combine Hills I in 2003, and two consecutive years following construction of Combine Hills II in 2010). (The studies concluded the wind farm would have no significant direct impacts to bird and bat populations.)
  - c. Financial guarantees for decommissioning, in the form of letters of credit.
- 2) **Waianae Solar Farm:** The Waianae solar farm is a solar farm constructed in 2017 in Waianae, Hawaii, with a nameplate capacity of 27 MW. Significant and relevant project mitigation and benefits features included:
  - a. Archaeological mitigation including designations of non-buildable areas onsite to avoid certain cultural features, creation of a setback area with a plan for preserving a corner portion of the site containing a national registered historic site (the Waianae Complex), and construction and donation of coral rock wall using traditional Hawaiian construction techniques.
  - b. Creation of a 2-acre parcel of land, subdivided from the project site, and donation of that parcel to the Hawaii Department of Education for use as a school playground

and other educational uses. Creating the new parcel was a complex and expensive transaction; the parcel transferred in June 2022.

- 3) **Avenal Solar Farm:** The Avenal Solar Farm is located in Avenal, Central California, and is a cumulative total of approximately 45 MW nameplate capacity. Significant and relevant project mitigation and benefits features have included:
- a. Design of site and construction measures including wild-life-friendly fencing surrounding the project site, to accommodate potential appearance of the listed endangered San Joaquin Kit Fox and other sensitive species.
  - b. Submission of a reclamation plan for decommissioning the site, including the posting of substantial letters of credit for the same.