



# Oregon

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**To:** Energy Facility Siting Council

**From:** Christopher M. Clark, Senior Siting Analyst

**Date:** March 7, 2025

**Subject:** Agenda Item H (Action Item): Cascade Renewable Transmission System – Request to Extend Expiration of the Notice of Intent, for the March 21, 2025 EFSC Meeting

**Attachments:** Attachment 1: NOI Extension Request  
Attachment 2: Draft Order

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## BACKGROUND

On March 7, 2023, the Department received a Notice of Intent to File and Application for Site Certificate (Notice of Intent) for the Cascade Renewable Transmission System (proposed facility). The Notice of Intent was submitted by Cascade Renewable Transmission, LLC (applicant), a joint enterprise of PB CRTS, LLC, a wholly owned subsidiary of PowerBridge, LLC; and Sun2o Partners, LLC.

The proposed facility would consist of a 320-kilovolt (kV) high-voltage direct current (HVDC) transmission line that would span approximately 100 miles between The Dalles and Portland with related or supporting facilities. The majority of the line would be installed in the bed of the Columbia River using a Hydro Jet Cable Burial Machine, or “jet plow.” An approximately 7.5-mile segment of the line would be buried in lands adjacent to the river near Stevenson, Washington to avoid the Bonneville Lock and Dam.

Additional underground segments would connect in-river transmission lines to two converter stations constructed near points of interconnection at both ends of the line. The Eastern Converter Station would be located near The Dalles and would connect to the Bonneville Power Administration’s Big Eddy Substation with approximately 500 feet of overhead 500-kV AC transmission line. The Western Converter Station would be located in the Rivergate Industrial District in North Portland and would be connected to Portland General Electric’s Harborton Substation with 230-kV AC cables installed under the Willamette River using horizontal-directional drilling.

On July 25, 2023, the Department issued a Project Order establishing the statutes, administrative rules, Council standards, local ordinances, and other requirements for the site

certificate application. Consistent with the requirements of OAR 345-020-0060, the expiration date of the Notice of Intent, as established in the Project Order, is March 7, 2025. Under OAR 345-021-0000(2), the applicant must submit their preliminary application before the expiration of the Notice of Intent.

Under OAR 345-020-0060, the Notice of Intent expires two years after its date of submission unless, at least 45 days before the expiration date, the applicant submits a petition to extend the expiration date. 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 applicant's submission of a timely petition for an extension under this rule stays the expiration of the Notice of Intent until the Council makes its decision to grant or deny the extension.

On January 16, 2025, the applicant submitted a petition to extend the expiration date of the Notice of Intent by one year. The petition is included as Attachment 1 to this staff report. Because the applicant submitted the petition more than 45 days before the Notice of Intent expiration date the Department recommends the Council find that it was submitted timely.

### **PROPOSED EXTENSION**

As stated above, under OAR 345-020-0060, the Council may extend the Notice of Intent expiration date for a period of up to one upon finding that the petition shows good cause for the extension.

As explained in the petition, the applicant requests that the Council grant a one-year extension to allow sufficient time to complete resource studies needed to demonstrate compliance with applicable Oregon, Washington and Federal requirements. Particularly, the applicant notes that it filed its Section 404 permit application with the US Army Corps of Engineers in June 2024, and that cultural resource investigations based on the outcomes of the Corps' tribal-government consultation process conducted under Section 106 of the National Historic Preservation Act are scheduled to take place in the spring of this year. The Department recommends the Council find that the need for additional time to ensure required surveys and resource studies meet the requirements of all affected jurisdictions and respond to tribal concerns represents good cause for an extension of the Notice of Intent expiration date.

### **STAFF RECOMMENDATION**

The Department recommends that the Council find that the applicant timely submitted a petition to extend the expiration date of the Notice of Intent for the proposed facility, and that the petition demonstrates good cause for the extension. The Department recommends the Council grant the request and extend the expiration of the Notice of Intent to March 7, 2026.