
Request for Amendment

**Request for Amendment to the Site
Certificate for the Perennial Wind
Chaser Station**

Prepared for
Oregon Energy Facility Siting Council

August 2018

Prepared and Submitted by
Perennial-WindChaser LLC

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Attachments

- Attachment 1 Standard Air Contaminant Discharge Permit
- Attachment 2 Updated Port of Umatilla Letter
- Attachment 3 Updated Property Owners List of Properties Sensitive to Noise
- Attachment 4 Updated Financial Capability Letter and Updated Exhibit-W – Facility Retirement
- Attachment 5 Updated Exhibit-Y – Carbon Dioxide Emissions
- Attachment 6 Updated Property Owner List and Tax Lot Map

Section 1

Introduction

The Perennial Wind Chaser Station (Facility) is a permitted, but not yet constructed natural gas facility in Umatilla County, Oregon with a maximum capacity of 415 megawatts (MW). On September 23, 2015, the Oregon Energy Facility Siting Council (EFSC or the Council) issued a Site Certificate approving the Facility¹. This Request for Amendment of the Site Certificate is only for extending the construction deadlines. No other requests for amendments have been made. The Facility will consist of up to 4 combustion turbines, as well as related and supported facilities located within the permitted site boundary. No changes to the site boundary or to the design and operation of the Facility are being requested.

“OAR 345-027-0013-Certificate Expiration” notes “If the certificate holder does not begin construction of the facility by the construction beginning date specified in the site certificate or amended site certificate, the site certificate expires on the construction beginning date specified, unless expiration of the site certificate is suspended pending final action by the Council on a request for amendment to a site certificate pursuant to OAR 345-027-0085(2).” Perennial-WindChaser LLC (Perennial) has determined that it will not be able to begin construction by the beginning date specified in its Site Certificate, and thus submits a request to amend the Site Certificate to extend the construction start date an additional three years, and accordingly extend the construction completion deadline from the start date. “OAR 345-027-0085-Request for Amendment to Extend Construction Deadlines” requires the submission of a preliminary request for amendment in accordance with OAR 345-027-0060. This rule also requires: “The preliminary request for amendment must include an explanation of the need for an extension and must be submitted to the Department of Energy before the applicable construction deadline, but no earlier than the date twelve months before the applicable construction deadline.”

The reason for this request is that Perennial has been unable to obtain a power purchase agreement and it is unlikely that one will be obtained before the required construction start date. There have been tremendous changes in the energy market and in pending federal regulations covering the energy sector, since the issuance of the Site Certificate. Perennial is optimistic that as soon as future energy planning becomes stable, the need for the Facility will become apparent to the market place. Perennial is also submitting this request within the noted timeline of the rule.

“OAR 345-027-0050(3)-Changes Requiring an Amendment” also requires an Amendment “to extend the construction beginning or completion deadline as described in OAR 345-027-0085.”

As allowed under “OAR 345-027-005- Review Processes for Requests for Amendment”, Perennial proposes to request a type B review process, if the Department and Council concur, since the request covers just an extension of the construction deadlines listed in the Site Certificate. As support, Perennial believes the proposed change is not complex. The anticipated level of public and agencies interest is expected to be low. The potential impacts

¹ The Council issued a Final Order approving the Site Certificate for The Perennial Wind Chaser Station on September 18, 2015; the Site Certificate was fully executed on September 23, 2015.

are known and presented in the Request for Amendment. There is no significant adverse impact anticipated from this proposed change.

Section 2

Information Required Pursuant to OAR-345-027-0060

2.1 OAR-345-027-0060(1)(a) Name and Mailing Address

(1) To request an amendment of a site certificate required by OAR 345-3027-0050(3) and (4), the certificate holder shall submit a written preliminary request for amendment to the Department of Energy that includes the following:

(a) The name of the facility, the name and mailing address of the certificate holder and the name, mailing address and phone number of the individual responsible for submitting the request.

RESPONSE:

Name of the Facility, the Name and Mailing Address of the Certificate Holder:

Perennial Wind Chaser Station
Perennial-WindChaser, LLC
600 Third Avenue, 30F
New York, NY 10016-2001

Name, Mailing Address, and Phone Number of Individual Responsible for Submitting the Request:

JJ Jamieson, Senior Director, Operations and Development
Perennial Power Holdings, Inc.
24 Waterway Ave, Suite 740 The Woodlands, TX 77380
(281) 719-8825
JJ.Jamieson@perennialpower.net

2.2 OAR-345-027-0060(1)(b) Description of the Proposed Change

(b) A detailed description of the proposed change, including:

(A) a description of how the proposed change affects the facility,

(B) a description of how the proposed change affects those resources or interests protected by applicable laws and Council standards, and

(C) the specific location of the proposed change, and any updated maps and/or geospatial data layers relevant to the proposed change.

RESPONSE: With regard to subpart (A), the proposed change only means that the start of construction will be extended an additional 3 years and the period of construction adjusted accordingly.

With regard to subpart (B), this request does not alter the description of the Facility as set forth in the Site Certificate. The design and operation was reviewed by the original engineering firm that prepared the Application for Site Certificate (ASC), and found no design or operational changes were necessary since the submittal of the ASC. The effect on resources or interests protected by applicable laws and Council standards is detailed in the following sections of this Request for Amendment. In summary, the proposed change of an extended start date of construction will have no significant adverse impact on the Standards.

With regard to subpart (C), the change affects the entire project. A review of the maps was made as part of this request and found that they did not require any updating.

2.3 OAR-345-027-0060(1)(c) Required Division 21 Information

(c) References to any specific Division 21 information that may be required for the Department to make its findings.

RESPONSE: Division 21 lists thirty sections of review which were presented in the ASC. Two sections are not applicable to this Request for Amendment, Exhibit N (Need for the Facility) and Exhibit BB (Other Information). There are seventeen sections related to Council Standards. The general Council Standards which total fourteen are reviewed in section 2.4 of this Request. The three specific Council Standards are reviewed in Section 2.5. Property owners (Exhibit F) adjacent to the Project are reviewed in Section 2.7. With regard to Exhibit A-Applicant Information, Exhibit B-Project Information, and Exhibit C-Location, no changes are noted except for updated applicant contact information which is presented in Section 2.1 and 2.2 of this request. The remaining Division 21 sections not covered by the standards are addressed in this subsection:

- OAR 345-021-0010(e) Exhibit E-Permits
- OAR 345-021-0010(g) Exhibit G-Material Analysis
- OAR 345-021-0010(j) Exhibit J-Jurisdictional Wetlands
- OAR 345-021-0010(o) Exhibit O-Water Use
- OAR 345-021-0010(m) Exhibit M-Financial Capability
- OAR 345-021-0010(x) Exhibit X-Noise
- OAR 345-021-0010(z) Exhibit Z-Cooling Tower Impacts
- OAR 345-021-0010(cc) Exhibit CC-Additional Statutes, Rules and Ordinances

2.3.1 OAR-345-021-0010(e) Permits

Information about permits needed for construction and operation of the facility, including:
(A) Identification of all federal, state and local government permits related to the siting of the proposed facility, a legal citation of the statute, rule or ordinance governing each permit, and the name, mailing address, email address and telephone number of the agency or office responsible for each permit.

(B) A description of each permit, the reasons the permit is needed for construction or operation of the facility and the applicant's analysis of whether the permit should or should not be included in and governed by the site certificate.

(C) For any state or local government agency permits, licenses or certificates that are proposed to be included in and governed by the site certificate, evidence to support findings by the Council that construction and operation of the proposed facility will comply with the statutes, rules and standards applicable to the permit. The applicant may show this evidence:

(i) In Exhibit J for permits related to wetlands.

(ii) In Exhibit O for permits related to water rights.

(D) For federally-delegated permit applications, evidence that the responsible agency has received a permit application and the estimated date when the responsible agency will complete its review and issue a permit decision.

(E) If the applicant relies on a state or local government permit or approval issued to a third party, identification of any such third-party permit and for each:

(i) Evidence that the applicant has, or has a reasonable likelihood of entering into, a contract or other agreement with the third party for access to the resource or service to be secured by that permit.

(ii) Evidence that the third party has, or has a reasonable likelihood of obtaining, the necessary permit.

(iii) An assessment of the impact of the proposed facility on any permits that a third party has obtained and on which the applicant relies to comply with any applicable Council standard.

(F) If the applicant relies on a federally-delegated permit issued to a third party, identification of any such third-party permit and for each:

(i) Evidence that the applicant has, or has a reasonable likelihood of entering into, a contract or other agreement with the third party for access to the resource or service to be secured by that permit.

(ii) Evidence that the responsible agency has received a permit application.

(iii) The estimated date when the responsible agency will complete its review and issue a permit decision.

(G) The applicant's proposed monitoring program, if any, for compliance with permit conditions.

RESPONSE: The ASC, Exhibit E details permit information required for the construction and operation of the Project. A review of the list of permits in the exhibit and federal, state and local regulations was conducted and no additional permits or approvals were found to be necessary.

Revisions to regulations have affected one permit, the Oregon Department of Energy (DOE) Site Certificate for the Project. This Request for Amendment has been prepared in compliance with the revised regulations.

An update of the active permits is discussed below:

The Air Contaminant Discharge Permit and Prevention of Significant Deterioration Permit (Air Permit) were initially issued on January 26, 2016. An application to extend the construction start date was submitted on April 5, 2017. Oregon Department of Environmental Quality (DEQ) approved the extension on May 17, 2017. The Air Permit now has a required start date of January 26, 2019. The DEQ may grant an additional 18 month extension for good cause. A copy of the Air Permit modification is included in Attachment 1.

On January 7, 2014 a NPDES 1200-C construction stormwater application was submitted to the DEQ-Eastern Region. As noted in DEQ's letter of February 6, 2014, DEQ expects to issue the Construction Stormwater Permit once the Site Certificate and Final Erosion and Sediment Control Plan were submitted. Perennial has been waiting for final project design before submitting these documents. Krista Ratliff at DEQ was contacted on June 28, 2018 and confirmed that the application for the NPDES permit was in the files and on hold. The following information provided in the original application is correct.

Permit: National Pollutant Discharge Elimination System (NPDES) Permit
Agencies: Oregon Department of Environmental Quality - Eastern Region
Water Quality Division
475 NE Bellevue Drive, Suite #110

Bend, Oregon 97701
Ms. Krista Ratliff
Ratliff.krista@deq.state.or.us
(541) 633-2033
Standards: ORS 468 and 468B OAR 340-014, 340-041, 340-045, 340-052, and 345-055
Clean Water Act of 1977 (33 USC § 1251 et seq.) 40 CFR Parts 6, 122 and 124

In addition, Perennial will rely on three third-party permits for the construction and operation of the Facility. The first third-party permit deals with the water supply. The second and third third-party permits deal with the reclaimed water generated by the Station. Perennial proposes to send reclaimed water from the Project to the Hermiston Generating Plant (HGP) as makeup water for the HGP's cooling towers. The HGP operates under a Council Site Certificate. The HGP then discharges its reclaimed water to Lamb Weston. Lamb Weston uses the reclaimed water for wash down or irrigation purposes. Lamb Weston operates under a Water Pollution Control Facilities Permit.

The Port of Umatilla has reissued a letter stating that it expects to be able to enter into a contract with Perennial Power Holdings, Inc. to supply up to 2,000 gallons per minute of raw water for the Project. A copy of the updated letter is included in Attachment 2.

Lamb Weston's Water Pollution Control Facilities Permit (Permit No 48780) allows the facility to manage and dispose of the HGP's wastewater, among other wastewaters, by land application for beneficial use on the North Farm and the Madison Farm in accordance with the DEQ-approved Operations, Monitoring, and Management Plan. The permit was issued on 07-20-2015.

Perennial expects that the Station will generate suitable wastewater for re-use as makeup water in the HGP because cooling water at the Station will be used inside the turbine equipment, which requires higher water quality specifications than cooling tower makeup water used at the HGP. Given the anticipated quality of water the HGP would receive from the Station, HGP anticipates no difficulty in continuing to meet the parameters of its contract with Lamb Weston, as well as all environmental standards and applicable Council standards, and that no amendment of the site certificate for the HGP would be required. Therefore, we anticipate that the receipt of wastewater from the Project by HGP will be acceptable to both HGP and Lamb Weston. Once Lamb Weston has indicated that it can accept reclaimed water from the HGP that has come from the Station, HGP will issue a letter to Perennial indicating acceptance of the Station's reclaimed water.

Although Perennial anticipates positive developments for reclaiming the Project's waste water, Perennial will keep the ZLD system as an option.

2.3.2 OAR-345-021-0010(g) Material Analysis

A materials analysis including:

(A) An inventory of substantial quantities of industrial materials flowing into and out of the proposed facility during construction and operation.

(B) The applicant's plans to manage hazardous substances during construction and operation, including measures to prevent and contain spills.

(C) The applicant's plans to manage non-hazardous waste materials during construction and operation.

RESPONSE: We expect no significant changes from the preliminary design conditions. Accordingly, material analysis estimates will remain unchanged from those found in ASC, Exhibit G. Therefore, we anticipate:

(A) The industrial materials flowing into and out of the proposed facility during construction and operation would be the same as those outlined in the initial application. The information is the same as was submitted in ASC, Exhibit G, G-2.

(B) The plans to manage hazardous substances during construction and operation are unchanged from the initial application. The information is the same as was submitted in ASC, Exhibit G, G-2.

(C) The plans to manage non-hazardous waste materials during construction and operation are unchanged from the initial application. The information is the same as was submitted in ASC, Exhibit G, G-2.

2.3.3 OAR-345-021-0010(j) Jurisdictional Wetlands

Information based on literature and field study, as appropriate, about waters of this state, as defined under ORS 196.800, including:

(A) A description of all areas within the site boundary that might be waters of this state and a map showing the location of these features.

(B) An analysis of whether construction or operation of the proposed facility would adversely affect any waters of this state.

(C) A description of the significance of potential adverse impacts to each feature identified in (A), including the nature and amount of material the applicant would remove from or place in the waters analyzed in (B).

(D) If the proposed facility would not need a removal-fill authorization, an explanation of why no such authorization is required for the construction and operation of the proposed facility.

(E) If the proposed facility would need a removal-fill authorization, information to support a determination by the Council that the Oregon Department of State Lands should issue a removal-fill permit, including information in the form required by the Department of State Lands under OAR Chapter 141 Division 85.

(F) A description of proposed actions to mitigate adverse impacts to the features identified in (A) and the applicant's proposed monitoring program, if any, for such impacts.

RESPONSE: In the Final Order for the Perennial Wind Chaser Station, the Council concluded that the proposed facility “would not impact any of the three canals because one waterbody would be crossed by a bridge and the other two would be crossed by an underground bore or horizontal directional drill. Additionally, there would be no removal-fill below the ordinary high water mark (OHWM) and no disturbance would occur above the OHWM or within the associated riparian areas.” These three canals were the only Waters of the State identified as occurring in the analysis area. Jurisdictional waters information relevant to the proposed facility was addressed in Exhibit J of the ASC, and those responses were reviewed as part of this Request for Amendment. The analysis area for this exhibit is defined as the location of all Project components where surface-disturbing activities will occur during construction or operation. This area includes the Perennial Wind Chaser Station, the temporary laydown area, the step-up substation and associated underground transmission cable, and the natural gas pipeline right-of-way.

Appendix J-1 of the ASC contains the revised Wetland Delineation Report submitted to the Oregon Department of State Lands (DSL) on May 14, 2014 (supersedes the original December 19, 2013, submission). The revised report describes the geographic extent, location, and character of the three waterbodies (canals) within the analysis area. On July 17, 2014, the DSL issued a letter of concurrence for the revised Wetland Delineation Report.

As determined by on-site reconnaissance conducted by qualified ecologists on June 11 and 12, 2018, and review of publicly available databases, the description of site conditions in the ASC remains applicable. This Request for Amendment does not contain any significant changes from the preliminary design, as described in the ASC. Accordingly, the potential impacts to protected areas from construction and operation are unchanged from those described in the ASC, Exhibit J and remains consistent with the Council conclusions. The following information and analysis provided in the ASC remains applicable to this Request for Amendment, and therefore no further information or analysis is necessary:

- (A) A description of all areas within the Site Boundary considered to be Waters of the State and a map showing the location of these features are provided in Appendix J-1 of the ASC.
- (B) The analysis of whether construction or operation of the proposed facility would adversely affect any Waters of the State was made in Exhibit J of the ASC.
- (C) Exhibit J of the ASC includes a description of the significance of potential adverse impacts to each feature identified in (A), including the nature and amount of material the applicant would remove from or place in the waters analyzed in (B).
- (D), (E), and (F) Exhibit J of the ASC includes an explanation of why there is no need for a removal-fill authorization for the construction and operation of the proposed facility.

2.3.4 OAR-345-021-0010(m) Financial Capability

Information about the applicant's financial capability, providing evidence to support a finding by the Council as required by OAR 345-022-0050(2). Nothing in this subsection shall require the disclosure of information or records protected from public disclosure by any provision of state or federal law. The applicant shall include:

- (A) An opinion or opinions from legal counsel stating that, to counsel's best knowledge, the applicant has the legal authority to construct and operate the facility without violating its bond indenture provisions, articles of incorporation, common stock covenants, or similar agreements.*
- (B) The type and amount of the applicant's proposed bond or letter of credit to meet the requirements of OAR 345-022-0050.*
- (C) Evidence that the applicant has a reasonable likelihood of obtaining the proposed bond or letter of credit in the amount proposed in paragraph (B), before beginning construction of the facility.*

RESPONSE: The ASC, Exhibit M, details Perennial's financial capability. Section M.1 provides the legal opinion as required in (A). For B and C, Section 2.5.6 details an updated retirement cost estimate based on Second Quarter, 2018 dollars and contains a letter from MUFG Bank, Ltd indicating its willingness to furnish or arrange a letter of credit for the revised cost estimate.

2.3.5 OAR-345-021-0010(o) Water Use

Information about anticipated water use during construction and operation of the proposed facility. The applicant shall include:

- (A) A description of the use of water during construction and operation of the proposed facility.*
- (B) A description of each source of water and the applicant’s estimate of the amount of water the facility will need during construction and during operation from each source under annual average and worst-case conditions.*
- (C) A description of each avenue of water loss or output from the facility site for the uses described in (A), the applicant’s estimate of the amount of water in each avenue under annual average and worst-case conditions and the final disposition of all wastewater.*
- (D) For thermal power plants, a water balance diagram, including the source of cooling water and the estimated consumptive use of cooling water during operation, based on annual average conditions.*
- (E) If the proposed facility would not need a groundwater permit, a surface water permit or a water right transfer, an explanation of why no such permit or transfer is required for the construction and operation of the proposed facility.*
- (F) If the proposed facility would need a groundwater permit, a surface water permit or a water right transfer, information to support a determination by the Council that the Water Resources Department should issue the permit or transfer of a water use, including information in the form required by the Water Resources Department under OAR Chapter 690, Divisions 310 and 380.*
- (G) A description of proposed actions to mitigate the adverse impacts of water use on affected resources.*

RESPONSE: We expect no significant changes from the preliminary design conditions. Accordingly, water usage estimates for construction and operation will remain relatively unchanged from those found in ASC, Exhibit O. Therefore, we anticipate:

- (A) The use of water during construction and operation of the proposed facility will remain approximately the same as estimated in ASC, Exhibit O, O.2.
- (B) The source of water (Port of Umatilla) and the estimated amount of water the facility will need during construction and during operation, from each source under annual average and worst-case conditions, will remain approximately the same as estimated in ASC, Exhibit O, Table O-1. An updated letter from the Port of Umatilla is included in Attachment 2 indicating that the Port can supply the necessary volume of water to the Project.
- (C) Water loss or output from the facility site for the uses described above, under annual average and worst-case conditions, and the final disposition of all wastewater, will remain the same as estimated in ASC, Exhibit O, O.3.
- (D) A water balance diagram was provided in ASC, Exhibit O, O.5. The diagram of the source of cooling water and the estimated consumptive use of cooling water during operation, based on annual average conditions, will remain approximately the same.
- (E) And (F) The proposed facility does not need a groundwater permit, a surface water permit, or a water right transfer, as previously discussed in ASC, Exhibit O, O.6. The Port of Umatilla will provide the necessary water to the Project (see Attachment 2).
- (G) A description of proposed actions to mitigate the adverse impacts of water use on affected resources was provided in ASC, Exhibit O, O.7. No changes are proposed.

2.3.6 OAR-345-021-0010(x) Noise

Information about noise generated by construction and operation of the proposed facility, providing evidence to support a finding by the Council that the proposed facility complies with the Oregon Department of Environmental Quality's noise control standards in OAR 340-035-0035. The applicant shall include:

- (A) Predicted noise levels resulting from construction and operation of the proposed facility.*
- (B) An analysis of the proposed facility's compliance with the applicable noise regulations in OAR 340-035-0035, including a discussion and justification of the methods and assumptions used in the analysis.*
- (C) Any measures the applicant proposes to reduce noise levels or noise impacts or to address public complaints about noise from the facility.*
- (D) Any measures the applicant proposes to monitor noise generated by operation of the facility.*
- (E) A list of the names and addresses of all owners of noise sensitive property, as defined in OAR 340-035-0015, within one mile of the proposed site boundary.*

RESPONSE: In the Final Order for the Perennial Wind Chaser Station, the Council concluded that, "the facility complies with the Noise Control Regulations in OAR 340-035-0035(1)(b)(A) and (B)." Noise relevant to the proposed Facility was addressed in Exhibit X of the Application for Site Certificate (ASC), and those responses were reviewed as part of this Request for Amendment (RFA).

As determined by review of 2018 parcel data provided by Umatilla County, the number of sensitive receptors within one mile of the Facility has increased slightly from 2013. However, the increases occurred in proximity to the proposed natural gas pipeline, the transmission line and the step-up substation; there has been no increase in the number of sensitive receptors within one mile of the proposed energy facility. In addition, this Request for Amendment does not contain any changes from the preliminary design as described in the original ASC that would affect noise. Accordingly, the potential impacts associated with noise from construction and operation of the proposed facility are unchanged from those described in the ASC, Exhibit X and remain consistent with the Council's conclusions.

Therefore, we anticipate:

- (A) The noise from construction and operation of the proposed facility will remain the same as estimated in ASC, Exhibit X.3.1 and Exhibit X.3.2.
- (B) The proposed facility will be in compliance with the applicable noise regulations established by the DEQ in OAR 340-035-0035. The Oregon noise regulations have not changed since the original submittal, nor has the design of the proposed facility. The methods and assumptions used in the original application have not changed and are outlined in ASC, Exhibit X.4. Condition PRE-NC-01 of the Site Certificate requires the certificate holder, prior to construction, to re-run the noise model using the noise characteristics of the equipment selected.
- (C) The noise control measures established in the original application have not changed. The noise control measures will be implemented as outlined in ASC, Exhibit X.5 and required by the Site Certificate to reduce noise levels and noise impacts to the surrounding community.
- (D) Due, in part, to the Station's distance from the residential receptors, and the proposed

noise control measures, the modeling results indicate that Station operation will not result in an increase in noise level greater than 10 dBA above the lowest-measured background hourly L50 for each noise sensitive property. Perennial will conduct noise studies to investigate any complaints of noise related to the operation of the Station as outlined in ASC, Exhibit X.6 and as required by Conditions OPR-NC-01 and OPR-NC-02 of the Site Certificate.

(E) An updated list of the names and addresses of all owners of noise sensitive property within one mile of the four components of the proposed Facility (natural gas pipeline, energy facility, transmission line, and step-up station) is included in Tables X-1, X-2, X-3, and X-4, contained in Attachment 4 of this document.

2.3.7 OAR-345-021-0010(z) Cooling Tower Impacts

If the proposed facility has an evaporative cooling tower, information about the cooling tower plume, including:

(A) The predicted size and frequency of occurrence of a visible plume and an assessment of its visual impact.

(B) The predicted locations and frequency of occurrence of ice formation on surfaces and ground level fogging and an assessment of significant potential adverse impacts, including, but not limited to, traffic hazards on public roads.

(C) The predicted locations and rates of deposition of solids released from the cooling tower (cooling tower drift) and an assessment of significant potential adverse impacts to soils, vegetation and other land uses.

(D) Any measures the applicant proposes to reduce adverse impacts from the cooling tower plume or drift.

(E) The assumptions and methods used in the plume analysis

(F) The applicant's proposed monitoring program, if any, for cooling tower plume impacts;

RESPONSE: We expect no significant changes from the preliminary design conditions. Accordingly, cooling tower impacts will remain unchanged from those found in ASC, Exhibit Z. Therefore, we anticipate:

(A) The size of the cooling tower and frequency of occurrence of a visible plume will be unchanged from the initial application. The assessment of the visual impact from the cooling tower plume will not change. The proposed facility's preliminary design included four blocks of power, each with its own cell, which were arranged in a single cooling tower. The cooling tower operation and design is unchanged from the original application. The Seasonal/ Annual Cooling Tower Impact (SACTI) model was used with the methodology described under Oregon Administrative Rules (OAR) 345-021-0010(1)(z)(E). The modeling results are the same as those submitted in ASC, Exhibit Z, Z-2.

(B) The SACTI model was also used for predicting ice formation and ground fogging from the cooling tower. The model uses actual meteorological data (five years) to conservatively predict the occurrence of ice formation and other parameters. The SACTI model parameters are unchanged from the original application. The cooling tower parameters and meteorological data from ASC, Exhibit Z are the same as the original application.

(C) The predicted locations and rates of deposition of solids released from the cooling tower are unchanged from the original application. The assessment of potential adverse impacts to

soils, vegetation and other land uses are the same as provided in ASC, Exhibit Z, Z-3.

(D)The mist eliminators, outlined in ASC, Exhibit Z, used to limit the amount of drift from the cooling tower exhaust, will be used to reduce adverse impacts from the cooling tower plume.

(E)The SACTI model was used for this analysis. The modeling parameters outlined in ASC, Exhibit Z are unchanged.

(F)Based on the SACTI computer modeling analysis performed, the physical and visual impacts due to the cooling tower plumes at the Site are expected to be minimal, and no potential significant adverse impacts are anticipated. The Project does not include a monitoring program for the cooling tower plume impacts because no potential significant adverse impacts are expected. Nevertheless, Perennial has prepared an overall Revegetation and Noxious Weed Control Plan. As part of that plan, areas within and surrounding the energy facility site will be monitored and remedial action taken if needed. Therefore, if the deposition of salts, metals, or other minerals were to significantly impact vegetation, that plan would provide a means to monitor and mitigate such impacts as outlined in ASC, Exhibit Z, Z-6.

2.3.8 OAR-345-021-0010(cc) Additional Statutes, Rules and Ordinances

Identification, by legal citation, of all state statutes and administrative rules and local government ordinances containing standards or criteria that the proposed facility must meet for the Council to issue a site certificate, other than statutes, rules and ordinances identified in Exhibit E, and identification of the agencies administering those statutes, administrative rules and ordinances. The applicant shall identify all statutes, administrative rules and ordinances that the applicant knows to be applicable to the proposed facility, whether or not identified in the project order. To the extent not addressed by other materials in the application, the applicant shall include a discussion of how the proposed facility meets the requirements of the applicable statutes, administrative rules and ordinances.

RESPONSE: Additional statutes, rules and ordinances were analyzed in Exhibit CC of the ASC and the responses were reviewed as part of this Request for Amendment. No changes to the information presented in Exhibit CC were deemed necessary.

2.4 OAR-345-027-0060(1)(d) Proposed Changes to Site Certificate

(d) The specific language of the site certificate, including conditions, that the certificate holder proposes to change, add or delete by an amendment.

RESPONSE: Perennial proposes to change only the language of General Conditions GEN-GS-02 and GEN-GS-03 concerning the construction start and completion deadlines.

(GEN-GS-02) *The certificate holder shall begin construction of the facility within three years of **September 18, 2018**. after the effective date of the site certificate. ~~Under OAR 345-015-0085(9), the site certificate is effective upon execution by the Council chair and the applicant.~~*

(GEN-GS-03) *The certificate holder shall complete construction of the facility within six years after **September 18, 2018**. the effective date of the site certificate.*

2.5 OAR-345-027-0060(1)(e) Applicable Council Standards

(e) A list of the Council standards and all other laws - including statutes, rules and ordinances - applicable to the proposed change, and an analysis of whether the facility, with the proposed change, would comply with those laws and Council standards. For the purpose of this rule, a law or Council standard is "applicable" if the Council would apply or consider the law or Council standard under OAR 345-027-0075(2).

RESPONSE: The relevant EFSC standards to the proposed change include Division 22 (General Standards for Siting Facilities) and Division 24 (Specific Standards for Siting Facilities). The standards are listed below for Division 22 and in Section 2.6 for Division 24. The Facility is an electric generating facility using natural gas combustion turbine technology, therefore Division 23, which applies to non-generating facilities, does not apply. Similarly, inapplicable provisions of Division 24 (i.e., standards applicable to gas storage, non-generating facilities, etc.) are also not discussed. The following Division 22 standards are addressed in this subsection:

- OAR 345-022-0010 Organizational Expertise
- OAR 345-022-0020 Structural Standard
- OAR 345-022-0022 Soil Protection
- OAR 345-022-0030 Land Use
- OAR 345-022-0040 Protected Areas
- OAR 345-022-0050 Retirement and Financial Assurance
- OAR 345-022-0060 Fish and Wildlife Habitat
- OAR 345-022-0070 Threatened and Endangered Species
- OAR 345-022-0080 Scenic Resources
- OAR 345-022-0090 Historic, Cultural and Archaeological Resources
- OAR 345-022-0100 Recreation
- OAR 345-022-0110 Public Services
- OAR 345-022-0120 Waste Minimization

2.5.1 OAR-345-022-0010 Organizational Expertise

(1) To issue a site certificate, the Council must find that the applicant has the organizational expertise to construct, operate and retire the proposed facility in compliance with Council standards and conditions of the site certificate. To conclude that the applicant has this expertise, the Council must find that the applicant has demonstrated the ability to design, construct and operate the proposed facility in compliance with site certificate conditions and in a manner that protects public health and safety and has demonstrated the ability to restore the site to a useful, non-hazardous condition. The Council may consider the applicant's experience, the applicant's access to technical expertise and the applicant's past performance in constructing, operating and retiring other facilities, including, but not limited to, the number and severity of regulatory citations issued to the applicant.

(2) The Council may base its findings under section (1) on a rebuttable presumption that an

applicant has organizational, managerial and technical expertise, 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.

(3) If the applicant does not itself obtain a state or local government permit or approval for which the Council would ordinarily determine compliance but instead relies on a permit or approval issued to a third party, the Council, to issue a site certificate, must find that the third party has, or has a reasonable likelihood of obtaining, the necessary permit or approval, and that the applicant has, or has a reasonable likelihood of entering into, a contractual or other arrangement with the third party for access to the resource or service secured by that permit or approval.

(4) If the applicant relies on a permit or approval issued to a third party and the third party does not have the necessary permit or approval at the time the Council issues the site certificate, the Council may issue the site certificate subject to the condition that the certificate holder shall not commence construction or operation as appropriate until the third party has obtained the necessary permit or approval and the applicant has a contract or other arrangement for access to the resource or service secured by that permit or approval.

RESPONSE: There have been no significant circumstances that should change EFSC’s previous finding that “Based on the information provided by the applicant and subject to compliance with the site certificate conditions, the Council finds that the applicant has the organizational expertise to construct, operate and retire the facility.” Final Order, page 21.

(1) Two people (David Daley and Russ Tenney) identified in the ASC, Exhibit D. D.3. are no longer part of Perennial’s project team. They have been replaced with the following personnel:

JJ Jamieson, Perennial Power Holdings, Inc. (PPH), Senior Director, Operations and Development and Senior Vice President of Hermiston Generating LP. Mr Jamieson has over 18 years of experience in the power and energy industry in a number of different areas. His roles include systems engineering, merchant operations, compliance, Balancing Authority design and implementation, thermal plant management, renewable integration and operation, and was certified as a NERC Reliability Coordinator in 2007. Mr Jamieson has also served on a number of WECC committees including the Operating Committee and was elected Chair of the Market Interface Committee during the implementation of the Energy Imbalance Market. Mr Jamieson was elected to sit on the Member Advisory Committee for Peak RC in 2016 and currently serves that role. Prior to joining PPH in 2016, he was Vice President of Strategic Development for Gridforce Energy Management.

Bradley Knight, Hermiston Generating LP, General Manager. Mr. Knight has over 25 years’ experience in the power and energy infrastructure industry. His roles include operating, maintaining, engineering and compliance of nuclear, gas and coal assets. Prior to joining PPH in 2009, he was a Plant Engineer for Cogentrix Energy.

Note that Shigenobu Hamada, PPH, President is still managing the project, thus all PPH documents are still in effect as presented in the ASC, Exhibit A. There has been no regulatory compliance issues associated with the Hermiston Generating Plant since the ASC was submitted.

(2) The Certificate Holder is not relying on an ISO 9000 or ISO 14000 certified program.

(3)(4) Perennial will be relying on three third-party permits, as discussed in ASC, Exhibit E. E.5. There have been no significant changes with the facts related to these permits, other than that DEQ has renewed Lamb Weston's Water Pollution Control Facility permit. Thus the Station will be able route its recyclable waste water to Hermiston Generating Plant (HGP) for cooling tower make-up and then HGP will be able to send its reclaimed water on to Lamb Weston for wash down or irrigation purposes. Refer to Section 2.3.1 for additional information. In addition, the Port of Umatilla has reissued and updated its letter stating its ability to supply water to the Station. A copy of this letter is included in response to Section 2.3.5 Water Use.

2.5.2 OAR-345-022-0020 Structural Standard

(1) Except for facilities described in sections (2) and (3), to issue a site certificate, the Council must find that:

(a) The applicant, through appropriate site-specific study and based on consultation with the Oregon Department of Geology and Mineral Industries, has adequately characterized the seismic hazard risk of the site;

(b) The applicant can design, engineer, and construct the facility to avoid dangers to human safety and the environment presented by seismic hazards affecting the site as identified in (a);

(c) The applicant, through appropriate site-specific study and based on consultation with the Oregon Department of Geology and Mineral Industries, has adequately characterized the potential geological and soils hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility; and

(d) The applicant can design, engineer and construct the facility to avoid dangers to human safety and the environment presented by the hazards identified in subsection (c).

(2) The Council may not impose the Structural Standard in section (1) to approve or deny an application for an energy facility that would produce power from wind, solar or geothermal energy. However, the Council may, to the extent it determines appropriate, apply the requirements of section (1) to impose conditions on a site certificate issued for such a facility.

(3) The Council may not impose the Structural Standard in section (1) to deny an application for a special criteria facility under OAR 345-015-0310. However, the Council may, to the extent it determines appropriate, apply the requirements of section (1) to impose conditions on a site certificate issued for such a facility.

RESPONSE: As provided in Exhibit H of the ASC, the project applicant coordinated with Oregon Department of Geology and Mineral Industries to satisfy the regulatory requirements of OAR-345-022-0020. Specifically:

(a) The applicant, through appropriate site-specific study and based on consultation with the Oregon Department of Geology and Mineral Industries, has adequately characterized the seismic hazard risk of the site;

(b) The applicant has appropriately designed, engineered, and will construct the facility to avoid dangers to human safety and the environment presented by seismic hazards affecting the site as identified in (a);

(c) The applicant, through appropriate site-specific study and based on consultation with the Oregon Department of Geology and Mineral Industries, has adequately characterized

the potential geological and soils hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility; and

(d) The applicant has designed, engineered and will construct the facility to avoid dangers to human safety and the environment presented by the hazards identified in subsection (c).

There have been no design changes, and Oregon Department of Geology and Mineral Industries approved of the previously submitted project. Multiple calls to Oregon Department of Geology and Mineral Industries have been placed to ensure they have no new guidance; however, these calls have not been returned. It is not anticipated that any additional analysis will be required prior to construction or operation activities, other than as already required by the Site Certificate.

2.5.3 OAR-345-022-0022 Soil Protection

To issue a site certificate, the Council must find that the design, construction and operation of the facility, taking into account mitigation, are not likely to result in a significant adverse impact to soils including, but not limited to, erosion and chemical factors such as salt deposition from cooling towers, land application of liquid effluent, and chemical spills.

RESPONSE: The Council previously found that the proposed facility complies with the Council's Siting Standards for Soil Protection. Soil protection relevant to the proposed Facility was addressed in Exhibit I of the ASC, and those responses were reviewed as part of this Request for Amendment (RFA).

As determined by review of publically available databases, the description of site conditions in the ASC remains applicable. The nature and extent of the soils occurring in the analysis area, as described in the ASC, have not changed substantially. The analysis area for this exhibit includes all areas within the Site Boundary where soil disturbance will potentially occur as a result of constructing and operating the Project. It does not include the portions of the existing transmission line to be re-conducted. This RFA does not contain any changes from the preliminary design, as described in the ASC. Accordingly, the potential impacts to soil from construction and operation will remain unchanged from those described in the ASC, Exhibit I.

Therefore, the construction and operation of the facility, taking into account mitigation and subject to the conditions of the Site Certificate, are not likely to result in significant adverse impact to soils including, but not limited to, erosion and chemical factors such as salt deposition from cooling towers, land application of liquid effluent, and chemical spills.

2.5.4 OAR-345-022-0030 Land Use

(1) To issue a site certificate, the Council must find that the proposed facility complies with the statewide planning goals adopted by the Land Conservation and Development Commission.

(2) The Council shall find that a proposed facility complies with section (1) if:

(a) The applicant elects to obtain local land use approvals under ORS 469.504(1)(a) and the Council finds that the facility has received local land use approval under the acknowledged comprehensive plan and land use regulations of the affected local government; or

(b) The applicant elects to obtain a Council determination under ORS 469.504(1)(b) and the Council determines that:

(A) The proposed facility complies with applicable substantive criteria as described in section (3) and the facility complies with any Land Conservation and Development Commission administrative rules and goals and any land use statutes directly applicable to the facility under ORS 197.646(3);

(B) For a proposed facility that does not comply with one or more of the applicable substantive criteria as described in section (3), the facility otherwise complies with the statewide planning goals or an exception to any applicable statewide planning goal is justified under section (4); or

(C) For a proposed facility that the Council decides, under sections (3) or (6), to evaluate against the statewide planning goals, the proposed facility complies with the applicable statewide planning goals or that an exception to any applicable statewide planning goal is justified under section (4).

(3) As used in this rule, the "applicable substantive criteria" are criteria from the affected local government's acknowledged comprehensive plan and land use ordinances that are required by the statewide planning goals and that are in effect on the date the applicant submits the application. If the special advisory group recommends applicable substantive criteria, as described under OAR 345-021-0050, the Council shall apply them. If the special advisory group does not recommend applicable substantive criteria, the Council shall decide either to make its own determination of the applicable substantive criteria and apply them or to evaluate the proposed facility against the statewide planning goals.

(4) The Council may find goal compliance for a proposed facility that does not otherwise comply with one or more statewide planning goals by taking an exception to the applicable goal. Notwithstanding the requirements of ORS 197.732, the statewide planning goal pertaining to the exception process or any rules of the Land Conservation and Development Commission pertaining to the exception process, the Council may take an exception to a goal if the Council finds:

(a) The land subject to the exception is physically developed to the extent that the land is no longer available for uses allowed by the applicable goal;

(b) The land subject to the exception is irrevocably committed as described by the rules of the Land Conservation and Development Commission to uses not allowed by the applicable goal because existing adjacent uses and other relevant factors make uses allowed by the applicable goal impracticable; or

(c) The following standards are met:

(A) Reasons justify why the state policy embodied in the applicable goal should not apply;

(B) The significant environmental, economic, social and energy consequences anticipated as a result of the proposed facility have been identified and adverse impacts will be mitigated in accordance with rules of the Council applicable to the siting of the proposed facility; and

(C) The proposed facility is compatible with other adjacent uses or will be made compatible through measures designed to reduce adverse impacts.

(5) If the Council finds that applicable substantive local criteria and applicable statutes and state administrative rules would impose conflicting requirements, the Council shall resolve the conflict consistent with the public interest. In resolving the conflict, the Council cannot waive any applicable state statute.

(6) If the special advisory group recommends applicable substantive criteria for an energy facility described in ORS 469.300(10)(a)(C) to (E) or for a related or supporting facility that does not pass through more than one local government jurisdiction or more than three zones in any one jurisdiction, the Council shall apply the criteria recommended by the special advisory group. If the special advisory group recommends applicable substantive

criteria for an energy facility described in ORS 469.300(10)(a)(C) to (E) or a related or supporting facility that passes through more than one jurisdiction or more than three zones in any one jurisdiction, the Council shall review the recommended criteria and decide whether to evaluate the proposed facility against the applicable substantive criteria recommended by the special advisory group, against the statewide planning goals or against a combination of the applicable substantive criteria and statewide planning goals. In making the decision, the Council shall consult with the special advisory group, and shall consider:

- (a) The number of jurisdictions and zones in question;*
- (b) The degree to which the applicable substantive criteria reflect local government consideration of energy facilities in the planning process; and*
- (c) The level of consistence of the applicable substantive criteria from the various zones and jurisdictions.*

RESPONSE: In the ASC, the certificate holder elected to have the Council make the determination of compliance with the Statewide Planning Goals, as provided in OAR 345-022-0030(2)(b). The Council's findings were set forth in the Final Order. Final Order at 38-116.

The Council found that for purposes of review of the ASC for compliance with the land use standard, the date the application was submitted was April 3, 2014, and the affected local governments are Umatilla County and the City of Umatilla. Final Order at 40.

For purposes of this Request for Amendment, the certificate holder has examined whether there have been changes in zoning or in applicable land use standards since April 3, 2014, or any changes in factual circumstances, that alter any of the Council's findings in the Final Order with respect to compliance with the Council's Land Use Standard, OAR 345-022-0030.

Zoning of Facility

The certificate holder has reviewed the current zoning maps applicable to the facility. The zoning map for Umatilla County zoning is the map designated "West Umatilla County, Oregon," posted at: <http://www.co.umatilla.or.us/planning/GIS%20maps/WestCountyZoning.pdf>

The zoning map for the City of Umatilla and for lands outside the City of Umatilla but within the City's Urban Growth Boundary (UGB) is posted at: http://www.co.umatilla.or.us/planning/city_info/UmatillaCityZoning.pdf The zones outside the city limits but within the UGB are from the County's 1972 Zoning Code.

These maps were compared to the zoning designations shown on Figure K-10 of the ASC. There were no changes in zoning for any portion of the Facility.

Changes in Applicable Land Use Standards

We prepared a chart of the state and local land use standards cited in the Final Order, and evaluated whether any of the standards have been amended since April 3, 2014.

Umatilla County Development Code (UCDC): The current version of the Umatilla County Development Code available online has a revision date of April 13, 2016 : http://www.co.umatilla.or.us/planning/pdf/Umatilla_County_Development_Code.pdf In order to ensure that all relevant changes were captured, the planning ordinances adopted by the

Umatilla County Board of Commissioners since the ASC was submitted on April 3, 2014 were reviewed.

Umatilla County Comprehensive Plan: All policies of the Umatilla County Comprehensive Plan addressed in the Final Order were compared to the current Comprehensive Plan available online, which has a revision date of June 7, 2017. The applicable Comprehensive Plan Policies (which were identified as applicable by the Umatilla County Board of Commissioners in its capacity as a Special Advisory Group) are addressed at pages 84-96 of the Final Order. No Comprehensive Plan policy addressed in the Final Order has been amended since the ASC was filed on April 3, 2014. One policy – Natural Hazards Policy 4 – is incorrectly quoted at page 92 of the Final Order. The policy should read: “Potentially hazardous major developments (e.g. power plants) must address earthquake hazard possibilities.” The Final Order, however, cites the analysis of seismic hazards and non-seismic geological hazards in Exhibit H of the ASC, and therefore is responsive to Natural Hazards Policy 4.

City of Umatilla Zoning Ordinance: Areas within the City of Umatilla are subject to the City’s Zoning Ordinance. There has only been one change to applicable standards since April 3, 2014: NC (Neighborhood Commercial) uses are addressed in new Umatilla Zoning Ordinance Article 10-4C. As discussed below, the re-conducted transmission line would now be a conditional use as a “major utility facility” in the NC zone. The conditional use criteria have not changed; therefore, the Council’s analysis of the transmission line’s compliance with those standards in the Final Order remains applicable.

City of Umatilla Comprehensive Plan: Applicable goals of the City of Umatilla Comprehensive Plan were identified and addressed at pages 113-115 of the Final Order. There have been no changes to those goals, as determined by comparing the goals cited in the Final Order with current version of the Comprehensive Plan on the City’s website: <https://www.umatilla-city.org/planning/page/comprehensive-plan>

1972 Umatilla County Zoning Ordinance: Areas within the Urban Growth Area (UGA) of the City of Umatilla – outside the City limits but within the Urban Growth Boundary – are subject to the 1972 Umatilla County Zoning Ordinance (UCZO). According to Umatilla County, the UCZO was last amended through Ordinance 2013-02, adopted by the County Board of Commissioners on January 29, 2013. Thus, there have been no amendments since the ASC for the facility was filed on April 3, 2014.

The analysis below addresses the following three changes: (1) the re-zoning of the property to the south of the energy facility site from EFU to LI/LU, affecting the natural gas pipeline; (2) the application of Umatilla County’s “associated transmission line” standards to the 230 kV transmission line and up to three new poles on the portion of the energy facility site zoned EFU; and (3) the change in the City of Umatilla’s NC (Neighborhood Commercial) zone, pursuant to which the re-conducted transmission line is now a “Major Utility Facility” rather than a “Community Service Use.”

UCDC § 152.617(II)(7)(A) and (7)(B): “Utility facility necessary for public service” and “associated transmission line”

In the ASC and the Final Order, the portions of the natural gas pipeline on EFU land and new transmission poles on EFU land were analyzed under the ORS 215.275(2) standards for “utility facilities necessary for public service.” For the “re-conducted” portion of the

transmission line on EFU land – i.e., where an existing 115 kV line will be replaced with a 230 kV line on existing poles – the transmission line was determined to be a “minor betterment of existing transmission lines” permitted outright allowed in the EFU zone under UCDC § 152.056. Final Order at 43. That conclusion has not changed.

In the UCDC, the criteria for approval of a “utility facility necessary for public service” are found in UCDC § 152.617(II)(6). UCDC § 152.617(II) was amended by Ordinance 2014-04 (July 2, 2014) to revise standards for “utility facility necessary for public service” (principally, adding provisions regarding workforce housing) and to add standards for a “utility facility necessary for public service” that is an “associated transmission line.” It was further amended by Ordinance 2016-02 (March 16, 2016) to make technical corrections to the criteria for “associated transmission lines.” The current provisions largely mirror ORS 215.275 (utility facilities necessary for public service) and ORS 215.274 (associated transmission line).

The criteria in UCDC 152.617(II)(6) for a “utility facility necessary for public service” have not changed and parallel ORS 215.275. Therefore, the analysis in the Final Order with respect to the natural gas pipeline on EFU lands has not changed.

Again, the transmission line on EFU land is primarily a re-conducted line permitted outright under UCDC § 152.056. As stated in the ASC, up to six new poles would be required to tie into that existing transmission infrastructure from the energy facility; at most three poles would be constructed on EFU land, all at the energy facility site. ASC, Ex. B, B-14; Figure K-6. For the reasons discussed below, those new poles and the 230 kV transmission line they would carry would be an “associated transmission line” under UCDC § 152.617(II)(7)(B).

The UCDC does not appear to define “associated transmission line.” UCDC § 152.617(II)(7)(B), however, is based on ORS 215.274, which states that “‘associated transmission line’ has the meaning given that term in ORS 469.300.” ORS 469.300 defines “associated transmission line” as referring to “new transmission lines constructed to connect an energy facility to the first point of junction of such transmission line or lines with either a power distribution system or an interconnected primary transmission system or both or to the Northwest Power Grid.” The additional poles and transmission line, located on EFU land on the energy facility site, would be necessary to provide a connection to the re-conducted transmission line, which in turn connects the proposed energy facility to the Northwest Power Grid at the McNary Substation.

UCDC § 152.617(II)(7)(B) sets forth the following requirements with respect to an “associated transmission line”:

(B) An associated transmission line is necessary for public service and shall be approved by the governing body of a county or its designee if an applicant for approval under ORS 215.283(1)(c) demonstrates to the governing body of the county or its designee that the associated transmission line meets either the requirements of paragraph (1) of this subsection or the requirements of paragraph (2) of this subsection.

RESPONSE: As discussed below, the new transmission poles and conductor meet the requirements of Paragraph (2) of this subsection.

(1) An applicant demonstrates that the entire route of the associated transmission

line meets at least one of the following requirements:

(a) The associated transmission line is not located on high-value farmland, as defined in ORS 195.300, or on arable land;

(b) The associated transmission line is co-located with an existing transmission line;

(c) The associated transmission line parallels an existing transmission line corridor with the minimum separation necessary for safety; or

(d) The associated transmission line is located within an existing right of way for a linear facility, such as a transmission line, road or railroad that is located above the surface of the ground.

RESPONSE: The transmission line and new poles on the energy facility site do not satisfy the criteria of Paragraph (1)(b), (c) or (d). With respect to Paragraph (1)(a), the definition of “high-value farmland” applicable to an associated transmission line is different than the definition applicable to the energy facility. For an associated transmission line, “high-value farmland” is defined in ORS 195.300. For the energy facility, which is a “commercial utility facility for the purpose of generating and distributing power for public use by sale” under UCDC § 152.617(I), the applicable definition of “high-value farmland” is found in OAR 660-033-0020. The energy facility site is not “high-value farmland” as defined in OAR 660-033-0020. ORS 195.300, applicable to “associated transmission lines,” defines “high-value farmland” to include:

Land that is in an exclusive farm use zone and that is no more than 3,000 feet above mean sea level, with an aspect between 67.5 and 292.5 degrees and a slope between zero and 15 percent, and that is located within:

* * *

(C) The portion of the Columbia Valley viticultural area as described in 27 C.F.R. 9.74 that is within the State of Oregon;

ORS 195.300(10)(f). The energy facility site is within the “Columbia Valley American Viticultural Area.” The certificate holder has chosen not to analyze the “aspect” of the energy facility site as a means of excluding the site from the definition of “high-value farmland.” For purposes of this analysis, the certificate holder has assumed that the energy facility site is “high-value farmland” under ORS 195.300, and has analyzed the “associated transmission line” for compliance with the criteria of Paragraph (2), below.

(2) After an evaluation of reasonable alternatives, an applicant demonstrates that the entire route of the associated transmission line meets, subject to paragraphs (3) and (4) of this subsection, two or more of the following criteria:

(a) Technical and engineering feasibility;

(b) The associated transmission line is locationally-dependent because the associated transmission line must cross high-value farmland, as defined in ORS

195.300, or arable land to achieve a reasonably direct route or to meet unique geographical needs that cannot be satisfied on other lands;

(c) Lack of an available existing right of way for a linear facility, such as a transmission line, road or railroad, that is located above the surface of the ground;

(d) Public health and safety; or

(e) Other requirements of state or federal agencies.

RESPONSE: The energy facility is located on EFU land. It is not technically feasible to interconnect to, and take advantage of, the existing transmission infrastructure between the Hermiston Generating Plant and the McNary Substation without erecting several new poles on the energy facility site so that the new segment of transmission line can cross Westland Road onto land that is not zoned EFU. There is no existing right-of-way by which that interconnection can occur. For those reasons, this short segment of “associated transmission line” can also be considered “locationally dependent.” Re-conductoring the existing Hermiston Generating to McNary transmission line eliminates the impacts that would be associated with development of a new transmission facility, including impacts to EFU land between the energy facility site and McNary.

(3) As pertains to paragraph (2), the applicant shall present findings to the governing body of the county or its designee on how the applicant will mitigate and minimize the impacts, if any, of the associated transmission line on surrounding lands devoted to farm use in order to prevent a significant change in accepted farm practices or a significant increase in the cost of farm practices on the surrounding farmland.

RESPONSE: The certificate holder does not anticipate any impacts of the associated transmission line on surrounding lands devoted to farm use. The energy facility site is surrounded to the north (across the railroad right-of-way), west (across Westland Road) and south by property zoned Light Industrial. As shown on Figure K-6 of the ASC, the new transmission poles will be located on the west side of the energy facility site and will be separated from any cultivated lands by the energy facility itself and by lands zoned Light Industrial. The Final Order concludes that the poles and transmission line on the energy facility site “will not interfere with the ability to irrigate, fertilize or harvest crops on surrounding center-pivot field,” “will not affect the costs of the inputs,” and “will not impair the ability of the workers to access surrounding farmlands.” Final Order at 48.

(4) The governing body of a county or its designee may consider costs associated with any of the factors listed in paragraph (B) of this subsection, but consideration of cost may not be the only consideration in determining whether the associated transmission line is necessary for public service.

RESPONSE: As the Final Order notes, cost was not the only consideration in determining the location of the new transmission line on the EFU-zoned energy facility site. Final Order

at 47. To the extent there are cost savings, it is because the location of the energy facility provides for a short interconnection to existing transmission infrastructure, which will be upgraded from 115 kV to 230 kV. In other words, locating up to three new poles and the associated 230 kV line within the EFU zone on the energy facility site makes it possible to avoid the development of an entirely new transmission route to interconnect to the grid.

City of Umatilla NC Zone

The re-conducted transmission line passes through a small area zoned NC (Neighborhood Commercial) by the City of Umatilla, just north of Highway 730. In the Final Order, it was noted that the transmission line was permitted as a “Community Service” use, a conditional use in the NC zone. Final Order at 107. The NC zone is addressed in a new Article 10-4C of the City of Umatilla Zoning Ordinance.

The transmission line would be a “major utility facility,” which is a conditional use in the NC zone pursuant to Section 10-4C-5(MM). Section 10-1-6 defines a “major utility facility” as follows:

UTILITY FACILITY, MAJOR: Any utility facility or structure, as distinguished from local distribution utility facilities, owned or operated by a public, semi-public, private or cooperative electric, fuel, communication, sewage or water company for the generation, transmission, distribution, or processing of its products or for the disposal of cooling water, waste or byproducts and including power transmission lines, major trunk pipelines, power substations, dams, water towers, railroad tracks, sewage lagoons, sanitary landfills, and similar facilities.

Section 10-4C-5 provides, with respect to conditional uses in the NC zone:

The following conditional uses may be permitted in the NC Zone subject to the property development standards of the NC Zone, the decision criteria and any additional applicable standards in Chapter 12 specific to the use, and the site plan design review requirements and procedures under Subsections 10-4C-7 and 10-4C-8.

With respect to Chapter 12, the general conditional use approval criteria in Section 10-12-1 and the specific standards for utility facilities in Section 10-12-2 were addressed in the Final Order. Final Order at 109-113. Those standards have not changed. Therefore, the Council’s findings in the Final Order remain applicable to the transmission line as a conditional use in the NC zone.

Section 10-4C-7 sets forth property development standards. The standards address:

- Basic site development standards (10-4C-7(A)) including Minimum Lot Size and Lot Width; Building Setbacks; Maximum Building Height and Site Coverage.

- Site development impact standards (10-4C-7(B)), including Traffic Impact Analysis; Floodplain, Wetland and Riparian Areas; Stormwater Surface Drainage; Vehicle Access, Driveway and Circulation Standards; Driveway Standards; Utilities (to serve a new building or structure); and Easements (pedestrian, open space, and general public).

- Special site and building design standards (10-4C-7(C)), including Building Orientation and Architectural Features; Off-street Parking, Loading and Unloading; Bicycle and Pedestrian Facilities and Easements; Landscaping, Lighting and Outdoor Storage; Vision Clearance Area and Fences; and Signs.

The re-conducted transmission line, however, will simply replace an existing 115 kV line with a 230 kV line on existing poles. There will be no new structures and no new “on the ground” impacts. Therefore, the property development standards do not apply.

Section 10-4C-8 sets forth requirements for site plan design review, the stated purpose of which is “to provide a process to review proposals to verify that compliance with the property development standards under Section 10-4C-7 of the NC Zone will be met, along with any other applicable provisions of this Code, or the Comprehensive Plan.” Section 10-4C-8 does not contain any substantive standards. The Council’s process in reviewing the Request for Amendment under the Council’s land use standard is sufficient to meet the purpose of the site plan design review requirement.

2.5.5 OAR-345-022-0040 Protected Areas

(1) Except as provided in sections (2) and (3), the Council shall not issue a site certificate for a proposed facility located in the areas listed below. To issue a site certificate for a proposed facility located outside the areas listed below, the Council must find that, taking into account mitigation, the design, construction and operation of the facility are not likely to result in significant adverse impact to the areas listed below. References in this rule to protected areas designated under federal or state statutes or regulations are to the designations in effect as of May 11, 2007:

(a) National parks, including but not limited to Crater Lake National Park and Fort Clatsop National Memorial;

(b) National monuments, including but not limited to John Day Fossil Bed National Monument, Newberry National Volcanic Monument and Oregon Caves National Monument;

(c) Wilderness areas established pursuant to The Wilderness Act, 16 U.S.C. 1131 et seq. and areas recommended for designation as wilderness areas pursuant to 43 U.S.C. 1782;

(d) National and state wildlife refuges, including but not limited to Ankeny, Bandon Marsh, Baskett Slough, Bear Valley, Cape Meares, Cold Springs, Deer Flat, Hart Mountain, Julia Butler Hansen, Klamath Forest, Lewis and Clark, Lower Klamath, Malheur, McKay Creek, Oregon Islands, Sheldon, Three Arch Rocks, Umatilla, Upper Klamath, and William L. Finley;

(e) National coordination areas, including but not limited to Government Island, Ochoco and

Summer Lake;

(f) National and state fish hatcheries, including but not limited to Eagle Creek and Warm Springs;

(g) National recreation and scenic areas, including but not limited to Oregon Dunes National Recreation Area, Hell's Canyon National Recreation Area, and the Oregon Cascades Recreation Area, and Columbia River Gorge National Scenic Area;

(h) State parks and waysides as listed by the Oregon Department of Parks and Recreation and the Willamette River Greenway;

(i) State natural heritage areas listed in the Oregon Register of Natural Heritage Areas pursuant to ORS 273.581;

(j) State estuarine sanctuaries, including but not limited to South Slough Estuarine Sanctuary, OAR chapter 142;

(k) Scenic waterways designated pursuant to ORS 390.826, wild or scenic rivers designated pursuant to 16 U.S.C. 1271 et seq., and those waterways and rivers listed as potentials for designation;

(l) Experimental areas established by the Rangeland Resources Program, College of Agriculture, Oregon State University: the Prineville site, the Burns (Squaw Butte) site, the Starkey site and the Union site;

(m) Agricultural experimental stations established by the College of Agriculture, Oregon State University...

(n) Research forests established by the College of Forestry, Oregon State University, including but not limited to McDonald Forest, Paul M. Dunn Forest, the Blodgett Tract in Columbia County, the Spaulding Tract in the Mary's Peak area and the Marchel Tract;

(o) Bureau of Land Management areas of critical environmental concern, outstanding natural areas and research natural areas;

(p) State wildlife areas and management areas identified in OAR chapter 635, division 8.

RESPONSE: In the Final Order for the Perennial Wind Chaser Station the Council concluded that, "the design, construction and operation of the facility are not likely to result in significant adverse impacts to any protected areas, in compliance with the Protected Area Standard."

The geographic extent and location of protected areas identified in the ASC has not changed. In addition, this request to amend does not contain any significant changes from the preliminary design as described in the original ASC that would affect protected areas. Accordingly, the potential impacts to protected areas from construction and operation are unchanged from those described in the ASC, Exhibit L and remains consistent with the Council conclusions.

Therefore, we conclude the following:

(A) The list of the protected areas within the analysis area showing the distance and direction from the proposed Facility and the basis for protection remains the same as described in the original ASC.

(B) The map showing the location of the proposed Facility relative to the protected areas within the analysis area remains the same as presented in the ASC, Exhibit L, Figure L-1.

(C) The description of significant potential impacts remains the same as described in the ASC, Exhibit L and the Final Order, which determined that the proposed Facility would generate no significant potential impacts to the protected areas from sources identified in subparagraphs (i) through (vi).

2.5.6 OAR-345-022-0050 Retirement and Financial Assurance

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

(1) The site, taking into account mitigation, can be restored adequately to a useful, non-hazardous condition following permanent cessation of construction or operation of the facility.

(2) The applicant has a reasonable likelihood of obtaining a bond or letter of credit in a form and amount satisfactory to the Council to restore the site to a useful, non-hazardous condition.

RESPONSE: The Council previously found that the Project complies with the Council's Retirement and Financial Assurance Standard. The Retirement and Financial Assurance Standard was reviewed in Exhibits M (Financial Capability) and W (Facility Retirement), and those responses were reviewed as part of this Request for Amendment.

With regard to Subsection (1), Exhibit W (Facility Retirement), cost estimates have been updated to Second Quarter 2018 dollars. The updated Exhibit W is included in Attachment 4 of this document.

With regard to Subsection (2), an updated Financial Capability letter is also included in Attachment 4 of this document, reflecting the higher cost estimate.

2.5.7 OAR-345-022-0060 Fish and Wildlife Habitat

To issue a site certificate, the Council must find that the design, construction and operation of the facility, taking into account mitigation, are consistent with:

(1) The general fish and wildlife habitat mitigation goals and standards of OAR 635-415-0025 (1) through (6) in effect as of February 24, 2017.

(2) For energy facilities that impact sage-grouse habitat, the sage-grouse specific habitat mitigation requirements of the Greater Sage-Grouse Conservation Strategy for Oregon at OAR 635-415-0025(7) and OAR 635-140-0000 through -0025 in effect as of February 24, 2017.

RESPONSE: The Council previously found that the proposed Facility complies with the Council's Fish and Wildlife Habitat Standard. Fish and wildlife habitat was reviewed in Exhibit P of the ASC, and those responses in Exhibit P were reviewed as part of this Request for Amendment.

As determined by on-site reconnaissance conducted by qualified ecologists on June 11 and 12, 2018, and review of publicly available databases, the description of site conditions in the ASC remains applicable. The location and geographic extent of waters, habitats, and other natural resources identified in the ASC have not changed. In addition, this Request for Amendment does not contain any significant changes from the preliminary design, as described in the ASC. Accordingly, the potential impacts to fish and wildlife species and habitat from construction and operation will remain relatively unchanged from those described in the ASC, Exhibit P.

Therefore, with regard to section (1) of the standard, the design, construction, and operation of the proposed Facility is consistent with the general fish and wildlife habitat

mitigation goals and standards of OAR 635-415-0025(1) through (6) in effect as of February 24, 2017, subject to the conditions of the Site Certificate.

With regard to section (2) of the standard, no mitigation specific to sage-grouse was proposed in the original ASC, and none is proposed in this Request for Amendment since neither sage-grouse nor sage-grouse habitat are known to occur within the Site Boundary or the vicinity.

2.5.8 OAR-345-022-0070 Threatened and Endangered Species

To issue a site certificate, the Council, after consultation with appropriate state agencies, must find that:

(1) For plant species that the Oregon Department of Agriculture has listed as threatened or endangered under ORS 564.105(2), the design, construction and operation of the proposed facility, taking into account mitigation:

(a) Are consistent with the protection and conservation program, if any, that the Oregon Department of Agriculture has adopted under ORS 564.105(3); or

(b) If the Oregon Department of Agriculture has not adopted a protection and conservation program, are not likely to cause a significant reduction in the likelihood of survival or recovery of the species; and

(2) For wildlife species that the Oregon Fish and Wildlife Commission has listed as threatened or endangered under ORS 496.172(2), the design, construction and operation of the proposed facility, taking into account mitigation, are not likely to cause a significant reduction in the likelihood of survival or recovery of the species.

RESPONSE: In the Final Order for the Perennial Wind Chaser Station, the Council concluded that, “the facility complies with the Council’s Threatened and Endangered Species Standard.” Threatened and endangered species information relevant to the proposed Facility was addressed in Exhibit Q of the ASC, and those responses were reviewed as part of this Request for Amendment.

As determined by on-site reconnaissance conducted by qualified ecologists on June 11 and 12, 2018, and review of publically available databases, the description of site conditions in the ASC remains applicable. This Request for Amendment does not contain any significant changes from the preliminary design, as described in the ASC. In addition, the lack of threatened and endangered species or habitat suitable for such species identified in the ASC has not changed.

Ecology and Environment, Inc., reviewed the current threatened and endangered species lists managed by the Oregon Department of Fish and Wildlife² and the Oregon Department of Agriculture³ to determine if any applicable species have been listed since the ASC was completed. OAR 345-021-0010(q)(A) no longer requires the consideration of federal threatened and endangered species, as it did at the time the ASC was prepared. No

² Oregon Department of Fish and Wildlife. 2018. Threatened, Endangered, and Candidate Fish and Wildlife Species. https://www.dfw.state.or.us/wildlife/diversity/species/threatened_endangered_candidate_list.asp Accessed July 10, 2018.

³ Oregon Department of Agriculture. 2018. Oregon Listed Plants by County. <https://www.oregon.gov/ODA/programs/PlantConservation/Pages/ListedPlants.aspx> Accessed July 10, 2018.

additional threatened or endangered wildlife species potentially occur in the analysis area. One additional state-listed endangered plant species, northern wormwood (*Artemisia campestris* var. *wormskioldii*), occurs in Umatilla County. This species is restricted to basalt, compacted cobble, and sand on the banks of the Columbia River.⁴ While suitable habitat occurs within the analysis area, there is no suitable habitat for this species within the Site Boundary. Accordingly, the potential impacts to threatened and endangered species from construction and operation will remain unchanged from those described in the ASC, Exhibit Q.

Therefore, with regard to section (1) of OAR-345-022-0070, the design, construction, and operation of the proposed Facility is (a) consistent with the Oregon Department of Agriculture's Native Plant Conservation Program adopted under ORS 564.105(3) and (b) not likely to cause a significant reduction in the likelihood of survival or recovery of any state- or federally listed species.

With regard to section (2) of OAR-345-022-0070, the design, construction, and operation of the proposed Facility, taking into account mitigation, are not likely to cause a significant reduction in the likelihood of survival or recovery of any state- or federally listed species.

2.5.9 OAR-345-022-0080 Scenic Resources

(1) *Except for facilities described in section (2), to issue a site certificate, the Council must find that the design, construction and operation of the facility, taking into account mitigation, are not likely to result in significant adverse impact to scenic resources and values identified as significant or important in local land use plans, tribal land management plans and federal land management plans for any lands located within the analysis area described in the project order.*

(2) *The Council may issue a site certificate for a special criteria facility under OAR 345-015-0310 without making the findings described in section (1). However, the Council may apply the requirements of section (1) to impose conditions on a site certificate issued for such a facility.*

RESPONSE: In the Final Order for the Perennial Wind Chaser Station the Council concluded that, "Based on the foregoing findings and the evidence in the record, and subject to compliance with the site certificate conditions, the Council finds that the facility complies with the Council's Scenic Resources Standard."

The Application for Site Certification (ASC) indicated that neither the City of Umatilla Comprehensive Plan nor the Morrow County Comprehensive Plan include any goals, policies, or inventories identifying or protecting specific scenic areas. In contrast, the Umatilla County Comprehensive Plan identifies a number of outstanding scenic views and establishes a policy addressing scenic resources.

The City of Umatilla Comprehensive Plan⁵ has not changed since the ASC was submitted to EFSC in October 2014 and the site certificate issued in September 2015. The City of Umatilla Comprehensive Plan Section 5.2 Scenic Areas is "Reserved for Expansion", and has no further

⁴ Oregon Department of Agriculture. No date. Northern wormwood (*Artemisia campestris* var. *wormskioldii*).

<https://www.oregon.gov/oda/shared/Documents/Publications/PlantConservation/ArtemisiaCampestrisWormskioldiiProfile.pdf> Accessed July 10, 2018.

⁵ https://www.umatilla-city.org/sites/default/files/fileattachments/planning/page/701/goal_5_-_natural_resources.pdf; Accessed July 6, 2018

information.

The Morrow County Comprehensive Plan⁶ has not changed since the ASC was submitted to EFSC in October 2014 and the site certificate issued in September 2015. This plan identifies the importance of protecting open lands for their “aesthetic aspects to all of the people.” However, it further states that, while Morrow County contains a variety of landscapes, many of which may be considered “scenic”, the county has not designated any sites or areas as having especially high scenic value.

The Umatilla County Comprehensive Plan⁷ has not changed since the ASC was submitted to EFSC in October 2014 and the site certificate issued in September 2015. The Umatilla County Comprehensive Plan states in Chapter 8 that open space “contributes to the aesthetic quality of the landscape” (Umatilla County 2010, p. 8-1). The plan asserts that Umatilla County has a number of outstanding scenic views and establishes a policy addressing scenic resources. The plan identifies McNary Dam, Lake Wallula, and the Umatilla River downstream from State Highway 207 as important sites with aesthetic qualities and views in the county. The visual analysis in the ASC indicated the Project, including the new step-up substation south of the dam and lake, the transmission line, and the Station, will not be easily visible or noticeable due to their distances from publicly accessible areas and intervening structures, terrain, and vegetation. The Project features have not changed in any manner that would make them more visible from these locations.

There are no tribal land management plans or federal land management plans located with the analysis area.

Therefore, we assert the following:

- (1) The description of significant potential impacts remains the same as described in the ASC, Exhibit R and the Final Order, which determined that the proposed Facility would generate no significant potential impacts to scenic resources.
- (2) The design, construction and operation of the Facility, taking into account mitigation, are not likely to result in significant adverse impact to scenic resources and values identified as significant or important in local land use plans, tribal land management plans and federal land management plans for any lands located within the analysis area described in the project order.

2.5.10 OAR-345-022-0090 Historic, Cultural and Archaeological Resources

(1) Except for facilities described in sections (2) and (3), to issue a site certificate, the Council must find that the construction and operation of the facility, taking into account mitigation, are not likely to result in significant adverse impacts to:

- (a) Historic, cultural or archaeological resources that have been listed on, or would likely be listed on the National Register of Historic Places;*
- (b) For a facility on private land, archaeological objects, as defined in ORS 358.905(1)(a), or archaeological sites, as defined in 358.905(1)(c); and*
- (c) For a facility on public land, archaeological sites, as defined in ORS 358.905(1)(c)*

RESPONSE: In the Final Order for the Perennial Wind Chaser Station, the Council

⁶ <https://www.co.morrow.or.us/planning/page/comprehensive-plan> ; Accessed July 12, 2018

⁷ http://www.co.umatilla.or.us/planning/pdf/Umatilla_County_Ccomp_Plan.pdf ; Accessed July 12, 2018

concluded that, “the design, construction and operation of the facility are not likely to result in significant adverse impacts to any historic, cultural and archaeological resources, in compliance with the Protected Area Standard.”

The geographic extent and location of historic, cultural, and archaeological resources identified in the analysis area for Exhibit S of the ASC have not changed. The analysis area for Exhibit S is defined as the area within the Site Boundary. In addition, this Request for Amendment does not contain any significant changes from the preliminary design as described in the original ASC that would affect historic, cultural, and archaeological resources. Accordingly, the potential impacts to historic, cultural, and archaeological resources from construction and operation of the proposed Facility are unchanged from those described in the ASC, Exhibit S and remain consistent with the Council’s conclusions.

Therefore, we assert the following:

- (A) The historic, cultural, and archaeological resources within the analysis area remain the same as described in the ASC, Exhibit S. No additional cultural resource inventories have been conducted within the analysis area, and no new historic, cultural, or archaeological resources have been recorded.
- (B) Per the original ASC and as required by the Site Certificate, Perennial-WindChaser LLC will take reasonable measures to avoid physical damage to the alignment, construction materials, and design of the five historic-period resources eligible for listing with the National Register of Historic Places. These five resources are Westland Irrigation District Canals, West Extension Irrigation Canal, Union Pacific Railroad Messner-Hinkle Segment, Bonneville Power Administration (BPA) McNary-Boardman No. 1 Line, and BPA McNary-Coyote Springs No. 1 Line. Construction of the proposed Facility will avoid impacts to the Westland Irrigation Canals and the Extension Irrigation Canal by horizontal directional drilling or, if that is not possible, trenching followed by restoration of the original alignment, construction materials, and design. Construction of the proposed Facility will avoid impacts to the Union Pacific Railroad Messner-Hinkle Segment by crossing underneath this resource via trenching. Construction of the proposed Facility will avoid impacts to the BPA McNary-Boardman No. 1 Line and the BPA McNary-Coyote Springs No. 1 Line, which are both transmission lines, by passing underneath or around them.

2.5.11 OAR-345-022-0100 Recreation

(1) Except for facilities described in section (2), to issue a site certificate, the Council must find that the design, construction and operation of a facility, taking into account mitigation, are not likely to result in a significant adverse impact to important recreational opportunities in the analysis area as described in the project order. The Council shall consider the following factors in judging the importance of a recreational opportunity:

- (a) Any special designation or management of the location;*
- (b) The degree of demand;*
- (c) Outstanding or unusual qualities;*
- (d) Availability or rareness;*
- (e) Irreplaceability or irretrievability of the opportunity.*

(2) The Council may issue a site certificate for a special criteria facility under OAR 345-015-0310 without making the findings described in section (1). However, the Council may apply the requirements of section (1) to impose conditions on a site certificate issued for

such a facility.

RESPONSE: In the Final Order for the Perennial Wind Chaser Station the Council concluded that, “None of the recreational opportunities . . . would be directly impacted by construction and operation of the facility. Therefore, as explained in the ASC, any potential impacts to important recreational opportunities would result from indirect impacts of the construction and operation of the proposed facility.”

The geographic extent and location of recreational opportunities identified in the ASC has not changed. The analysis area for recreational opportunities, as defined in the Final Order, is the area within the Site Boundary, including the proposed rights-of-way for the natural gas pipeline and transmission line, and 5 miles from the Site Boundary. In addition, this Request for Amendment does not contain any significant changes from the preliminary design as described in the ASC that would affect recreation. Accordingly, the potential impacts to recreation from construction and operation are unchanged from those described in the ASC, Exhibit T and remain consistent with the Council’s conclusions.

2.5.12 OAR-345-022-0110 Public Services

To issue a site certificate, the Council must find that the construction and operation of the facility, taking into account mitigation, are not likely to result in significant adverse impact to the ability of public and private providers within the analysis area described in the project order to provide: sewers and sewage treatment, water, storm water drainage, solid waste management, housing, traffic safety, police and fire protection, health care and schools.

RESPONSE: The Council previously found that the proposed Facility complies with the Council’s Public Services Standard. Public services relevant to the proposed Facility were addressed in Exhibit U of the Application for Site Certificate (ASC), and those responses were reviewed as part of this Request for Amendment.

Some facets of public services identified in the ASC have changed to some extent since submittal of the ASC in October 2014, but the overall volume and quality of public services provided in the analysis area has remained approximately the same. The analysis area for public services, as defined in the Final Order, is the Site Boundary, including the proposed rights-of-way for the natural gas pipeline and transmission line, plus an area 10 miles around the Site Boundary

No changes have occurred in the following public services: sewage collection and treatment, water supply and disposal, stormwater, solid waste, housing, or roads and traffic. Regarding police and fire services, the Hermiston Police Department Communications Center closed in 2014 and services were contracted with the Umatilla County Public Safety Answering Point. The Hermiston Fire and Emergency Services District merged with the Stanfield Fire District and became Umatilla Fire District 1, for a combined total of four fire stations, and continues to operate the station located approximately 2 miles from the proposed Facility. Regarding health services, the Umatilla County Fire District 1 operates six medical units to provide emergency medical transportation, whereas in 2014 it had operated five medical units. Regarding school services, although enrollment growth in recent years in the Hermiston School District has neared capacity, Interim Superintendent of Schools Tricia Mooney indicated on July 16, 2018, that she does not anticipate any adverse impact from an increase in student population associated with construction of the proposed Facility. The demand for public

services in the project vicinity has not changed since 2014, when the ASC was submitted, due to a relatively slow rise in population; the U.S. Census Bureau estimated that the Umatilla County population was 76,985 in 2017, an increase of only 1.44 percent above the 2010 population.⁸

This Request for Amendment does not contain any significant changes from the preliminary design, as described in the ASC. In combination with the minimal changes discussed above, the potential impacts to public services from construction and operation of the proposed Facility will remain essentially unchanged from those described in the ASC, Exhibit U. Thus, no significant adverse impacts to public services are expected during construction or operation of the proposed Facility.

2.5.13 OAR-345-022-0120 Waste Minimization

(1) Except for facilities described in sections (2) and (3), to issue a site certificate, the Council must find that, to the extent reasonably practicable:

(a) The applicant's solid waste and wastewater plans are likely to minimize generation of solid waste and wastewater in the construction and operation of the facility, and when solid waste or wastewater is generated, to result in recycling and reuse of such wastes;

(b) The applicant's plans to manage the accumulation, storage, disposal and transportation of waste generated by the construction and operation of the facility are likely to result in minimal adverse impact on surrounding and adjacent areas.

(2) The Council may issue a site certificate for a facility that would produce power from wind, solar or geothermal energy without making the findings described in section (1). However, the Council may apply the requirements of section (1) to impose conditions on a site certificate issued for such a facility.

(3) The Council may issue a site certificate for a special criteria facility under OAR 345-015-0310 without making the findings described in section (1). However, the Council may apply the requirements of section (1) to impose conditions on a site certificate issued for such a facility.

RESPONSE: We expect no significant changes from the preliminary design conditions. Accordingly, the plans to minimize the generation -- and maximize recycling or reuse -- of solid waste and wastewater will remain unchanged from those found in ASC, Exhibit V. Therefore, we anticipate:

(1)(a) The description of major types of solid waste and wastewater that construction, operation and retirement of the facility are likely to generate will remain unchanged from those described in ASC, Exhibit V.

(1)(b) The description of structures, systems and equipment for management and disposal of solid waste, wastewater and storm water will remain unchanged from those described in ASC, Exhibit V.

⁸ United States Census Bureau. 7/1/2017. American Fact Finder.
https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml Accessed July 16, 2018.

2.6 OAR-345-024 Applicable Specific Division 24 Standards

The following Division 24 standards are addressed in this subsection:

- OAR 345-024-0090 Transmission Lines
- OAR 345-024-0590 Standard for Non-Base Load Power Plants
- OAR 345-024-0600 Means of Compliance for Non-Base Load Power Plants
- OAR 345-024-0610 Modification of the Standard for Non-Base Load Power Plants
- OAR 345-024-0710 Monetary Path Payment Requirement
- OAR 345-024-0720 Qualified Organization

2.6.1 OAR-345-024-0090 Transmission Lines

To issue a site certificate for a facility that includes any transmission line under Council jurisdiction, the Council must find that the applicant:

- (1) Can design, construct and operate the proposed transmission line so that alternating current electric fields do not exceed 9 kV per meter at one meter above the ground surface in areas accessible to the public;*
- (2) Can design, construct and operate the proposed transmission line so that induced currents resulting from the transmission line and related or supporting facilities will be as low as reasonably achievable.*

RESPONSE: Electric and magnetic fields (EMF) were analyzed in Exhibit AA of the ASC and the responses were reviewed as part of this Request for Amendment. We expect no significant changes from the preliminary design conditions. There is one new residence within 200 feet of the proposed transmission line. Other residences are located closer to the proposed transmission line than this residence and were analyzed for EMF. Therefore, the new residence would be less impacted than the closer residences and would not need to be further analyzed for this update. Accordingly, we expect the previously estimated EMF impacts to remain unchanged from those found in ASC, Exhibit AA. Accordingly, the plans to minimize electromagnetic fields will remain unchanged from those found in ASC, Exhibit AA. Therefore, we anticipate:

- (A) The design and operation of the proposed transmission lines will remain unchanged from those described in ASC, Exhibit AA, so that alternating current electric fields do not exceed 9 kV per meter at one meter above the ground surface in areas accessible to the public.
- (B) The design and operation of the proposed transmission lines will remain unchanged from those described in ASC, Exhibit AA, so that induced currents resulting from the transmission line and related or supporting facilities will be as low as reasonably achievable.

2.6.2 OAR-345-024-0590 Standard for Non-Base Load Power Plants

To issue a site certificate for a non-base load power plant, the Council must find that the net carbon dioxide emissions rate of the proposed facility does not exceed 0.614 pounds of carbon dioxide per kilowatt-hour of net electric power output, with carbon dioxide emissions and net electric power output measured on a new and clean basis. For a base load gas plant designed with power augmentation technology as defined in OAR 345-001-0010, the Council shall

apply this standard to the incremental carbon dioxide emissions from the designed operation of the power augmentation technology. The Council shall determine whether the carbon dioxide emissions standard is met as follows:

(1) The Council shall determine the gross carbon dioxide emissions that are reasonably likely to result from the operation of the proposed energy facility. The Council shall base such determination on the proposed design of the energy facility, the limitation on the hours of generation for each fuel type and the average temperature, barometric pressure and relative humidity at the site during the times of the year when the facility is intended to operate. For a base load gas plant designed with power augmentation technology, the Council shall base its determination of the incremental carbon dioxide emissions on the proposed design of the facility, the proposed limitation on the hours of generation using the power augmentation technology and the average temperature, barometric pressure and relative humidity at the site during the times of the year when the facility is intended to operate with power augmentation technology. The Council shall adopt site certificate conditions to ensure that the predicted carbon dioxide emissions are not exceeded on a new and clean basis; however, the Council may modify the parameters of the new and clean basis to accommodate average conditions at the times when the facility is intended to operate and technical limitations, including operational considerations, of a non-base load power plant or power augmentation technology or for other cause.

(2) For any remaining emissions reduction necessary to meet the applicable standard, the applicant may elect to use any of the means described in OAR 345-024-0600 or any combination thereof. The Council shall determine the amount of carbon dioxide or other greenhouse gas emissions reduction that is reasonably likely to result from the applicant's offsets and whether the resulting net carbon dioxide emissions meet the applicable carbon dioxide emissions standard. The amount of greenhouse gas emissions means the pounds of carbon dioxide and the carbon dioxide equivalent of other greenhouse gases. For methane, one pound of methane is equivalent to 25 pounds of carbon dioxide. For nitrous oxide, one pound of nitrous oxide is equivalent to 298 pounds of carbon dioxide.

(3) If the applicant elects to comply with the standard using the means described in OAR 345 024-0600(2), the Council shall determine the amount of greenhouse gas emissions reduction that is reasonably likely to result from each of the proposed offsets. In making this determination, the Council shall not allow credit for offsets that have already been allocated or awarded credit for greenhouse gas emissions reduction in another regulatory setting. The fact that an applicant or other parties involved with an offset may derive benefits from the offset other than the reduction of greenhouse gas emissions is not, by itself, a basis for withholding credit for an offset. The Council shall base its determination of the amount of greenhouse gas emission reduction on the following criteria and as provided in OAR 345-024-0680:

(a) The degree of certainty that the predicted quantity of greenhouse gas emissions reduction will be achieved by the offset.

(b) The ability of the Council to determine the actual quantity of greenhouse gas emissions reduction resulting from the offset, taking into consideration any proposed measurement, monitoring and evaluation of mitigation measure performance.

(c) The extent to which the reduction of greenhouse gas emissions would occur in the absence of the offsets.

(4) Before beginning construction, the certificate holder shall notify the Department of Energy in writing of its final selection of an equipment vendor and shall submit a written design information report to the Department sufficient to verify the facility's designed new and clean heat rate and its nominal electric generating capacity at average annual site conditions for each fuel type. For a base load gas plant designed with power augmentation

technology, the certificate holder shall include in the report information sufficient to verify the facility's designed new and clean heat rate, tested under parameters the Council orders pursuant to section (1), and the nominal electric generating capacity at average site conditions during the intended use for each fuel type from the operation of the proposed facility using the power augmentation technology. The certificate holder shall include the proposed limit on the annual average number of hours for each fuel used, if applicable. The certificate holder shall include the proposed total number of hours of operation for all fuels, subject to the limitation that the total annual average number of hours of operation per year is not more than 6,600 hours. In the site certificate, the Council may specify other information to be included in the report. The Department shall use the information the certificate holder provides in the report as the basis for calculating, according to the site certificate, the gross carbon dioxide emissions from the facility and the amount of greenhouse gas emissions reductions the certificate holder must provide under OAR 345-024-0600.

(5)(a) Every Five years after commencing commercial operation, the certificate holder shall report to the Council the facility's actual gross carbon dioxide emissions. The certificate holder shall calculate actual gross carbon dioxide emissions using the new and clean heat rate and the actual hours of operation on each fuel during the five-year period or shall report to the Council the actual measured or calculated carbon dioxide emissions as reported to either the Oregon Department of Environmental Quality or the U.S. Environmental Protection Agency pursuant to a mandatory carbon dioxide emissions reporting requirement.

(b) The certificate holder shall specify its election of method used to measure or calculate carbon dioxide emissions in the notification report described at section (4) of this rule. That election, once made, shall apply for each five year period unless the site certificate is amended to allow a different election. If the certificate holder calculates actual carbon dioxide emissions using the new and clean heat rate and the actual hours of operation, the certificate holder shall also report to the Council the facility's actual annual hours of operation by fuel type. If the actual gross carbon dioxide emissions exceed the projected gross carbon dioxide emissions for the five-year period calculated under section (4), the certificate holder shall offset any excess emissions for that period and shall offset estimated future excess carbon dioxide emissions using the monetary path as described in OAR 345-024-0600(3) and (4) or as approved by the Council.

(6) For a base load gas plant designed with power augmentation technology, every five years after commencing commercial operation, the certificate holder shall report to the Council the facility's actual hours of operation using the power augmentations technology for each fuel type. If the actual gross carbon dioxide emissions, calculated using the new and clean heat rate, tested under parameters the Council orders pursuant to section (1), and the actual hours of operation using the power augmentation technology on each fuel during the five-year period exceed the projected gross carbon dioxide emissions for the five-year period calculated under section (4), the certificate holder shall offset any excess emissions for that period and shall offset estimated future excess carbon dioxide emissions using the monetary path as described in OAR 345-024-0600(3) and (4) or as approved by the Council.

RESPONSE: We expect no significant changes from the design, operating conditions, or planned operational profile of the Facility. However the Council standard has changed from 0.675 to 0.614 pounds of carbon dioxide per kilowatt-hour of net electric power output. Accordingly, Exhibit Y has been updated with the new standard and is presented in Attachment 5.

- (1) The gross carbon dioxide emissions will remain unchanged as a result of the operation of the proposed energy Facility as the predicted CO₂ emissions of the Project measured on a new and clean basis as estimated in Exhibit Table Y-2. No power augmentation will be proposed for the project.
- (2) Means of emissions reductions to meet applicable standards will remain unchanged and are outlined in ASC, Exhibit Y.
- (3) Means of emissions reductions to meet applicable standards will remain unchanged and are outlined in ASC, Exhibit Y.
- (4) Before beginning construction, the certificate holder will notify the ODOE in writing of the final selection of equipment vendor and will submit a written design information report to the Department verifying the Facility's designed new and clean performance.
- (5) Every five years after commencing operation, the certificate holder will comply with the Council's emissions reporting requirements as specified by OAR-345-024-0590.

2.6.3 OAR-345-024-0600 Means of Compliance for Non-Base Load Power Plants

The applicant may elect to use any of the following means, or any combination thereof, to comply with the carbon dioxide emissions standard for non-base load power plants or for the incremental carbon dioxide emissions from the operation of a base load gas plant with power augmentation technology:

- (1) Designing and operating the facility to produce electrical and thermal energy sequentially from the same fuel source and using the thermal energy to displace another source of carbon dioxide emissions from fossil fuels that would have otherwise continued to occur. The Council shall adopt site certificate conditions ensuring that the carbon dioxide emissions reduction will be achieved.*
- (2) Implementing offset projects directly or through a third party, pursuant to OAR 345-024-0680. The Council may adopt site certificate conditions ensuring that the proposed offset projects are implemented by the date specified in the site certificate, but shall not require that predicted levels of avoidance, displacement or sequestration of greenhouse gas emissions be achieved.*
- (3) Providing offset funds, directly or through a third party, in an amount deemed sufficient to produce the reduction in greenhouse gas emissions necessary to meet the applicable carbon dioxide emissions standard. The applicant or third party shall use the funds as specified in OAR 345-024-0710. The Council shall deem the payment of the monetary offset rate, pursuant to OAR 345-024-0580, to result in a reduction of one ton of carbon dioxide emissions. The Council shall determine the offset funds using the monetary offset rate and the level of emissions reduction required to meet the applicable standard. If the Council issues a site certificate based on this section, the Council may not adjust the amount of the offset funds based on the actual performance of offsets.*
- (4) Notwithstanding sections (1), (2) or (3), if the certificate holder exceeds the projected gross carbon dioxide emissions calculated under OAR 345-024-0590(4) during any five-year reporting period described in 345-024-0590(5) and (6), the certificate holder shall offset excess emissions for the specific reporting period according to subsection (a) and shall offset the estimated future excess emissions according to subsection (b). The certificate holder shall offset excess emissions using the monetary path as described in subsection (c) and OAR 345-024-0710 or as approved by the Council.*

- (a) *In determining the excess carbon dioxide emissions that the certificate holder must offset for a five-year period, the Council shall credit the certificate holder with offsets equal to the difference between the carbon dioxide emissions allowed by the site certificate in previous periods and actual emissions, if actual emissions were lower than allowed. Once a certificate holder has used a credit, the certificate holder shall not use it again.*
- (b) *The Council shall specify in the site certificate a methodology for estimating future excess carbon dioxide emissions. The Department of Energy shall calculate estimated future excess emissions. To estimate excess emissions for the remaining period of the deemed life of the facility, the Department shall use the annual average number of hours of operation during the five-year period in which the certificate holder exceeded the estimated gross carbon dioxide emissions described in OAR 345-024-0590(5) and the new and clean heat rate and capacity for the facility, adjusted for the average temperature, barometric pressure and relative humidity at the site during the times of the year when the facility is intended to operate. If the annual average hours exceed 6,600, the Department shall estimate emissions at 100 percent capacity for the remaining period of a deemed 30-year life of the facility. At the request of the certificate holder, the Council may, by amendment of the site certificate, use an alternative methodology to estimate future excess carbon dioxide emissions.*
- (c) *The certificate holder shall pay for the net excess carbon dioxide emissions calculated pursuant to subsections (a) and (b) at the monetary path offset rate in real dollars for the quarter and year in which the Council issued the final order that applied the carbon dioxide standard. The Council shall specify in the site certificate the methodology for calculating the real dollar value of the monetary offset rate. The Department shall calculate the net excess carbon dioxide emissions and notify the certificate holder of the amount of the monetary path payment required to offset them. The certificate holder shall pay fully the required amount to the qualified organization within 60 days of notification by the Department of the amount. The certificate holder shall not be eligible for a refund of any monetary path payments due to the calculations in this rule.*
- (5) *Any other means that the Council adopts by rule for demonstrating compliance with the carbon dioxide emissions standard.*
- (6) *If the Council or a court on judicial review concludes that the applicant has not demonstrated compliance with the applicable carbon dioxide emissions standard under sections (1), (2) or (5) of this rule, or any combination thereof, and the applicant agrees to meet the requirements of sections (3) and (4) for any deficiency, the Council or a court shall find compliance based on such agreement.*

RESPONSE: We expect no significant changes from the design, operating conditions, or planned operational profile of the Facility. Accordingly, emissions estimates will remain relatively unchanged from those found in ASC, Exhibit Y and the applicant maintains the selection of OAR 345-024-0600(3) to comply with the carbon dioxide emissions standard for non-base load power plants.

2.6.4 OAR-345-024-0610 Modification of the Standard for Non-Base Load Power Plants

The Council may by rule modify the carbon dioxide emissions standard for non-base load power plants in OAR 345-024-0590 so that the standard remains equivalent to the standard for the net carbon dioxide emissions rate of a base load gas plant, subject to the principles described in OAR 345-024-0510.

RESPONSE: As the Council has modified the carbon dioxide standard for non-base load power plants since the issuance of the Site Certificate, Exhibit Y has been updated and

included in Attachment 5.

2.6.5 OAR-345-024-0710 Monetary Path Payment Requirement

(1) If the applicant elects to meet the applicable carbon dioxide emissions standard in whole or in part under OAR 345- 024-0560(3), 345-024-0600(3) or 345-024-0630(2), (4) and (5), the applicant shall provide a bond or letter of credit in a form reasonably acceptable to the Council to ensure the payment of the offset funds and the additional funds required under section (4) of this rule. The applicant shall provide such security by the date specified in the site certificate. In the site certificate, the Council shall specify a date no later than the commencement of construction of the facility for base load gas plants and non-base load power plants. For nongenerating facilities, the Council shall specify a date no later than the commencement of construction of the facility for providing the initial bond or letter of credit, and the Council shall specify conditions for providing subsequent incremental payments to meeting the monetary path payment requirement. The certificate holder for a nongenerating facility must meet its incremental monetary path payment requirements before exhausting its offset credit account, as described in OAR 345-024-0630(4). In no case shall the applicant diminish the bond or letter of credit or receive a refund from a qualified organization based on the calculations of the facility's emissions on a new and clean basis for a fossil-fueled power plant or any other measure for a nongenerating energy facility. A qualified organization shall not refund any offset funds to a certificate holder based on the operation or performance of a non-base load power plant during any five-year period reported under OAR 345-024- 0590(5) or, for a nongenerating facility, on any offset credits the certificate holder provided under 345-024-0620(5).

(2) In the site certificate, the Council shall require the certificate holder to disburse the offset funds and other funds required as specified in sections (3) and (4), unless the Council finds that no qualified organization exists, in which case the Council shall require the certificate holder to disburse the offset funds as specified in 345-024-0720(2).

(3) When the certificate holder receives written notice from the qualified organization certifying that the qualified organization is contractually obligated to pay any funds to implement offsets using the offset funds, the certificate holder shall make the requested amount available to the qualified organization unless the total of the amount requested and any amounts previously requested exceeds the offset funds, in which case the certificate holder shall make available only the remaining amount of the offset funds. The qualified organization shall use at least 80 percent of the offset funds for contracts to implement offsets. The qualified organization shall assess offsets for their potential to qualify in, generate credits in or reduce obligations in other regulatory settings. The qualified organization may use up to 20 percent of the offset funds for monitoring, evaluation, administration and enforcement of contracts to implement offsets.

(4) At the request of the qualified organization and in addition to the offset funds, the certificate holder shall pay the qualified organization an amount equal to 10 percent of the first \$500,000 of the offset funds and 4.286 percent of any offset funds in excess of \$500,000. The certificate holder for a base load gas plant shall pay not less than \$50,000, unless the Council specifies a lesser amount in the site certificate. In the site certificate, the Council may specify a minimum amount that other fossil-fueled power plants or nongenerating energy facilities must pay. This payment compensates the qualified organization for its costs of selecting offsets and contracting for the implementation of offsets.

(5) Notwithstanding any provision to the contrary, a certificate holder subject to this rule has no obligation with regard to offsets, the offset funds or the funds required by section (4) other than to make available to the qualified organization the total amount required under OAR 345-024-0560(3), 345-024-0600(3) and (4), 345-024-0630(2), (4) and (5), and section

(4) of this rule. The Council shall not base a revocation of the site certificate or any other enforcement action with respect to the certificate holder on any nonperformance, negligence or misconduct by the qualified organization.

(6) For monetary path payments a certificate holder must make before beginning construction, the certificate holder shall make all offset fund payments and all payments required by section (4) to the qualifying organization in real dollars of the year in which the Council issues a final order applying the carbon dioxide emissions standard to the energy facility. In the site certificate, the Council shall specify an appropriate inflation index for calculating real dollars. For a non-base load power plant, if a certificate holder must make a payment as described in OAR 345-024-0600(4), the certificate holder shall make a payment that has the same present value per ton of carbon dioxide as the monetary path offset rate of the year in which the Council issued the final order applying the carbon dioxide standard. In the site certificate, the Council shall specify the methodology for calculating present value. If the certificate holder of a nongenerating facility must make payments as described in OAR 345-024-0630(4) and (5), the Council shall specify in the site certificate the method for calculating the rate for the dollar value per ton of carbon dioxide required according to subsection (a) or (b) below:

(a) Unless the applicant and the Council agree to the methodology in subsection (b), the certificate holder shall make payments that have the same present value per ton of carbon dioxide as the monetary path offset rate of the year in which the Council issued the final order applying the carbon dioxide standard. The Council shall set an appropriate discount rate for calculating the present value, using the cost of capital most recently approved by a state utility regulatory commission for that utility or a similar utility as a guide; or

(b) If the applicant requests and the Council agrees, the certificate holder shall make payments at the monetary path offset rate in effect on the date the certificate holder makes the payment.

RESPONSE: We expect no significant changes from the design, operating conditions, or planned operational profile of the Facility. Accordingly, emissions estimates will remain relatively unchanged from those found in ASC, Exhibit Y. The applicant will comply with the revised CO₂ standard of OAR 345-024-0590 for the Project solely by providing offset funds to The Climate Trust, as allowed by OAR 345-024-0600(3) and in compliance with the monetary path payment requirement of OAR 345-024-0710. The applicant has modified Exhibit Y to adjust the present value per ton of carbon dioxide from \$1.27/TCO₂ to \$1.90/TCO₂ as the current year monetary path offset rate. The revised Exhibit Y is included in Attachment 5.

2.6.6 OAR-345-024-0720 Qualified Organization

(1) If the applicant elects to meet the applicable carbon dioxide emissions standard in whole or in part under OAR 345-024-0560(3), 345-024-0600(3) and (4), or 345-024-0630(2), (4) and (5), the applicant shall identify the qualified organization. The applicant may identify an organization that has applied for, but has not received, an exemption from federal income taxation, but the Council may not find that the organization is a qualified organization unless the organization is exempt from federal taxation under section 501(c)(3) of the Internal Revenue Code as amended and in effect on September 18, 2015.

(2) If the Council finds there is no qualified organization, the certificate holder shall disburse the offset funds according to one or more contracts for implementation of offsets as determined by the following process:

(a) The Council shall establish criteria for selection of offsets, based on the reduction of net carbon dioxide emissions and the criteria set forth in OAR 345-024-0550(3) for base load plants, 345-024-0590(3) for non-base load power plants and 345-024-0620(3) for nongenerating facilities. The Council may consider the costs of particular types of offsets in relation to the expected benefits of such offsets. In establishing criteria, the Council shall not require the certificate holder to select particular offsets and shall allow the certificate holder a reasonable range of choices in selecting offsets.

(b) Based on the criteria established by the Council, the certificate holder shall select one or more offsets. The certificate holder shall give written notice of its selections to the Council and to any person requesting notice. For the purposes of this rule, the date of notice is the date the certificate holder places the notice in the United States mail, with first-class postage prepaid.

(c) On petition by the Department of Energy or by any person adversely affected or aggrieved by the certificate holder's selection of offsets, or on the Council's own motion, the Council may review the selection. The petition must be received by the Council within 30 days of the date of notice.

(d) The Council shall approve the certificate holder's selection unless it finds that the selection is not consistent with criteria established under subsection (a).

(e) The certificate holder shall execute one or more contracts to implement the selected offsets within 18 months after commencing construction of the facility unless the Council allows additional time based on a showing of good cause by the certificate holder. If a certificate holder would have made a payment to a qualified organization as described in OAR 345-024-0600(4) or 345-024-0630(4) or (5), the certificate holder shall instead execute one or more contracts to implement the selected offsets, by a method acceptable to the Council, within 18 months after reporting to the Council as described in 345-024-0590(5) or within 18 months after the Department notifies the certificate holder that the certificate holder must replenish the offset credit account as described in 345-024-0630(4). The certificate holder shall, under such contracts, obligate the expenditure of at least 85 percent of the offset funds for the implementation of offsets. The certificate holder may spend no more than 15 percent of the offset funds on monitoring, evaluation and enforcement of such contracts.

(f) The certificate holder's financial liability for implementation, monitoring, evaluation and enforcement of offsets under this subsection (2) is limited to the amount of any offset funds not already contractually obligated. The Council shall not base a revocation of the site certificate or any other enforcement action with respect to the certificate holder on any nonperformance, negligence or misconduct by the entity or entities implementing, monitoring or evaluating the selected offsets.

(3) Every qualified organization that has received funds under this rule shall, at five-year intervals beginning on the date of receipt of such funds, provide the Council with the information the Council requests about the qualified organization's performance. The Council shall evaluate the information requested and, based on such information, shall make recommendations to the Legislative Assembly that the Council deems appropriate.

RESPONSE: We have elected to use the monetary path per OAR-345-024-0710 as designated in our response in ASC, Exhibit Y. The applicant will provide the amount of offset funds to a qualified organization that meets OAR-345-024-0720 requirements. As required by the Site Certificate, the certificate holder will provide a bond or letter of credit for the amount equal to the present value of the calculated offset funds as determined by the Council prior to beginning construction of the Facility.

2.7 OAR-345-027-0060(1)(f) Other Applicable Requirements

(f) An updated list of the owners of property located within or adjacent to the site of the facility, as described in OAR 345-021-0010(1)(f).

RESPONSE: The updated landowners list is included in Attachment 6. (To be done when requested)

2.8 OAR-345-027-0060(3) Analysis Area

(3) For any Council standard that requires evaluation of impacts within an analysis area, the analysis area shall be the larger of either the study area(s) as defined in OAR 345-001-0000(59) or the analysis area(s) described in the project order for the application for site certificate, unless otherwise approved in writing by the Department following a pre-amendment conference.

RESPONSE: The analysis area described in the Project Order was used in the evaluation of impacts.

2.9 OAR-345-027-0060(4) Other Information

(4) The certificate holder may incorporate, by specific reference, evidence previously submitted to the Department in the application for site certificate or previous request for amendment, or evidence that is otherwise included in the Department's record on the facility.

RESPONSE: All exhibits of the ASC are hereby incorporated by reference.

ATTACHMENT 1

Standard Air Contaminant Discharge Permit



State of Oregon
Department of
Environmental
Quality

Permit No.: 30-0039-ST-01

Expiration Date: 02/01/2021

Page 1 of 2

STANDARD
AIR CONTAMINANT DISCHARGE PERMIT

Department of Environmental Quality
Eastern Region
475 NE Bellevue Dr., Suite 110
Bend, OR 97701
541-388-6146

This permit is being issued in accordance with the provisions of ORS 468A.040
and based on the land use compatibility findings included in the permit record.

ISSUED TO:

Perennial-WindChaser LLC
600 Madison Avenue, 30F
New York, NY 10022-1615

INFORMATION RELIED UPON:

Application No.: 29036
Date Received: 04/05/2017

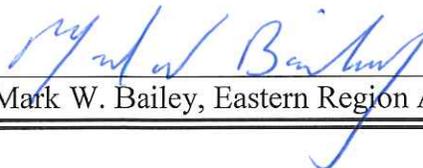
PLANT SITE LOCATION:

Perennial WindChaser Station
78145 Westland Road
Hermiston, OR 97838

LAND USE COMPATIBILITY FINDING:

Pursuant to ORS 469, Oregon Department of Energy's Energy Facility Siting Council will determine that the proposed land use complies with state-wide planning goals prior to granting a Site Certificate.

ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY



Mark W. Bailey, Eastern Region Air Quality Manager

MAY 17 2017

Dated

Addendum No. 1
Simple Technical Permit Modification

In accordance with OAR 340-216-0020 and 340-224-0030(5), Condition 1.2.a and 1.2.b now read as follows: **(Changes are highlighted)**

1.2 Procedural Requirements

- a. Construction must commence within 36 months of initial permit issuance. Approval terminates and is invalid if construction is not commenced within 36 months of initial permit issuance, if construction is discontinued for a period of 18 months or more, or if construction is not completed within 18 months of the scheduled time. [OAR 340-222-0030(4)]
- b. DEQ may grant one additional 18-month construction approval extension for good cause as allowed in OAR 340-224-0030(5).

ATTACHMENT 2

Updated Port of Umatilla Letter



PORT OF UMATILLA

May 30, 2018

Mr. JJ Jamieson
Senior Director, Operations and Development
Perennial Power Holdings, Inc.
24 Waterway Ave, Suite 740
The Woodlands, TX 77380

RE: PERENNIAL WIND CHASER STATION

Dear Mr. Jamieson,

The Port of Umatilla holds water rights under Permit Number 49497, Municipal Use, with an allowed rate of diversion of 155 cfs. Under this permit the Port of Umatilla has the capacity to supply process water to Perennial's Wind Chaser Station for both construction and operation.

The Port of Umatilla expects to be able to enter into a contract with Perennial Power Holdings, Inc. to supply raw water (up to 2000 gpm) to the Wind Chaser Project.

It is understood that this letter will be used as an attachment to the Perennial Wind Chaser Station's Site Certificate Renewal.

Sincerely,

Kim B. Puzey
General Manager
Port of Umatilla

ATTACHMENT 3

Updated Property Owner List of Properties

Sensitive to Noise

Table X-1: Parcels with noise receptors (including residences) within one mile of the proposed natural gas pipeline, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Pipeline
3N28000002500	MOORE BRIAN A & ARLENE M	77151 COL JORDAN RD	HERMISTON	OR	97838-6180	2018	0.21
3N28000006000	MADISON SCOTT & MARY	75512 HIGHWAY 207	ECHO	OR	97826-9027	2018	0.24
4N28310000800	SHARKEY PHILIP E & LORA L	29689 NOBLE RD	HERMISTON	OR	97838-6188	2018	0.00
4N28310000900	SMITH RAYMON J & LEAH JOY	29704 NOBLE RD	HERMISTON	OR	97838	2018	0.06
4N28310001000	JOHNSTON ANDREW DEAN	29616 NOBLE RD	HERMISTON	OR	97838-6188	2018	0.00
4N28310001200	PEDRO MARK ANTHONY & MORGAN ALEXIS	29592 NOBLE RD	HERMISTON	OR	97838-6187	2018	0.00
4N28310001400	FREDERICKSON ERICK D & TRESIA A	29330 NOBLE RD	HERMISTON	OR	97838	2018	0.33
4N28310001500	ELDRIDGE MARK D & VERONICA G (TRS)	430 MTN CITY HIGHWAY #UNIT 11	ELKO	NV	89801-9521	2018	0.28
4N28310002000	VAZZA VINCENT C & LOHMAN JANICE	77225 COL JORDAN RD	HERMISTON	OR	97838	2018	0.23
4N28C00003801	CASTILLO HECTOR M	29290 NW LIVESTOCK RD	HERMISTON	OR	97838-6161	2018	0.25
4N28C00003802	SERNA AMY & ANTONIO	29296 NW LIVESTOCK RD	HERMISTON	OR	97838-6161	2018	0.25
4N28C00005708	WHITE RICHARD H & TAMARA L	704 OLD HIGHWAY 8	ROOSEVELT	WA	99356-9730	2018	0.20
4N28C00005802	SALEM SALEM G & MARILYN K	29831 NOBLE RD	HERMISTON	OR	97838	2018	0.29

Table X-2: Parcels with noise receptors (including residences) within one mile of the proposed energy facility, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
4N27360000800	ROCK-IT LLC	74854 WASHINGTON AVE	IRRIGON	OR	97844-7102	2018	0.71
4N2819A000400	BLAKE JASON H & JODI A	78586 WESTLAND RD	HERMISTON	OR	97838	2018	0.91
4N2819A000600	LOERA SAIRA ET AL	30298 NW STEWART LN	NORTH PLAIN	OR	97133-2022	2018	0.92
4N2819A000601	DARCY JEFFREY W & SHELLY J	78470 AGNEW RD	HERMISTON	OR	97838-6129	2018	0.91
4N2819A000700	ABUNDIZ BENJAMIN DEMETRIO HOYD	78486 AGNEW RD	HERMISTON	OR	97838-6129	2018	0.93
4N2819D000100	MENCHACA MATTHEW T ET AL	78368 AGNEW RD	HERMISTON	OR	97838-6133	2018	0.74
4N2819D000200	COOMBS MICHELLE C & SUMMERLIN	78390 AGNEW RD	HERMISTON	OR	97838-6133	2018	0.77
4N2819D000300	LEAL ADOLFO	PO BOX 1334	HERMISTON	OR	97838-3334	2018	0.79
4N2819D000401	STENSRUD MICHAEL CHRISTOPHER	78426 AGNEW RD	HERMISTON	OR	97838-6129	2018	0.84
4N2819D000600	SWEEK CURTIS & KATHLEEN	78444 AGNEW RD	HERMISTON	OR	97838	2018	0.86
4N2819D000700	HUMBERT NED E	78462 AGNEW RD	HERMISTON	OR	97838	2018	0.89
4N2819D000900	ANTEAU ANGELA D	PO BOX 982	HERMISTON	OR	97838-0982	2018	0.67
4N2819D000901	MCCOMBS RICHARD A	29870 BLOOM RD	HERMISTON	OR	97838	2018	0.65
4N2820C000400	TUCKER JANICE M	78433 AGNEW RD	HERMISTON	OR	97838-6129	2018	0.87
4N2820C000600	SHUNK SHANNON T	29345 FEEDVILLE RD	HERMISTON	OR	97838-8465	2018	0.63
4N2820C000800	WILLHOFT KAY M	29395 FEEDVILLE RD	HERMISTON	OR	97838	2018	0.82
4N2820C000900	NEWMAN JEFF & KATHY	29411 FEEDVILLE RD	HERMISTON	OR	97838	2018	0.86
4N28300000900	CRAFT THOMAS D	PO BOX 4532	PORTLAND	OR	97208-4532	2018	0.40
4N28300001600	STRAND MARY E & PAUL J	77941 COTTONWOOD BE	HERMISTON	OR	97838	2018	0.42
4N28300001900	BUCKALLEW CREGG A & M MARY	77867 COTTONWOOD BE	HERMISTON	OR	97838	2018	0.47
4N28C00002700	SMITH CONNIE A	29224 BLOOM RD	HERMISTON	OR	97838-6131	2018	0.52
4N28C00002701	DYER JERRY E	78401 COTTONWOOD BE	HERMISTON	OR	97838-7151	2018	0.43
4N28C00002703	LOWRANCE WILLIAM D & LORETTA K	29278 BLOOM RD	HERMISTON	OR	97838	2018	0.62
4N28C00002704	MIDDLETON ROBERT L & CAROL R	PO BOX 411	HERMISTON	OR	97838-0411	2018	0.59
4N28C00002800	BRITT SIDNEY & RANDY RAE	78540 BIG BUTTERCREEK	ECHO	OR	97826-7040	2018	0.55

Table X-3: Parcels with noise receptors (including residences) within one mile of the existing transmission line, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Transmission Line
4N27000000700	FLOOD STEVEN L	79238 WALKER RD	HERMISTON	OR	97838	2018	0.41
4N27000000800	7S FARMING LLC	78638 WALKER RD	HERMISTON	OR	97838	2018	0.24
4N27000000801	MCDONOUGH RYAN THOMAS	79220 WALKER RD	HERMISTON	OR	97838-6155	2018	0.38
4N27000000900	7S FARMING LLC	78638 WALKER RD	HERMISTON	OR	97838	2018	0.06
4N27000001100	7S FARMING LLC	78638 WALKER RD	HERMISTON	OR	97838	2018	0.00
5N2817CA01000	LOVE THOMAS W & KAREN L	371 STEPHENS AVE	UMATILLA	OR	97882	2018	0.48
5N2817CA01102	ROYER CHARLES F	78668 POWERLINE RD	HERMISTON	OR	97838	2018	0.48
5N2817CA01200	LANDIS JAMES R & CHERIE L	PO BOX 758	UMATILLA	OR	97882	2018	0.49
5N2817CA01300	HUXEL DARLA M	PO BOX 584	UMATILLA	OR	97882	2018	0.47
5N2817CA01600	HUXEL DARLA M	PO BOX 584	UMATILLA	OR	97882	2018	0.46
5N2817CA01700	ESTES RICHARD A JR	27898 HIGHWAY 730	UMATILLA	OR	97882	2018	0.46
5N2817CA01900	GEHLEN KARIN	PO BOX 158	UMATILLA	OR	97882-0158	2018	0.45
5N2817CA02200	STEPHENS ALVA B	PO BOX 34	UMATILLA	OR	97882-0034	2018	0.43
5N2817CA02400	ROCK TRAVIS B	PO BOX 238	UMATILLA	OR	97882	2018	0.44
5N2817CA02500	KOWALSKI-MILBRODT APRIL D	PO BOX 97	STANFIELD	OR	97875	2018	0.45
5N2817CA02600	ROSS DONALD A & PATRICIA H	PO BOX 238	UMATILLA	OR	97882	2018	0.45
5N2817CA02700	FIELDS JUSTIN S & PATRICK RACHEL A	328 STEPHENS AVE	UMATILLA	OR	97882-9787	2018	0.46
5N2817CA02800	MORRISON NATHAN	80809 WAGON WHEEL LOOP	IRRIGON	OR	97844-7150	2018	0.46
5N2817CA02900	HEWITT MELVIN R & GENEVIEVE J	300 STEPHENS AVE	UMATILLA	OR	97882-9787	2018	0.46
5N2817CA03000	BORGHESE MARK	PO BOX 69	ARLINGTON	OR	97812	2018	0.43
5N2817CA03100	KONTUR MICHAEL J & ETAL	314 TUCKER AVE	UMATILLA	OR	97882-9317	2018	0.43

Table X-3: Parcels with noise receptors (including residences) within one mile of the existing transmission line, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Transmission Line
5N2817CA03201	KONTUR SUZANNE M	314 TUCKER AVE	UMATILLA	OR	97882-9317	2018	0.42
5N2817CA03300	HOTRUM PETER L	356 TUCKER AVE	UMATILLA	OR	97882-9317	2018	0.42
5N2817CA03400	MKG ENTERPRISES LLC	PO BOX 368	UMATILLA	OR	97882-0368	2018	0.41
5N2817CA03600	DRACE MAUREEN E	PO BOX 1196	UMATILLA	OR	97882	2018	0.40
5N2817CA04300	THE HOUSING AUTHORITY OF CO OF UMATILLA	PO BOX 996	UMATILLA	OR	97882-0996	2018	0.39
5N2817CA04400	THE HOUSING AUTHORITY OF CO OF UMATILLA	500 TUCKER AVE	UMATILLA	OR	97882-9335	2018	0.39
5N2817CC00200	NOBLES CLYDE C & BETTY L	650 MONROE ST	UMATILLA	OR	97882-9508	2018	0.43
5N2817CC00401	REYNOLDS MAXINE S	PO BOX 1325	AFTON	WY	83110	2018	0.44
5N2817CC00500	BARRICK NOREEN A	10 JACKSON ST	UMATILLA	OR	97882	2018	0.47
5N2817CC00600	MCLAREN JEFFREY LEE & MARY LOUISE	26 JACKSON ST	UMATILLA	OR	97882-9726	2018	0.45
5N2817CC00700	MUELLER ROBERT G & LINDA D	108 HAMILTON ST	UMATILLA	OR	97882-9727	2018	0.43
5N2817CC00800	ZITTERKOB HENRY E	110 HAMILTON ST	UMATILLA	OR	97882-9727	2018	0.42
5N2817CC00900	LANGLEY JOYCE A	PO BOX 577	UMATILLA	OR	97882	2018	0.41
5N2817CC01100	KESTLER RODNEY & MICHELLE	172 HAMILTON ST	UMATILLA	OR	97882-9727	2018	0.39
5N2817CC01200	BOARDMAN EDWARD JOSEPH	200 MONROE ST	UMATILLA	OR	97882-9728	2018	0.38
5N2817CC01400	NOLAN DANNY JOE	228 MONROE ST	UMATILLA	OR	97882-9728	2018	0.36
5N2817CC01500	DAHLIN LAURENCE R & LISA A	240 MONROE ST	UMATILLA	OR	97882	2018	0.35

Table X-3: Parcels with noise receptors (including residences) within one mile of the existing transmission line, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Transmission Line
5N2817CC01600	STRIKER ROBERT O & ESTHER	231 MONROE ST	UMATILLA	OR	97882-9728	2018	0.37
5N2817CC01601	MCAHREN MARK	1000 S HIGHWAY 395 #STE A209	HERMISTON	OR	97838-2663	2018	0.39
5N2817CC01601	MCAHREN MARK	1000 S HIGHWAY 395 #STE A209	HERMISTON	OR	97838-2663	2018	0.40
5N2817CC01800	TORRE GREGORIO & ELSIE L	PO BOX 1609	HERMISTON	OR	97838-3609	2018	0.36
5N2817CC01900	HENDON R LEBRON	258 MONROE ST	UMATILLA	OR	97882-9728	2018	0.32
5N2817CC02000	HULL ANTHONY L & DEBRA A	2210 SE 186TH AVE	PORTLAND	OR	97233-5642	2018	0.32
5N2817CC02001	JAIMEZ TESSA N	151 WASHINGTON ST	UMATILLA	OR	97882	2018	0.33
5N2817CC02002	BRESHEARS DOUGLAS & JANET	PO BOX 1768	UMATILLA	OR	97882	2018	0.33
5N2817CC02003	PACKARD JOHN L	175 WASHINGTON ST	UMATILLA	OR	97882-9304	2018	0.32
5N2817CC02007	HOJABOOM ROBERT H & CAROLYN J	135 WASHINGTON ST	UMATILLA	OR	97882-9304	2018	0.34
5N2817CC02008	WILSON LESA A	121 WASHINGTON ST	UMATILLA	OR	97882	2018	0.35
5N2817CC02009	BRESHEARS DOUGLAS & JANET	PO BOX 1768	UMATILLA	OR	97882	2018	0.33
5N2817CC02100	MCMILLAN DENNIS CARL & JEANNE L	15 WASHINGTON ST	UMATILLA	OR	97882-9729	2018	0.43
5N2817CC02101	NYCZ DAVID & KOI	31 WASHINGTON ST	UMATILLA	OR	97882-9729	2018	0.41
5N2817CC02102	ORNELAS BENJAMIN S & TERESA G	PO BOX 820	THORNTON	CA	95686	2018	0.40
5N2817CC02103	SMITH FRANCIS C II & JENNINGS DAVID C	57 WASHINGTON ST	UMATILLA	OR	97882-9729	2018	0.39

Table X-3: Parcels with noise receptors (including residences) within one mile of the existing transmission line, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Transmission Line
5N2817CC02104	WOOD THOMAS J & DANA A	30052 THREE MILE LN	HERMISTON	OR	97838-6652	2018	0.38
5N2817CC02105	BORDEN JAMES A & VICTORIA L	71 WASHINGTON ST	UMATILLA	OR	97882	2018	0.37
5N2817CC02200	TENNANT GARY G	995 NE BAILEY LN	HERMISTON	OR	97838-6757	2018	0.38
5N2817CC02201	HODGE D LANCE & GAYE S	1655 MCFARLAND AVE	UMATILLA	OR	97882	2018	0.39
5N2817CC02202	ORTIZ-MENDOZA ROSA M	233 SPARROW AVE	UMATILLA	OR	97882	2018	0.37
5N2817CC02203	WISER RICHARD L JR & TERESA	1610 COLUMBIA ST	UMATILLA	OR	97882-9733	2018	0.36
5N2817CC02300	MATTESON JERRY L & RITA M	12 JEFFERSON ST	UMATILLA	OR	97882-9730	2018	0.36
5N2817CC02400	TORRES ABEL R	1650 COLUMBIA DR	UMATILLA	OR	97882-9733	2018	0.35
5N2817CC02500	BULOW JAKE DANIEL & JACQUELINE DIANE	204 WASHINGTON ST	UMATILLA	OR	97882-9305	2018	0.29
5N2817CC02501	LAFFERTY PATRICK L	100 JEFFERSON ST	UMATILLA	OR	97882	2018	0.31
5N2817CC02502	HOLDEN ROBERT L & LAURIE A	234 JEFFERSON ST	UMATILLA	OR	97882-9821	2018	0.28
5N2817CC02503	NOBLES CLYDE C & BETTY L	650 MONROE ST	UMATILLA	OR	97882	2018	0.33
5N2817CC02504	WILLIAMS DAVID G & CHARLEEN J	134 WASHINGTON ST	UMATILLA	OR	97882	2018	0.30
5N2817CC02505	SEVERSON JANET M	945 W RIDGEWAY AVE	HERMISTON	OR	97838-1564	2018	0.30
5N2817CC02506	OROZCO MA ENGRACIA	164 WASHINGTON ST	UMATILLA	OR	97882	2018	0.29
5N2817CC02507	HESS KYLE ANTHONY	178 WASHINGTON ST	UMATILLA	OR	97882-9304	2018	0.29
5N2817CC02508	OLSON DAVID C & FILER-OLSON DENISE J	79007 N LOOP RD	STANFIELD	OR	97875-4573	2018	0.28

Table X-3: Parcels with noise receptors (including residences) within one mile of the existing transmission line, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Transmission Line
5N2817CC02509	PAYNE JERAD S & MUNOZ ASHLEI K	120 WASHINGTON ST	UMATILLA	OR	97882-9304	2018	0.31
5N2817CC02510	MORENO REYNA G	1615 COLUMBIA DR	UMATILLA	OR	97882-9809	2018	0.32
5N2817CC02600	EKLEBERRY RICHARD D & AGNES J	256 SAGE ST	UMATILLA	OR	97882	2018	0.27
5N2817CC02800	HARRIS DEAN A	217 JEFFERSON ST	UMATILLA	OR	97882	2018	0.25
5N2817CC02801	ANDERSON LEE J & MARIE E	247 JEFFERSON ST	UMATILLA	OR	97882-9821	2018	0.24
5N2817CC02803	MENDEZ EDGAR NOE AVILA & RUBIO MARISELA	178 JEFFERSON ST	UMATILLA	OR	97882-9819	2018	0.26
5N2817CC02804	BOGGS JEREMY L	233 JEFFERSON ST	UMATILLA	OR	97882-9821	2018	0.25
5N2817CC02805	MEAGHER JAMES P & RONDA	203 JEFFERSON ST	UMATILLA	OR	97882-9821	2018	0.25
5N2817CC02806	HOOFARD TREVOR LEE	1117 LAPPLAND DR	IDLEYLD PARK	OR	97447-9826	2018	0.26
5N2817CC02807	GARCIA CANDELARIA A	149 JEFFERSON ST	UMATILLA	OR	97882	2018	0.27
5N2817CC02900	VANDERCAR JOSEPH H & ROSANNA E	109 JEFFERSON ST	UMATILLA	OR	97882-9819	2018	0.28
5N2817CC02901	GRIFFIN ROCHELLE R	870 E KENNEDY AVE	HERMISTON	OR	97838-9436	2018	0.30
5N2817CC02902	BOWMAN JOHN E & DONNA L	123 JEFFERSON ST	UMATILLA	OR	97882-9819	2018	0.28
5N2817CC02903	PEDRO RYAN	135 JEFFERSON ST	UMATILLA	OR	97882-9819	2018	0.27
5N2817CC02904	GREEN DELBERT M & BARBARA	83 JEFFERSON ST	UMATILLA	OR	97882-9730	2018	0.29

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Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Transmission Line
5N2817CC03000	TONNING BARBARA L	PO BOX 1376	UMATILLA	OR	97882-1376	2018	0.31
5N2817CC03100	TOLIVER ROBERT R	39 JEFFERSON ST	UMATILLA	OR	97882-9730	2018	0.34
5N2817CC03101	RODRIGUEZ FRANCISCO C &	1745 MCFARLAND AVE	UMATILLA	OR	97882	2018	0.33
5N2817CC03200	GUTIERREZ IVAN	244 MADISON ST	UMATILLA	OR	97882	2018	0.21
5N2817CC03201	CARRAHER JOHN S & LYNDA L	42 MADISON ST	UMATILLA	OR	97882-9734	2018	0.29
5N2817CC03202	BEEZLEY RUTH A	PO BOX 488	UMATILLA	OR	97882-0488	2018	0.30
5N2817CC03203	BROWN RICKY E & BROWN ELANA K	82 MADISON ST	UMATILLA	OR	97882-9734	2018	0.26
5N2817CC03204	TAFT JAMES L & DEBORAH G	54 MADISON ST	UMATILLA	OR	97882-9734	2018	0.28
5N2817CC03205	CHEWNING TANNER J	108 MADISON ST	UMATILLA	OR	97882-9734	2018	0.25
5N2817CC03206	CERVANTES-VARGAS ALBERTO ETAL	122 MADISON ST	UMATILLA	OR	97882-9734	2018	0.25
5N2817CC03207	ROCK STANLEY J & MARTHA J	PO BOX 535	IRRIGON	OR	97844	2018	0.24
5N2817CC03208	MAKER LEWIS L	70 MADISON ST	UMATILLA	OR	97882-9734	2018	0.27
5N2817CC03209	ROBLEDO VALENTE LEMUS & LEMUS FRANCISCA	1000 7TH ST	UMATILLA	OR	97882-9778	2018	0.23
5N2817CC03210	O'DELL A G & DORIS F	188 MADISON ST	UMATILLA	OR	97882	2018	0.23
5N2817CC03211	ODELL DORIS F & A G	188 MADISON ST	UMATILLA	OR	97882-9734	2018	0.22
5N2817CC03212	MOSLEY RYAN C	200 MADISON ST	UMATILLA	OR	97882-3008	2018	0.22

Table X-3: Parcels with noise receptors (including residences) within one mile of the existing transmission line, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Transmission Line
5N2817CC03213	KREITZER SHAVON L	214 MADISON ST	UMATILLA	OR	97882-9734	2018	0.22
5N2817CC03215	RICO ASHLEE & JOSE	274 MADISON ST	UMATILLA	OR	97882-3008	2018	0.20
5N2817CC03216	MLY RENTALS LLC	PO BOX 698	STANFIELD	OR	97875-0698	2018	0.21
5N2817CD04000	RASMUSSEN CHRISTIAN C & JEANNE	515 MONROE ST	UMATILLA	OR	97882-9807	2018	0.18
5N2817CD04100	LEWIS DONALD D & TERESA M	501 MONROE ST	UMATILLA	OR	97882	2018	0.19
5N2817CD04200	ARTERBURN MICHAEL K	457 MONROE ST	UMATILLA	OR	97882-9806	2018	0.20
5N2817CD04300	HALL CANDI K	443 MONROE ST	UMATILLA	OR	97882	2018	0.21
5N2817CD04400	BROWN CLAYTON R & CAROL B	PO BOX 261	UMATILLA	OR	97882	2018	0.22
5N2817CD04600	ROXBURY CYNTHIA A	401 MONROE ST	UMATILLA	OR	97882-9806	2018	0.24
5N2817CD04700	BUCKLEY JAMES E & SUZANNE L	371 MONROE ST	UMATILLA	OR	97882	2018	0.25
5N2817CD04800	GROTZ ROY J (TRUSTEE)	357 MONROE ST	UMATILLA	OR	97882	2018	0.26
5N2817CD04900	WEBB EARL P	329 MONROE ST	UMATILLA	OR	97882	2018	0.27
5N2817CD05000	LEONARD RICHARD G & ELAINE I	315 MONROE ST	UMATILLA	OR	97882	2018	0.29
5N2817CD05100	LEONARD RICHARD G & ELAINE I	315 MONROE ST	UMATILLA	OR	97882	2018	0.30
5N2817CD05200	MUELLER ROBERT G & LINDA D (TRS)	108 HAMILTON ST	UMATILLA	OR	97882-9727	2018	0.32
5N2817CD05300	SIDEBOTTOM DUANE B & KAREN E	328 MONROE ST	UMATILLA	OR	97882	2018	0.31
5N2817CD05400	BLAKE SARAH M	342 MONROE ST	UMATILLA	OR	97882-9740	2018	0.30
5N2817CD05500	LACHER JACK W & DORIS M	356 MONROE ST	UMATILLA	OR	97882-9740	2018	0.29
5N2817CD05600	DARGATZ RAY & JEANNE	810 NE QUEENS LN	HILLSBORO	OR	97124	2018	0.28

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Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Transmission Line
5N2817CD05700	TESTERMAN TIMOTHY W	400 MONROE ST	UMATILLA	OR	97882-9806	2018	0.27
5N2817CD05800	SMITH DONALD G & JANET W	32985 NE 40TH PL	CARNATION	WA	98014-8713	2018	0.26
5N2817CD05900	WIGGINS BRIAN C	428 MONROE ST	UMATILLA	OR	97882-9806	2018	0.25
5N2817CD06000	TROTT DAVID P	442 MONROE ST	UMATILLA	OR	97882-9806	2018	0.23
5N2817CD06100	WIMBERLY ROBERT J & SHIRLEY A	456 MONROE ST	UMATILLA	OR	97882	2018	0.22
5N2817CD06200	WICKSTROM DAVID E & NANCY J	500 MONROE ST	UMATILLA	OR	97882	2018	0.21
5N2817CD07900	WILLIAMS BRUCE & SHANDA D	300 MONROE ST	UMATILLA	OR	97882	2018	0.33
5N2817D001200	NOBLES CLYDE C JR & BETTY L	650 MONROE ST	UMATILLA	OR	97882	2018	0.31
5N2817D001400	NOBLES CLYDE C JR & BETTY 50% ETAL 50%	1050 STEPHENS AVE	UMATILLA	OR	97882	2018	0.18
5N2817D001400	NOBLES KELLY	1050 STEPHENS AVE	UMATILLA	OR	97882	2018	0.18
5N2817D001500	NOBLES CLYDE C JR & BETTY L	650 MONROE ST	UMATILLA	OR	97882	2018	0.10
5N2817D001600	NOBLES CLYDE C JR & BETTY L	650 MONROE ST	UMATILLA	OR	97882	2018	0.02
5N2818DD00400	BLAIR DAVID D & BRANDY L	PO BOX 423	UMATILLA	OR	97882	2018	0.42
5N2818DD00500	LEE JEFFREY H & SHERRI L	111 ALDER ST	UMATILLA	OR	97882-9633	2018	0.41
5N2818DD01400	CHURCH OF JESUS CHRIST OF LDS	50 E NORTH TEMPLE	SALT LAKE CITY	UT	84150	2018	0.34
5N2818DD01800	HAMMAN JOHN W & MARY LOU	25 TRUMAN AVE	UMATILLA	OR	97882	2018	0.45
5N2818DD01900	WHEELER JEFFREY M	55 TRUMAN AVE	UMATILLA	OR	97882-6238	2018	0.47
5N2818DD02700	MORGAN KEITH C & EDIE JANE	85 TRUMAN AVE	UMATILLA	OR	97882-6238	2018	0.49
5N2818DD02800	CHOWNING GLENN	1645 W ORCHARD AVE	HERMISTON	OR	97838-6104	2018	0.50
5N2818DD03200	STONECREST BUILDERS INC	2381 ROBERTSON DR	RICHLAND	WA	99354	2018	0.46

Table X-3: Parcels with noise receptors (including residences) within one mile of the existing transmission line, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Transmission Line
5N2818DD03700	SHURTS KENDALL & KATELYN	1630 REAGAN ST	UMATILLA	OR	97882-9236	2018	0.49
5N2818DD03800	MUNIZ EUGENE	1660 REAGAN ST	UMATILLA	OR	97882-6236	2018	0.47
5N28200000702	HINSLEY RICHEY JAMES & JODI LADEANNE	333 PINE TREE AVE	UMATILLA	OR	97882-6197	2018	0.00
5N28200000800	GARCIA GUADALUPE P & MARGARITA G	PO BOX 1582	UMATILLA	OR	97882	2018	0.00
5N28200000900	ANDERSON JUNE	PO BOX 1234	UMATILLA	OR	97882-1234	2018	0.00
5N28200001000	UMATILLA-MORROW CO HEADSTART INC	721 SE 3RD ST #STE 107	PENDLETON	OR	97801-3182	2018	0.00
5N28200001100	LEATHERS LLOYD L	PO BOX 1708	UMATILLA	OR	97882	2018	0.00
5N28200001200	RAMSEY A SCOTT	690 PINE TREE AVE	UMATILLA	OR	97882-6199	2018	0.11
5N2820BB00100	RIBICH MARK & JOAN C	270 PIERCE AVE	UMATILLA	OR	97882-9808	2018	0.15
5N2820BB00200	MADRIGAL GERARDO CORIA	272 POWERLINE RD	UMATILLA	OR	97882-9721	2018	0.14
5N2820BB00300	SANCHEZ RAMON & NORALBA	274 POWERLINE RD	UMATILLA	OR	97882	2018	0.13
5N2820BB00400	ZAPATA VERONICA	PO BOX 546	UMATILLA	OR	97882	2018	0.11
5N2820BB00500	TIMPY ANNA L	401 6TH ST	UMATILLA	OR	97882-9504	2018	0.11
5N2820BB00600	ONEAL PEGGY M & FROST SHIRLEY A	PO BOX 1705	UMATILLA	OR	97882	2018	0.11
5N2820BB00700	MEEKS LARRY D & LEANNA K	PO BOX 907	UMATILLA	OR	97882	2018	0.11
5N2820BB00800	JONES MONICA L	823 E NEWPORT AVE	HERMISTON	OR	97838	2018	0.11
5N2820BB00900	SEUFERT JAMES & MICHELLE	205 TYLER AVE	UMATILLA	OR	97882	2018	0.11

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Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Transmission Line
5N2820BB01000	SAVAGE MELVIN & KAREN	175 VAN BUREN DR	UMATILLA	OR	97882-9306	2018	0.12
5N2820BB01100	LIEBE LINDA S	155 VAN BUREN DR	UMATILLA	OR	97882-9306	2018	0.14
5N2820BB01200	BURNS PAOLA	145 VAN BUREN DR	UMATILLA	OR	97882-9306	2018	0.15
5N2820BB01300	UITTO IRVING A & LYNNE E	135 VAN BUREN DR	UMATILLA	OR	97882-9306	2018	0.17
5N2820BB01400	SHERWOOD KYLE & AMANDA	100 PIERCE AVE	UMATILLA	OR	97882	2018	0.18
5N2820BB01500	ROSALES JESUS MIGUEL	PO BOX 422	HERMISTON	OR	97838-0422	2018	0.18
5N2820BB01600	LAFFERTY MICHAEL C & CAROL A	180 PIERCE AVE	UMATILLA	OR	97882-9735	2018	0.18
5N2820BB01700	ANDERSON JUNE E	PO BOX 1234	UMATILLA	OR	97882-1234	2018	0.17
5N2820BB01800	ANDERSON JUNE E	PO BOX 1234	UMATILLA	OR	97882	2018	0.17
5N2820BB01900	AVILA JAIRO DAVID	2080 E BEATRICE AVE	HERMISTON	OR	97838-7533	2018	0.16
5N2820BB02000	ORTIZ-LEON LAZARO & MARIA E	242 ADAMS CT	UMATILLA	OR	97882	2018	0.16
5N2820BB02100	ESCOBEDO JOSE LUIS JR & JENNIFER A	246 ADAMS CT	UMATILLA	OR	97882	2018	0.15
5N2820BB02200	COLE LESLIE D & MARY K	28182 HIGHWAY 730	UMATILLA	OR	97882-6127	2018	0.13
5N2820BB02300	MEEKS LARRY D & MEEKS LEANNA K	PO BOX 907	UMATILLA	OR	97882-0907	2018	0.13
5N2820BB02400	HERMISTON JUNIOR ACADEMY FOUNDATION	PO BOX 403	HERMISTON	OR	97838-0403	2018	0.13
5N2820BB02500	MEINKE DARREN & ANITA	254 ADAMS CT	UMATILLA	OR	97882	2018	0.14

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Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Transmission Line
5N2820BB02600	STOKOE LEONARD R & MACK MARCIA L	PO BOX 1683	UMATILLA	OR	97882	2018	0.16
5N2820BB02700	JOHNSON PHILIP	2724 KYLE RD	KENNEWICK	WA	99338	2018	0.18
5N2820BB02800	IBARRA JEFFREY R	265 PIERCE AVE	UMATILLA	OR	97882	2018	0.18
5N2820BB02900	KELL NANCY A	255 PIERCE AVE	UMATILLA	OR	97882	2018	0.19
5N2820BB03000	MUNOZ OBDULIA	245 PIERCE AVE	UMATILLA	OR	97882- 9808	2018	0.19
5N2820BB03100	CORIA MARISOL JIMENEZ	235 PIERCE AVE	UMATILLA	OR	97882- 9808	2018	0.19
5N2820BB03200	NORRIS ALMA E	PO BOX 1324	UMATILLA	OR	97882	2018	0.20
5N2820BB03300	CROUCH EVERETT R (TDD)	PO BOX 1171	UMATILLA	OR	97882- 1171	2018	0.20
5N2820BB03400	VAZQUEZ ALBERTO	185 PIERCE AVE	UMATILLA	OR	97882	2018	0.21
5N2820BB03500	MAGDALENA JAVIER	155 PIERCE AVE	UMATILLA	OR	97882	2018	0.21
5N2820BB03600	BURGUS CARL E & LIEBE REBECCA D	145 PIERCE AVE	UMATILLA	OR	97882	2018	0.22
5N2820BB03700	BLACKBURN GARY A	3434 NE RIVERSIDE AVE	PENDLETON	OR	97801- 3432	2018	0.22
5N2820BB03800	BROWER KALIB D & REBECCA L	125 VAN BUREN DR	UMATILLA	OR	97882- 9306	2018	0.21
5N2820BB03900	PACK DANIEL M	115 VAN BUREN DR	UMATILLA	OR	97882- 9306	2018	0.23
5N2820BB04000	CARRILLO PORFIRIO	85 VAN BUREN DR	UMATILLA	OR	97882- 9736	2018	0.25
5N2820BB04100	BONDURANT DAVID A & MARY	1175 E ELM AVE	HERMISTON	OR	97838	2018	0.25
5N2820BB04200	REYNOLDS WILMA A	113 NACHES ST	UMATILLA	OR	97882	2018	0.26
5N2820BB04300	BROKAW LINDA S ET AL	40645 VIA DIAMANTE	MURRIETA	CA	92562- 8505	2018	0.27

Table X-3: Parcels with noise receptors (including residences) within one mile of the existing transmission line, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Transmission Line
5N2820BB04400	MECHAM QUINETTE I	15 VAN BUREN DR	UMATILLA	OR	97882-9736	2018	0.29
5N2820BB04500	ANDERSON JUNE E	PO BOX 1234	UMATILLA	OR	97882	2018	0.27
5N2820BB04600	EDWARDS GENE D & GERALDINE E	PO BOX 951	UMATILLA	OR	97882	2018	0.26
5N2820BB04700	PAYNE ALLAN R & LEIGH E	1123 W WHITMAN DR	COLLEGE PLACE	WA	99324-1040	2018	0.25
5N2820BB04800	HORN BRADFORD M & CYNTHIA A	76965 HIGHWAY 207	ECHO	OR	97826-9028	2018	0.24
5N2820BB04900	MEJIA NAVA BRENDA GABRIELA	80 VAN BUREN DR	UMATILLA	OR	97882-9736	2018	0.23
5N2820BB05000	LEMON DOUGLAS H	PO BOX 541	YAKIMA	WA	98907-0541	2018	0.22
5N2820BB05100	BAKER JOHN R & LINDA S	115 PIERCE AVE	UMATILLA	OR	97882-9735	2018	0.21
5N2820BB05200	ALTERGOTT RICKY F & MARY N	15 BURLINGTON LOOP	GOLDENDALE	WA	98620-3618	2018	0.21
5N2820BB05300	DE RIVERA MACIAS ARCELIA	63 HARRISON DR	UMATILLA	OR	97882-9732	2018	0.23
5N2820BB05400	NOBLES CLYDE C & BETTY L	650 MONROE ST	UMATILLA	OR	97882-9508	2018	0.24
5N2820BB05500	LEMUS JOSE V	23 HARRISON DR	UMATILLA	OR	97882	2018	0.25
5N2820BB05600	WATSON MARK D	13 HARRISON DR	UMATILLA	OR	97882	2018	0.26
5N2820BB05700	WEBB HIRAM J	124 HARRISON DR	UMATILLA	OR	97882	2018	0.18
5N2820BB05800	UPPER COL CORP OF SDA	104 HARRISON DR	UMATILLA	OR	97882-9302	2018	0.19
5N2820BB05900	MENDOZA LUIZ ANTONIO &	84 HARRISON DR	UMATILLA	OR	97882-9732	2018	0.21

Table X-3: Parcels with noise receptors (including residences) within one mile of the existing transmission line, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Transmission Line
5N2820BB06000	TAFT RONALD N & VIRGINIA L	54 HARRISON DR	UMATILLA	OR	97882-9732	2018	0.22
5N2820BB06100	ASH DAVID A & DONNA L	21 FILLMORE ST	UMATILLA	OR	97882-9737	2018	0.20
5N2820BB06200	EYNON TRAVIS P & ARNELL L	PO BOX 1535	UMATILLA	OR	97882	2018	0.21
5N2820BB06300	PACK FREDRICK J & MARTHA	71 POLK AVE	UMATILLA	OR	97882-9738	2018	0.19
5N2820BB06400	KENNEDY KEITH & MICHELLE E	81582 APRICOT LN	UMATILLA	OR	97882-6164	2018	0.18
5N2820BB06500	MCMILLAN DENNIS & MARIA	144 HARRISON DR	UMATILLA	OR	97882-9302	2018	0.17
5N2820BB06600	MURR ROBERT G & ALTAGRACIA O	8 FILLMORE ST	UMATILLA	OR	97882-9737	2018	0.25
5N2820BB06700	RANDALL RANDY D & RHONDA J	868 W PUNKIN CENTER RD	HERMISTON	OR	97838	2018	0.24
5N2820BB06800	POTTS STEVEN R & KERI L	28 FILLMORE ST	UMATILLA	OR	97882	2018	0.23
5N2820BB06900	GRIGGS COREY	38 FILLMORE ST	UMATILLA	OR	97882-9737	2018	0.23
5N2820BB07000	ABBOTT DANIEL SCOTT & KATIE BETH	48 FILLMORE ST	UMATILLA	OR	97882-9737	2018	0.23
5N2820BB07100	WILSON RYAN ROBERT	58 FILLMORE ST	UMATILLA	OR	97882	2018	0.22
5N2820BB07200	MENDOZA RAMON ORTIZ	48 COLUMBIA AVE	UMATILLA	OR	97882-9414	2018	0.21
5N2820BB07300	ALVAREZ BRENDA	78 POLK AVE	UMATILLA	OR	97882-9738	2018	0.19
5N2820BB07400	MULLIKIN MIRANDA J	88 POLK AVE	UMATILLA	OR	97882-9738	2018	0.18
5N2820BB07500	CLIFF MARK J & SANDI M	98 POLK AVE	UMATILLA	OR	97882-9738	2018	0.17

Table X-3: Parcels with noise receptors (including residences) within one mile of the existing transmission line, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Transmission Line
5N2820BB07600	KUNS PAMELA & CHARLES TRS	108 POLK AVE	UMATILLA	OR	97882-9307	2018	0.16
5N2820BB07700	DEDRICK WILLIAM	PO BOX 2840	UMATILLA	OR	97882	2018	0.15
5N2820BB07800	GARNER JON P & KATHY S	128 POLK AVE	UMATILLA	OR	97882-9307	2018	0.12
5N2820BB07900	VANDEN BRINK JOHN & JANNA (TRS)	66975 MORTER LN	IONE	OR	97843	2018	0.12
5N2820BB08000	DIAZ JOSE R & LOERA GISELA	163 HARRISON DR	UMATILLA	OR	97882-9302	2018	0.14
5N2820BB08100	BARRERA ERNESTO L & MORALES CINTHIA	143 HARRISON DR	UMATILLA	OR	97882-9302	2018	0.15
5N2820BB08200	CLARK JEREMY S	123 HARRISON DR	UMATILLA	OR	97882	2018	0.16
5N2820BB08300	RAMIREZ JAIME R	127 PIERCE AVE	UMATILLA	OR	97882	2018	0.18
5N2820BB08400	LACHINO ANDRES Z	PO BOX 1772	UMATILLA	OR	97882-1772	2018	0.18
5N2820BB08500	VANDEVER KRISTLE STARR	130 VAN BUREN DR	UMATILLA	OR	97882	2018	0.17
5N2820BB08600	FUENTES-LOPEZ J JESUS & FUENTES JUDITH M	140 VAN BUREN DR	UMATILLA	OR	97882	2018	0.15
5N2820BB08700	ESCOBEDO GUADALUPE	138 JOHN DAY ST	UMATILLA	OR	97882	2018	0.14
5N2820BB08800	CONTRERAS ARTURO & VALENCIA GABRIELA	160 VAN BUREN DR	UMATILLA	OR	97882	2018	0.13
5N2820BB08900	MCLANE BRUCE A & CARLA B	170 VAN BUREN DR	UMATILLA	OR	97882-9306	2018	0.00
5N2820BB08900	MCLANE BRUCE A & CARLA B	170 VAN BUREN DR	UMATILLA	OR	97882-9306	2018	0.11
5N2820BB09000	MADSEN WAYNE L	180 TYLER AVE	UMATILLA	OR	97882-3009	2018	0.10
5N2820BB09100	POWELL ROBERT J & WILMA	190 TYLER AVE	UMATILLA	OR	97882	2018	0.09

Table X-3: Parcels with noise receptors (including residences) within one mile of the existing transmission line, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Transmission Line
5N2820BB09200	RIESTRA LETICIA RAMOS	200 TYLER AVE	UMATILLA	OR	97882-9739	2018	0.09
5N2820BB09300	SCHUENING KRIS W & JULIE A	210 TYLER AVE	UMATILLA	OR	97882-9739	2018	0.08
5N2820BB09400	PEREZ ADAN JR & AMELIA	230 TYLER AVE	UMATILLA	OR	97882-9739	2018	0.08
5N2820BB09500	ANDERSON DON & RAMONA D	250 TYLER AVE	UMATILLA	OR	97882	2018	0.08
5N2820BB09600	PAYNE LEO J (EST)	625 BROADWAY ST	BAKER CITY	OR	97814-3144	2018	0.08
5N2820BB09800	VILLARREAL HORACIO & ISIDORA	277 CHUKAR CIR	UMATILLA	OR	97882	2018	0.00
5N2820BB10000	ESPAIN JAQUELIN	255 CHUKAR CIR	UMATILLA	OR	97882-6182	2018	0.00
5N2820BB11000	BULLINGTON SUSAN JEPSEN	245 CHUKAR CIR	UMATILLA	OR	97882-6182	2018	0.03
5N2820BB12000	HEDMAN JARED WADE & LATOSHA CHRISTINE	233 CHUKAR CIR	UMATILLA	OR	97882-6182	2018	0.03
5N2820BB13000	GARCILAZA RAFAEL & GARCILAZA ANDRES	440 PENDLETON ST	UMATILLA	OR	97882-9417	2018	0.05
5N2820BB14000	WISE JASON & HEATHER	199 PINE TREE AVE	UMATILLA	OR	97882	2018	0.06
5N2820BB15000	DAVIS DAVID WAYNE	177 PINE TREE AVE	UMATILLA	OR	97882-6176	2018	0.07
5N2820BB16000	GARCILAZO NORMA G	4795 REGENT BLVD	IRVING	TX	75063-2466	2018	0.09
5N2820BB17000	NEWMAN & DACK	242 E MAIN ST #PMB 114	HERMISTON	OR	97838-1840	2018	0.10
5N2820BB18000	RIVERA-LEMUS ANTONIO & ARCELIA M	111 PINE TREE AVE	UMATILLA	OR	97882-6176	2018	0.12
5N2820BC01300	CLEVELAND RONALD J	2322 PHEASANT RIDGE ST	UMATILLA	OR	97882	2018	0.13

Table X-3: Parcels with noise receptors (including residences) within one mile of the existing transmission line, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Transmission Line
5N2820BC01400	RAMIREZ LUIS TEJEDA & TEJEDA BRENDA A	2344 PHEASANT RIDGE ST	UMATILLA	OR	97882- 6178	2018	0.13
5N2820BC01500	FREEL RAYMOND C	2366 PHEASANT RIDGE ST	UMATILLA	OR	97882	2018	0.12
5N2820BC01600	GOMEZ AYERIM GONZALEZ	2388 PHEASANT RIDGE ST	UMATILLA	OR	97882- 6178	2018	0.12
5N2820BC01700	WYNN PATRICIA A	2422 PHEASANT RIDGE ST	UMATILLA	OR	97882	2018	0.11
5N2820BC01800	ORTIZ JOAQUIN M & BEDOLLA DE ORTIZ ROSA	2444 PHEASANT RIDGE ST	UMATILLA	OR	97882- 6179	2018	0.11
5N2820BC01900	TROTT KATHLEEN J	2466 PHEASANT RIDGE ST	UMATILLA	OR	97882- 6179	2018	0.10
5N2820BC01901	GLOVER JAMES A & FLORENCE	2488 PHEASANT RIDGE ST	UMATILLA	OR	97882- 6179	2018	0.10
5N2820BC02000	GLOVER JAMES A & FLORENCE	2488 PHEASANT RIDGE ST	UMATILLA	OR	97882- 6179	2018	0.10
5N2820BC02100	SANCHEZ DAVID	144 PINE TREE AVE	UMATILLA	OR	97882- 6176	2018	0.11
5N2820BC02200	WEBB GARY & IONE	166 PINE TREE AVE	UMATILLA	OR	97882	2018	0.09
5N2820BC02300	GAMBLE KATHLEEN A & SKILLMAN DUANE R	2342 BLUE BIRD DR	UMATILLA	OR	97882- 6180	2018	0.08
5N2820BC02301	MARTIN TONY J & BRENDA G	2364 BLUE BIRD DR	UMATILLA	OR	97882- 6180	2018	0.08
5N2820BC02400	HORVATH FRANZ I	2355 PHEASANT RIDGE ST	UMATILLA	OR	97882- 6178	2018	0.10
5N2820BC02500	MARTIN TONY J & BRENDA G	2364 BLUE BIRD DR	UMATILLA	OR	97882- 6180	2018	0.08
5N2820BC02600	HERNANDEZ FRANCES E	2377 PHEASANT RIDGE ST	UMATILLA	OR	97882- 6178	2018	0.08

Table X-3: Parcels with noise receptors (including residences) within one mile of the existing transmission line, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Transmission Line
5N2820BC02700	WOODS LEAH V	2433 PHEASANT RIDGE ST	UMATILLA	OR	97882-6179	2018	0.08
5N2820BC02800	CANCINO GENARO LEON & MAGUADALUPE	2460 BLUE BIRD DR	UMATILLA	OR	97882-6181	2018	0.08
5N2820BC02900	BOMBELA RAFAEL & MARIA G	222 PINE TREE AVE	UMATILLA	OR	97882	2018	0.05
5N2820BC03000	NORRIS DONALD R	2353 BLUE BIRD DR	UMATILLA	OR	97882	2018	0.05
5N2820BC03100	PIXTON ANTHONY F & HOLLY A	2375 BLUE BIRD DR	UMATILLA	OR	97882	2018	0.05
5N2820BC03200	HODGDON CYNTHIA G	2417 BLUE BIRD DR	UMATILLA	OR	97882-6181	2018	0.05
5N2820BC03300	WICKERS ROGER	2439 BLUE BIRD DR	UMATILLA	OR	97882	2018	0.05
5N2820BC03400	JONES GENE & HALEY	2471 BLUE BIRD DR	UMATILLA	OR	97882-6181	2018	0.05
5N2820BC03500	OLVERA SERGIO & ALIZ M	2477 BLUE BIRD DR	UMATILLA	OR	97882-6181	2018	0.07
5N2820BC03600	WOODARD PAUL R	2586 BLUE JAY ST	UMATILLA	OR	97882	2018	0.03
5N2820BC03700	TREANOR PAUL E	1040 YORKSHIRE CT SE	SALEM	OR	97317	2018	0.03
5N2820BC03800	MACIAS BRIDGET J	2422 BLUE JAY ST	UMATILLA	OR	97882-6184	2018	0.03
5N2820BC03900	HUMPHREY MICHAEL S & KATHERINE	2410 BLUE JAY ST	UMATILLA	OR	97882	2018	0.03
5N2820BC04000	COSSETTE LINDA M	2366 BLUE JAY ST	UMATILLA	OR	97882	2018	0.03
5N2820BC04100	FINCK REBECCA & SHANE	2344 BLUE JAY ST	UMATILLA	OR	97882-6183	2018	0.03
5N2820BC04200	MACIAS ANTONIO & IRMA	2322 BLUE JAY ST	UMATILLA	OR	97882	2018	0.03
5N2820BC04300	MARTINEZ PEDRO V & HILDA	266 PINE TREE AVE	UMATILLA	OR	97882	2018	0.00
5N2820BC04400	MCWILLIAMS DONN A & ALANA J	2355 BLUE JAY ST	UMATILLA	OR	97882	2018	0.00
5N2820BC04500	RADILLO MIGUEL & FLORA	2377 BLUE JAY ST	UMATILLA	OR	97882	2018	0.00
5N2820BC04600	VARGAS FERNANDO	2399 BLUE JAY ST	UMATILLA	OR	97882	2018	0.00

Table X-3: Parcels with noise receptors (including residences) within one mile of the existing transmission line, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Transmission Line
5N2820BC04700	GARCIA MARCO ANTONIO & ARMENTA MARIA D R	2433 BLUE JAY ST	UMATILLA	OR	97882-6184	2018	0.00
5N2820BC04800	CENICEROS RENATO	326 NW BUTTE DR	HERMISTON	OR	97838	2018	0.00
5N2820BC04900	MUNIZ SANDY J	130 S CONWAY PL ## 17	KENNEWICK	WA	99336-3145	2018	0.00
5N2820BC05000	ESPAIN JAQUELIN	2533 BLUE JAY ST	UMATILLA	OR	97882-6185	2018	0.00
5N2820BC05100	CLEMENTS JEFFREY	2589 BLUE JAY ST	UMATILLA	OR	97882	2018	0.00
5N2820BC05200	ORTIZ MACARIO M	233 SPARROW AVE	UMATILLA	OR	97882	2018	0.03
5N2820BC05300	BARRERA JORGE LEON	511 SPARROW AVE	UMATILLA	OR	97882-6205	2018	0.05
5N2820BC05400	METSKER CHERYL M	2533 PHEASANT RIDGE ST	UMATILLA	OR	97882-6208	2018	0.07
5N2820BC05500	SCOTT DUSTIN M & CARVER HEIDI M	78368 N LOOP RD	STANFIELD	OR	97875-4563	2018	0.07
5N2820BC05600	GOSS CYNTHIA A	222 SPARROW AVE	UMATILLA	OR	97882	2018	0.05
5N2820BC05700	ASHER ARTHUR S	244 SPARROW AVE	UMATILLA	OR	97882	2018	0.03
5N2820BC05800	NICHOLS ALBERTA R & JOHN D JR (TDD)	PO BOX 338	UMATILLA	OR	97882-0338	2018	0.00
5N2820BC06000	CHRISTOPHER CATHERINE M	PO BOX 2197	FALLBROOK	CA	92028-2197	2018	0.00
5N2820BC06100	NAVARETE ISIDRO & HERMELINDA	2633 BLUE JAY ST	UMATILLA	OR	97882	2018	0.00
5N2820BC06200	FULLERTON TIMOTHY	2655 BLUE JAY ST	UMATILLA	OR	97882-6213	2018	0.00
5N2820BC06300	MEZA GARCIA JORGE A & MEZA ALEJANDRA	2677 BLUE JAY ST	UMATILLA	OR	97882-6213	2018	0.00
5N2820BC06400	SANGUINO GERARDO JR & MENDOZA GUADALUPE	2733 BLUE JAY ST	UMATILLA	OR	97882	2018	0.00

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Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Transmission Line
5N2820BC06600	PATRICK RICHARD B	233 EAGLE AVE	UMATILLA	OR	97882	2018	0.03
5N2820BC06700	PEREZ SAN JUANITA	211 EAGLE AVE	UMATILLA	OR	97882-6212	2018	0.05
5N2820BC06800	ENGBRETSON CURTIS	199 EAGLE AVE	UMATILLA	OR	97882	2018	0.06
5N2820BC06900	BURRES DWAYNE R & MA ISABEL	2688 BLUE JAY ST	UMATILLA	OR	97882	2018	0.04
5N2820BC07000	MUNOZ MARCO A	2666 BLUE JAY ST	UMATILLA	OR	97882-6213	2018	0.04
5N2820BC07100	GIUSTI RHONDA L & JAMES E	2644 BLUE JAY ST	UMATILLA	OR	97882-6213	2018	0.05
5N2820BC07200	SANCHEZ DIEGO ANDRADE	2622 BLUE JAY ST	UMATILLA	OR	97882-6213	2018	0.04
5N2820BC07300	STREBIN JOEL B	2596 BLUE JAY ST	UMATILLA	OR	97882	2018	0.03
5N2820BC07400	CHAVEZ JUAN PONCE & MELISSA	2577 PHEASANT RIDGE ST	UMATILLA	OR	97882	2018	0.06
5N2820BC07500	MACIAS ANTONIO & IRMA	2322 BLUE JAY ST	UMATILLA	OR	97882	2018	0.07
5N2820BC07600	ROBERTS WAYNE K JR & CAROL L	2655 PHEASANT RIDGE ST	UMATILLA	OR	97882-6209	2018	0.07
5N2820BC07700	MENDOZA ABEL GARCILAZA	2677 PHEASANT RIDGE ST	UMATILLA	OR	97882-6209	2018	0.07
5N2820BC07800	LA CRUZ ROCIO DE	2699 PHEASANT RIDGE ST	UMATILLA	OR	97882	2018	0.07
5N2820BC07900	MARTINEZ-VALENCIA JOSE E & MARTINEZ J S	PO BOX 1792	UMATILLA	OR	97882-1792	2018	0.08
5N2820BC08000	RODRIGUEZ GARY B	2766 PHEASANT RIDGE ST	UMATILLA	OR	97882	2018	0.11
5N2820BC08100	ESPAIN JOSE D	2744 PHEASANT RIDGE ST	UMATILLA	OR	97882	2018	0.11
5N2820BC08200	HEYNE KYLE P & BRENNAN R	2722 PHEASANT RIDGE ST	UMATILLA	OR	97882-6210	2018	0.11

Table X-3: Parcels with noise receptors (including residences) within one mile of the existing transmission line, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Transmission Line
5N2820BC08300	SANTILLAN JUANA	2688 PHEASANT RIDGE ST	UMATILLA	OR	97882-6209	2018	0.10
5N2820BC08400	RUBIN CHUCK	2666 PHEASANT RIDGE ST	UMATILLA	OR	97882	2018	0.10
5N2820BC08500	NEUBIG RYAN C	2644 PHEASANT RIDGE ST	UMATILLA	OR	97882-6209	2018	0.10
5N2820BC08600	HOPHAN TIMOTHY A & KAREN F	PO BOX 2096	LAKE OSWEGO	OR	97035-0639	2018	0.10
5N2820BC08700	VALDEZ NOE D JR	2588 PHEASANT RIDGE ST	UMATILLA	OR	97882	2018	0.10
5N2820BC08800	HOPHAN TIMOTHY A & KAREN F	PO BOX 2096	LAKE OSWEGO	OR	97035-0639	2018	0.10
5N2820BC08900	HOPHAN TIMOTHY A & KAREN F	PO BOX 2096	LAKE OSWEGO	OR	97035-0639	2018	0.10
5N2820BC09000	HERNANDEZ ANA L	2522 PHEASANT RIDGE ST	UMATILLA	OR	97882	2018	0.10
5N2820BD00100	LEON JORGE & MARIA B	288 PINE TREE AVE	UMATILLA	OR	97882-6177	2018	0.02
5N2820BD00200	NAIDENOV NICKON	300 PINE TREE AVE	UMATILLA	OR	97882-6197	2018	0.03
5N2820BD00300	SHEPHERD ELAINE	322 PINE ST	UMATILLA	OR	97882	2018	0.05
5N2820BD00400	GORE AMY B	344 PINE TREE AVE	UMATILLA	OR	97882-6197	2018	0.06
5N2820BD00500	ARMENTA ARMANDO & LEMUS ANTONIO RIVERA	336 PINE TREE AVE	UMATILLA	OR	97882	2018	0.07
5N2820BD00600	HARDING KEITH & CHRISTINE	388 PINE TREE AVE	UMATILLA	OR	97882-6197	2018	0.07
5N2820BD00700	YEPEZ ELSA MORALES	392 PINE TREE AVE	UMATILLA	OR	97882-6197	2018	0.07

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Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Transmission Line
5N2820BD00800	BERRY NOAH R	400 PINE TREE AVE	UMATILLA	OR	97882-6188	2018	0.08
5N2820BD00900	GREENE JEFFREY T & KACILYNN	422 PINE TREE AVE	UMATILLA	OR	97882-6188	2018	0.08
5N2820BD01100	MORIN ROBERT K	2333 ORIOLE ST	UMATILLA	OR	97882	2018	0.10
5N2820BD01200	GARCIA SOILO B	2344 ORIOLE ST	UMATILLA	OR	97882	2018	0.10
5N2820BD01300	BROWN DENISE F & DONALD W	411 BOBWHITE AVE	UMATILLA	OR	97882-9326	2018	0.09
5N2820BD01400	GUZMAN-GUZMAN A & YEPEZ MARISELA M	399 BOBWHITE AVE	UMATILLA	OR	97882-9322	2018	0.09
5N2820BD01500	LEONARD JAMES W	200 RIO SENDA ST	UMATILLA	OR	97882-9828	2018	0.08
5N2820BD01600	MORGAN LADEANA MARIE	355 BOBWHITE AVE	UMATILLA	OR	97882-9322	2018	0.07
5N2820BD01700	AMES KEITH E	333 BOBWHITE AVE	UMATILLA	OR	97882	2018	0.05
5N2820BD01800	CROCKER MICHAEL L	301 HAWK CIR	UMATILLA	OR	97882-6096	2018	0.04
5N2820BD01900	EBKER PHILLIP S	297 HAWK CIR	UMATILLA	OR	97882-6196	2018	0.02
5N2820BD02000	PICKER STACEY L & MONIQUE	285 HAWK CIR	UMATILLA	OR	97882-6196	2018	0.02
5N2820BD02100	KARAN SALESH SHALENDRA & TABITHA	2444 CURLEW ST	UMATILLA	OR	97882-6192	2018	0.02
5N2820BD02200	PRIVETT H JOHN & FRANCES J	2466 CURLEW ST	UMATILLA	OR	97882-6192	2018	0.02
5N2820BD02300	ORTIZ MENDOZA ROSA M	233 SPARROW AVE	UMATILLA	OR	97882-6205	2018	0.02
5N2820BD02400	DEACON JAMES E & SIRENA D	2522 CURLEW ST	UMATILLA	OR	97882	2018	0.02

Table X-3: Parcels with noise receptors (including residences) within one mile of the existing transmission line, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Transmission Line
5N2820BD02500	ESQUIVEL RAMON A	PO BOX 93	UMATILLA	OR	97882-0093	2018	0.05
5N2820BD02600	MONTENEGRO MARILYN SCHWISOW	4010 S OLSON CT	KENNEWICK	WA	99337-2618	2018	0.05
5N2820BD02700	HOTTMAN GAVIN & MOLLY	29003 WILGERS WAY	HERMISTON	OR	97838	2018	0.05
5N2820BD02800	WALKER DONALD R & SHARRON L	2433 CURLEW ST	UMATILLA	OR	97882	2018	0.05
5N2820BD02900	GARCIA MICHAEL J	344 BOBWHITE AVE	UMATILLA	OR	97882	2018	0.07
5N2820BD03000	CASTEEL PETE A	445 E JENNIE AVE #UNIT 77	HERMISTON	OR	97838-1993	2018	0.08
5N2820BD03100	BURTON PARKER T & KATIE R	388 BOBWHITE AVE	UMATILLA	OR	97882-9322	2018	0.10
5N2820BD03200	ARMENTA-MADRIGAL PEDRO & ARMENTA AMALIA	400 BOBWHITE AVE	UMATILLA	OR	97882-9326	2018	0.12
5N2820BD03300	HODGE SARAH	422 BOBWHITE AVE	UMATILLA	OR	97882-9326	2018	0.13
5N2820CB00300	MENDOZA ROSA ELENA CAMPOS	49 RIO SENDA ST	UMATILLA	OR	97882-9600	2018	0.00
5N2820CB00400	CORIA ERIK G & SOLIS KIMBERLY	489 DARK CANYON AVE	UMATILLA	OR	97882-6227	2018	0.03
5N2820CB00500	DAVILA ELVIS & MORELOS M & RAYO F	469 DARK CANYON AVE	UMATILLA	OR	97882-9227	2018	0.04
5N2820CB00600	JIMENEZ GERARDO CORIA & DE CORIA ADELFA	627 CHENOWETH AVE	UMATILLA	OR	97882-9625	2018	0.05
5N2820CB00700	KEGLER ARTHUR T	PO BOX 875	BOARDMAN	OR	97818-0875	2018	0.06
5N2820CB00800	TENORIO FRED	389 DARK CANYON AVE	UMATILLA	OR	97882-6226	2018	0.07

Table X-3: Parcels with noise receptors (including residences) within one mile of the existing transmission line, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Transmission Line
5N2820CB00900	ARITA PEDRO LEMUS	PO BOX 322	UMATILLA	OR	97882-0322	2018	0.08
5N2820CB01000	ARMENTA ARMANDO & RIVERA LAURA	125 JUNIPER CT	UMATILLA	OR	97882-9693	2018	0.09
5N2820CB01100	ARAUJO CARLOTA	309 DARK CANYON AVE	UMATILLA	OR	97882-6226	2018	0.10
5N2820CB01200	PIFER KATHERINE ALLYN	289 DARK CANYON AVE	UMATILLA	OR	97882-6229	2018	0.11
5N2820CB01300	MENDOZA CHEIRA	PO BOX 1036	UMATILLA	OR	97882-1036	2018	0.13
5N2820CB01400	RANDALL RANDY D & RHONDA J	PO BOX 1201	HERMISTON	OR	97838-3201	2018	0.14
5N2820CB01500	PARISIEN PEGGY L	PO BOX 1114	UMATILLA	OR	97882-1114	2018	0.15
5N2820CB01600	SANCHEZ MARIA D	189 DARK CANYON AVE	UMATILLA	OR	97882	2018	0.16
5N2820CB01700	ARELLANO CARMEN	169 DARK CANYON AVE	UMATILLA	OR	97882	2018	0.17
5N2820CB01800	HESS KENNETH R	139 DARK CANYON AVE	UMATILLA	OR	97882	2018	0.18
5N2820CB01900	GUARDADO KARLA BEATRIZ	119 DARK CANYON AVE	UMATILLA	OR	97882-6225	2018	0.19
5N2820CB02000	RETFERFORD OSCAR	PO BOX 2232	BIG RIVER	CA	92242-2232	2018	0.20
5N2820CB02100	WILLIAMS STEVEN M	3020 HIGH DESERT LOOP	UMATILLA	OR	97882-6234	2018	0.22
5N2820CB02200	HEREDIA ONOFRE & RICARDO LAURA	3040 HIGH DESERT LOOP	UMATILLA	OR	97882	2018	0.22
5N2820CB02300	NORSTROM GWEN C	33090 LAKE MEAD DR	FREMONT	CA	94555	2018	0.20

Table X-3: Parcels with noise receptors (including residences) within one mile of the existing transmission line, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Transmission Line
5N2820CB02400	GARCIA GERARDO MADRIGAL	120 DARK CANYON AVE	UMATILLA	OR	97882-6225	2018	0.19
5N2820CB02500	BLAKE SARAH	140 DARK CANYON AVE	UMATILLA	OR	97882-6225	2018	0.18
5N2820CB02600	LEWIS JENNIFER A	4379 N LOCUST GROVE RD	MERIDIAN	ID	83646-5513	2018	0.17
5N2820CB02700	VAN HOLLEBEKE WAYNE R & MARLA D	190 DARK CANYON AVE	UMATILLA	OR	97882-6225	2018	0.16
5N2820CB02800	FAULKNER CORY E & ELLEN L	210 DARK CANYON AVE	UMATILLA	OR	97882	2018	0.15
5N2820CB02900	CORDOVA JOSHUA R	230 DARK CANYON AVE	UMATILLA	OR	97882	2018	0.14
5N2820CB03000	DONEY NORMAN A & HAZEL P	270 DARK CANYON AVE	UMATILLA	OR	97882	2018	0.13
5N2820CB03100	BORDEN ASHLEY M	290 DARK CANYON AVE	UMATILLA	OR	97882-6229	2018	0.11
5N2820CB03200	DOMINGUEZ RICARDO MARTINEZ	310 DARK CANYON AVE	UMATILLA	OR	97882	2018	0.10
5N2820CB03300	RUIZ RODRIGUEZ HECTOR JAVIER &	330 DARK CANYON AVE	UMATILLA	OR	97882-6226	2018	0.09
5N2820CB03400	WEST DEBRA A	370 DARK CANYON AVE	UMATILLA	OR	97882	2018	0.08
5N2820CB03500	LONG JESSICA R	390 DARK CANYON AVE	UMATILLA	OR	97882	2018	0.07
5N2820CB03600	TEJEDA MANUELA QUINTERO	410 DARK CANYON AVE	UMATILLA	OR	97882-6227	2018	0.06
5N2820CB03700	MEZA MARIA G MORALES	430 DARK CANYON AVE	UMATILLA	OR	97882-6227	2018	0.05

Table X-3: Parcels with noise receptors (including residences) within one mile of the existing transmission line, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Transmission Line
5N2820CB03800	GONZALES WILLIAM & BARBARA	192 DEL CANTO LN	SANTA BARBARA	CA	93110	2018	0.04
5N2820CB03900	GONZALES WILLIAM & BARBARA	192 DEL CANTO LN	SANTA BARBARA	CA	93110	2018	0.03
5N2820CB04000	COLLINS STEVEN H & JEANNA M &	3025 BLUE JAY ST	UMATILLA	OR	97882-6222	2018	0.00
5N2820CB04100	GARCILAZO ANTHONY	3045 BLUE JAY ST	UMATILLA	OR	97882-6222	2018	0.00
5N2820CB04200	MADRIGAL MENDOZA GERARDO	PO BOX 1071	HERMISTON	OR	97838-3071	2018	0.00
5N2820CB04300	GONZALES WILLIAM & BARBARA	192 DEL CANTO LN	SANTA BARBARA	CA	93110	2018	0.03
5N2820CB04400	GONZALES WILLIAM & BARBARA	192 DEL CANTO LN	SANTA BARBARA	CA	93110	2018	0.04
5N2820CB04500	GONZALES WILLIAM & BARBARA	431 BRIDGEPORT AVE	UMATILLA	OR	97882	2018	0.05
5N2820CB04600	MADRIGAL ROMUALDO G ET AL	411 BRIDGEPORT AVE	UMATILLA	OR	97882-6232	2018	0.06
5N2820CB04700	HARTSTEEN AMANDA	391 BRIDGEPORT AVE	UMATILLA	OR	97882	2018	0.07
5N2820CB04800	HENDON MARIA C	371 BRIDGEPORT AVE	UMATILLA	OR	97882-6231	2018	0.08
5N2820CB04900	ELFERING WILLIAM & YVONNE	1889 E HIGHLAND AVE	HERMISTON	OR	97838-6733	2018	0.09
5N2820CB05000	ESCOBAR BLANCA L	311 BRIDGEPORT AVE	UMATILLA	OR	97882-6231	2018	0.10
5N2820CB05100	KEGLER ARTHUR T	PO BOX 875	BOARDMAN	OR	97818-0875	2018	0.11
5N2820CB05200	HERNANDEZ CRISTINA CAMPOS	271 BRIDGEPORT AVE	UMATILLA	OR	97882-6230	2018	0.13

Table X-3: Parcels with noise receptors (including residences) within one mile of the existing transmission line, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Transmission Line
5N2820CB05300	TORRES ANGELICA M	231 BRIDGEPORT AVE	UMATILLA	OR	97882-6230	2018	0.14
5N2820CB05400	GIL NOE AREVALO	211 BRIDGEPORT AVE	UMATILLA	OR	97882-6230	2018	0.15
5N2820CB05500	BAUTISTA DE ALANIZ MARIA TERESA	191 BRIDGEPORT AVE	UMATILLA	OR	97882-6216	2018	0.16
5N2820CB05600	MUNOZ CHARLIE & SOLORIO SANDRA	171 BRIDGEPORT AVE	UMATILLA	OR	97882-6216	2018	0.17
5N2820CB05700	PETERSON RONALD & LORRI	1014 S VERDE ST	ANAHEIM	CA	92805	2018	0.18
5N2820CB05800	MUNIZ MIGUEL	121 BRIDGEPORT AVE	UMATILLA	OR	97882	2018	0.19
5N2820CB05900	VICTORIO TERESA	101 BRIDGEPORT AVE	UMATILLA	OR	97882-6216	2018	0.20
5N2820CB06000	MANRIQUEZ PEDRO ET AL	3070 HIGH DESERT LP	UMATILLA	OR	97882-6234	2018	0.22
5N2820CB06100	ROLDAN MANUEL & EVANGELINA L	3090 HIGH DESERT LOOP	UMATILLA	OR	97882	2018	0.22
5N2820CB06200	RIVERA-MACIAS LUIS	3120 HIGH DESERT LOOP	UMATILLA	OR	97882	2018	0.22
5N2820CB06400	CRUZ-CRUZ FRANCISCO SANTA	PO BOX 211	UMATILLA	OR	97882-0211	2018	0.20
5N2820CB06500	KROKSTROM MICHAEL L	122 BRIDGEPORT AVE	UMATILLA	OR	97882-6216	2018	0.19
5N2820CB06600	ROSALES ALBERTO & PERLA L	142 BRIDGEPORT AVE	UMATILLA	OR	97882-6216	2018	0.18
5N2820CB06700	CERVANTES JAIME MADRIGAL ET AL	114 NACHES ST	UMATILLA	OR	97882-9607	2018	0.17
5N2820CB06800	CORIA GARCIA MARIELA A	190 BRIDGEPORT AVE	UMATILLA	OR	97882	2018	0.15
5N2820CB07000	OSORIO GARCIA DELFINO & KAEI	332 BRIDGEPORT AVE	UMATILLA	OR	97882-6231	2018	0.09

Table X-3: Parcels with noise receptors (including residences) within one mile of the existing transmission line, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Transmission Line
5N2820CB07100	NAVARRETE ENEIDA JAIME	372 BRIDGEPORT AVE	UMATILLA	OR	97882-6231	2018	0.08
5N2820CB07200	WEBB MATTHEW	392 BRIDGEPORT AVE	UMATILLA	OR	97882-6231	2018	0.07
5N2820CB07300	BROOKS JOYCE S	412 BRIDGEPORT AVE	UMATILLA	OR	97882-6232	2018	0.06
5N2820CB07400	MANRIQUEZ-BARAJAS PEDRO H	432 BRIDGEPORT AVE	UMATILLA	OR	97882-6232	2018	0.05
5N2820CB07500	MADRIGAL AGUSTIN GARCIA & CORIA ISABEL	472 BRIDGEPORT AVE	UMATILLA	OR	97882-6232	2018	0.04
5N2820CB07600	MACIAS LAURA RIVERA & ARMENTA ARMANDO M	492 BRIDGEPORT AVE	UMATILLA	OR	97882-6232	2018	0.03
5N28210000300	WHITE DEBRA A 1/3 ET AL 2/3	77311 COL JORDAN RD	HERMISTON	OR	97838-6182	2018	0.02
5N28210000400	WHITE DEBRA A 1/3 ET AL 2/3	77311 COLONEL JORDAN RD	HERMISTON	OR	97838-6182	2018	0.09

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2808DC00301	UMATILLA MORROW HEAD START	110 NE 4TH ST	HERMISTON	OR	97838-1861	2018	0.90
5N2808DC00501	CAIN NORMAN V & CINDY L	136 PATTERSON ST	UMATILLA	OR	97882-9661	2018	0.73
5N2808DC00503	CARLSON BRUCE D	PO BOX 340	UMATILLA	OR	97882	2018	0.74
5N2808DC00504	DUTCHER KENNETH W	1531 2ND ST	UMATILLA	OR	97882	2018	0.76
5N2808DC00600	MARINA INVESTORS LLC	9220 SW BARBUR BLVD #STE 119-040	PORTLAND	OR	97219-5428	2018	0.72
5N2808DC00700	PETTEY RAYMOND E & PETTEY EDITH A	1401 3RD ST	UMATILLA	OR	97882	2018	0.87
5N2808DC00701	YARBROUGH BRIAN K & TERRA D	1420 SW 2ND ST	UMATILLA	OR	97882	2018	0.85
5N2808DC00800	GONZALES EFREN N & NERIBERTO N	1441 3RD ST	UMATILLA	OR	97882	2018	0.84
5N2808DC00801	BETERAN JOSE L & AUSTIN F	PO BOX 917	UMATILLA	OR	97882-0917	2018	0.81
5N2808DC00802	CIEZ ANTHONY & LORI & COLE RANDY	18207 SUNSET	EDMONDS	WA	98026-5332	2018	0.83
5N2808DC00803	GONZALEZ ENUS & CHAVEZ BLANCA E	1451 3RD ST	UMATILLA	OR	97882-9767	2018	0.83
5N2808DC00804	LEE GARRETT A & ANGELA	200 VIEWCREST DR	SPRING CREEK	NV	89815	2018	0.81
5N2808DC00901	BURTON MICHAEL DEAN	1431 3RD ST	UMATILLA	OR	97882-9767	2018	0.85
5N2808DC01000	GOULD DAVID E	1401 3RD ST	UMATILLA	OR	97882-9767	2018	0.86
5N2808DD00400	HASH GEORGE A & HASH GEORGE RANDALL	1631 2ND ST	UMATILLA	OR	97882	2018	0.66
5N2808DD00401	MCKINNEY ALAN R	PO BOX 1576	UMATILLA	OR	97882	2018	0.70
5N2808DD00402	STOCKARD DAVID E & SUSAN E	1611 2ND ST	UMATILLA	OR	97882-9708	2018	0.68

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2808DD00403	HASH GEORGE A & HASH GEORGE RANDALL	1631 2ND ST	UMATILLA	OR	97882	2018	0.67
5N2808DD00404	BOYD D SHARP TRUST ET AL	1651 2ND ST	UMATILLA	OR	97882-9708	2018	0.64
5N2808DD00800	MARINA INVESTORS LLC	9220 SW BARBUR BLVD #STE 119-287	PORTLAND	OR	97219-5428	2018	0.63
5N2808DD00804	MARINA INVESTORS LLC	9220 SW BARBUR BLVD #STE 119-287	PORTLAND	OR	97219-5428	2018	0.65
5N28090000300	MUNGER JANET	82381 MUNGER LN	UMATILLA	OR	97882-6101	2018	0.17
5N28090000400	MUNGER JANET	82381 MUNGER LN	UMATILLA	OR	97882-6101	2018	0.22
5N28090000500	ARBOGAST CARL A & KAREN K	82365 MUNGER LN	UMATILLA	OR	97882	2018	0.16
5N28090000600	WINDWAVE TECHNOLOGIES INC	PO BOX 1390	BOARDMAN	OR	97818-1390	2018	0.16
5N28090000601	TIMPY ANNA L	401 6TH ST	UMATILLA	OR	97882-9504	2018	0.20
5N2815AA00100	ROGERS EMSLEY E & BARBARA C	200 RIO SENDA ST	UMATILLA	OR	97882-9828	2018	0.88
5N2815AA00200	KEITH CHARLES W	196 RIO SENDA ST	UMATILLA	OR	97882-9642	2018	0.85
5N2815AA00300	GUTIERREZ MARICELA & MUNOZ OCTAVIO G	194 RIO SENDA DR	UMATILLA	OR	97882-2017	2018	0.85
5N2815AA00400	HOWLAND MATT D	192 RIO SENDA ST	UMATILLA	OR	97882-9642	2018	0.85
5N2815AA00500	MYERS KURTIS A	190 RIO SENDA ST	UMATILLA	OR	97882-9642	2018	0.83
5N2815AA00600	BEARDSLEY SCOTT O & TONI A	188 RIO SENDA ST	UMATILLA	OR	97882-9642	2018	0.82

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2815AA00800	MATTESON DAVID & CARSON KAREN J	PO BOX 324	UMATILLA	OR	97882-0324	2018	0.82
5N2815AA00900	MUELLER KRIEG M	192 EL MONTE ST	UMATILLA	OR	97882-9644	2018	0.85
5N2815AA01000	MCINTYRE SHERMAN & MICHELLE	188 EL MONTE ST	UMATILLA	OR	97882	2018	0.83
5N2815AA01100	MENDOZA DOMITILA CORIA	184 EL MONTE ST	UMATILLA	OR	97882-9644	2018	0.82
5N2815AA01200	BAUSTERT JOHN W ETAL	9220 SW BARBUR BLVD #STE 119-287	PORTLAND	OR	97219	2018	0.83
5N2815AA01300	BAUSTERT JOHN W ETAL	9220 SW BARBUR BLVD #STE 119-287	PORTLAND	OR	97219	2018	0.84
5N2815AA01400	BAUSTERT JOHN W ETAL	9220 SW BARBUR BLVD #STE 119-287	PORTLAND	OR	97219	2018	0.86
5N2815AA01500	PHILLIPS JEFFREY L & THERESA D	197 EL MONTE ST	UMATILLA	OR	97882-9644	2018	0.88
5N2815AA01800	CRUZ CURTIS D	PO BOX 1327	BOARDMAN	OR	97818-1327	2018	0.90
5N2815AA02300	NEW HOPE COMMUNITY CHURCH	1350 S HWY 395	HERMISTON	OR	97838-6719	2018	0.86
5N2815AA02400	TRI HARBOR LANDING APTS LMTD	155 SW 10TH ST	HERMISTON	OR	97838	2018	0.80
5N2815AA02500	BIG RIVER GOLD COURSE LLC	709 WILLAMETTE ST	UMATILLA	OR	97882-9404	2018	1.00
5N2815AB00100	JOHNSON STEVEN R & JACQUELYN R	PO BOX 404	SAGLE	ID	83860-0404	2018	0.80
5N2815AB00200	EDMISTON LANA	184 RIO SENDA ST	UMATILLA	OR	97882-9642	2018	0.79
5N2815AB00300	SIGOUIN ALINE M	180 RIO SENDA ST	UMATILLA	OR	97882-9642	2018	0.77

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2815AB00400	SNYDER TERESA E	176 RIO SENDA ST	UMATILLA	OR	97882-9642	2018	0.76
5N2815AB00500	CAMPOS RICARDO & ELIZABETH M	172 RIO SENDA ST	UMATILLA	OR	97882	2018	0.74
5N2815AB00600	DANIELS LESLIE R	168 RIO SENDA ST	UMATILLA	OR	97882-9642	2018	0.73
5N2815AB00700	SCHMEITS ALAN J & LINDA D	164 RIO SENDA ST	UMATILLA	OR	97882-9642	2018	0.71
5N2815AB00800	DUFLOTH DAREN L & PAULETTE M	160 RIO SENDA ST	UMATILLA	OR	97882-9642	2018	0.70
5N2815AB00900	PAYNE LESTER L & KATHLEEN R	156 RIO SENDA ST	UMATILLA	OR	97882-9642	2018	0.68
5N2815AB01000	SCHROTH NORMAN H (TRS)	PO BOX 841	HERMISTON	OR	97838	2018	0.67
5N2815AB01100	SCHROTH NORMAN H (TRS)	PO BOX 841	HERMISTON	OR	97838	2018	0.66
5N2815AB01200	FOSTER JANETTE K	148 RIO SENDA ST	UMATILLA	OR	97882-9642	2018	0.64
5N2815AB01300	STONE FRED J & JEAN I	PO BOX 127	UMATILLA	OR	97882	2018	0.63
5N2815AB01400	GEORGE ANTHONY J JR & CONSTANCE L	136 RIO SENDA ST	UMATILLA	OR	97882-9612	2018	0.61
5N2815AB01601	MCCLANNAHAN VELMA J	PO BOX 224	UMATILLA	OR	97882-0224	2018	0.59
5N2815AB01700	MCCLANNAHAN VELMA J	PO BOX 224	UMATILLA	OR	97882-0224	2018	0.58
5N2815AB01800	SIPE KYLE R & HEIDI A	120 RIO SENDA ST	UMATILLA	OR	97882-9612	2018	0.57
5N2815AB01901	WOODWARD ROBERTA JEAN	PO BOX 1255	UMATILLA	OR	97882-1255	2018	0.59
5N2815AB02100	CAVE THOMAS M & LINDA L	PO BOX 969	UMATILLA	OR	97882	2018	0.60
5N2815AB02200	REBMAN DONALD L & YOUNG OK	129 RIO SENDA ST	UMATILLA	OR	97882	2018	0.62

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2815AB02300	SIMSON CRAIG R	133 RIO SENDA ST	UMATILLA	OR	97882-9612	2018	0.63
5N2815AB02400	DELFS WILLIAM C & CECELIA E	137 RIO SENDA ST	UMATILLA	OR	97882-9612	2018	0.64
5N2815AB02500	RAY MELVIN C & DONNA L	PO BOX 1126	UMATILLA	OR	97882	2018	0.65
5N2815AB02700	REED KENNETH JOHN & RACHELLE MONIQUE	145 RIO SENDA ST	UMATILLA	OR	97882-9612	2018	0.67
5N2815AB02900	WRIGHT WILLIAM D & JOYCE L	157 RIO SENDA ST	UMATILLA	OR	97882	2018	0.71
5N2815AB03100	TOWNSEND STEVEN & ZELDA R	165 RIO SENDA ST	UMATILLA	OR	97882-9642	2018	0.73
5N2815AB03200	YOUNG DAVID H & SANDRA R	169 RIO SENDA ST	UMATILLA	OR	97882-9642	2018	0.75
5N2815AB03300	LIND BRANDT ADAM & JOANNE MARY	173 RIO SENDA ST	UMATILLA	OR	97882-9642	2018	0.76
5N2815AB03400	MADRIGAL OCARIO	177 RIO SENDA ST	UMATILLA	OR	97882-9642	2018	0.77
5N2815AB03500	MADRIGAL NORMA	181 RIO SENDA ST	UMATILLA	OR	97882-9642	2018	0.79
5N2815AB03700	JORSTAD ALAN & VALERIE TRS	108 JOHN DAY ST	UMATILLA	OR	97882-9643	2018	0.58
5N2815AB03800	THOMAS JOHN W & SUSAN E	81434 CRAIG RD	HERMISTON	OR	97838-7233	2018	0.59
5N2815AB03900	PHILLIPS ZACHARY A	118 JOHN DAY ST	UMATILLA	OR	97882-9643	2018	0.60
5N2815AB04000	JACKS SPENCER D	122 JOHN DAY ST	UMATILLA	OR	97882-9643	2018	0.62
5N2815AB04100	PHILLIPS ALAN B & MARY L	126 EL MONTE ST	UMATILLA	OR	97882-9644	2018	0.63
5N2815AB04200	ORTIZ ABIGAIL M	130 EL MONTE ST	UMATILLA	OR	97882	2018	0.64

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2815AB04300	FROST ALLEN J & MORRIS ANGELA A	134 EL MONTE ST	UMATILLA	OR	97882-9644	2018	0.65
5N2815AB04400	C P R CONSTRUCTION INC	705 S 1ST ST	HERMISTON	OR	97838	2018	0.66
5N2815AB04500	C P R CONSTRUCTION INC	705 S 1ST ST	HERMISTON	OR	97838	2018	0.68
5N2815AB04600	GARZA SOCORRO	146 EL MONTE ST	UMATILLA	OR	97882	2018	0.69
5N2815AB04700	LEE JASON K & CRYSTAL J	152 EL MONTE ST	UMATILLA	OR	97882	2018	0.70
5N2815AB04800	C P R CONSTRUCTION INC	705 S 1ST ST	HERMISTON	OR	97838	2018	0.72
5N2815AB04900	BAUSTERT JOHN W ETAL	9220 SW BARBUR BLVD #STE 119-287	PORTLAND	OR	97219	2018	0.73
5N2815AB05000	KAUFFMAN DOROTHY L & CHARLES R	164 EL MONTE ST	UMATILLA	OR	97882	2018	0.75
5N2815AB05100	SANGUINO LAURENCIO D & DELFINA O	130 JOHN DAY ST	UMATILLA	OR	97882	2018	0.76
5N2815AB05200	JOHNSON BELVA ET AL	105 RIO SENDA ST	UMATILLA	OR	97882-9612	2018	0.78
5N2815AB05300	BAUSTERT JOHN W ETAL	9220 SW BARBUR BLVD #STE 119-287	PORTLAND	OR	97219	2018	0.79
5N2815AB05400	BAUSTERT JOHN W ETAL	9220 SW BARBUR BLVD #STE 119-287	PORTLAND	OR	97219	2018	0.81
5N2815AB05500	BAUSTERT JOHN W ETAL	9220 SW BARBUR BLVD #STE 119-287	PORTLAND	OR	97219	2018	0.81
5N2815AB05600	BAUSTERT JOHN W ETAL	9220 SW BARBUR BLVD #STE 119-287	PORTLAND	OR	97219	2018	0.80
5N2815AB05700	BAUSTERT JOHN W ETAL	9220 SW BARBUR BLVD #STE 119-287	PORTLAND	OR	97219	2018	0.78
5N2815AB05800	BAUSTERT JOHN W ETAL	9220 SW BARBUR BLVD #STE 119-287	PORTLAND	OR	97219	2018	0.77
5N2815AB05900	BAUSTERT JOHN W ETAL	9220 SW BARBUR BLVD #STE 119-287	PORTLAND	OR	97219	2018	0.76

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2815AB06000	SCHWAB TERRY L	PO BOX 482	UMATILLA	OR	97882-0482	2018	0.74
5N2815AB06100	HOVERSON SIGMUND J & LAUREL F	157 EL MONTE ST	UMATILLA	OR	97882	2018	0.73
5N2815AB06200	SHEELY FRED L & ARLENE	151 EL MONTE ST	UMATILLA	OR	97882	2018	0.71
5N2815AB06300	BAUSTERT JOHN W ETAL	9220 SW BARBUR BLVD #STE 119-287	PORTLAND	OR	97219	2018	0.73
5N2815AB06400	BAUSTERT JOHN W ETAL	9220 SW BARBUR BLVD #STE 119-287	PORTLAND	OR	97219	2018	0.74
5N2815AB06500	BAUSTERT JOHN W ETAL	9220 SW BARBUR BLVD #STE 119-287	PORTLAND	OR	97219	2018	0.73
5N2815AB06600	C P R CONSTRUCTION INC	705 S 1ST ST	HERMISTON	OR	97838	2018	0.71
5N2815AB06700	C P R CONSTRUCTION INC	705 S 1ST ST	HERMISTON	OR	97838	2018	0.69
5N2815AB06800	SMITH MICHAEL L & LEEANN M	PO BOX 807	UMATILLA	OR	97882-0807	2018	0.68
5N2815AB06900	MERCADO TEODORO N & LOPEZ EVA	1492 E THEATER LN	HERMISTON	OR	97838	2018	0.67
5N2815AB07000	GOMEZ SIMON & ELISA	128 JOHN DAY ST	UMATILLA	OR	97882	2018	0.66
5N2815AB07100	SANGUINO LAURENCIO & DELFINA	130 JOHN DAY ST	UMATILLA	OR	97882	2018	0.67
5N2815AB07200	LEON IMELDA C	PO BOX 151	UMATILLA	OR	97882	2018	0.69
5N2815AB07300	ECHEVERRIA MAYRA Y	134 JOHN DAY ST	UMATILLA	OR	97882-9643	2018	0.70
5N2815AB07400	SWISHER PATRICIA JEAN	136 JOHN DAY ST	UMATILLA	OR	97882	2018	0.72
5N2815AB07500	ESCOBEDO GUADALUPE	138 JOHN DAY ST	UMATILLA	OR	97882	2018	0.73
5N2815AB07600	ALANIZ LORENA	PO BOX 955	UMATILLA	OR	97882-0955	2018	0.75
5N2815AB07700	BRUCE STEVEN W	142 JOHN DAY ST	UMATILLA	OR	97882	2018	0.76
5N2815AB07800	BAUSTERT JOHN W ETAL	9220 SW BARBUR BLVD #STE 119-287	PORTLAND	OR	97219	2018	0.76

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2815AB07900	BAUSTERT JOHN W ETAL	9220 SW BARBUR BLVD #STE 119-287	PORTLAND	OR	97219	2018	0.76
5N2815AB08000	SKOUBO RICHARD & ELLA	705 CHINOOK CT	UMATILLA	OR	97882	2018	0.77
5N2815AB08100	ABBOTT JAMES & LINDA	707 CHINOOK CT	UMATILLA	OR	97882	2018	0.76
5N2815AB08200	MURR MALLORY	709 CHINOOK CT	UMATILLA	OR	97882- 9652	2018	0.78
5N2815AB08300	BEYERS JACK D & EVE A	711 CHINOOK CT	UMATILLA	OR	97882	2018	0.80
5N2815AB08400	CHEWNING BLAKE A	713 CHINOOK CT	UMATILLA	OR	97882	2018	0.81
5N2815AB08500	GOLLADAY SANDY L	712 CHINOOK CT	UMATILLA	OR	97882- 9652	2018	0.82
5N2815AB08600	LONG CORY S & KATHERIN L	710 CHINOOK CT	UMATILLA	OR	97882- 9652	2018	0.82
5N2815AB08700	MCMILLAN DENNIS CARL & KATIE ERIN	708 CHINOOK CT	UMATILLA	OR	97882- 9652	2018	0.80
5N2815AB08800	VERNON ANITA	704 CHINOOK CT	UMATILLA	OR	97882- 9652	2018	0.79
5N2815AB08900	SORN RICHARD NEALE JR	702 CHINOOK CT	UMATILLA	OR	97882- 9652	2018	0.79
5N2815AB09000	WINTERS KIMBERLY K & VANDECAR JOSEPH H	700 CHINOOK CT	UMATILLA	OR	97882	2018	0.79
5N2815AB09100	HARTUNG LAURIE L	164 JOHN DAY ST	UMATILLA	OR	97882- 9643	2018	0.81
5N2815AB09200	HLAWEK RICKY J & SABRINA M	168 JOHN DAY ST	UMATILLA	OR	97882- 9643	2018	0.82
5N2815AB09300	LAUTENSLAGER LANCE	170 GORDON CT	UMATILLA	OR	97882- 9682	2018	0.81
5N2815AB09400	BOWEN MICHAEL C	PO BOX 1247	HERMISTON	OR	97838- 3247	2018	0.81
5N2815AB09500	PARKS BENNETT J	174 GORDON CT	UMATILLA	OR	97882	2018	0.83

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2815AB09600	TRUKOSITZ STEPHEN & CHRISTINE	PO BOX 478	UMATILLA	OR	97882	2018	0.84
5N2815AB09700	GUNNYON EDWARD L & SUSAN A	242 E MAIN ST ## 146	HERMISTON	OR	97838-1840	2018	0.85
5N2815AB10100	NOBLES CLYDE C & BETTY L	650 MONROE ST	UMATILLA	OR	97882-9508	2018	0.82
5N2815AB10200	HULETT RUTH E	557 GOERIG ST	WOODLAND	WA	98674	2018	0.80
5N2815AB10300	RODRIGUEZ BEATRIZ L & OCTAVIO D	110 COWLITZ ST	UMATILLA	OR	97882-9641	2018	0.79
5N2815AB10400	CORIA OLFIO & MARGARITA	607 CHINOOK ST	UMATILLA	OR	97882-9615	2018	0.79
5N2815AB10500	TENEYCK ROAK D	PO BOX 1677	UMATILLA	OR	97882	2018	0.78
5N2815AB10600	APARICIO FRANCISCO G	PO BOX 928	UMATILLA	OR	97882-0928	2018	0.78
5N2815AB10700	SAWYER JUDITH A	PO BOX 1465	UMATILLA	OR	97882	2018	0.77
5N2815AB10800	CORIA OLFIO & MARGARITA D	607 CHINOOK ST	UMATILLA	OR	97882-9615	2018	0.76
5N2815AB10900	ALVARADO ANTONIO LUGO & MARIA G V G	PO BOX 1302	UMATILLA	OR	97882	2018	0.76
5N2815AB11000	BAUSTERT JOHN W ETAL	9220 SW BARBUR BLVD #STE 119-287	PORTLAND	OR	97219	2018	0.76
5N2815AB11100	BAUSTERT JOHN W ETAL	9220 SW BARBUR BLVD #STE 119-287	PORTLAND	OR	97219	2018	0.74
5N2815AB11200	CERNA JESUS CARRILLO	135 JOHN DAY ST	UMATILLA	OR	97882-9643	2018	0.73
5N2815AB11300	ALCORN JANE L	133 JOHN DAY ST	UMATILLA	OR	97882-9643	2018	0.71
5N2815AB11400	MORRIS BRIAN P & REBECCA L	131 JOHN DAY ST	UMATILLA	OR	97882	2018	0.70
5N2815AB11500	PERKINS PAULA	129 JOHN DAY ST	UMATILLA	OR	97882-9643	2018	0.68

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2815AB11600	MILLHAEM THERESE M	127 JOHN DAY ST	UMATILLA	OR	97882	2018	0.66
5N2815AB11700	FRANCES ROGER L & RUTH L	125 JOHN DAY ST	UMATILLA	OR	97882-9643	2018	0.65
5N2815AB11800	CARLSON THOMAS E & DEBRA L	123 JOHN DAY ST	UMATILLA	OR	97882	2018	0.63
5N2815AB11900	SURBER CASEY J	119 JOHN DAY ST	UMATILLA	OR	97882-9643	2018	0.62
5N2815AB12000	MADRIGAL FERNANDO C	113 JOHN DAY ST	UMATILLA	OR	97882	2018	0.61
5N2815AB12100	GARCIA CHRIS & DOMITILA	109 JOHN DAY ST	UMATILLA	OR	97882-9643	2018	0.60
5N2815AB12200	SCHOOL DIST #6	1001 6TH ST	UMATILLA	OR	97882-6201	2018	0.61
5N2815AC00100	CAIN JAMES M & LINDA K	32306 BENJAMIN LN	HERMISTON	OR	97838	2018	0.64
5N2815AC00200	MCCLENAHEEN KEVIN E	609 CHENOWITH AVE	UMATILLA	OR	97882-9625	2018	0.65
5N2815AC00300	MADRIGAL LEONEL C & ANDREA O	597 CHENOWITH ST	UMATILLA	OR	97882-9803	2018	0.66
5N2815AC00400	MADRIGAL LEONEL C & ANDRA O	597 CHENOWITH ST	UMATILLA	OR	97882-9803	2018	0.66
5N2815AC00500	CORIA JOSE	112 COLUMBIA ST	UMATILLA	OR	97882	2018	0.67
5N2815AC00600	CORIA JOSE C & INES M	112 COLUMBIA AVE	UMATILLA	OR	97882-9681	2018	0.67
5N2815AC00700	SANGUINO ANTONIO & ALICIA	321403 E PUNKIN CENTER RD	HERMISTON	OR	97838-7505	2018	0.69
5N2815AC00800	GOLLADAY ANNA	119 KIWI CT	UMATILLA	OR	97882-9692	2018	0.76
5N2815AC00900	BARNETT BUD & PATTON DOLLY MAE	502 2ND AVE	UMATILLA	OR	97882-9626	2018	0.76
5N2815AC01000	ORTIZ RAMON M	48 COLUMBIA AVE	UMATILLA	OR	97882-9414	2018	0.76

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2815AC01100	BUENROSTRO NAZARIO	506 2ND AVE	UMATILLA	OR	97882-9626	2018	0.75
5N2815AC01200	DIAZ ROBERTO RODRIQUEZ	508 2ND AVE	UMATILLA	OR	97882-9626	2018	0.75
5N2815AC01300	CANCINO SERGIO MENDOZA	117 KIWI CT	UMATILLA	OR	97882-9692	2018	0.75
5N2815AC01400	CASTELLANOS JULIO & CARRILLO ELIA	PO BOX 951	IRRIGON	OR	97844	2018	0.73
5N2815AC01500	LOERA GARCIA ELIZARDO	PO BOX 625	STANFIELD	OR	97875-0625	2018	0.73
5N2815AC01600	GARZA CRISPIN & JILLIAN M	123 ALAMEDA CT	UMATILLA	OR	97882	2018	0.72
5N2815AC01700	MENDOZA LEONARDO	121 ALAMEDA CT	UMATILLA	OR	97882-9631	2018	0.73
5N2815AC01800	GEMELKE JAMES E	119 ALAMEDA CT	UMATILLA	OR	97882-9631	2018	0.74
5N2815AC01900	VANDEVER KEITH	117 ALAMEDA CT	UMATILLA	OR	97882	2018	0.74
5N2815AC02000	VANDEVER KEITH	117 ALAMEDA CT	UMATILLA	OR	97882	2018	0.74
5N2815AC02001	PETTYJOHN LOLA A					2018	0.72
5N2815AC02100	TENNANT GARY G	995 NE BAILEY LN	HERMISTON	OR	97838-6757	2018	0.71
5N2815AC02200	CLOUSER GEGORY E	PO BOX 1523	HERMISTON	OR	97838-3523	2018	0.70
5N2815AC02300	DE LA PAZ GUADALUPE	PO BOX 1597	HERMISTON	OR	97838	2018	0.69
5N2815AC02600	CAMPOS TIOFANI M & SANDRA D	42 ELDERBERRY CT	UMATILLA	OR	97882-9687	2018	0.80
5N2815AC02700	SAMPLES PATRICIA A	43 ELDERBERRY CT	UMATILLA	OR	97882-9687	2018	0.80
5N2815AC02800	MORRIS MICKEY L & MILLER NATHANEUAL	44 ELDERBERRY CT	UMATILLA	OR	97882	2018	0.79
5N2815AC02900	CORIA JESUS & OFELIA	45 ELDERBERRY CT	UMATILLA	OR	97882	2018	0.79

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2815AC03000	SOLORIO PRESILIANO & ELIA R	46 ELDERBERRY CT	UMATILLA	OR	97882	2018	0.80
5N2815AC03100	MADRIGAL LAURENCIO A	47 ELDERBERRY CT	UMATILLA	OR	97882	2018	0.81
5N2815AC03200	CORIA-GORSILOZO J AMPARO	48 ELDERBERRY CT	UMATILLA	OR	97882	2018	0.81
5N2815AC03300	BEDOLLA JUAN ET AL	39 APPLE CT	UMATILLA	OR	97882-9683	2018	0.82
5N2815AC03400	NINO OLIVERIO	50 ELDERBERRY CT	UMATILLA	OR	97882-9687	2018	0.82
5N2815AC03500	BALDOVINEZ MIGUEL G	51 FIR CT	UMATILLA	OR	97882-9688	2018	0.84
5N2815AC03600	SAUCEDO JUAN CARLOS V & CARDENAS BERTHA	52 FIR CT	UMATILLA	OR	97882-9688	2018	0.83
5N2815AC03700	GARCILAZO RAFAEL M & GARCILAZO RIGOBERTO	53 FIR CT	UMATILLA	OR	97882	2018	0.83
5N2815AC03800	MENDOZA MARICELA MADRIGAL	436 PENDLETON ST	UMATILLA	OR	97882-9417	2018	0.82
5N2815AC03900	HANSON ELINOR(LE)& HANSON LOUIS & LARRY	2110 S HIGHWAY 395	HERMISTON	OR	97838	2018	0.83
5N2815AC04000	CAMPOS LEONARDO S & YADRIA V	56 FIR CT	UMATILLA	OR	97882	2018	0.85
5N2815AC04100	JUAREZ AMELIA & ELISEO	PO BOX 657	UMATILLA	OR	97882	2018	0.85
5N2815AC04200	NINO OLIVERO & NINO ROBERTO	58 FIR CT	UMATILLA	OR	97882	2018	0.85
5N2815AC04300	GARCIA JOSE MORALES & GARCIA REBECA	608 W HERMISTON AVE	HERMISTON	OR	97838-1617	2018	0.85
5N2815AC04400	CANCINO LADISLAO MADRIGAL ET AL	PO BOX 721	UMATILLA	OR	97882-0721	2018	0.87
5N2815AC04500	GUZMAN M & ARMENTA L	61 GINGER CT	UMATILLA	OR	97882	2018	0.87
5N2815AC04600	PALOMINO ADRIAN & LOZANO MARTHA	PO BOX 1521	UMATILLA	OR	97882	2018	0.86

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2815AC04700	QUEZADA CARMELO F & MARIA C	63 GINGER CT	UMATILLA	OR	97882	2018	0.86
5N2815AC04800	HERNANDEZ JOSE L	64 GINGER CT	UMATILLA	OR	97882-9689	2018	0.86
5N2815AC04900	GARCIA REBECA V	608 W HERMISTON AVE	HERMISTON	OR	97838-1617	2018	0.85
5N2815AC05000	MENDOZA MARIA CRUZ	66 GINGER CT	UMATILLA	OR	97882-9689	2018	0.86
5N2815AC05100	TEJEDA LUZ ELENA ET AL	67 GINGER CT	UMATILLA	OR	97882	2018	0.88
5N2815AC05200	VILLANUEVA ENRIQUE & AMY	PO BOX 771	COLLEGE PLACE	WA	99324-0771	2018	0.88
5N2815AC05300	BELT STEPHEN D & JEANNIE	69 GINGER CT	UMATILLA	OR	97882	2018	0.88
5N2815AC05400	OCHOA ELIDIA	71 GINGER CT	UMATILLA	OR	97882	2018	0.88
5N2815AC05500	OCHOA ELIDIA	71 GINGER CT	UMATILLA	OR	97882-9689	2018	0.88
5N2815AC05600	JIMENEZ ALEJANDRO G	72 GINGER CT	UMATILLA	OR	97882	2018	0.89
5N2815AC05700	URSUA ROSA A	73 HEMLOCK CT	UMATILLA	OR	97882-9690	2018	0.90
5N2815AC05900	RICHARDS LAVERNE C & LAVONNE	75 HEMLOCK CT	UMATILLA	OR	97882	2018	0.90
5N2815AC06000	POLITRON JORGE O	76 HEMLOCK CT	UMATILLA	OR	97882	2018	0.89
5N2815AC06100	ORTIZ PEDRO T & JESUS L	PO BOX 896	UMATILLA	OR	97882	2018	0.90
5N2815AC06200	ARMENTA ISABEL	78 HEMLOCK CT	UMATILLA	OR	97882	2018	0.92
5N2815AC06300	CISNEROS VALENTIN & YOLANDA	79 HEMLOCK CT	UMATILLA	OR	97882-9690	2018	0.92
5N2815AC06400	ISLAS KIRSTEN	80 HEMLOCK CT	UMATILLA	OR	97882	2018	0.92
5N2815AC06500	COREA LE & MADRIGAL AS	PO BOX 894	UMATILLA	OR	97882	2018	0.92
5N2815AC06600	ISLAS BENITO M & CANCINO LADISLAO M	PO BOX 721	UMATILLA	OR	97882-0721	2018	0.94

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2815AC06700	THOMPSON NOKA A & STEWART CORA ANN	83 SONESTA ST	UMATILLA	OR	97882	2018	0.93
5N2815AC06800	MARTINEZ ERNESTO L & SANDRA O	84 SONESTA ST	UMATILLA	OR	97882	2018	0.93
5N2815AC06900	GUTIERREZ MARIA	PO BOX 725	UMATILLA	OR	97882	2018	0.93
5N2815AC07000	FRIAS ORALIA	1030 SW 11TH ST #UNIT 74	HERMISTON	OR	97838-9426	2018	0.93
5N2815AC07100	EDWARDS GENE DENNIS & GERALDINE E	80 HEMLOCK CT	UMATILLA	OR	97882-9690	2018	0.88
5N2815AC07101	EDWARDS GENE DENNIS & GERALDINE E	80 HEMLOCK CT	UMATILLA	OR	97882-9690	2018	0.90
5N2815AC07102	EDWARDS GENE DENNIS & GERALDINE E	PO BOX 763	HERMISTON	OR	97838-0763	2018	0.92
5N2815AC07200	SALAS GREGORIO RESENDIZ	PO BOX 92	UMATILLA	OR	97882-0092	2018	0.92
5N2815AC07300	SPOON OLLIE MAE	102 LARCH CT	UMATILLA	OR	97882-9691	2018	0.92
5N2815AC07400	GARCILAZO RIGOBERTO & OLGA	53 FIR CT	UMATILLA	OR	97882-9688	2018	0.91
5N2815AC07500	SOLIS NICOLAS	4 SONESTA ST	UMATILLA	OR	97882	2018	0.91
5N2815AC07600	NAFARRATE PAULINO & PATRICIA A	5 SONESTA ST	UMATILLA	OR	97882	2018	0.91
5N2815AC07700	CORIA OCARIO O & MENDOZA ROSA M	6 DRIFTWOOD CT	UMATILLA	OR	97882-9686	2018	0.90
5N2815AC07800	THOMPSON CLINTON A	8 DRIFTWOOD CT	UMATILLA	OR	97882-9686	2018	0.90
5N2815AC07900	HESS CHRISTIE & THOMPSON CLINTON	8 DRIFTWOOD CT	UMATILLA	OR	97882	2018	0.90
5N2815AC08000	PIMENTEL JAIME & IZAGUIRRE YOLANDA	PO BOX 1186	UMATILLA	OR	97882-1186	2018	0.91

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2815AC08100	RICHMOND JEANETTE	10 DRIFTWOOD CT	UMATILLA	OR	97882-9686	2018	0.90
5N2815AC08200	LIDDELL CORRIE L	11 DRIFTWOOD CT	UMATILLA	OR	97882	2018	0.88
5N2815AC08300	ADAMS GORDON & ADAMS BRENDA	12 DRIFTWOOD CT	UMATILLA	OR	97882-9686	2018	0.88
5N2815AC08500	CAMPOS ADOLFO & ANITA M	14 DRIFTWOOD CT	UMATILLA	OR	97882-9686	2018	0.88
5N2815AC08600	GARCIA ALFREDO M	PO BOX 481	UMATILLA	OR	97882	2018	0.86
5N2815AC08700	PERKINS CLAUDIA L	PO BOX 85	UMATILLA	OR	97882	2018	0.86
5N2815AC08800	HERRERA M IRENE & CORDENAS H EUDORO	81545 W EIGHTH RD	IRRIGON	OR	97844-7118	2018	0.86
5N2815AC08900	SANDOVAL-LOPEZ WELSON E	18 CEDAR CT	UMATILLA	OR	97882	2018	0.87
5N2815AC09000	NOBLES CLYDE C & BETTY L	650 MONROE ST	UMATILLA	OR	97882-9508	2018	0.86
5N2815AC09100	GARCIA JOSE M & REBECCA V	PO BOX 822	UMATILLA	OR	97882	2018	0.85
5N2815AC09200	SERRANO RAUL & CORIA MA GUADALUPE	21 CEDAR CT	UMATILLA	OR	97882-9685	2018	0.84
5N2815AC09300	CORREA MARIA	22 CEDAR CT	UMATILLA	OR	97882	2018	0.84
5N2815AC09400	RANSOM RONALEE	23 CEDAR CT	UMATILLA	OR	97882-9685	2018	0.84
5N2815AC09500	BEDOLLA EDMUMDO & HERMELINDA	PO BOX 1023	UMATILLA	OR	97882	2018	0.83
5N2815AC09600	SOTO NEFTALI & ESTHER	PO BOX 33	UMATILLA	OR	97882	2018	0.83
5N2815AC09700	COOK DAVID L & FRANCES B	26 BIRCH CT	UMATILLA	OR	97882	2018	0.83
5N2815AC09800	MADRIGAL PEDRO ARMENTA & AMALIA A	27 BIRCH CT	UMATILLA	OR	97882-9684	2018	0.84
5N2815AC09900	CASTANON JOSE M & DE LA PAZ ADELMA	PO BOX 1316	UMATILLA	OR	97882	2018	0.81
5N2815AC10100	ESCOBEDO GUADALUPE	138 JOHN DAY ST	UMATILLA	OR	97882	2018	0.81

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2815AC10200	BRANCH BANKING & TRUST CO	301 COLLEGE ST	GREENVILLE	SC	29601-2014	2018	0.81
5N2815AC10300	LEON FROYLAN	PO BOX 215	UMATILLA	OR	97882	2018	0.79
5N2815AC10400	BAKER FRANCES M	34 APPLE CT	UMATILLA	OR	97882	2018	0.79
5N2815AC10500	BAKER FRANCES M	34 APPLE CT	UMATILLA	OR	97882	2018	0.80
5N2815AC10600	JIMENEZ ORLANDO M & ARMENTA MARIA D	35 APPLE CT	UMATILLA	OR	97882	2018	0.80
5N2815AC10700	MCNARY MANOR MOBILE ESTATES	86 1/2 SONESTA ST	UMATILLA	OR	97882	2018	0.79
5N2815AC10800	CAMPOS CESAR & SALAMANCA ELVIRA	PO BOX 234	UMATILLA	OR	97882-0234	2018	0.81
5N2815AC10900	VANDECAR BRANDI L	76307 E OREGON LN	IRRIGON	OR	97844	2018	0.79
5N2815AC11000	ORTIZ SAMUEL & AGRIPINA	38 APPLE CT	UMATILLA	OR	97882	2018	0.78
5N2815AC11100	MUNOZ MARIE G & CARDENAS FELIPE	39 APPLE CT	UMATILLA	OR	97882	2018	0.78
5N2815AC11200	MADRIGAL JORGE J & LOURDES A	40 APPLE CT	UMATILLA	OR	97882	2018	0.78
5N2815AC11300	MULVANEY JAMES	703 NE MOE LN	HERMISTON	OR	97838-6763	2018	0.77
5N2815AD00800	MACIAS LEOBARDO & HILDA M	PO BOX 906	UMATILLA	OR	97882	2018	0.99
5N2815AD00900	MURGUIA FLORENTINO V	116 KIWI CT	UMATILLA	OR	97882	2018	0.99
5N2815AD01000	SHUBIN LORNA J & RUST JOHN D	114 KIWI CT	UMATILLA	OR	97882-9692	2018	0.99
5N2815AD01100	RANDALL BROTHERS LLC	705 S 1ST ST	HERMISTON	OR	97838	2018	0.98
5N2815AD01200	OLEA THOMAS JEFFERY & MARIA L	112 KIWI CT	UMATILLA	OR	97882-9692	2018	0.98
5N2815AD01400	QUALLS KYLE	110 LARCH CT	UMATILLA	OR	97882-9691	2018	0.97
5N2815AD01500	SQUIRE TRINA L	109 LARCH CT	UMATILLA	OR	97882	2018	0.97
5N2815AD01600	MARIN AURELIO & JUAN	107 LARCH CT	UMATILLA	OR	97882-9691	2018	0.97

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2815AD01700	MARIN AURELIO & JUAN	107 LARCH CT	UMATILLA	OR	97882-9691	2018	0.97
5N2815AD01800	PEREZ FIDEL	106 LARCH CT	UMATILLA	OR	97882-9691	2018	0.97
5N2815AD01900	ISLAS BENITO	80 HEMLOCK CT	UMATILLA	OR	97882-9690	2018	0.98
5N2815AD02000	GARCILAZO GUILLERMO & MADRIGAL ADOLFINA	104 LARCH CT	UMATILLA	OR	97882-9691	2018	0.97
5N2815AD02100	PINKHAM KENDRA M	103 LARCH CT	UMATILLA	OR	97882-9691	2018	0.96
5N2815AD02200	SPOON OLLIE MAE	102 LARCH CT	UMATILLA	OR	97882-9691	2018	0.95
5N2815AD02300	GUENTHER MARVIN / GUENTHER MARVIN R	99 LARCH CT	UMATILLA	OR	97882-9691	2018	0.95
5N2815AD02500	GUENTHER MARVIN R	99 LARCH CT	UMATILLA	OR	97882-9691	2018	0.95
5N2815AD02600	MENDOZA CARLOS G	PO BOX 122	UMATILLA	OR	97882	2018	0.95
5N2815AD02700	PONCE YANELI CORIA & CORIA IMELDA D	97 SONESTA ST	UMATILLA	OR	97882-9675	2018	0.93
5N2815AD02800	CARRANZA FILIBERTO H & CERVANTES POMPEY	96 SONESTA ST	UMATILLA	OR	97882-9675	2018	0.93
5N2815AD02900	CISNEROS JAVIER C & LAURA G	95 SONESTA ST	UMATILLA	OR	97882	2018	0.93
5N2815AD03000	CEREZO ROBERTO G & CORREA VERONICA L	94 SONESTA ST	UMATILLA	OR	97882-9675	2018	0.94
5N2815AD03100	RODRIGUEZ M F & RADILLO M S	93 SONESTA ST	UMATILLA	OR	97882-9675	2018	0.94
5N2815AD03300	CAMPOS FERMIN & SANDRA	91 SONESTA ST	UMATILLA	OR	97882-9675	2018	0.94
5N2815AD03400	MENDOZA FERMIN CAMPOS	91 SONESTA ST	UMATILLA	OR	97882-9675	2018	0.95

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2815AD03500	ALLEN JOAN R	90 SONESTA ST	UMATILLA	OR	97882-9675	2018	0.95
5N2815AD03600	CORIA ALEJANDRA GARCIA & RUBEN GARCIA	128 JUNIPER CT	UMATILLA	OR	97882-9693	2018	0.95
5N2815AD03700	MENDOZA FERNANDO B & RAFAELA G	88 SONESTA ST	UMATILLA	OR	97882	2018	0.95
5N2815AD03800	TEJEDA-DAVILA JOSE A	87 SONESTA ST	UMATILLA	OR	97882	2018	0.96
5N2815AD03900	ALLEN DORIS	141 ILEX CT	UMATILLA	OR	97882-9694	2018	0.97
5N2815AD04000	POWERS GARY L & PEGGY L	137 ILEX CT	UMATILLA	OR	97882	2018	0.97
5N2815AD04100	VARGAS DANIEL	PO BOX 1081	UMATILLA	OR	97882-1081	2018	0.97
5N2815AD04200	STOKOE RICHARD E	PO BOX 432	UMATILLA	OR	97882-0432	2018	0.96
5N2815AD04300	POWERS GARY LEE & PEGGY LORRAINE	137 ILEX CT	UMATILLA	OR	97882-9694	2018	0.97
5N2815AD04500	CAMPOS ALEGUNDO	PO BOX 1523	UMATILLA	OR	97882	2018	0.99
5N2815AD04600	PANKEY RICHARD S	2510 SW REDMOND HILL RD	MCMINNVILLE	OR	97128	2018	0.99
5N2815AD05000	HARPSTER LEONA V & HARLE LUANNA M	130 JUNIPER CT	UMATILLA	OR	97882-9693	2018	1.00
5N2815AD05100	MENDOZA HILDA HERNANDEZ ET AL	129 JUNIPER CT	UMATILLA	OR	97882	2018	0.99
5N2815BA00100	OLSON ERICK E	113 RIO SENDA ST	UMATILLA	OR	97882-9612	2018	0.58
5N2815BA00101	GARRETT RANDI M & JONATHAN F	109 RIO SENDA ST	UMATILLA	OR	97882-9612	2018	0.57
5N2815BA00300	JOHNSON BELVA	105 RIO SENDA ST	UMATILLA	OR	97882-9612	2018	0.55

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2815BA00400	CULVER CHARLENE K	807 CHENOWITH ST	UMATILLA	OR	97882-9412	2018	0.57
5N2815BA00500	JOURNOT MELODY	103 JOHN DAY ST	UMATILLA	OR	97882-9643	2018	0.59
5N2815BA00600	BEITEL ROBERT M & JANET L (TRS)	701 CHENOWITH ST	UMATILLA	OR	97882-9804	2018	0.60
5N2815BA00700	CORIA GERARDO & ADELFA	627 CHENOWITH ST	UMATILLA	OR	97882	2018	0.61
5N2815BA00800	LEON JOSE M	PO BOX 1077	UMATILLA	OR	97882-1077	2018	0.63
5N2815BA00900	CARLSON BRUCE	PO BOX 340	UMATILLA	OR	97882-0340	2018	0.60
5N2815BA01000	RODRIGUEZ MARTIN GARCIA	31119 BAGGETT LN	HERMISTON	OR	97838-9779	2018	0.60
5N2815BA01100	RODRIGUEZ OCTAVIO & BEATRIZ	110 COWLITZ ST	UMATILLA	OR	97882-9641	2018	0.59
5N2815BA01200	HERSCH BRIAN R	8107 SPIEDEN DR	PASCO	WA	99301-7913	2018	0.58
5N2815BA01300	ORTIZ RAMON	48 COLUMBIA AVE	UMATILLA	OR	97882-9414	2018	0.57
5N2815BA01400	JOHNSON WILLIAM D & AMBER M	708 CHENOWITH ST	UMATILLA	OR	97882	2018	0.56
5N2815BA01500	RODRIGUEZ TERESO H & LINDA S	80808 HICKEY LN	HERMISTON	OR	97838-7215	2018	0.55
5N2815BA01700	CORTES YVONNE SANCHEZ	902 CHENOWITH AVE	UMATILLA	OR	97882-2002	2018	0.54
5N2815BA01800	RIDER SONNY R & BARBARA A	57 RIO SENDA ST	UMATILLA	OR	97882-9600	2018	0.53
5N2815BA01900	COLLINS JERRY D & THERESA M	100 RIO SENDA ST	UMATILLA	OR	97882-9612	2018	0.52

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2815BA02000	CONWAY DAVID B	104 RIO SENDA ST	UMATILLA	OR	97882-9612	2018	0.53
5N2815BA02100	CONWAY DAVID B	104 RIO SENDA ST	UMATILLA	OR	97882-9612	2018	0.54
5N2815BA02300	TERJESON STEVEN D & BETTE L	116 RIO SENDA ST	UMATILLA	OR	97882	2018	0.56
5N2815BA04800	VANDEVER JUSTIN & BRUCE JESSICA	53 RIO SENDA ST	UMATILLA	OR	97882-9600	2018	0.52
5N2815BA04900	VILLARREAL RICARDO R & RODRIGUEZ RICARDO	49 RIO SENDA ST	UMATILLA	OR	97882-9600	2018	0.51
5N2815BA05000	KENDRICK KEVIN & KENDRICK AMANDA KAY	45 RIO SENDA ST	UMATILLA	OR	97882-9600	2018	0.49
5N2815BA05100	GUZMAN GUZMAN MARIO	41 RIO SENDA ST	UMATILLA	OR	97882-9600	2018	0.48
5N2815BA05200	TORRES JOSEFINA	39 DIABLO CT	UMATILLA	OR	97882-9668	2018	0.49
5N2815BA05300	BEDOLLA JUAN M	37 DIABLO CT	UMATILLA	OR	97882-9668	2018	0.51
5N2815BA05400	COLULA FRANCISCA	35 DIABLO CT	UMATILLA	OR	97882-9668	2018	0.52
5N2815BA05500	OLSON DANA A & SHERRIE E	33 DIABLO CT	UMATILLA	OR	97882	2018	0.53
5N2815BA05600	RIDINGS KRISTINA L	PO BOX 818	UMATILLA	OR	97882	2018	0.54
5N2815BA05700	CHAVEZ EFREN	PO BOX 1563	UMATILLA	OR	97882-1653	2018	0.55
5N2815BA05800	CORTABERRIA GREGORIO D & BRIANA B	80326 SUNSHINE LN	HERMISTON	OR	97838-9319	2018	0.54
5N2815BA05900	FRANKS SHAWN N	24 DIABLO CT	UMATILLA	OR	97882	2018	0.52
5N2815BA06000	JUAREZ ALEJANDRA MORAS	22 DIABLO CT	UMATILLA	OR	97882-9668	2018	0.51
5N2815BA06100	ANTHONY LOGAN JAMES & ELIZABETH ROSE	20 DIABLO CT	UMATILLA	OR	97882-9668	2018	0.50

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2815BA06200	MENDOZA FERNANDO & NORBERTA	18 DIABLO CT	UMATILLA	OR	97882	2018	0.48
5N2815BA06300	MCCONKEY MATHEW C	16 DIABLO CT	UMATILLA	OR	97882-9668	2018	0.47
5N2815BA06400	RAZON YOUBANY	11 RIO SENDA ST	UMATILLA	OR	97882-9600	2018	0.46
5N2815BA06500	MADRIGAL POMPEYO C & CERVANTES JAVIER	610 POMONA DR	UMATILLA	OR	97882-9623	2018	0.45
5N2815BA06600	VASQUEZ JERRY J & KERRY L	876 WHITETAIL DEER ST NW	SALEM	OR	97304	2018	0.46
5N2815BA06700	SANCHEZ ERIKA RODRIQUEZ	1 RIO SENDA ST	UMATILLA	OR	97882-9600	2018	0.47
5N2815BA06800	CANCINO PEDRO SANGUINO & JAVIER SANGUINO	4 RIO SENDA	UMATILLA	OR	97882-9600	2018	0.46
5N2815BA06900	HEWITT DONALD & SMITH NANCY	8 RIO SENDA ST	UMATILLA	OR	97882	2018	0.45
5N2815BA07000	CASAS JESUS E	12 RIO SENDA ST	UMATILLA	OR	97882-9600	2018	0.43
5N2815BA07100	BAGGERLY E BETH	16 RIO SENDA ST	UMATILLA	OR	97882	2018	0.42
5N2815BA07200	TOBIN THOMAS R & MARLENE	20 RIO SENDA ST	UMATILLA	OR	97882-9600	2018	0.41
5N2815BA07300	TOBIN THOMAS R & MARLENE	20 RIO SENDA ST	UMATILLA	OR	97882	2018	0.42
5N2815BA07500	ARMSTRONG JENNIFER	PO BOX 1290	UMATILLA	OR	97882-1290	2018	0.44
5N2815BA07600	ENKEY DIETRICH L & MELINA	36 RIO SENDA ST	UMATILLA	OR	97882-9600	2018	0.45
5N2815BA07800	SMITH LYLE T & LESLIE R	44 RIO SENDA ST	UMATILLA	OR	97882	2018	0.47
5N2815BA07900	KAHLE LARRY C	48 RIO SENDA ST	UMATILLA	OR	97882-9600	2018	0.48

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Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2815BA08000	SCHNEIDER DENNIS LEE	52 RIO SENDA ST	UMATILLA	OR	97882-9600	2018	0.49
5N2815BA08100	WILLIAMS JOHN MICHAEL (TRS)	PO BOX 310	UMATILLA	OR	97882-0310	2018	0.51
5N2815BA08300	CORIA ADOLFO & IMELDA	716 POMONO DR	UMATILLA	OR	97882-9622	2018	0.58
5N2815BA08400	MENDOZA MARIA ISSACC & LADISLADO C	720 POMONO DR	UMATILLA	OR	97882	2018	0.58
5N2815BA08500	SANGUINO GERARDO & MAGDA M	34 POMONO DR	UMATILLA	OR	97882	2018	0.57
5N2815BA08600	DE LA CRUZ MANUEL C & MARIA Y C	30 POMONO DR	UMATILLA	OR	97882-9624	2018	0.55
5N2815BA08700	MENDOZA FERMIN & MARILU CORIA	6 DRIFTWOOD CT	UMATILLA	OR	97882-9686	2018	0.54
5N2815BA08800	CORIA HILARIO C & MARIA G	22 POMONO DR	UMATILLA	OR	97882	2018	0.53
5N2815BA08900	PONCE-CORIA G & VALENCIA-BIRRUETA Y	18 POMONO DR	UMATILLA	OR	97882-9624	2018	0.52
5N2815BA09000	RODRIGUEZ OCTAVIO & BEATRIZ	110 COWLITZ ST	UMATILLA	OR	97882-9641	2018	0.50
5N2815BA09100	MARTINEZ JUVENTINO & BERTALICIA	10 POMONO DR	UMATILLA	OR	97882	2018	0.49
5N2815BA09200	BOW GARY L & BOW MARY J	6 POMONO DR	UMATILLA	OR	97882	2018	0.48
5N2815BA09300	ORTIZ MACARIO	233 SPARROW AVE	UMATILLA	OR	97882	2018	0.47
5N2815BA09400	ALANIZ MANUEL C & MARIA C	615 POMONO DR	UMATILLA	OR	97882	2018	0.46
5N2815BA09500	MADRIGAL LEON CARLOS & ROSALINA C	613 POMONO DR	UMATILLA	OR	97882-9623	2018	0.48
5N2815BA09700	SANGUINO RUBEN D & ANA M	612 POMONO DR	UMATILLA	OR	97882-9623	2018	0.50
5N2815BA09800	RINCON GLORIA L CLARO	11 POMONO DR	UMATILLA	OR	97882	2018	0.51

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Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2815BA09900	MARTELL REBECA P	1853 NE 6TH PL	HERMISTON	OR	97838-1473	2018	0.52
5N2815BA10000	RAMIREZ OSCAR & CHRISTINA	19 POMONO DR	UMATILLA	OR	97882	2018	0.53
5N2815BA10100	MADRIGAL IMELDA CORIA	21 POMONO DR	UMATILLA	OR	97882-9624	2018	0.54
5N2815BA10200	VARGAS MOISES & HELIA	25 POMONO DR	UMATILLA	OR	97882	2018	0.55
5N2815BA10300	FRIAS RAUL & SANDOVAL BORI	717 POMONO DR	UMATILLA	OR	97882	2018	0.56
5N2815BD00300	LANGLEY JOYCE	PO BOX 577	UMATILLA	OR	97882	2018	0.63
5N2815BD00400	STUCK KARLA K	1130 7TH ST	UMATILLA	OR	97882-9772	2018	0.64
5N2815BD00500	RAGSDALE JASON O ETAL	82283 POLLOCK LN	UMATILLA	OR	97882	2018	0.65
5N2815BD00601	DONNS PLACES INC	PO BOX 1379	HERMISTON	OR	97838	2018	0.62
5N2815BD00605	DONNS PLACES INC	PO BOX 1379	HERMISTON	OR	97838	2018	0.58
5N2815BD00609	DONNS PLACES INC	PO BOX 1379	HERMISTON	OR	97838	2018	0.61
5N2815BD00700	TEJEDA MIGUEL A	107 COLUMBIA AVE	UMATILLA	OR	97882-9650	2018	0.68
5N2815BD00800	WIEDERICH RON	1505 W BROCK AVE	HERMISTON	OR	97838-9471	2018	0.68
5N2815BD00900	MORA JOSE	103 BUENA CT	UMATILLA	OR	97882	2018	0.69
5N2815BD01000	ARMENTA ANTONIO	101 BUENA CT	UMATILLA	OR	97882-9613	2018	0.70
5N2815BD01100	ORTEGA ARTURO D & MARIA T	PO BOX 885	UMATILLA	OR	97882	2018	0.70
5N2815BD01200	ATILANO JOSE	53 BUENA CT	UMATILLA	OR	97882	2018	0.68
5N2815BD01300	LEWIS ROBERT C JR	51 BUENA CT	UMATILLA	OR	97882	2018	0.67
5N2815BD01400	LEWIS JACQUELYN M (TRS)	49 BUENA CT	UMATILLA	OR	97882-9645	2018	0.66
5N2815BD01500	MARKS RODNEY N	1030 SW 11TH ST #UNIT 51	HERMISTON	OR	97838-9425	2018	0.65
5N2815BD01600	STATE OF ORE (DVA)	1499 NE GILLESPIE LN	HERMISTON	OR	97838-6745	2018	0.64

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2815BD01700	BEDOLLA JUAN	43 COVINA CT	UMATILLA	OR	97882-9646	2018	0.65
5N2815BD01800	REEVES LOUIS W	PO BOX 1149	UMATILLA	OR	97882	2018	0.66
5N2815BD01900	WHITLOCK SAMUEL A	28200 HIGHWAY 730	UMATILLA	OR	97882	2018	0.66
5N2815BD02000	SMITH HARLEEN S & STEFANI KELLY S	414 NACHES CT	UMATILLA	OR	97882-9608	2018	0.64
5N2815BD02100	STEFANI PHYLLIS	PO BOX 1183	UMATILLA	OR	97882-1183	2018	0.63
5N2815BD02200	LONGHORN EDWARD A SR	53969 LEFORE RD	MILTON FREEWATER	OR	97862-7118	2018	0.62
5N2815BD02300	MADRIGAL LEONEL & ANDREA	597 CHENOWITH ST	UMATILLA	OR	97882-9803	2018	0.61
5N2815BD02400	CERVANTES MINERBA M & MADRIGAL B A	32 DOS PALOS CT	UMATILLA	OR	97882-9647	2018	0.60
5N2815BD02500	GARCIA GUADALUPE & MARGARITA	PO BOX 1582	UMATILLA	OR	97882	2018	0.59
5N2815BD02600	C U S INC	32930 THORNY GROVE LN	HERMISTON	OR	97838-6358	2018	0.59
5N2815BD02700	ROCK TRAVIS B	PO BOX 238	UMATILLA	OR	97882	2018	0.58
5N2815BD06000	CORIA OLIVEROS M & ESTELA G	211 WENATCHEE ST	UMATILLA	OR	97882-9628	2018	0.64
5N2815BD06100	TREVINO RAYMOND	735 E VIEW DR	HERMISTON	OR	97838-9431	2018	0.63
5N2815BD06200	QUEZADA NOE GARCIA	31119 BAGGETT LN	HERMISTON	OR	97838-9779	2018	0.62
5N2815BD06300	GARCIA-QUEZADA NOE	614 CHENOWITH AVE	UMATILLA	OR	97882-9440	2018	0.61
5N2815BD06400	ORTIZ RAMON & DOMETILA	48 COLUMBIA AVE	UMATILLA	OR	97882-9414	2018	0.62
5N2815BD06500	EHRMANTRAUT SHELLY	704 POMONO DR	UMATILLA	OR	97882	2018	0.61

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2815BD06600	GERBER DONALD L	PO BOX 475	UMATILLA	OR	97882	2018	0.60
5N2815BD06700	GARCILAZO EFRAIN & EDELIA	105 COWLITZ ST	UMATILLA	OR	97882-9641	2018	0.59
5N2815BD06900	LEON JORGE & MARIA B	288 PINE TREE AVE ##B	UMATILLA	OR	97882-6177	2018	0.57
5N2815BD07000	CAMPOS FROILAN D & MARIA	709 POMONO DR	UMATILLA	OR	97882	2018	0.58
5N2815BD07100	CANCINO NORMA A	1476 NE GILLESPIE LN	HERMISTON	OR	97838-6745	2018	0.59
5N2815BD07200	CHAIRES GREGORIA CASTILLO	40 COLUMBIA AVE	UMATILLA	OR	97882-9414	2018	0.61
5N2815BD07300	JONAS EDMUND C	36 COLUMBIA AVE	UMATILLA	OR	97882-9414	2018	0.59
5N2815BD07400	ARMENTA BERNARDO M & MADRIGAL MINERBA C	32 DOS PALOS CT	UMATILLA	OR	97882	2018	0.58
5N2815BD07500	HERNANDEZ FIDEL MARQUEZ ETAL	PO BOX 503	UMATILLA	OR	97882	2018	0.58
5N2815BD07600	MADRIGAL GABINO	28 DOS PALOS CT	UMATILLA	OR	97882-9647	2018	0.57
5N2815BD07700	RODRIGUEZ BEATRIZ L & OCTAVIO D	110 COWLITZ ST	UMATILLA	OR	97882-9641	2018	0.55
5N2815BD07800	MCCORKLE EDWIN R JR	22 DOS PALOS CT	UMATILLA	OR	97882	2018	0.53
5N2815BD07900	CERVANTES ANDRES M & MADRIGAL TERESA M	18 DOS PALOS CT	UMATILLA	OR	97882-9647	2018	0.53
5N2815BD08000	GARCIA OFELIA ARMENTA	16 DOS PALOS CT	UMATILLA	OR	97882-9647	2018	0.55
5N2815BD08100	CHAVEZ CASTILLO AMADOR	14 DOS PALOS CT	UMATILLA	OR	97882-9647	2018	0.57
5N2815BD08200	ABBOTT CHARLIE L & BARBARA E	8 COLUMBIA AVE	UMATILLA	OR	97882-9601	2018	0.56

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2815BD08300	ARREDONDO PAULINO M & ZAVALA ROSA M	2 COLUMBIA BLVD	UMATILLA	OR	97882	2018	0.55
5N2815BD08400	SANGUINO JAVIER	604 POMONO DR	UMATILLA	OR	97882-9623	2018	0.54
5N2815BD08500	CARDENAS GONZALO & MARIA DE JESUS	PO BOX 203	UMATILLA	OR	97882-0203	2018	0.53
5N2815BD08600	CERVANTES POMPEYO M & DOMITILA O	610 POMONO DR	UMATILLA	OR	97882-9623	2018	0.52
5N2815BD08700	ARMENTA JUAN C	611 POMONO DR	UMATILLA	OR	97882	2018	0.49
5N2815BD08800	BEEMER EDWARD S & ANITA J	609 POMONO DR	UMATILLA	OR	97882	2018	0.50
5N2815BD08900	LACHER JACK W & DORIS M	607 POMONO DR	UMATILLA	OR	97882-9623	2018	0.52
5N2815BD09000	MORRIS KENNETH L & BECKY A	605 POMONO DR	UMATILLA	OR	97882	2018	0.53
5N2815BD09100	UGARTE MARIA & MENDOZA ANTONIO	603 POMONO DR	UMATILLA	OR	97882	2018	0.54
5N2815CC01000	PEREZ ELIGIO O & OBDULIA TOPIA	PO BOX 272	UMATILLA	OR	97882	2018	0.83
5N2815CC01400	GONZALEZ JUAN D & ORALIA M	30830 KLAUS RD	HERMISTON	OR	97838	2018	0.94
5N2815CC01500	GARCILAZO VINCENTE & MARIA	30596 NO NAME LN	UMATILLA	OR	97882	2018	0.93
5N2815CC01600	SANGUINO JOSE & ESTELA A	30592 NO NAME LN	UMATILLA	OR	97882	2018	0.93
5N2815CC02200	MYERS JANNIE	30500 POWER CITY RD	UMATILLA	OR	97882-6110	2018	0.96
5N2815CC02900	LEE EDWARD F	81780 LEE ESTATES LN	UMATILLA	OR	97882-6147	2018	0.82
5N2815CC03000	MYERS LEON R & SWANK BARBARA A	82060 MARIAN AVE	UMATILLA	OR	97882	2018	0.86
5N2815CC03700	FREDERICKSON DARYL C & JUNE	82022 LIND RD	UMATILLA	OR	97882	2018	0.87
5N2815CC03902	POULSON STEVEN D & JONILYN M	30410 MARGARET AVE	UMATILLA	OR	97882	2018	0.82
5N2815CC04000	FORD CHRISTOPHER H & DINA L	30462 POWER CITY RD	UMATILLA	OR	97882	2018	0.99

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2815CC04001	FORD CHRISTOPHER H & DINA L	30462 POWER CITY RD	UMATILLA	OR	97882	2018	0.95
5N2815CC04090	CHARLO CLARENCE L & GERALDINE	81999 LIND RD	UMATILLA	OR	97882	2018	0.91
5N2816BB03401	BRAATEN LARRY A & JANET S	PO BOX 195	UMATILLA	OR	97882	2018	0.32
5N2816BB03500	MCBRIDE SHANON	PO BOX 1251	UMATILLA	OR	97882	2018	0.32
5N2816BB03900	BOESCH JEFFREY H	1831 CHERRY ST	UMATILLA	OR	97882-9755	2018	0.46
5N2816BB03901	MCKNIGHT JAMES ANDREW	1857 CHERRY ST	UMATILLA	OR	97882	2018	0.44
5N2816BB03902	MCQUINN MATTHEW	1811 CHERRY ST	UMATILLA	OR	97882-9755	2018	0.49
5N2816BB03903	NOBLES CLYDE C & BETTY L	PO BOX 1471	HERMISTON	OR	97838-3471	2018	0.42
5N2816BB03905	SECRETARY OF VETERANS AFFAIRS	700 SUMMER ST NE	SALEM	OR	97301-1285	2018	0.42
5N2816BB03906	MEDELEZ BENITO & RAQUEL	1186 E PUNKIN CENTER RD	HERMISTON	OR	97838-6787	2018	0.51
5N2816BB04000	MCCALL JAMES EMERSON & CAROLYN RAE	1913 CHERRY ST	UMATILLA	OR	97882	2018	0.40
5N2816BB04200	MEDELEZ BENITO JR	1186 E PUNKIN CENTER RD	HERMISTON	OR	97838-6787	2018	0.38
5N2816BB04400	RODENBOUGH KEITH	1959 CHERRY ST	UMATILLA	OR	97882-9756	2018	0.36
5N2816BB04500	LORENCE DAVID A	28520 HIGHWAY 730	UMATILLA	OR	97882-6158	2018	0.33
5N2816BB04501	NOBLES CLYDE C & BETTY L	650 MONROE ST	UMATILLA	OR	97882	2018	0.32
5N2816BB04700	NOBLES CLYDE C & BETTY L	650 MONROE ST	UMATILLA	OR	97882	2018	0.31
5N2816BB04800	SURBER CHARLES R & ANNA	2030 CHERRY ST	UMATILLA	OR	97882	2018	0.32
5N2816BB04900	MILLER JACK B	476 BROWNELL BLVD	UMATILLA	OR	97882-9662	2018	0.33

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2816BB05000	TOOLEY ROBERT L JR	2028 CHERRY ST	UMATILLA	OR	97882-6102	2018	0.34
5N2816BB05100	MEJIA-ORTEGA HAZAEL	2010 CHERRY ST	UMATILLA	OR	97882-6102	2018	0.36
5N2816BB05200	FIELDS GENEVIEVE	1948 CHERRY ST	UMATILLA	OR	97882	2018	0.39
5N2816BB05201	HARE INGEBORG	1962 CHERRY ST	UMATILLA	OR	97882	2018	0.37
5N2816BB05300	SARDINHA KRISTAL M	1920 CHERRY ST	UMATILLA	OR	97882-9756	2018	0.40
5N2816BB05600	BUSLER NORMA V	PO BOX 1056	UMATILLA	OR	97882	2018	0.40
5N2816BB05700	VANSCHOIACK ROGENA	PO BOX 691	UMATILLA	OR	97882	2018	0.38
5N2816BB05800	CROXEN THOMAS JR & IMOGENE (TRS)	PO BOX 1305	UMATILLA	OR	97882	2018	0.37
5N2816BB05900	MEDELEZ HECTOR	2021 LOCUST ST	UMATILLA	OR	97882-9802	2018	0.36
5N2816BB06000	MALDONADO JOSE A	14735 E BURNSIDE ST	PORTLAND	OR	97233-2803	2018	0.35
5N2816BB06100	ZUNIGA ESTELA GARCIA	478 BROWNELL BLVD	UMATILLA	OR	97882-9662	2018	0.33
5N2816BB06200	HUGHES CLARENCE E	1888 CHERRY ST	UMATILLA	OR	97882-9755	2018	0.43
5N2816BB06400	SMITH MEREDITH G & TANYA L	1802 CHERRY ST	UMATILLA	OR	97882	2018	0.47
5N2816BB06401	MITCHELL CHARLES L & MARLENE M	1842 CHERRY ST	UMATILLA	OR	97882-9755	2018	0.48
5N2816BB06402	DOBBINS J N & SHARON	1870 CHERRY ST	UMATILLA	OR	97882-9755	2018	0.46
5N2816BB06801	ASH ZACHERY	1828 CHERRY ST	UMATILLA	OR	97882-9755	2018	0.50
5N2816BB06900	BREDFIELD HAROLD A	PO BOX 1128	UMATILLA	OR	97882-1128	2018	0.52
5N2816BB07600	FRYE AL & DEANNA	PO BOX 2980	LA GRANDE	OR	97850	2018	0.46

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2816BB07700	PRINDLE KENNETH RAY JR & DANETTE MARIE	1899 LOCUST ST	UMATILLA	OR	97882-9749	2018	0.44
5N2816DD00100	FISH RODGER L & DEBORA LEE	37425 HUNGRY HILL DR	SCIO	OR	97374-9764	2018	0.81
5N2816DD00200	FREDERICKSON DARYL C & JUNE M	82022 LIND RD	UMATILLA	OR	97882-6114	2018	0.83
5N2817AA00700	GAY ROGER L & SUSAN G	1800 CHERRY ST	UMATILLA	OR	97882	2018	0.54
5N2817AB00700	ANDERSON ALICIA	PO BOX 362	UMATILLA	OR	97882-0362	2018	0.97
5N2817AB00702	OERTWICH BRENDA & SLEAD DANNY R	PO BOX 418	UMATILLA	OR	97882	2018	0.96
5N2817AB00703	SANGCUINO LAURENCIO D & DEELFINA O	130 JOHN DAY ST	UMATILLA	OR	97882	2018	0.94
5N2817AB00705	ORDAZ SALVADOR & GABRIELA	PO BOX 909	UMATILLA	OR	97882	2018	0.93
5N2817AC05500	PHILLIPS ELBERT	4323 NE 18TH AVE	PORTLAND	OR	97211-5711	2018	0.85
5N2817AC05600	SALAS LUCAS & CARRILLO MARIA J	PO BOX 37	UMATILLA	OR	97882	2018	0.86
5N2817AC05900	BORCHERT DAVID C & CECILIA J	1411 7TH ST	UMATILLA	OR	97882	2018	0.90
5N2817AC06000	MISTRY HAMUCKH & REKHA B	PO BOX 327	UMATILLA	OR	97882-0327	2018	0.91
5N2817AC06100	SCHOOL DIST #6	1001 6TH ST	UMATILLA	OR	97882-6201	2018	0.87
5N2817AD01500	DETWILER TERRY L & JANET F	PO BOX 1076	UMATILLA	OR	97882	2018	0.77
5N2817AD01600	PRINDLE KENNETH RAY JR & DANETTE MARIE	1899 LOCUST ST	HERMISTON	OR	97838	2018	0.78
5N2817AD01700	LONGORIA ROBERTO JR & ROSIE	1561 7TH ST	UMATILLA	OR	97882	2018	0.78
5N2817AD01800	SAIRA & JIMMY LOERA TRUST ET AL	1551 7TH ST	UMATILLA	OR	97882-9770	2018	0.79

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2817AD01900	CASTRO ESTEBAN & ORTEGA MARTHA	1116 E 60TH ST	TACOMA	WA	98404	2018	0.80
5N2817AD02000	WYLIE SCOTT A & MARILYN	1531 7TH ST	UMATILLA	OR	97882	2018	0.81
5N2817AD02101	CLAUSTRO MARIA Y	1521 7TH ST	UMATILLA	OR	97882	2018	0.82
5N2817AD02200	FISHER AILEEN M	PO BOX 718	UMATILLA	OR	97882	2018	0.84
5N2817AD02700	ALLEN DORIS M	PO BOX 73	UMATILLA	OR	97882-0073	2018	0.84
5N2817AD02800	LANKFORD VICTORIA	1520 7TH ST	UMATILLA	OR	97882-9702	2018	0.83
5N2817AD02900	BARKER BILL C & LUCILLE M	1530 7TH ST	UMATILLA	OR	97882	2018	0.83
5N2817AD03000	BRITTAIN PHILLIP A & SHANNA L	6302 WESTPORT LN	PASCO	WA	99301-7803	2018	0.82
5N2817AD03100	WRENCHY KELLY D	1550 7TH ST	UMATILLA	OR	97882-9702	2018	0.81
5N2817AD03200	DUNHAM CHERYL J	1560 7TH ST	UMATILLA	OR	97882	2018	0.80
5N2817AD03300	GRIFFIN RICHARD & REBECCA	710 RANDALL ST	UMATILLA	OR	97882-9501	2018	0.79
5N2817AD03400	MOORE MARK A & PATRICIA E	2625 E PICADILLY LN	EAGLE	ID	83616-5557	2018	0.80
5N2817AD03500	BAKER BRENT H & ELLA M	PO BOX 566	UMATILLA	OR	97882	2018	0.81
5N2817AD03600	WOOD ROY L & LENA J	1551 8TH ST	UMATILLA	OR	97882	2018	0.82
5N2817AD03700	FLORES ENEDELIA	1541 8TH ST	UMATILLA	OR	97882-9769	2018	0.83
5N2817AD03800	RAMIREZ SAMANTHA O	1531 8TH ST	UMATILLA	OR	97882-9769	2018	0.84
5N2817AD03900	WOOD THEODORE DD	1521 8TH ST	UMATILLA	OR	97882-9769	2018	0.84
5N2817AD04000	MENDOZA REYNA PACHECO	1511 8TH ST	UMATILLA	OR	97882-9769	2018	0.85

Table X-4: Parcels with noise receptors (including residences) within one mile of the proposed step-up substation, Perennial Wind Chaser Station, July 2018.

Tax Lot Identification	Owner	Mailing Address	City	State	Zip	Taxlot Year	Miles from Station
5N2817AD04200	KURTZ MARION LESTER (TRS) ET AL	PO BOX 708	HERMISTON	OR	97838-0708	2018	0.78
5N2817AD04300	PEREZ JUAN MJ & JAIREGIO MARIA G	1610 7TH ST	UMATILLA	OR	97882-9703	2018	0.77
5N2817AD04400	AFFORDABLE PROPERTIES OF OREGON LLC	PO BOX 1150	UMATILLA	OR	97882-1150	2018	0.76
5N2817AD04500	BIEGEL ROBERT M & SHEILA J	PO BOX 1767	UMATILLA	OR	97882	2018	0.75
5N2817AD04800	DAVISON GLEN W	6521 W VICTORIA AVE	KENNEWICK	WA	99336	2018	0.73
5N2817AD04900	BALL GEORGE W & JANICE R	1641 8TH ST	UMATILLA	OR	97882-9502	2018	0.75
5N2817AD04901	CASTILLO GUILLERMO & MARIBEL	737 RANDALL ST	UMATILLA	OR	97882	2018	0.78
5N2817AD04902	RAMIREZ JOAQUINA	1625 8TH ST	UMATILLA	OR	97882	2018	0.76
5N2817AD05200	MORRISON JOHN K ET AL	1020 BOYER AVE	WALLA WALLA	WA	99362-2316	2018	0.72

ATTACHMENT 4

**Updated Financial Capability Letter and
Updated Exhibit-W – Facility Retirement**

EXHIBIT W

FACILITY RETIREMENT

OAR 345-021-0010(1)(w)

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- W-1 Detailed Cost Estimate Spreadsheet
- W-2 Detailed Cost Estimate Spreadsheet Alternative Scenario with Zero Liquid Discharge

W.1 INTRODUCTION

OAR 345-021-0010(1)(w) *Information about site restoration, providing evidence to support a finding by the Council as required by OAR 345-022-0050(1).*

Response: Under Oregon Administrative Rule (OAR) 345-022-0050(1), before the Oregon Energy Facility Siting Council (Council) can approve the Perennial Wind Chaser Station project (Project), it must determine that the Project site can be restored adequately to a useful, non-hazardous condition following permanent cessation of construction or operation of the Project. This updated exhibit describes the expected operating life of the Project, how it will be retired, and how the site will be restored at the end of its useful life. The reasons for the extensive update is to first express the cost estimate in 2018 dollars, and second because the Oregon Department of Energy has not updated the retirement cost estimate workbooks or guidance since Jan 2011, and no longer recommends these be used in retirement cost estimating because the unit costs are outdated. Thus, the updated exhibit uses a proven approach from Perennial's engineering firm, Burns & McDonnell, to developing retirement and restoration estimates. This exhibit also explains how Perennial-WindChaser LLC (Perennial) will manage and monitor hazardous waste at the Site.

W.2 SUMMARY

For the purpose of this Application for Site Certificate (ASC), the useful life of the Project is 30 years. At the end of its useful life, the Project will be retired and the site restored to a useful, non-hazardous condition in accordance with the approved retirement plan and in compliance with all laws and regulations in effect at the time of retirement. The cost of site restoration is expected to be \$6.08 million, expressed in 2018 dollars. The anticipated scrap value is \$1.40 million, for a net cost of \$4.68 million.

In addition, Perennial is keeping the installation of a zero liquid discharge (ZLD) system at the Project site as a potential alternative. Since this option would affect the restoration cost estimate, this updated exhibit also addresses compliance with OAR 345-022-0050(1) as an alternative scenario. The cost of site restoration if a ZLD system is installed is expected to be \$6.09 million, expressed in 2018 dollars. The anticipated scrap value is \$1.40 million, for a net cost of \$4.69 million dollars.

W.3 USEFUL LIFE

OAR 345-021-0010(1)(w)(A) *The estimated useful life of the proposed facility.*

Response: Perennial plans to operate the Project for as long as a market exists for the electrical energy that it produces. For the purpose of the ASC, the estimated useful life of the Project is 30 years. When it is determined that there is no future market for the electrical energy produced by the Project, a retirement plan will be developed that is appropriate for the intended use of the site and then-current technology and submitted to the Council for its approval. The retirement plan will outline how the Project will be retired and the site restored to a useful, non-hazardous condition.

W.4 RETIREMENT AND SITE RESTORATION

OAR 345-021-0010(1)(w)(B) *The specific actions and tasks to restore the site to a useful, non-hazardous condition.*

Response: When the decision is made to retire the Project, the site will be restored to a useful, non-hazardous condition in accordance with the approved retirement plan. For the purposes of the retirement and financial assurance standard, a ‘useful, non-hazardous condition’ is a condition consistent with the applicable local comprehensive land use plan and land use regulations¹. The Project and the natural gas pipeline will be sited on land in areas currently zoned for Exclusive Farm Use (EFU). The transmission line will cross lands with a variety of zoning designations, including EFU and urban designations within Umatilla County and City of Umatilla. Site restoration will be conducted in compliance with conditions in the approved retirement plan and in compliance with all contemporary laws and regulations in effect at the time of retirement. Site restoration will consist primarily of the dismantling and removing most equipment and structures and restoring the site to a useful condition. Transmission line tower foundations, if not being used by another energy source, will be removed to a depth of 4 feet below grade. Water pipelines will be capped and left in place. Water supply wells, if any are installed and if not used by another entity, will be abandoned in accordance with applicable Oregon laws and regulations. The natural gas pipeline will be disconnected from the header and capped, and the pipes will be left in place. Two years prior to the date on which Perennial expects to permanently shut down the Project, a site restoration plan will be developed and submitted to the Council for approval.

W.5 ESTIMATED COST OF RETIREMENT

OAR 345-021-0010(1)(w)(C) *An estimate, in current dollars, of the total and unit costs of restoring the site to a useful, non-hazardous condition.*

¹ Oregon Energy Facility Siting Council, In the Matter of the Application for a Site Certificate for the Port Westward Generating Project, Final Order 46 (Nov. 8, 2002).

OAR 345-021-0010(1)(w)(D) *A discussion and justification of the methods and assumptions used to estimate site restoration costs.*

Response: The costs to retire the Project and restore the Project site are estimated to be \$6.08 million, assuming that all structures are to be removed from site, and with no credit for scrap. For the alternative scenario with ZLD, the costs to retire and restore the site are estimated to be \$6.09 million. The final costs to restore the Project site will depend on the nature of the zoning regulations and the approved retirement plan.

The estimate was developed using a proven approach from Perennial's engineering firm, Burns & McDonnell, to developing retirement and restoration estimates. Table W-1 shows a summary breakdown of the retirement cost estimates; Table W-2 shows a summary breakdown of the retirement cost estimates for the alternative scenario with ZLD.

The retirement and restoration costs presented above include the costs to return the site to a condition compatible with the surrounding land, similar to the conditions that existed before development of the Project. This includes the costs to dismantle the four LMS100 combustion turbine generators owned by Perennial, as well as the costs to dismantle all Perennial-owned balance of plant facilities.

The site retirement costs were developed based on order-of-magnitude quantities using in-house information available to Perennial's engineering firm, Burns & McDonnell, and historical quantities data from other similar projects.

The following assumptions are included in this determination of the retirement costs for the Project:

1. Cost estimates are presented in 2018 dollars.
2. Labor costs are developed using unit rates in RSMeans online.
3. Project-related indirect costs are included at 10 percent for overhead, 10 percent for profit, and 3 percent for insurance cost, according to the *Cost Guide*.
4. Contingencies are included at 10 percent for administration and project management and 20 percent for future developments of escalated costs, as well as \$500,000 for hazardous materials management in the estimates to cover unknown costs.
5. All above-grade structures and buildings are included for demolition, unless otherwise noted herein.
6. Cost estimates include the demolition of all buildings onsite, including administration buildings, the water treatment building, and any other ancillary buildings. To the extent possible, any spare parts, tools, inventory, or equipment in the buildings will be

transferred to another facility or sold prior to decommissioning activities commencing and remaining spare parts will be scrapped by the demolition contractor.

7. All facilities will be decommissioned to zero generating output. Existing utilities will remain in place for use by the contractor for the duration of these demolition activities.
8. The onsite 230-kilovolt (kV) switchyard, 500-kV step-up substation, and 11-mile transmission line are not included in the demolition scope. Additionally, the transmission towers between the tie-in to the 230-kV system and the 500-kV step-up substation are not included because it is assumed that the towers will be required for continued operation of the HGP.
9. The natural gas pipeline lateral will be disconnected from the Gas Transmission Northwest (GTN) interstate transmission pipeline header and capped. The pipeline from the GTN tie-in to the Site Boundary will be left in place.
10. All burnable lubricating oil, fuel oil, and other chemicals will be consumed prior to commencement of demolition activities. Costs to handle and dispose of fuels and chemicals are not included in this estimate.
11. Site areas will be graded to achieve suitable site drainage to natural drainage patterns, but grading will be minimized to the greatest extent possible.
12. Cost for offsite disposal is included for all materials, including debris and concrete.
13. Crushed rock is assumed to be disposed of onsite by using it for clean fill, or it will be recycled by the demolition contractor for beneficial use.
14. All structures 4 feet below grade and above grade will be demolished. All structures below 4 feet will be abandoned in place unless otherwise stated in the assumptions as being demolished.
15. Since no asbestos, underground storage tanks, or lead paint are expected onsite, inspection costs for these items are not included.
16. It is anticipated that sufficient onsite material will be available to backfill the stormwater basin, thus an additional cost for bringing in outside fill has not been included.
17. Owner's costs are not included.
18. Disturbed site areas will be seeded after they are graded to provide suitable ground cover to prevent soil erosion.
19. Salvage value for equipment and scrap values are not included in the cost estimates.

W.6 MONITORING PLAN

OAR 345-021-0010(1)(w)(E) *For facilities that might produce site contamination by hazardous materials, a proposed monitoring plan, such as periodic environmental site assessment and reporting, or an explanation why a monitoring plan is unnecessary.*

Response: Hazardous materials to be stored and used at the Project site include, but are not limited to, lubricating oils, aqueous ammonia, chemicals fed into the cooling tower and used for turbine wash, and pipe cleaning, solvents, and batteries. Hazardous materials will be used and stored in a manner that will minimize the chance of accidental release to the environment and be consistent with a site-specific materials management and monitoring plan that Perennial will develop and implement. Hazardous waste will be disposed of through an appropriate waste disposal service provider. Condition PRE-SP-01 of the Site Certificate requires that the certificate holder develop and implement a Hazardous Materials Management and Monitoring Plan.

APPENDIX W-1

Detailed Cost Estimate Spreadsheet

Table W-1
Wind Chaser
Decommissioning Cost Summary

	Labor	Material and Equipment	Disposal	Environmental	Total Cost	Scrap Value
Wind Chaser						
<i>CTs 1-4</i>						
Turbines & Foundations	\$ 960,000	\$ 1,086,000	\$ -	\$ -	\$ 2,047,000	\$ -
GSUs	\$ 18,000	\$ 21,000	\$ -	\$ -	\$ 39,000	\$ -
On-site Concrete Crushing & Disposal	\$ -	\$ -	\$ 34,000	\$ -	\$ 34,000	\$ -
Debris	\$ -	\$ -	\$ 15,000	\$ -	\$ 15,000	\$ -
Scrap	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (1,269,000)
Subtotal	\$ 979,000	\$ 1,107,000	\$ 49,000	\$ -	\$ 2,134,000	\$ (1,269,000)
<i>Common</i>						
BOP Misc.	\$ 500,000	\$ 565,000	\$ -	\$ -	\$ 1,065,000	\$ -
Roads	\$ 26,000	\$ 29,000	\$ -	\$ -	\$ 55,000	\$ -
All BOP Buildings	\$ 7,000	\$ 7,000	\$ -	\$ -	\$ 14,000	\$ -
Fuel Equipment	\$ 55,000	\$ 63,000	\$ -	\$ -	\$ 118,000	\$ -
All Other Tanks	\$ 17,000	\$ 19,000	\$ -	\$ -	\$ 36,000	\$ -
Transformers & Foundation	\$ 160,000	\$ 181,000	\$ -	\$ -	\$ 341,000	\$ -
Cooling Towers and Basin	\$ 101,000	\$ 115,000	\$ -	\$ -	\$ 216,000	\$ -
Hazardous Waste Disposal	\$ -	\$ -	\$ -	\$ 500,000	\$ 500,000	\$ -
Concrete Removal, Crushing, & Disposal	\$ -	\$ -	\$ 66,000	\$ -	\$ 66,000	\$ -
Grading & Seeding	\$ -	\$ -	\$ -	\$ 317,000	\$ 317,000	\$ -
Debris	\$ -	\$ -	\$ 1,000	\$ -	\$ 1,000	\$ -
Scrap	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (134,000)
Subtotal	\$ 866,000	\$ 979,000	\$ 67,000	\$ 817,000	\$ 2,729,000	\$ (134,000)
Wind Chaser Subtotal	\$ 1,845,000	\$ 2,086,000	\$ 116,000	\$ 817,000	\$ 4,863,000	\$ (1,403,000)
TOTAL DECOM COST (CREDIT)					\$ 4,863,000	\$ (1,403,000)
PROJECT INDIRECTS (5%)					\$ 243,000	
CONTINGENCY (20%)					\$ 973,000	
TOTAL PROJECT COST (CREDIT)					\$ 6,079,000	\$ (1,403,000)
TOTAL NET PROJECT COST (CREDIT)					\$ 4,676,000	

APPENDIX W-2

Detailed Cost Estimate Spreadsheet Alternative Scenario with Zero Liquid Discharge

Table W-2
Wind Chaser
Decommissioning Cost Summary

	Labor	Material and Equipment	Disposal	Environmental	Total Cost	Scrap Value
Wind Chaser						
<i>CTs 1-4</i>						
Turbines & Foundations	\$ 960,000	\$ 1,086,000	\$ -	\$ -	\$ 2,047,000	\$ -
GSUs	\$ 18,000	\$ 21,000	\$ -	\$ -	\$ 39,000	\$ -
On-site Concrete Crushing & Disposal	\$ -	\$ -	\$ 34,000	\$ -	\$ 34,000	\$ -
Debris	\$ -	\$ -	\$ 15,000	\$ -	\$ 15,000	\$ -
Scrap	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (1,269,000)
Subtotal	\$ 979,000	\$ 1,107,000	\$ 49,000	\$ -	\$ 2,134,000	\$ (1,269,000)
<i>Common</i>						
BOP Misc.	\$ 482,000	\$ 546,000	\$ -	\$ -	\$ 1,028,000	\$ -
Roads	\$ 26,000	\$ 29,000	\$ -	\$ -	\$ 55,000	\$ -
All BOP Buildings	\$ 7,000	\$ 7,000	\$ -	\$ -	\$ 14,000	\$ -
Fuel Equipment	\$ 55,000	\$ 63,000	\$ -	\$ -	\$ 118,000	\$ -
All Other Tanks	\$ 17,000	\$ 19,000	\$ -	\$ -	\$ 36,000	\$ -
Transformers & Foundation	\$ 160,000	\$ 181,000	\$ -	\$ -	\$ 341,000	\$ -
Cooling Towers and Basin	\$ 101,000	\$ 115,000	\$ -	\$ -	\$ 216,000	\$ -
ZLD	\$ 22,000	\$ 25,000	\$ -	\$ -	\$ 47,000	\$ -
Hazardous Waste Disposal	\$ -	\$ -	\$ -	\$ 500,000	\$ 500,000	\$ -
Concrete Removal, Crushing, & Disposal	\$ -	\$ -	\$ 66,000	\$ -	\$ 66,000	\$ -
Grading & Seeding	\$ -	\$ -	\$ -	\$ 317,000	\$ 317,000	\$ -
Debris	\$ -	\$ -	\$ 1,000	\$ -	\$ 1,000	\$ -
Scrap	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (137,000)
Subtotal	\$ 870,000	\$ 985,000	\$ 67,000	\$ 817,000	\$ 2,739,000	\$ (137,000)
Wind Chaser Subtotal	\$ 1,849,000	\$ 2,092,000	\$ 116,000	\$ 817,000	\$ 4,873,000	\$ (1,406,000)
TOTAL DECOM COST (CREDIT)					\$ 4,873,000	\$ (1,406,000)
PROJECT INDIRECTS (5%)					\$ 244,000	
CONTINGENCY (20%)					\$ 975,000	
TOTAL PROJECT COST (CREDIT)					\$ 6,092,000	\$ (1,406,000)
TOTAL NET PROJECT COST (CREDIT)					\$ 4,686,000	

ATTACHMENT 5

Updated Exhibit-Y – Carbon Dioxide Emissions

EXHIBIT Y

CARBON DIOXIDE EMISSIONS

OAR 345-021-0010(1)(y)

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APPENDIX

Appendix Y-1 Project Review with a Zero Liquid Discharge System

Y.1 INTRODUCTION

OAR 345-021-0010(1)(y) *If the facility is a base load gas plant, a non-base load power plant, or a nongenerating energy facility that emits carbon dioxide, a statement of the means by which applicant elects to comply with the applicable carbon dioxide emissions standard under OAR 345-024-0560, OAR 345-024-0600, or OAR 345-024-0630 and information, showing detailed calculations, about the carbon dioxide emissions of the energy facility.*

Response: To issue a site certificate, the Energy Facility Siting Council (Council) must find that “the energy facility complies with any applicable carbon dioxide [CO₂] emissions standard adopted by the Council or enacted by statute” (Oregon Administrative Rule [OAR] 345-024-0500.) The Perennial Wind Chaser Station project (Project) would be classified as a “non-base load power plant” as defined in OAR 345-001-0010(40) because the Project would be limited by the site certificate to an average number of hours of operation per year of not more than 6,600 hours. Under this definition, for a plant designed to operate at variable loads, the facility’s annual hours of operation are determined by dividing the actual annual electric output of the facility in megawatt-hours by the facility’s nominal electric generating capacity in megawatts (MW). Thus, for a non-base load power plant, the Council must find that the net CO₂ emissions rate of the proposed facility does not exceed 0.614 pounds of carbon dioxide per kilowatt hour (lbs CO₂/kWh) of net electric power output, with CO₂ emissions and net electric power output measured on a new and clean basis, according to OAR 345-024-0590.

The Project is heavily dependent upon the third party permits of both the Hermiston Generating Plant (HGP) and the Lamb Weston Hermiston Plant with regard to managing its wastewaters. Lamb Weston’s Water Pollution Control Facilities Permit allows Lamb Weston to manage and dispose of the HGP’s wastewater, along with their own reclaimed waters, by land application for beneficial use on the North Farm and the Madison Farm in accordance with the Operations, Monitoring, and Management Plan that has been approved by the Oregon Department of Environmental Quality. Lamb Weston’s permit is currently being renewed. Because this permit is under review, Lamb Weston has not been able to consent to the Project potentially sending reclaimed water to the HGP. If Lamb Weston becomes able to accept reclaimed water from the HGP that has come from the Station, then Perennial would like to have all the necessary process and approvals in place to do so. This exhibit details how the Project will comply with any applicable Council standards with this option. Should Lamb Weston not be able to accept reclaimed water from HGP that has come from the Station, then Perennial would install a zero liquid discharge (ZLD) system. Because this option is a potential alternative that would have a significant effect upon the auxiliary electrical load demand, compliance with the CO₂ standard under this alternative is reviewed separately in Appendix Y-1.

Y.2 SUMMARY

This exhibit provides information regarding compliance with the CO₂ emissions standard, as required by OAR 345-021-0010(1)(y). Perennial WindChaser LLC (Perennial) will comply with the CO₂ emissions standard of OAR 345-024-0590 for the Project by providing offset funds to The Climate Trust (formerly the Oregon Climate Trust), as allowed by OAR 345-024-0600(3). Perennial's payments will be made in compliance with the monetary path payment requirement of OAR 345-024-0710. The gross CO₂ emissions rates are estimated to be 1.055 lbs CO₂/kWh for the non-base load element, resulting in an excess CO₂ emission of 0.441 lbs CO₂/kWh for the non-base load element. The Project will not include power enhancement or augmentation.

Y.3 FUEL CYCLE AND USAGE

OAR 345-021-0010(1)(y)(A) *Exhibit Y shall include information about the fuel cycle and usage including the maximum hourly fuel use at net electrical power output at average annual conditions for a base load gas plant and the maximum hourly fuel use at nominal electric generating capacity for a non-base load power plant or a base load gas plant with power augmentation technologies, as applicable.*

Response: The Project will be fueled by natural gas only and will be an open/simple cycle electrical generating facility. Natural gas will be fired only in the combustion turbine generators. Electricity will be produced by the motive force of the combustion turbine generators. Under average annual operating conditions, the Project is expected to produce a net electrical output of approximately 415 MW, with actual output dependent upon the technology selected. Assuming 415 MW output at average annual conditions, the Project would use approximately 3,740 million British thermal units (Btu)/hour (higher heating value [HHV]) or 3.68 million standard cubic feet of natural gas per hour.

Y.4 GROSS CAPACITY FOR EACH GENERATING UNIT

OAR 345-021-0010(1)(y)(B) *Exhibit Y shall include the gross capacity as estimated at the generator output terminals for each generating unit. For a base load gas plant, gross capacity is based on the average annual ambient conditions for temperature, barometric pressure and relative humidity. For a non-base load plant, gross capacity is based on the average temperature, barometric pressure and relative humidity at the site during the times of year when the facility is intended to operate. For a baseload gas plant with power augmentation, gross capacity in that mode is based on the average temperature, barometric pressure and relative humidity at the site during the times of year when the facility is intended to operate with power augmentation.*

Response: The gross capacity of each generating unit will depend on the final technology selected. Based upon the General Electric LMS100 technology, the gross capacity of each generating unit will be approximately 106.5 MW for each of the four identical units.

Y.5 ONSITE ELECTRICAL LOADS AND LOSSES

OAR 345-021-0010(1)(y)(C) *Exhibit Y shall include a table showing a reasonable estimate of all on-site electrical loads and losses greater than 50 kilowatts, including losses from on-site transformers, plus a factor for incidental loads, that are required for the normal operation of the plant when the plant is at its designed full power operation.*

Response: A list of all expected electrical loads and losses greater than 50 kilowatts is shown in Table Y-1. This list is based on a typical technology and will vary with the final technology selected.

Table Y-1 Loads and Losses

Unit	Electrical Loads (kW)	Electrical Losses (kW)
CTG-1	106,483	
CTG-2	106,483	
CTG-3	106,483	
CTG-4	106,483	
Air Compressors		450
Circulating Water Pumps		1,050
Fuel/Gas Compressors		1,900
Demineralizer Water Forwarding Pumps		150
Close Cooling Water Pumps		750
Cooling Tower Fans		600
Water Treatment and Chemical Feed		100
Gas Turbine Auxiliaries		2,400
SCR System		1,300
DC Power Supply and UPS		100
Lighting		70
Miscellaneous Controls & Small Loads		750
Main Transformer Losses		700
Auxiliary Transformer Losses		300
Electrical Balance	425,932	10,620

Key:

CTG combustion turbine generator

DC direct current

kW kilowatt

SCR selective catalytic reduction

UPS uninterruptible power supply

Y.6 ALTERNATE FUEL USE

OAR 345-021-0010(1)(y)(D) *Exhibit Y shall include maximum number of hours per year and energy content (Btu per year, higher heating value) of alternate fuel use.*

Response: OAR 345-021-0010(1)(y)(D) is not applicable because Perennial proposes to use only natural gas as fuel for this energy facility.

Y.7 CALCULATIONS OF CARBON DIOXIDE EMISSIONS

This section describes the detailed calculations of the CO₂ emissions for the Project, as required by OAR 345-021-0010(1)(y)(E)-(H). A spreadsheet of expected emissions calculations is provided as Table Y-2, presented at the end of the exhibit. This table also provides information regarding how the emission factors used in the non-base load were calculated. The emissions calculations provided herein are estimates only. As described in Section Y.4, after technology selection and prior to construction of the energy facility, actual final emissions calculations will be submitted to the Oregon Department of Energy to determine the amount of the monetary path offset funds.

Y.7.1 Gross Carbon Dioxide Emissions

OAR 345-021-0010(1)(y)(E) *Exhibit Y shall include the total gross carbon dioxide emissions for 30 years, unless an applicant for a non-base load power plant or nongenerating energy facility proposes to limit operation to a shorter time.*

Response: Gross CO₂ emissions are defined in Oregon Revised Statute (ORS) 469.502(2)(e) as the predicted CO₂ emissions of the Project measured on a new and clean basis. Gross CO₂ emissions for 30 years' operation at non-base load, at average site conditions, and for 3,000 hours per year were estimated to be approximately 39,434 million pounds of CO₂, as shown in Table Y-2. Note that Perennial is requesting a peak of 4,400 hours per year of 100% load in other Exhibits and permit applications. Because the electrical demand will be variable, and Exhibit Y reviews a 30-year span of time, a 3,000 hours per year average over 30 years seems more realistic of actual operation. Also there are no refunds of offset CO₂ costs if there are any over estimations of operating time.

OAR 345-021-0010(1)(y)(F) *Exhibit Y shall include the gross carbon dioxide emissions rate expressed as:*

- (i) *Pounds of carbon dioxide per kilowatt-hour of net electric power output for a base load gas plant, including operation with or without power augmentation, as appropriate, or for a non-base load power plant;*
- (ii) *Pounds of carbon dioxide per horsepower hour for nongenerating facilities for which the output is ordinarily measured in horsepower; or*
- (iii) *A rate comparable to pounds of carbon dioxide per kilowatt-hour of net electric power output for nongenerating facilities other than those measured in horsepower;*

Response: Items (ii) and (iii) do not apply, the following text is in response to item (i). Net electric power output is defined under OAR 345-001-0010(35) as “the electric power produced or capacity made available for use. Calculation of net electric power output subtracts losses from on-site transformers and power used for any on-site electrical loads from gross capacity as measured or estimated at the generator terminals for each generating unit.” Based on the onsite electrical loads and losses in Section Y.5, the net electric power for non-base load condition is approximately 415 MW. The net CO₂ emissions rate was estimated to be 1.055 lbs CO₂/kWh for non-base load element, as shown in Table Y-2.

Y.7.2 Excess Carbon Dioxide Emissions and Rate

OAR 345-021-0010(1)(y)(G) *Exhibit Y shall include the total excess carbon dioxide emissions for 30 years, unless an applicant for a non-base load power plant or a nongenerating energy facility proposes to limit operation to a shorter time.*

OAR 345-021-0010(1)(y)(H) *The excess carbon dioxide emissions rate, using the same measure as required for paragraph (F).*

Response: The total excess CO₂ emissions for 30 years, at average site conditions, and 3,000 hours per year are estimated to be approximately 7.10 million tons of CO₂, as shown in Table Y-2. The excess CO₂ emission rate is estimated to be 0.441 lbs CO₂/kWh, also as shown in Table Y-2.

Y.8 SITE CONDITIONS

OAR 345-021-0010(1)(y)(I) *Exhibit Y shall contain the average annual site conditions, including temperature, barometric pressure and relative humidity, together with a citation of the source and location of the data collection devices.*

Response: The annual average site conditions were calculated based on the Hermiston 2S National Climatic Data Center metrological station (1971 to 2000)¹ and are as follows:

Temperature	53.0 °F
Barometric Pressure	14.399 pounds per square inch
Relative Humidity	64.8 percent

OAR 345-021-0010(1)(y)(J) *For a non-base load power plant (or when using power augmentation), the average temperature, barometric pressure and relative humidity at the site during the times of the year when the facility is intended to operate, together with a citation of the source and location of the data collection devices.*

Response: No power augmentation will be proposed for the project. Refer to the text above for site conditions.

Y.9 FUEL INPUT

OAR 345-021-0010(1)(y)(K) *Exhibit Y shall contain the annual fuel input in British thermal units, higher heating value, to the facility for each type of fuel the facility will use, assuming:*

- (i) For a base load gas plant, a 100-percent capacity factor on a new and clean basis and the maximum number of hours annually that the applicant proposes to use alternative fuels;*
- (ii) For a non-base load power plant, the applicant's proposed annual hours of operation on a new and clean basis, the maximum number of hours annually that the applicant proposes to use alternative fuels and, if the calculation is based on an operational life of fewer than 30 years, the proposed operational life of the facility;*
- (iii) For a nongenerating energy facility, the reasonably likely operation of the facility based on one year, 5-year, 15-year, and 30-year averages, unless an applicant proposes to limit operation to a shorter time.*

Response: Perennial proposes to use only natural gas as fuel for the Station. It is expected that the Station will operate 3,000 hours per year. The expected total annual fuel input is 11.2 x 10⁶ million Btu per year.

OAR 345-021-0010(1)(y)(L) *For each type of fuel a base load gas plant or a non-base load power plant will use, the estimated heat rate and capacity of the facility measured on a new and*

¹ See Western Regional Climate Center. HERMISTON 2 S, OREGON (353847) 1971-2000 Monthly Climate Summary. Available at: <http://www.wrcc.dri.edu/cgi-bin/cliNORM2000tM.pl?orherm>.

clean basis with no thermal energy to cogeneration, consistent with the data supplied in Exhibit B shall be provided in Exhibit Y.

Response: Perennial proposes to use only natural gas as fuel for the proposed energy facility. As shown in Table Y-2, the estimated load net power output is 415 MW, with a capacity of approximately 34 percent and an estimated gross heat rate of 8,781 Btu/kWh, HHV.

Y.10 NON GENERATING FACILITY EFFICIENCY AND CAPACITY

OAR 345-021-0010(1)(y)(M) *For each type of fuel a nongenerating energy facility will use, the estimated efficiency and capacity of the facility with no thermal energy to cogeneration.*

Response: OAR 345-021-0010(1)(y)(M) is not applicable.

Y.11 COGENERATION TO LOWER CARBON DIOXIDE EMISSIONS

OAR 345-021-0010(1)(y)(N)(i) through (xii) *If the facility provides thermal energy for cogeneration to lower its net carbon dioxide emissions rate, the applicant shall include:[information outlined in subsection (i) through (xii)].*

Response: The Project will not include cogeneration; therefore, OAR 345- 021-0010(1)(y)(N) is not applicable.

OAR 345-021-0010(1)(y)(O)(i) through (xxi) *If the applicant proposes to offset carbon dioxide emissions as described in OAR 345-024-0550(3), 345-024-0560(2), 345-024-0590(3), 345-024-0600(2), 345-024-0620(3) or 345-024-0630(1), the applicant shall include:[information outlined in subsection (i) through (xxi)].*

Response: OAR 345-021-0010(1)(y)(O) is not applicable since all required offsets will be provided through the monetary path.

Y.12 MONETARY PATH

OAR 345-021-0010(1)(y)(P) *If the applicant elects to comply with the applicable carbon dioxide emissions standard by using the monetary path under OAR 345-024-0560(3), 345-024-0600(3) or 345-024-0630(2), the applicant shall include:*

(i) A statement of the applicant's election to use the monetary path;

Response: Perennial will comply with the CO₂ standard of OAR 345-024-0590 for the Project solely by providing offset funds to The Climate Trust, as allowed by OAR 345-024-0600(3) and in compliance with the monetary path payment requirement of OAR 345-024-0710.

(ii) The amount of carbon dioxide reduction, in tons, for which the applicant is taking credit by using the monetary path;

Response: Perennial will use the monetary path for the full amount of the CO₂ emission reduction required to comply with the CO₂ emission standard. Section Y.7 provides an initial calculation of CO₂ emissions. The actual monetary path payment requirement will be determined in accordance with site certificate conditions.

(iii) The qualified organization to whom the applicant will provide offset funds and funds for the cost of selecting and contracting for offsets. The applicant shall include evidence that the organization meets the definition of a qualified organization under OAR 345-001-0010. The applicant may identify an organization that has applied for, but has not received, an exemption from federal income taxation, but the Council shall not find that the organization is a qualified organization unless the organization is exempt from federal taxation under section 501(c)(3) of the Internal Revenue Code as amended and in effect on December 31, 1996; and

Response: Perennial will provide offset funds, and funds for the cost of selecting and contracting for offsets, to The Climate Trust. For the following reasons, The Climate Trust is a “qualified organization” as defined by OAR 345-001-0010(48):

- The Climate Trust is exempt from federal taxation under section 501(c)(3) of the Internal Revenue Code. By a letter dated November 19, 1997, the Internal Revenue Service determined that The Climate Trust (then the Oregon Climate Trust) is exempt from taxation under section 501(c)(3).
- The Climate Trust is incorporated in the State of Oregon. The Articles of Incorporation are filed with the Oregon Secretary of State.
- The Articles of Incorporation of The Climate Trust require that offset funds received under OAR 345-024-0710(3) (ORS 469.503(2)) are to be used for offsets projects that would result in direct reduction, elimination, sequestration, or avoidance of CO₂ emissions. The Articles of Incorporation of The Climate Trust require that decisions regarding the use of such funds be made by a body composed of seven voting members, of which three are appointed by the Council, three are Oregon residents appointed by the Bullitt Foundation, and one is appointed by applicants for site certificates that are subject to ORS 469.503(2)(d) and the holders of such site certificates.
- The Climate Trust has made available on an annual basis, beginning after the first year of operation, a signed opinion of an independent certified public accountant stating that the qualified organization’s use of funds pursuant to ORS 469.503 conforms with generally accepted accounting principles.
- The Climate Trust has provided DOE with documentation that the Climate Trust has complied with OAR 345-001-0010(1)(48)(e) (ORS 469.503(2)(e)(K)(v)).

(iv) A statement of whether the applicant intends to provide a bond or letter of credit to secure the funds it must provide to the qualified organization or whether it requests the option of providing either a bond or a letter of credit.

Response: Perennial is requesting the option of providing either a letter of credit or bond to ensure the payment of funds to The Climate Trust.

Table Y-2 Carbon Dioxide Emission Factor Calculations

A. CO₂ Standard	415 MW of Combustion Turbines
CO ₂ Standard (lbs CO ₂ /kWh)	0.614
B. Parameters for Non-Base Load Gas Plant	
Net Power Output (kW)	415,312
New and Clean Gross Heat Rate (Btu/kWh) HHV	8,781
Annual Hours of Operation	3,000
C. Parameters for Power Augmentations	
Net Power Output (kW)	NA
New and Clean Heat Rate (Btu/kWh) HHV	
Annual Hours of Operation	
D. Calculations	
New Power Output (kW)	415,312
Annual Hours of Operation	3,000
Percent Time on Non-Base Load	34.2%
Net Annual Generation (million kWh/yr)	1,245.9
Deemed Life of Plant (years) by Statute or Rule	30
Total Gross Plant Output (million kWh for 30 years)	38,334
Total Net Plant Output (million kWh for 30 years)	37,378
Gross Heat Rate (Btu/kWh) HHV	8,781
CO ₂ Emissions Rate (lbs CO ₂ /Btu)	0.00011715
Total Gross CO ₂ Emissions (million lbs)	39,434

Table Y-2 Carbon Dioxide Emission Factor Calculations

E. Total Operations

Combined Net Output (million kWh for 30 years)	37,378
Combined CO ₂ Emissions (million lbs for 30 years)	39,434
Net CO ₂ Emissions Rate (lbs CO ₂ /kWh)	1.055
CO ₂ Standard (lbs CO ₂ /kWh)	0.614
Excess CO ₂ Emissions Rate (lbs CO ₂ /kWh)	0.441
Excess Tons CO ₂ (million tons over 30 years)	8.24

F. Monetary Path

Offset Fund Rate (\$/ton CO ₂)	\$1.90
Offset Funds Required (\$ million)	\$15.66
Contracting and Selection Funds (\$ million)	\$0.41
Monetary Path Requirement (\$ million)	\$16.07

Key:

Btu/kWh British thermal units per kilowatt hour
 CO₂ carbon dioxide
 HHV higher heating value
 kW kilowatt
 kWh/yr kilowatts per year
 lbs pounds
 lbs/CO₂/kWh pounds of carbon dioxide per kilowatt hour
 NA not applicable

APPENDIX Y-1

Project Review with a Zero Liquid Discharge System

1 INTRODUCTION

This section demonstrates compliance of the Energy Facility Siting Council's (Council) carbon dioxide emissions (CO₂) standard to not exceed 0.614 pounds of carbon dioxide per kilowatt hour (lbs CO₂/kWh) of net electric power output, should a zero liquid discharge (ZLD) system be installed by Perennial-WindChaser LLC (Perennial) as part of the Perennial Wind Chaser Station project (Project).

2 SUMMARY

This appendix to Exhibit Y provides information on compliance with the CO₂ standard, as required by Oregon Administrative Rules (OAR) 345-021-0010(1)(y). Perennial will comply with the CO₂ emissions standard of OAR 345-024-0590 for the Project by providing offset funds to The Climate Trust (formerly the Oregon Climate Trust), as allowed by OAR 345-024-0600(3). Perennial's payments will be made in compliance with the monetary path payment requirement of OAR 345-024-0710. The gross CO₂ emissions rates are estimated to be 1.064 lbs CO₂/kWh for the non-base load element, resulting in an excess CO₂ emission of 0.450 lbs CO₂/kWh for the non-base load element. The Project will not include power enhancement or augmentation.

3 FUEL CYCLE AND USAGE

The Perennial Wind Chaser Station (Station) will be fueled by natural gas only and will be an open/simple cycle electrical generating facility. Natural gas will be fired only in the combustion turbine generators. Electricity will be produced by the motive force of the combustion turbine generators. Under average annual operating conditions, the Station is expected to produce a net electrical output of approximately 411.9 megawatts (MW), with actual output dependent upon the technology selected. Note that without a ZLD system the electrical output would be approximately 415.3 MW, the decrease is due entirely to the ZLD system as shown in Table 1 below. Assuming 411.9 MW output at average annual conditions, the Station will use approximately 3,740 million British thermal units (Btu)/hour (higher heating value [HHV]) or 3.68 million standard cubic feet of natural gas per hour.

4 GROSS CAPACITY FOR EACH GENERATING UNIT

The gross capacity of each generating unit will depend on the final technology selected. Based upon the General Electric LMS100 technology, the gross capacity of each generating unit will be approximately 106.5 MW for each of the four identical units.

5 ONSITE ELECTRICAL LOADS AND LOSSES

A list of all expected electrical loads and losses greater than 50 kilowatts is shown in Table 1. This list is based on a typical technology and will vary with the final technology selected.

Table 1 Loads and Losses

Unit	Electrical Loads (kW)	Electrical Losses (kW)
CTG-1	106,483	
CTG-2	106,483	
CTG-3	106,483	
CTG-4	106,483	
Air Compressors		450
Circulating Water Pumps		1,050
Fuel/Gas Compressors		1,900
Demineralizer Water Forwarding Pumps		150
Close Cooling Water Pumps		750
Cooling Tower Fans		600
Water Treatment and Chemical Feed		100
Gas Turbine Auxiliaries		2,400
SCR System		1,300
DC Power Supply and UPS		100
Lighting		70
Miscellaneous Controls & Small Loads		750
Main Transformer Losses		700
Auxiliary Transformer Losses		300
Zero Liquid Discharge System		3430
Electrical Balance	425,932	14,050

Key:

CTG combustion turbine generator

DC direct current

SCR selective catalytic reduction

UPS uninterruptible power supply

6 ALTERNATE FUEL USE

Perennial proposes to use only natural gas as fuel for the Project.

7 CALCULATIONS OF CARBON DIOXIDE EMISSIONS

This section describes the detailed calculations of the CO₂ emissions of the Project, as required by OAR 345-021-0010(1)(y)(E)-(H). A spreadsheet of expected emissions calculations is provided as Table 2, presented at the end of this appendix. This table also provides information regarding how the emission factors used in the non-base load were calculated. The emissions calculations provided herein are estimates only. As described in Section 4, after technology selection and prior to construction of the Station, actual final emissions calculations will be submitted to the Oregon Department of Energy to determine the amount of the monetary path offset funds.

7.1 Gross Carbon Dioxide Emissions

Gross CO₂ emissions for 30 years' operation at non-base load, at average site conditions, and for 3,000 hours per year, were estimated to be approximately 39,434 million pounds of CO₂, as shown in Table 2.

Based on the onsite electrical loads and losses in Section 5, the net electric power for non-base load condition is approximately 411.9 MW. The net CO₂ emissions rate was estimated to be 1.064 lbs CO₂/kWh for non-base load element, as shown in Table 2.

7.2 Excess Carbon Dioxide Emissions

The total excess CO₂ emissions for 30 years, at average site conditions, and 3,000 hours per year are estimated to be approximately 7.21 million tons of CO₂, as shown in Table 2. The excess CO₂ emission rate is estimated to be 0.450 lbs CO₂/kWh, also shown in Table 2.

8 SITE CONDITIONS

The annual average site conditions were calculated based on the Hermiston 2S National Climatic Data Center; metrological station (1971 to 2000)² and are as follows:

Temperature	53.0 °F
Barometric Pressure	14.399 pounds per square inch
Relative Humidity	64.8 percent

No power augmentation would be proposed for the Project.

² See Western Regional Climate Center. HERMISTON 2 S, OREGON (353847) 1971-2000 Monthly Climate Summary. Available at: <http://www.wrcc.dri.edu/cgi-bin/cliNORM2000tM.pl?orherm>.

9 FUEL INPUT

Perennial proposes to use only natural gas as fuel for the Station. It is expected that the Station will operate 3,000 hours per year. The expected total annual fuel input would be 11.2×10^6 million Btu per year. As shown in Table 2, the estimated load net power output is 411.9 MW, with a capacity of about 34 percent and an estimated gross heat rate of 8,781 Btu/kWh, HHV.

10 NON GENERATING FACILITY EFFICIENCY AND CAPACITY

The Station will an electrical generating facility.

11 COGENERATION TO LOWER CARBON DIOXIDE EMISSIONS

The Project would not include cogeneration

12 MONETARY PATH

Perennial will comply with the CO₂ standard of OAR 345-024-0590 for the Station solely by providing offset funds to The Climate Trust, as allowed by OAR 345-024-0600(3) and in compliance with the monetary path payment requirement of OAR 345-024-0710.

Perennial will use the monetary path for the full amount of the CO₂ emission reduction required to comply with the CO₂ emission standard. Section 7 provides an initial calculation of CO₂ emissions. The actual monetary path payment requirement will be determined in accordance with site certificate conditions.

Perennial will provide offset funds, and funds for the cost of selecting and contracting for offsets, to The Climate Trust and is requesting the option of providing either a letter of credit or bond to ensure the payment of funds to The Climate Trust.

Table 2 Carbon Dioxide Emission Factor Calculations

A. CO₂ Standard	411.9 MW of Combustion Turbines
CO ₂ Standard (lbs CO ₂ /kWh)	0.614

B. Parameters for Non-Base Load Gas Plant

Net Power Output (kW)	411,882
New and Clean Gross Heat Rate (Btu/kWh) HHV	8,781
Annual Hours of Operation	3,000

C. Parameters for Power Augmentations

Net Power Output (kW)	NA
New and Clean Heat Rate (Btu/kWh) HHV	
Annual Hours of Operation	

D. Calculations

New Power Output (kW)	411,882
Annual Hours of Operation	3,000
Percent Time on Non-Base Load	34.2%
Net Annual Generation (million kWh/year)	1235.6
Deemed Life of Plant (years) by Statute or Rule	30
Total Gross Plant Output (million kWh for 30 years)	38,334
Total Net Plant Output (million kWh for 30 years)	37,069
Gross Heat Rate (Btu/kWh) HHV	8,781
CO ₂ Emissions Rate (lbs CO ₂ /Btu)	0.00011715
Total Gross CO ₂ Emissions (million lbs)	39,434

E. Total Operations

Combined Net Output (million kWh for 30 years)	37,069
Combined CO ₂ Emissions (million lbs for 30 years.)	39,434
Net CO ₂ Emissions Rate (lbs CO ₂ /kWh)	1.064
CO ₂ Standard (lbs CO ₂ /kWh)	0.614
Excess CO ₂ Emissions Rate (lbs CO ₂ /kWh)	0.450
Excess Tons CO ₂ (million tons over 30 years)	8.34

F. Monetary Path

Offset Fund Rate (\$/ton CO ₂)	\$1.90
Offset Funds Required (\$ million)	\$15.85
Contracting and Selection Funds (\$ million)	\$0.42
Monetary Path Requirement (\$ million)	\$16.27

Key:

Btu British thermal units
CO₂ carbon dioxide
HHV higher heating value
kW kilowatt
kWh kilowatt hour
lbs pounds

ATTACHMENT 6

Updated Property Owner List and Tax Lot Map