

Oregon Department of **ENERGY**

Energy Facility Siting
Council Meeting

ODOE office
550 Capitol St NE
Salem Oregon

March 21, 2025



Opening Items:

- Call to Order
- Roll Call
- Announcements

Announcements:

- Reminder to Council and to anyone addressing the Council to please remember to state your full name clearly, and do not use the speakerphone feature, as it will create feedback.
- You may sign up for email notices by clicking the link on the agenda or the Council webpage.
- You are also welcome to access the online mapping tool and any documents by visiting our website.

Announcements continued:

- Please silence your cell phones
- Please use the “Raise Your Hand” feature in Webex to speak during the public comment period, or press *3 to raise your hand if you are participating by telephone.
- Energy Facility Council meetings shall be conducted in a respectful and courteous manner where everyone is allowed to state their positions at the appropriate times consistent with Council rules and procedures. Willful accusatory, offensive, insulting, threatening, insolent, or slanderous comments which disrupt the Council meeting are not acceptable. Pursuant to Oregon Administrative Rule 345-011-0080, any person who engages in unacceptable conduct which disrupts the meeting may be expelled.

Agenda Item A (Action Item & Information Item)

Consent Calendar

- January Council Meeting Minutes
- Council Secretary Report

March 21, 2025

Agenda Item A (Action Item & Information Item)

Consent Calendar

- January Council Meeting Minutes
- Council Secretary Report

March 21, 2025

Compliance Updates

Facility	Update	Status
Boardman to Hemingway	Complaint regarding preconstruction requirements	Open
Biglow Canyon	1. Transformer failure. 446 gallons of mineral oil were spilled and there was a small fire.	Closed
	2. 3 Turbine doors found open.	Closed
	3. A blade shroud and trunnion cap were found on the ground near a turbine	Open
Port Westward	Five year true up related to power usage and carbon payment not timely submitted.	Open

2025 EFSC Specific Legislation

Bill #	ODOE Summary
HB 3681	1) 12 months from issuance of proposed order to issuance of final order; 2) appeal language; 3) minor changes to site boundary; 4) construction extensions
HB 3422	Goal Exception Criteria – must make finding there are no other areas that could support the facility that do not require a goal exception
SB 1034	Applicable Substantive Criteria – must implement local requirements identified by special advisory group
HB 3874	Wind Facility Jurisdictional Threshold - Raises the threshold before a wind project would be required to be reviewed by EFSC from 50 MW average (150 MW nameplate capacity) to 100 MW average (300 MW nameplate capacity).

2025 EFSC Specific Legislation – Cont’d.

Bill #	ODOE Summary
SB 969	EFSC and NEPA Review - Prohibits EFSC from exercising jurisdiction over an energy facility that is a renewable energy facility or transmission line, is sited wholly within federal lands and is subject to review under NEPA.
SB 215, HB 2426, SB 3548 & SB 216	Nuclear Energy Facilities – All variations related to: 1) repealing the requirement that there be a licensed repository for the disposal of high-level radioactive waste; and 2) repealing the requirement that a proposed facility must receive approval from the electors of the state
SB 994, SB 995, SB 996, SB 997 & HB 3565	Small Modular Nuclear Reactors - All variations related to: 1) repealing the requirement that there be a licensed repository for the disposal of high-level radioactive waste; and 2) repealing the requirement that a proposed facility must receive approval from the electors of the state



2025 EFSC Specific Legislation – Cont'd.

Bill #	ODOE Summary
SB 2410	Small Modular Nuclear Reactor Demo: 1) Allows EFSC to approve demo project in Umatilla County; 2) Directs ODOE to prepare report and provide to legislature any OAR and ORS needed changes; 3) Establishes demo project fund; and 4) Refers act to the electors of Umatilla County for approval.
SB 398	Carbon Offset Funds: Reallocates all carbon offset funds received by executive branch agencies, including EFSC's carbon standard, to ODOT's road fund.

Agenda Item B (Action Item)

Madras Solar Energy Facility Request for Amendment 1 Council Review of Proposed Order and Potential Decision on Final Order

Chase McVeigh-Walker, Senior Siting Analyst - ODOE

March 21, 2025

Madras Solar Energy Facility RFA1 Council Review of Proposed Order

Approved Item Overview

- **Facility Overview and Site Certificate History**
- **Request for Amendment 1 (RFA1) Proposed Changes**
- **Comments received on Record of Draft Proposed Order**
- **Council Review of Proposed Order**
- **Council Deliberation/Potential Decision**

Madras Solar Energy Facility RFA1 Council Review of Proposed Order

Approved Facility Overview

Certificate Holder:

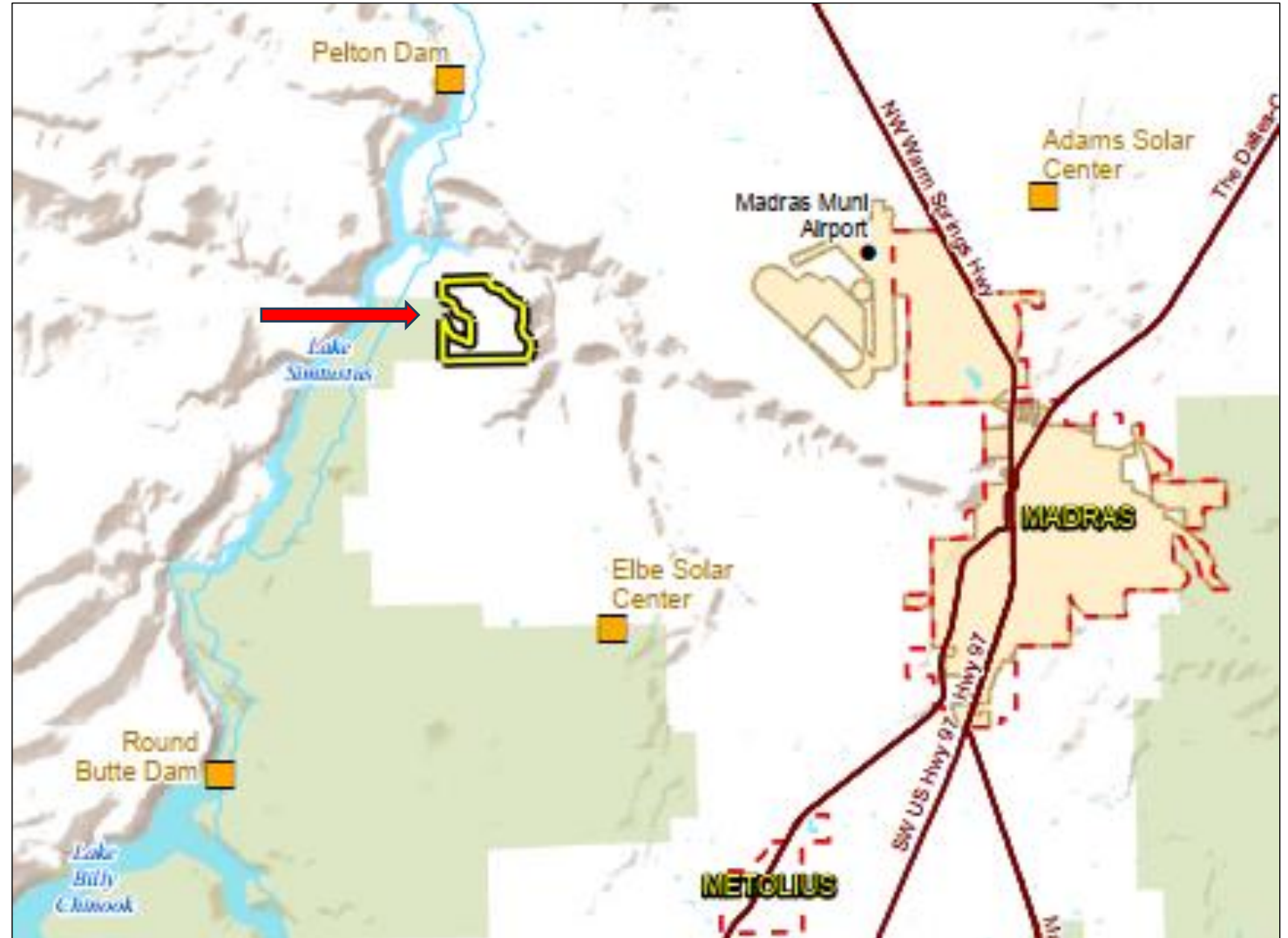
Madras PV1, LLC., a wholly owned subsidiary of Ecoplexus Inc.

Location/Site Boundary:

284-acre site boundary in Jefferson County, 5.5 miles west of the City of Madras.

Facility Details: *[Not yet Constructed]*

- Up to 63 MW of solar PV energy generation
- EFSC Site Certificate issued on July 16, 2021.



Madras Solar Energy Facility RFA1 Council Review of Proposed Order

Approved Facility Overview

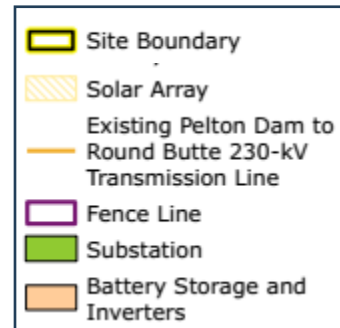
Energy Facility:

Solar Components

- modules
- posts
- cabling
- Power conversion stations

Related or Supporting Facilities:

- Battery energy storage system
- 34.5 kV collector lines
- 230 kV transmission line
- Substation and switching station
- Operation and maintenance building
- Access, perimeter and service roads
- Perimeter fencing
- Temporary construction areas



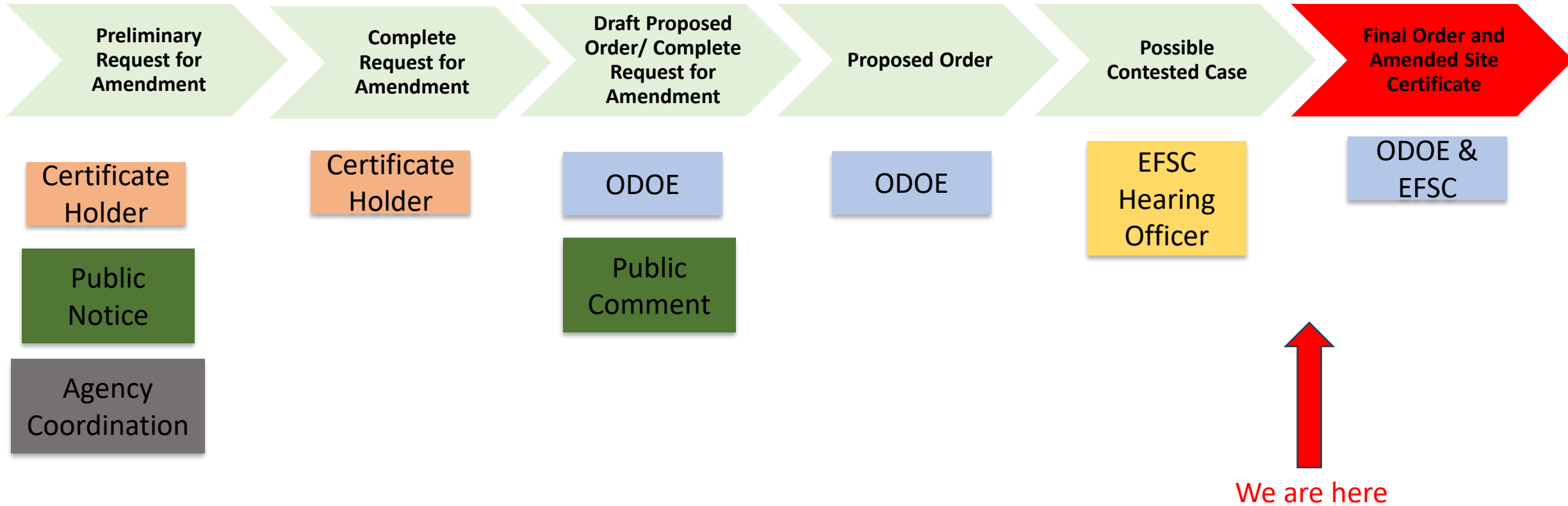
Madras Solar Energy Facility RFA1 Council Review of Proposed Order

RFA1 Proposed Changes

RFA1 requests a three-year extension to both the construction commencement and completion deadlines, making the new construction commencement deadline June 25, 2027, and new completion deadline 18 months after construction commences.

Madras Solar Energy Facility RFA1 Council Review of Proposed Order

Review Steps



Madras Solar Energy Facility RFA1 Council Review of Proposed Order

Council Scope of Review

For Amendments extending construction deadlines (OAR 345-027-0375(2)(b)):

The Council must determine that the preponderance of evidence on the record supports the following conclusions:

- The facility, with the proposed change, complies with the laws or Council standards applicable to an original site certificate application, and;
- For all requests for amendment, the amount of the bond or letter of credit required under OAR 345-022-0050 is adequate.

Madras Solar Energy Facility RFA1 Council Review of Proposed Order

Summary of DPO Comments

Commenter	Summary of Comments/Issues
Oregon State Historic Preservation Office	Case Number assigned for review of project.
Oregon Department of State Lands	Wetland Delineation expired on March 5, 2024. However, there are no jurisdictional wetlands or waterways within the project study area.
Oregon Department of Agriculture	No comment for RFA1; no listed plants known to occur in Jefferson County.
Confederated Tribes of the Warm Springs Reservation of Oregon	Request to extend the public comment period.
Certificate Holder*	Transmittal of Deschutes Valley Water District letter, and Jefferson County Fire and EMS letter.
Alan Clark	In favor of project. Great location, and states that the project will “preserve the ground for years to come”.
Daniel Craig	“we need bad fo rhe [sic] environment”



*Certificate Holder also provided responses to DPO comments on January 6, 2025

Madras Solar Energy Facility RFA1 Council Review of Proposed Order

Summary of DPO Comments – Further Discussion/Evaluation

Commenter	Summary of Comments/Issues
Confederated Tribes of the Warm Springs Reservation of Oregon	<ol style="list-style-type: none"><li data-bbox="970 568 1480 611">1. Preemption Argument<li data-bbox="970 625 2328 782">2. Council's approval of the goal exception based on a determination that the facility is locationally dependent is not supported given lack of CTWS interconnection agreement.

Madras Solar Energy Facility RFA1 Council Review of Proposed Order

Recommendations in Proposed Order

In response to DPO Comments:

- Impose two new conditions
 - General Standard Condition 12: ensures that the facility layout and design would not preclude or limit access to the 230-kV Pelton Dam to Round Butte transmission line Right of Way (ROW), by the line owner unless an access agreement has been obtained.
 - Land Use Condition 7: requires that, prior to construction of the facility or facility component, as applicable, the certificate holder demonstrate that it has executed an agreement with the owners to interconnect to the 230 kV Pelton to Round Butte transmission line.

Recommended Council Action:

Council approve the Proposed Order as the Final Order, based on a preponderance of the evidence on the record, and with recommended new, amended and existing site certificate conditions, that the site certificate may be amended as requested.

Madras Solar Energy Facility RFA1 Council Review of Proposed Order

Requests for Contested Case Proceeding

The Department did not receive any requests for a contested case.

Madras Solar Energy Facility RFA1 Council Decision on Proposed Order

Possible Council Decision on Final Order

If Council does not approve any requests for contested case (or none are received), Council may make a decision on the Final Order:

- a. **Approve (Department Recommendation)** – Adopt the Proposed Order as the Final Order, and issue an amended site certificate, subject to the recommended findings, conclusions, and conditions of approval in the Proposed Order.
- b. **Approve with Changes** – The Council may make changes from the Proposed Order to the Final Order.
- c. **Deny** – The Council may also deny RFA1 with modified findings.

Council Options

Option 1 (Recommended)

Approve Proposed
Order as Final Order

Option 2

Approve Proposed
Order, with changes, as
Final Order

Option 3

Reject Proposed Order

Council Deliberation

Agenda Item C (Action Item)

Application Process Phase 2 Rulemaking

Tom Jackman, Rules Coordinator

March 21, 2025

Background - Rulemaking Process



Why Are We Here?

Rules Now Divide Standards & Info. Req.

- Standards – Div 22
 - Organizational Expertise
 - Structural Standard
 - Soil Protection
 - Land Use
 - Protected Areas
 - Retirement and Fin.
 - Fish & Wildlife
 - T&E Species
 - Scenic Resources
 - Historic, Cultural, Arch
 - Recreation
 - Public Services
 - Wildlife Prevention
 - Waste Management
- Information Req – Div 21
 - Exhibit A – Applicant Info.
 - Exhibit B – Facility Description
 - Exhibit C – Facility Location
 - Exhibit D – Organizational Expertise
 - Exhibit E – Permit Info.
 - Exhibit F – Adjacent Property Owner Info.
 - Exhibit G – Material Info.
 - Exhibit H – Geologic and Soil Stability
 - Exhibit I – Soil
 - Exhibit J – Water
 - Exhibit K – Land Use
 - Exhibit L – Protected Areas
 - ***

Clear as Mud

- Standards – Div 22

- Organizational Expertise
- Structural Standard
- Soil Protection
- Land Use
- Protected Areas
- Retirement and Fin.
- Fish & Wildlife
- T&E Species
- Scenic Resources
- Historic, Cultural, Arch
- Recreation
- Public Services
- Wildfire Prevention
- Waste Management

- Information Req – Div 21

- Exhibit A – Applicant Info.
- Exhibit B – Facility Description
- Exhibit C – Facility Location
- Exhibit D – Organizational Expertise
- Exhibit E – Permit Info.
- Exhibit F – Adjacent Property Owner Info.
- Exhibit G – Material Info.
- Exhibit H – Geologic and Soil Stability
- Exhibit I – Soil
- Exhibit J – Water
- Exhibit K – Land Use
- Exhibit L – Protected Areas
- ***

Not All Exhibits Directly Tied to Standards

• Standards – Div 22

- Organizational Expertise
- Structural Standard
- Soil Protection
- Land Use
- Protected Areas
- Retirement and Fin.
- Fish & Wildlife
- T&E Species
- Scenic Resources
- Historic, Cultural, Arch
- Recreation
- Public Services
- Wildfire Prevention
- Waste Management

• Information Req – Div 21

- Exhibit A – Applicant Info.
- **Exhibit B – Facility Description**
- **Exhibit C – Facility Location**
- Exhibit D – Organizational Expertise
- Exhibit E – Permit Info.
- **Exhibit F – Adjacent Property Owner Info.**
- Exhibit G – Material Info.
- Exhibit H – Geologic and Soil Stability
- Exhibit I – Soil
- **Exhibit J – Water**
- Exhibit K – Land Use
- Exhibit L – Protected Areas
- ***

Key Issues With Current Rules

- Not all exhibits are connected to a Council standard
 - This rulemaking addresses this by identifying relevant information for the various standards
- It can be confusing where information related to a standard is spread across parts of exhibits as well as found in multiple exhibits
 - The relationship between information requirements and standards should be clear
 - We address this in part by combining exhibits into one exhibit where possible
 - To be addressed in Phase 3
- Rules can better explain where the same information is required for multiple standards (e.g., information related to scenic and recreational opportunities can be the same)
 - Did part of this with duplicating (verbatim to make it clear the information is shared) the materials analysis
 - To be addressed in Phase 3

Moved Div 21 Info Req. to Div 22

- Organizational Expertise
 - Exhibits A, D, E
- Structural Standard
 - Exhibit H
- Soil Protection
 - Exhibits G & I
- Land Use
 - Exhibit K
- Protected Areas
 - Exhibit L
- Retirement and Fin.
 - Exhibit M, X
- Fish & Wildlife
 - Exhibit P
- T&E Species
 - Exhibit Q
- Scenic Resources
 - Exhibit R
- Historic, Cultural, Arch
 - Exhibit S
- Recreation
 - Exhibit T
- Public Services
 - Exhibit U
- Wildlife Prevention
 - Exhibit V
- Waste Management
 - Exhibit W

Exhibit Letters Gone

- Organizational Expertise
 - Organizational Expertise Exhibit
- Structural Standard
 - Structural Standard Exhibit
- Soil Protection
 - Soil Protection Exhibit
- Land Use
 - Land Use Exhibit
- Protected Areas
 - Protected Areas Exhibit
- Retirement and Fin.
 - Retirement Exhibit
- Fish & Wildlife
 - Fish & Wildlife Exhibit
- T&E Species
 - T&E Species Exhibit
- Scenic Resources
 - Scenic Resources Exhibit
- Historic, Cultural, Arch
 - Historic, Cultural, Arch Exhibit
- Recreational Areas
 - Recreational Areas Exhibit
- Public Services
 - Public Services Exhibit
- Wildlife Prevention
 - Wildlife Prevention Exhibit
- Waste Management
 - Waste Management Exhibit

Public Comments

- Public Hearing
 - **Irene Gilbert**
 - Spoke about the contested case process
 - Staff response: Comments out of scope of this rulemaking
- Written Submission
 - **Renewable Northwest**
 - Wants new application to be able to cross-reference prior-approved applications where applicable
 - **Staff response** – We are trying to get away from references that require external review. If previously submitted information is applicable to an existing application, copy and paste it and submit it again.
 - Wants exhibit names to be explicit
 - **Staff response** – There will be a learning curve as people figure this out, but the exhibit names are explicit, it is: “[Standard] Exhibit.”
 - Concerns about rollout of rules
 - **Staff response** – Applicants are invited to reach out to us to discover more about how this will all work.

Public Comments

- **Renewable Northwest Comment Cont.**
 - Concerned with the removal of “unless directed by the Department that the information does not apply” in reference to OAR 345-022-0130, which describes information that is submitted to assist the Council in determining compliance with all applicable state and local laws and regulations.
 - **Staff Response:** The proposed language in this rule now makes it clear that the submission requirements are set by the project order. This would include any direction that certain information requirements do not apply:
 - “To assist the Council in determining compliance with all state and local laws and regulations, submit the following, as directed by the project order described in OAR 345-015-0160.”

Public Comments

- **Friends of the Columbia Gorge**
 - Is concerned that our monthly siting report description of the rulemaking did not match the refined scope of the rulemaking approved by Council
 - **Staff response:** The scope is indeed the scope set by the Council at the December Council meeting
 - Is concerned that some exhibit letters remain in the draft rules
 - **Staff response:** All exhibit letters will be removed from the rules submitted to the secretary of state

Staff Recommended Change

- Staff recommends one minor change to the rules, to revise the language for each of the standards and their respective information requirements as follows:
 - “To **assist Council in determining**~~demonstrate~~ that the standard outlined [above] has been met, the Applicant must submit the following information:”

Council Options

Option 1 - Recommended

Approve the draft
permanent rules as
proposed

Option 2

Approve the draft
permanent rules with
changes

Option 3

Deny the proposal

Council Deliberation

BREAK

Agenda Item D (Information Item)

PUBLIC COMMENT PERIOD

Time Limit – 7 Minutes per commentor

How to Raise Your Hand in Webex:

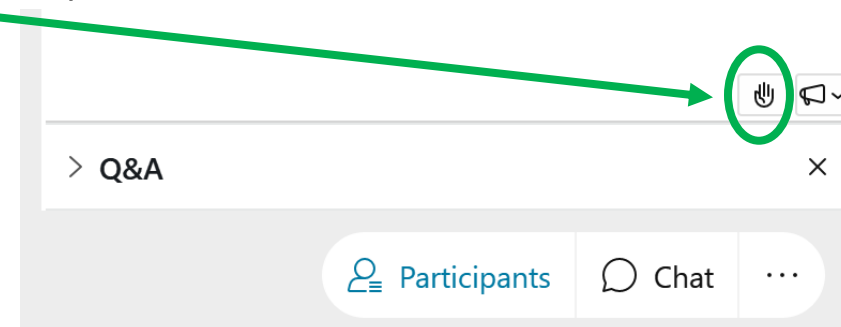
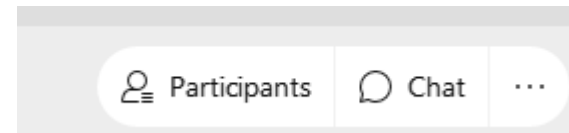
Webinar Participants

The bottom right of the main window is a set of icons:

Click on “Participants”

The bottom right of the participant window is a hand icon, click on the hand:

Clicking on it again will lower your hand.



Phone Participants

Press *3 on your telephone keypad to raise your hand.

Press *3 again on your telephone keypad to lower your hand.

Agenda Item E (Action Item)

Exemptions Rulemaking Initiation

Tom Jackman, Rules Coordinator

March 21, 2025

Background - Rulemaking Process



Exemptions Rulemaking - Background

Certain energy facilities may be exempt from the requirement to obtain a site certificate under ORS 469.320. Depending on the type of facility, the person who wishes to claim an exemption may be required to submit an exemption request subject to Council's review and approval. This includes:

- Natural gas pipeline or underground gas storage
- Energy facility below 50 megawatts (except coal and nuclear)
- Energy facility, if the plant produces a secondary fuel used on site for the production of heat or electricity at less than six million Btu / day
- Consumes biomass, requires no new transmission lines, produces synthetic fuel, and emits less than 118 lbs of CO₂ per million Btu
- Standby generators that are electrically incapable of connecting to the grid

Exemptions Rulemaking - Scope

This rulemaking would evaluate several outstanding policy questions related to exemptions, including:

- Whether the Council may impose conditions on an exemption;
- Ongoing monitoring and reporting requirements for exempt facilities; and
- The process for loss of an exemption.

Exemptions Rulemaking – Focused Workgroup

Staff requests that the Council authorize it to initiate this rulemaking with help of a focused workgroup instead of a traditional rulemaking advisory committee given:

- The universe of potential stakeholders affected by the proposed scope of these rule changes is limited, consisting of only a few existing and future facility operators.
- The scope of this rule change is not intended to affect the ability to seek an exemption, merely the process of monitoring and ensuring compliance.

Council Options

Option 1 - Recommended

Approve the initiation
as recommended

Option 2

Approve the initiation
with changes

Option 3

Deny the proposed
initiation

Council Deliberation

Agenda Item F (Action Item)

Modernization Rulemaking Initiation

Tom Jackman, Rules Coordinator

March 21, 2025

Background - Rulemaking Process



Modernization Rulemaking - Background

- Given the busy legislative session underway, this rulemaking can largely be done internally
- This rulemaking is designed to identify “housekeeping items” that would not necessarily merit their own rulemaking.

Modernization Rulemaking - Scope

This rulemaking would evaluate ways of modernizing the Council's application process. These include (but are not limited to):

- A review of hard copy submission requirements
- A review of various notice requirements (including formalizing the notice to the Department of Defense)
- Possibility of requiring applicants to submit geographic information system (GIS) data with their application
- Potentially other minor rulemaking changes that do not merit their own rulemaking

Modernization Rulemaking – Internal Development

- Staff requests that Council authorize it to initiate this rulemaking by primarily developing draft language internally prior to a possible notice of proposed rulemaking.
- This rulemaking deals with housekeeping items that are not likely to significantly affect stakeholders one way or another.
- All parties will be able to comment during the public comment period.

Council Options

Option 1 - Recommended

Approve the initiation

Option 2

Approve the initiation
with changes

Option 3

Deny the proposed
initiation

Council Deliberation

WORKING LUNCH BREAK

Agenda Item G (Information Item)

Wildfire Mitigation Plan Templates

Kellen Tardaewether, Senior Siting Analyst

March 21, 2025

Wildfire Mitigation Plan Templates

Wildfire Standard Overview

- July 2022 – Council adopted the Wildfire Prevention and Risk Mitigation standard (OAR 345-022-0115)
- September 2024 – Council review of the Council’s Wildfire Prevention and Risk Mitigation Standard, including details of state and local government WMP programs
- Since July 2022 - Council has approved 3 ASCs; and 7 site certificate amendments for 8 energy facilities

345-022-0115

Wildfire Prevention and Risk Mitigation

(1) To issue a site certificate, the Council must find that:

(b) That the proposed facility will be designed, constructed, and operated in compliance with a Wildfire Mitigation Plan approved by the Council. The Wildfire Mitigation Plan must, at a minimum:

(A) Identify areas within the site boundary that are subject to a heightened risk of wildfire, using current data from reputable sources, and discuss data and methods used in the analysis;

(B) Describe the procedures, standards, and time frames that the applicant will use to inspect facility components and manage vegetation in the areas identified under subsection (a) of this section;

(C) Identify preventative actions and programs that the applicant will carry out to minimize the risk of facility components causing wildfire, including procedures that will be used to adjust operations during periods of heightened wildfire risk;

(D) Identify procedures to minimize risks to public health and safety, the health and safety of responders, and damages to resources protected by Council standards in the event that a wildfire occurs at the facility site, regardless of ignition source; and

(E) Describe methods the applicant will use to ensure that updates of the plan incorporate best practices and emerging technologies to minimize and mitigate wildfire risk.

Wildfire Mitigation Plan Templates

Council Approved WMPs

- Since July 2022 - Since July 2022 - Council has approved 3 ASCs; and 7 site certificate amendments

Draft Emergency Management and Wildfire Mitigation Plan

1.0 General Information

1.1 Introduction

EE West End Solar LLC (Applicant) proposes a solar energy generation facility and Facility), a solar energy generation facility and Oregon. The Project will be a photovoltaic solar average generating capacity of 50 megawatts include an energy storage system with a capacity acres within which all Project facilities will be

This document provides an annotated outline Wildfire Mitigation Plan (Emergency Management) would be implemented at the Project during construction by the Applicant and construction for preparing for and responding to a range of

The plan will list project emergency contact information, contractors, and local emergency services. The Project's operational period that will provide discuss emergency planning and response should beginning of Project operations, a copy of the structures and access points will be provided.

1.1.1 Plan Purpose and Update

This EMWMP sets forth the Applicant's plan to emergency and hazardous situations that may finalized prior to construction and will comply Manufacturer's standard operation procedures practices.

This EMWMP specifies communication channels protection agency personnel, for example, and invitations to observe any emergency drill operations, a copy of the site plan indicating the points will also be provided to the local fire department. EMWMP will ensure risks to public health and minimized.

As discussed in this EMWMP, the Applicant will wildfire through Project design, through open regular maintenance and inspection of Project

West End Solar Project

Draft Emergency Management and Wildfire Mitigation Plan

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1.2.1	Project Design Features that Minimize Fire Risk	1
1.2.2	Construction Activities and Sequencing/Schedule	1
1.2.3	Operations and Maintenance Activities and Schedule	1
1.3	Site Description	1
1.3.1	Site Access	1
1.3.2	Site Plan	1
1.3.3	Areas Subject to Heightened Fire Risk	1
1.3.4	Updated Review of Wildfire Risk	1
2.0	Personnel Responsibilities and Communication	1
2.1	Project Emergency Information	1
2.2	Personnel Roles and Responsibilities	1
2.2.1	Project Safety Manager	1
2.2.2	Site Personnel / Subcontractors	1
2.3	Communication	1
2.3.1	Communication Plan	1
2.4	Training	1
3.0	Pre-Emergency Planning	1
3.1	Pre-Emergency Planning	1
3.2	Notices and Signage	1
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West End Solar Project

Oregon Trail Solar Facility Draft Wildfire Mitigation Plan

Changes Approved by Council March, 2023

Oregon Trail Solar Facility
December 2022

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Draft Wildfire Mitigation Plan

Prepared for
Wheatridge East Wind, LLC

Updated

Wildfire Mitigation Plan

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Wildfire Mitigation Plan Templates

Wildfire Standard Overview

- September 2024 – Council review of the Council’s Wildfire Prevention and Risk Mitigation Standard, including details of state and local government WMP programs
- Recommendations from September 2024 Staff Report:

LESSONS LEARNED AND RECOMMENDATIONS

Based on review of rules, policies and community planning efforts in Oregon, California and Washington, as summarized in this staff report, the Department recommends Council provide a policy directive to staff to initiate the following measures:

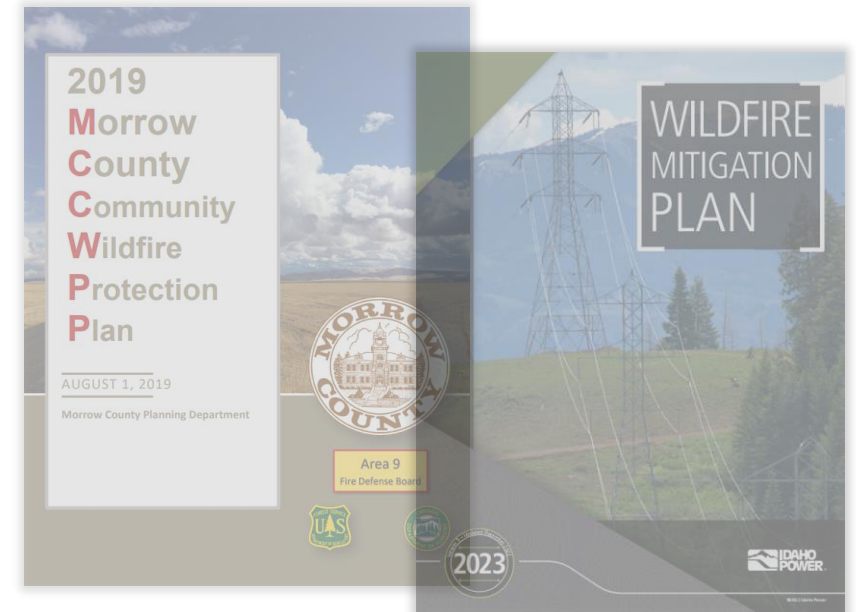
- Develop a guidance document to support the evaluation of the wildfire risk assessment and the adequacy of proposed mitigation measures for both construction and operations.
 - Clarify that projects within counties that have adopted a CWPP and WUI zone should be considered/applied to the wildfire risk evaluation and addressed, as applicable, in WMP development
- Establish the state and local governments that Siting staff should be consulting with in review of construction and operational WMPs.
- Develop guidance for the scope and scale of public notification and community engagement to be included in the WMP.
- Evaluate the availability of third-party consultants with subject matter expertise in climate and wildfire management, and develop a plan for utilizing their support in reviewing WMPs and/or preparing or evaluating guidance documents

Wildfire Mitigation Plan Templates

Draft ODOE WMP Templates

- In drafting ODOE WMP Templates, staff:
 - Separated CON and OPR WMP's
 - Organized to clarify what needs to be finalized PRE and PRO; applied coding consistent with site certificate conditions
 - Removed longer narratives
 - Focused on action items and deliverables to demonstrate compliance with measures in WMP
 - Several internal review and QC iterations between Senior Analysts and Senior Policy Advisor, and DOJ review
 - Shared WMP templates with staff at the Oregon Public Utility Commission (OPUC) and Oregon State Fire Marshal (OSFM)

Key	Type of Conditions/Phase of Implementation
GEN	General Conditions: Design, Construction and Operation
PRE	Pre-Construction Conditions
CON	Construction Conditions
PRO	Pre-Operational Conditions
OPR	Operational Conditions
RET	Retirement Conditions



Wildfire Mitigation Plan Templates

Draft ODOE WMP Templates

- How to use the WMP Templates:
 - Provide templates to applicants/certificate holders for their optional use
 - During review of an ASC/RFA siting analyst and applicant/certificate holder, in consultation with agencies, update facility design features and mitigation measures in the plan to the extent known at that time

Draft Operational Wildfire Mitigation Plan

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Wildfire Mitigation Plan Templates

Important Measures in the WMP's

- Final WMPs will include/require:
 - Figures illustrating:
 - Areas subject to high wildfire risk;
 - Fire break areas such as roads dimensions, setbacks, fire breaks;
 - Entry/exit locations; and
 - Location(s) of water truck(s) and fire protection equipment.
 - Updated contact information for local fire departments, certificate holder, contractors, and landowners within 0.5 miles of the facility site. Landowner letter sent to residences and includes certificate holder, Department and local emergency notification system contact information.
 - Conduct safety and fire-prevention measure trainings.
 - Cont..

Wildfire Mitigation Plan Templates

Important Measures in the WMP's

- WMPs will include:
 - Fire-Prevention Measures and Restrictions Associated with Fire Season

Table 1: Fire Prevention Measures During Fire Season Summary

Requirement	 Non-Fire Season	 Fire Season	 Fire Weather Watch	 Red Flag Warning
Fire weather advisory	Not required	Check for fire weather advisory daily before work begins.	Check for fire weather advisory daily before work begins.	Check for fire weather advisory daily before work begins. On-site personnel must be aware of Red Flag Warning.
On-site water source	N/A	As specified in Section 3.2	As specified in Section 3.2 and 3.3.	As specified in Section 3.2 and 3.3.
Hot work	Only permitted on roads or on non-combustible surfaces.	Only permitted on roads or on non-combustible surfaces; fire watch required for 60 minutes after completion	Not Permitted	Not Permitted
Fire Watch Service	Not required	During breaks and for 60 minutes after all power-driven machinery has been shut down for the day.	During breaks and for 60 minutes after all power-driven machinery has been shut down for the day.	During breaks and for 60 minutes after all power-driven machinery has been shut down for the day.
Driving and Parking	As described in Section 3.9.	As described in Section 3.9.	Only permitted on roads or on non-combustible surfaces and Section 3.9.	Only permitted on roads or on non-combustible surfaces and Section 3.9.
Smoking	Designated areas only	Designated areas only	Not permitted	Not permitted

Wildfire Mitigation Plan Templates

Important Measures in the WMP's

- Final WMPs will include:
 - OPR only – Updated Table 2: Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results.

Table 2: Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results

Facility Component(s)	Inspection Procedure	Inspection Frequency	Standard ¹	Maintenance Schedule	Date and Personnel Completing Inspection(s); Inspection Results	Date and Personnel Completing Maintenance; Maintenance Results
System Protection	Protection Relays <ul style="list-style-type: none"> Verify calibration and check functionality. Breaker Trip Testing <ul style="list-style-type: none"> Verify the ability to trip breakers via coil. 	X	Manufacturer's maintenance recommendations	Repair or replace once every 5 years	Date: Personnel: Results: Notes:	Date: Personnel: Results: Notes:
System Protection	System Protection Potential Transducers ("PTs") and Current Transducers ("CTs") <ul style="list-style-type: none"> Verify calibration and check functionality. 	X	Manufacturer's maintenance recommendations	Repair or replace once every 11 years	Date: Personnel: Results: Notes:	Date: Personnel: Results: Notes:
Solar Inverter	<ul style="list-style-type: none"> Visual inspection of inverter and surrounding area. Verify torque specifications. For alternating current (AC)/direct current (DC), perform inspection of communication and control power terminations. Cycle AC/DC disconnects, inspect AC/DC contactors and cooling fans. Perform infrared scan. Inverter Testing and Preventative Parts Replacement <ul style="list-style-type: none"> Preventative maintenance replacement of inverter parts (e.g.: cooling system and power supplies that are operating effectively but scheduled for replacement per manufacturer's recommendations). 		Spill Prevention, Control, and Countermeasures (SPCC) Plan ⁵ Manufacturer's maintenance recommendations	<ul style="list-style-type: none"> Monthly SPCC Plan Bi-annual Preventative Maintenance Per manufacturer's recommendations 	Date: Personnel: Results: Notes:	Date: Personnel: Results: Notes:
	Vegetation: Visual inspection during component inspections and visual inspections during vegetation surveys twice a year.	Vegetation: Twice a year during vegetation surveys and additional visual inspections during routine inspections of components.	Vegetation: Herbicide application on gravel pad around inverter to prevent vegetation growth. IEEE 80 NEC 70	Vegetation: Yearly, depending on vegetation condition. Or more frequent based on vegetation survey results or upon visual inspections listed above.	Date: Personnel: Results: Notes:	Date: Personnel: Results: Notes:

Wildfire Mitigation Plan Templates

Important Measures in the WMP's

- Plan Updates: Amendments and Reporting Requirements:
 - Section 4.0 in both CON and OPR Plans details items that must be provided in the semi-annual or annual report. These items are to determine compliance with the measures detailed in the WMP.
 - This information will be used by certificate holder and Department to determine the performance of the WMP and if adjustments or improvements must be made to ensure the WMP provides wildfire mitigation.
 - The OPR WMP will be reviewed annually by certificate holder to determine if updates are necessary.
 - The WMP may be amended from time to time by agreement of the certificate holder and EFSC or ODOE, acting within its delegated authority of EFSC.



Council Deliberation

Agenda Item H (Action Item)

Cascade Renewable Transmission System Request to Extend Expiration of Notice of Intent

Chris Clark, Senior Siting Analyst

March 21, 2025

Cascade Renewable Transmission System

Request to Extend Expiration of Notice of Intent

Background

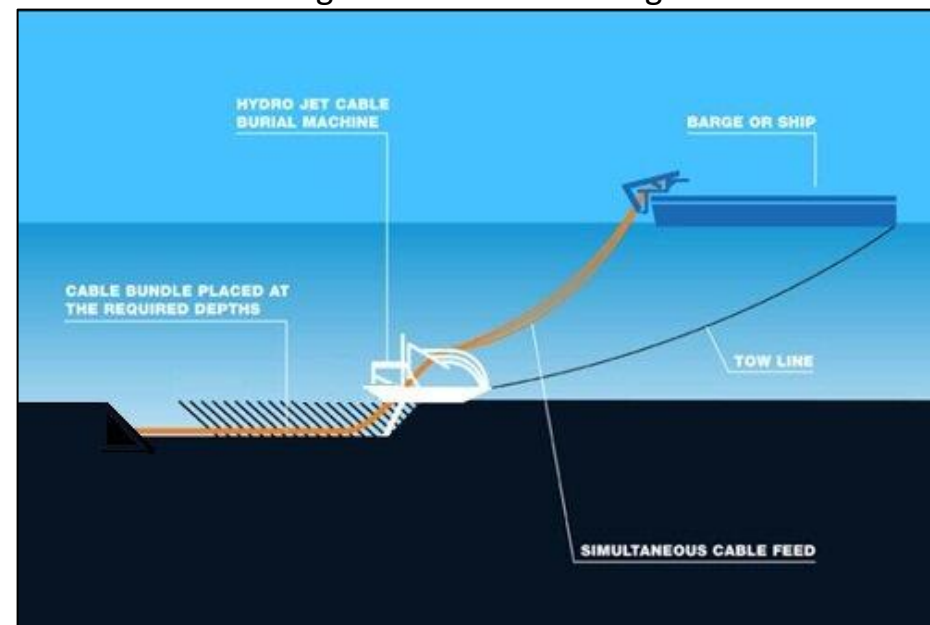
- On March 7, 2023, Cascade Renewable Transmission, LLC (applicant) submitted a Notice of Intent (NOI) for the Cascade Renewable Transmission System.
- An NOI expires two years after submittal unless the applicant submits a petition for extension to the Council at least 45 days before the expiration date. Submission of a timely petition stays the expiration of the NOI until the Council makes its decision.
- If the applicant does not submit a preliminary application for a site certificate or obtain an extension before the NOI expires, the applicant must submit a new NOI to proceed with the siting process.
- On January 16, 2025, the applicant submitted a petition to extend the NOI expiration date by one year.

Cascade Renewable Transmission System Request to Extend Expiration of Notice of Intent

Proposed Facility Overview

- Proposed 320-kV HVDC merchant transmission line and related or supporting facilities
 - Corridor is appx. 100 mi. from The Dalles to Portland
 - Mostly in bed of Columbia River
 - Shorter underground segments in road ROWs and on Hayden Island with HDD transitions.
- HVDC converter stations proposed at both ends of HVDC line
 - Appx. 500 ft. of overhead 500-kV AC line to connect eastern converter station to BPA's Big Eddy Substation
 - Appx. 3 mi. of 230-kV AC line to connect western converter station to PGE's Harborton Substation
 - Appx. 2.5 mi. buried in road ROW
 - Appx. 0.5 mi. HDD installed under Willamette River

NOI Figure C-1: Jet Plow Diagram



NOI Figure B-2: Representative Converter Station Layout



Cascade Renewable Transmission System Request to Extend Expiration of Notice of Intent

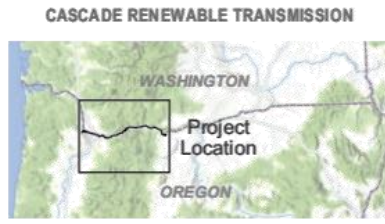
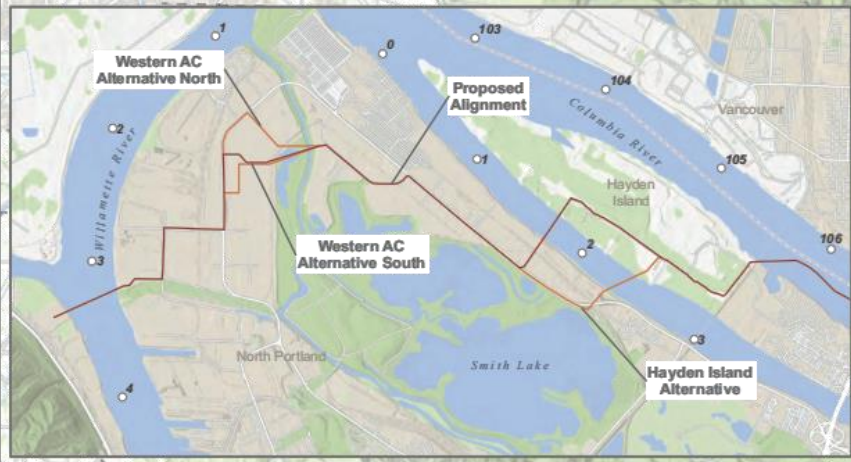
Proposed Corridor



**FIGURE C-1
VICINITY MAP**

FOR INFORMATION ONLY - CONCEPT DRAWING

- PROPOSED ALIGNMENT
- ALTERNATIVES
- RIVER MILES (USACE)
- - - COUNTY BOUNDARY
- STATE BOUNDARY



HR 0 10 mi 1:450,000



9/5/2024 NAD 1983 State Plane Oregon North Feet Data Sources: Esri, HDR.

Cascade Renewable Transmission System Request to Extend Expiration of Notice of Intent

Request for Extension

- The petition for extension was submitted 50 days before expiration and was timely under OAR 345-020-0060.
- If the Council finds that the petition shows good cause, the Council may extend the expiration date for a period of up to one year.
- The petition explains that the one-year extension is needed to allow sufficient time to complete resource studies (i.e. sediment sampling, benthic habitat surveys, cultural resource surveys) needed to demonstrate compliance with applicable Oregon, Washington, and Federal requirements. The Department recommends this demonstrates good cause.

Council Options

Option 1 - Recommended

Approve the petition
for extension

Option 2

Deny the petition for
extension

Council Deliberation

ADJOURN

