



Oregon

Kate Brown, Governor



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March 14, 2019

Lenna Cope, Environmental Engineer
Portland General Electric

Sent via email: Lenna.Cope@PGN.com

RE: Proposed Change to Biglow Canyon Wind Farm: Amendment Determination Request Pursuant to OAR 345-027-0057(2)(a)

Dear Lenna Cope,

On December 17, 2018, the Oregon Department of Energy (ODOE or the Department) received an Amendment Determination Request (ADR) pursuant to OAR 345-027-0057 from Portland General Electric (hereinafter referred to as "PGE" or "certificate holder") for the Biglow Canyon Wind Farm (facility); the ADR requests a determination as to whether an amendment is required, so that the facility may transition crane pads from a temporary disturbance to a permanent disturbance. PGE indicates that, over the life of the facility, each turbine would require at least one repair that would require the use of a crane. PGE estimates that approximately 27 temporary crane pads currently exist at the facility (the facility maintains a total of 217 total turbines).

On January 17, 2018 the Department requested further information from the certificate holder relating to (1) a clarification of the size of expected crane pad footprint; (2) an update to the "maximum area of affected higher-value habitat" table and; (3) confirmation that costs associated with the construction of crane pads, that were previously evaluated by the Council through the Retirement and Financial Assurances standard, are still valid. On February 27, 2019, the certificate holder responded to the Department's inquiry.

In accordance with OAR 345-027-0057, the Department reviewed the ADR and determined that the request included all information required by OAR 345-027-0057(4). Furthermore, the Department agrees with the certificate holder's evaluation under 345-027-0050 and finds that the proposed modification does not require a site certificate amendment. The Department's findings and reasoning are provided below. The ADR is included as Attachment 1.

Pursuant to OAR 345-027-0057(5), on December 17, 2018, the Department posted an announcement on the agency's website to notify the public that an amendment determination request had been received. A copy of the ADR was included in the announcement. OAR 345-027-0057(6) requires that, after issuing its determination, the Department must (1) provide the Determination and the ADR to the Energy Facility Siting Council (Council); (2) post the determination to the ODOE public website and; (3) inform the Council of the ADR and determination during the "consent calendar" agenda item.

OAR 345-027-0057(6) also allows for the Department's Determination to be referred to the Council for concurrence, modification, or rejection, at the request of either a Councilmember or by the certificate holder. Should such a request be made by a Councilmember or the certificate holder, the determination would be presented before EFSC at an upcoming Council meeting.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/LM/

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cc (via e-mail distribution)

Todd Cornett, Oregon Department of Energy
Max Woods, Oregon Department of Energy
Duane Kilsdonk, Oregon Department of Energy
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Staff Evaluation of the Biglow Canyon Wind Farm Amendment Determination Request and Determination

I. Proposed Facility Modifications

The Biglow Canyon Wind Farm is an operating wind energy facility with 217 wind turbines, and the facility currently produces approximately 404 megawatts. As originally approved by the Council's 2010 Final Order, the site boundary encompasses approximately 25,000 acres of land located within Sherman County, Oregon.

As noted above, the ADR requests a "determination" as to whether an amendment is required to transition crane pads from a temporary to permanent status. PGE indicates that it expects each turbine would require at least one repair during the life of the facility; each turbine repair requires the use of a crane. PGE indicates that it would not "preemptively" install crane pads at locations that do not require maintenance; rather, crane pads would be installed at turbine locations only after turbine repair deemed necessary. As currently operated, after repair work is completed, the crane pad is decommissioned and the land restored to farming use. As requested by PGE, the crane pads would remain after repair work is completed, and could be used for future repairs at the turbine. "Crane pads" are graveled areas at the base of a wind turbine that provide stable ground upon which is locate a crane. Crane pads were constructed as part of initial facility construction, and then restored following facility commissioning.

PGE estimates that approximately 27 temporary crane pads currently exist at the facility, and the facility maintains a total of 217 total turbines. Crane pads are necessary for facility decommissioning, and PGE indicates that it would install crane pads "in a manner that makes maximum use of the existing road and turbine pad area so any additional disturbance ... is minimal." Access roads are approved to be up to 28 feet in width and up to 44 miles long. Crane pads would be included within temporary laydown and staging areas that were previously reviewed by Council.¹ Crane pads would be graveled, and constructed by "lightly grading for bumps and berms."²

II. Site Certificate Amendment Applicability

OAR 345-027-0050(4) requires the certificate holder to submit a request to amend its site certificate to design, construct, or operate a facility in a manner different from the description in the site certificate, if the proposed change:

- (a) Could result in a significant adverse impact that the Council has not addressed in an earlier order and the impact affects a resource protected by Council standards;*
- (b) Could impair the certificate holder's ability to comply with a site certificate condition; or*
- (c) Could require a new condition or a change to a condition in the site certificate*

¹ *Amendment Determination Request, p. 3.* Temporary laydown areas encompass 18,500 square feet at the base of each turbine, and would otherwise be "constructed in areas that are entirely within the [previously evaluated] 500-foot wide turbine corridors."

² *Amendment Determination Request, Comment to Condition 28*

If an amendment determination request assessment affirms any of the above criteria, then the proposed change requires an amendment to the site certificate. If none of the above criteria apply, then the certificate holder must provide a “written evaluation” of the change(s) in accordance with OAR 345-027-0055.

The proposed change must be evaluated under the “three could’s” set forth above because crane pads are not specifically mentioned within the Site Certificate; however, the impacts of a crane pad are naturally included within the construction activities previously approved by Council and associated with turbine laydown and staging areas.

III. Evaluation under OAR 345-027-0050(4)(a)

A site certificate amendment is required pursuant to OAR 345-027-0050(4)(a) if the proposed change could result in a significant adverse impact to a Council regulated resource, and that impact was not addressed through prior Council review. In order to demonstrate compliance with Council’s Standards (Division 22 and Division 24), the certificate holder provided a compliance evaluation of the determinations being requested for the proposed facility modifications in the ADR (*Attachment 1* to this ADR Determination).

Based upon an initial review of the ADR, specific standards are further evaluated because the proposed change could trigger the OAR 35-027-0050(4)(a) criterion; the Department’s evaluation is presented below. Council standards that are not discussed within this ADR Determination would not be impacted; through reliance on the Council’s previous findings, those standards were deemed acceptable and are not further evaluated.

Land Use (OAR 345-022-0030)

Since the issuance of the most recent Final Order (2008), the Land Conservation and Development Department (LCDC) adopted rule OAR 660-033-0130(37), which imposes requirements relating to “wind power generation” facilities. The LCDC wind power generation rules eliminated the requirement that wind power facilities seek a Goal 3 exception if it were to preclude more than 12 acres of high-value farmland, 20 acres of arable land, or 320 acres of other land. Instead, the rules require facilities that would impact “high-value” farmland soils to demonstrate (in pertinent part) that:

- “Reasonable alternatives” to the facility component were considered;
- Long term environmental, economic, social and energy consequences resulting from the facility component are not significantly more adverse than would typically result from the same proposal being located on other agricultural lands that do not include high-value farmland soils;
- The owner of the wind power generation facility shall be responsible for restoring, as nearly as possible, any agricultural land that is damaged or otherwise disturbed through the siting, maintenance, repair or reconstruction of the facility.
- Additionally, the applicant must satisfy the criteria contained within Subsection (b) of OAR 660-033-0130(37), which provides for evaluative criteria relating specifically to “arable lands” as follows:
 - The proposed wind power facility will not create unnecessary negative impacts on agricultural operations (the rule provides that “negative impacts could include” the unnecessary construction of roads, the division of fields in a manner that reduces

- farming capability, or the siting of facility components in a manner that disrupts common and accepted farming practices;
- The facility must not result in unnecessary soil erosion;
 - Construction and maintenance activities would not result in unnecessary soil compaction that would reduce the productivity of soil or crop production;
 - Construction and maintenance activities would not result in the unabated introduction or spread of noxious weeds.

The above administrative rule would apply to the Biglow Canyon facility if an amendment were required, because the majority of the permanent impacts are located on high-value farmland.³ The area within the site boundary contains dry land wheat and barley farming.⁴

Relating to the requirement to assess “reasonable alternatives,” there are no alternatives to where crane plans may be located that would not be on high value farmland, given that their location is dependent on proximity to currently operating wind turbines, and because the majority of the site boundary is considered to be “high-value” farmland by statutory definition.

The long term environmental, economic, social, and energy consequences that would result from transitioning temporary crane pads to a permanent status are not more adverse than would typically result from the same proposal being located on other agricultural lands that do not include high-value farmland soils. Based on the rules in place at the time of application, in the *Final Order on the ASC*, the Council found that a Goal 3 Exception was appropriate; the Goal 3 analysis required a review of relevant “environmental, economic, social and energy” factors. To reiterate, Goal 3 Exceptions are no longer required for wind energy facilities, and the level of review associated with a Goal 3 Exception is considered to be a higher level of review than under current LCDC rules. The Council found that the facility would permanently occupy less than 1% of the total area of actively farmed land that is “adjacent” to the facility,⁵ and that the spacing of turbines would “preserve most of the land” for farm use.⁶ The Council reasoned that because the facility design was not a “single, continuous area,” farmland operations would not be seriously impacted. Furthermore, the Council found that the facility was compatible with farm use, and would not seriously interfere with accepted farm practices. Landowner statements indicate that the area of land disturbed by the “project’s turbines, roads and other facilities” is “very small in comparison to the total acreage I control. Accordingly, the amount of my land taken out of economic agricultural production will not represent a significant portion of my farm income.” The statements indicate that the facility would result in “minor” adjustments to farming practices such as “new access routes” and “increased weed control,” and that those changes would not result in a “significant change” to farming operations. The presence of permanent crane pads, which represents a small subset of land compared to the overall facility site, would not affect these findings. The Council also found that the facility would boost the local economy, landowners would receive the benefits of

³*Final Order on the ASC*, p. 56 provides that the facility would preclude 157 acres from agricultural use, “the majority of which are high-value farmlands.”

⁴*Final Order on the ASC*, p. 51

⁵ *Final Order on the ASC*, p. 61. Note that at *Final Order on the ASC*, p 50, the Council noted that the facility would have a permanent impact of approximately 157 acres out of a total 25,000 acres under the wind energy lease easement. The final order “assumes” that “about 80%” of the 25,000 acres is used for farmland; as such, the permanent impacts to farmlands would be approximately .8% percent.

⁶ *Final Order on the ASC*, p. 61

annual lease payments, and that the “best” wind resources are all located on agricultural land. Lastly, current site certificate conditions already require the certificate holder to minimize impacts to farming practices.⁷

The construction of crane pads would likewise not result in a failure to meet the requirements imposed by OAR 660-033-0130(b). Crane pads would not further divide fields or otherwise result in a change to farming practices that is different from the present situation. As noted above, the landowners indicated that the facility itself would not result in a significant change to agricultural operations; as such, the proposed change would not result in a negative finding under subsection (A) of OAR 660-033-0130(37)(b). Additionally, the certificate holder must comply with an Erosion and Sediment Control Plan and a Revegetation plan, which provides for remediation measures to minimize the risk of the spread of noxious weeds. As such, current conditions require the certificate holder to abide by plans that ensure that no unnecessary soil erosion or compaction would occur, and that activities would not result in the unabated introduction or spread of noxious weeds.

At facility decommissioning, the certificate holder is required to retire the facility subject to the terms of a final retirement plan, which would include measures “for the protection of the environment.”⁸ In conclusion, the Council previously evaluated the facility in the context of a Goal 3 exception, which requires the same analysis found in OAR 660-033-0130(37), there are no “reasonable alternatives” to locate crane pads in areas that would have lesser impacts to agricultural land, and current site certificate conditions require the certificate holder to ensure that any impacted land is restored to a useful condition at facility retirement.

Retirement and Financial Assurance (OAR 345-022-0050)

Under the Council’s Retirement and Financial Assurance Standard, the certificate holder must demonstrate that the facility site can be restored to a useful, non-hazardous condition following permanent cessation of operation or construction.

The certificate holder represents that the change proposed within its ADR would reduce its estimated decommissioning cost. Crane pads are necessary to deconstruct turbines; as such, crane pads would otherwise be required during the decommissioning phase. PGE represents that the retention of temporary crane pads, which are installed during the operations phase, would reduce decommissioning costs because those crane pads need not be constructed during the retirement phase. The certificate holder confirmed that the Council has already considered costs associated with the construction of crane pads within the cost estimate that was approved by the Council in the *Final Order on Amendment 3*. Specifically, these costs were included within various unit costs associated with the disassembly of the turbines; the certificate holder indicates crane pad costs are already included within estimates relating to the removal of blades, hubs, nacelles, and towers. Furthermore, a crane cannot be disassembled without properly preparing the ground, and costs associated with the restoration of crane pads was included in the retirement line item estimate “Restore Additional Areas Disturbed by Facility Removal.” Therefore, expenditures associated with the construction of crane pads during the life of the facility, would not also be required of the certificate holder at the time of facility decommissioning.

⁷ As pertaining to “access roads and... staging areas,” Condition 21 requires the certificate holder to “minimize disturbance with farming practices.”

⁸ *Final Order on the ASC*, p. 65

The Department notes that there are several conditions imposed in the existing site certificate that satisfy the requirements of the Retirement and Financial Assurance standard. As such, the Department considers the existing conditions to be sufficient to address the proposed facility modifications.

Fish and Wildlife Habitat and Threatened and Endangered Species Standards (OAR 345-022-0060 and -0070)

Under the Council's Fish and Wildlife habitat, the certificate holder must demonstrate that the design, construction, and operation of the facility would meet Oregon Department of Fish and Wildlife habitat mitigation goals. Under the Council's Threatened and Endangered Species standard, the certificate holder must satisfy conservation and protection programs administered by the Oregon Department of Agriculture relating to listed threatened or endangered species. The requested modifications would occur entirely on cultivated agricultural fields, which is Category 6 habitat. Impacts to Category 6 habitat do not require mitigation, in accordance with the Council's Fish and Wildlife Habitat standard and ODFW's Fish and Wildlife Habitat Mitigation Policy. Furthermore, any temporary disturbance would be managed through the pre-existing revegetation plan as opposed to through mitigation offsets.⁹

The *Final Order on AMD 3* (Table 4) indicates that there would be a total of 177.84 acres of permanent disturbance to Category 6 habitat. The Department requested an updated total disturbance estimate from the certificate holder, and PGE indicates that maximum impacts to Category 6 habitat would be 177.84 acres (previously occupied) plus an additional 17.44 acres (to account for crane pads) for a total of 195.28 acres; the certificate holder indicates that it expects each crane pad would occupy approximately 50 x 70 feet of graveled area.

The Council approved the certificate holder to construct "turbines and any other facility components within the 500-foot corridors" as long as (a) the facility would not affect any Category 1 or Category 2 habitats; and (2) the facility design would minimize component size¹⁰ (current Condition 59). Condition 59(c) also requires the certificate holder to provide maps of impacts to category 3 or 4 habitat. None of these conditions would be affected by the proposed facility modification.

Since the construction and retention of crane pads would occur immediately adjacent to turbines, would naturally extend from access roads, and would occupy areas that are currently disturbed by agricultural practices, such impacts are within areas that were previously evaluated by the Council. As such, the Department concludes that the proposed facility modifications would neither result in a significant adverse impact that the Council has not addressed in an earlier order, nor result in a new impact affecting a resource protected by the Fish and Wildlife Habitat standard or the Threatened or Endangered Species standard. The Department further concludes that the proposed facility modifications are not likely to impact the certificate holder's ability to comply with a site certificate condition or require a new or change in existing condition.

⁹ See comment to Condition 29 (All areas disturbed during construction of gravel crane pads become part of the permanent disturbance associated with the pad. If additional disturbance occurs to vegetation not associated with the final footprint of the pad, PGE will revegetate according to the Revegetation Plan.)

¹⁰ *Final Order on the ASC*, p. 108

Historic, Cultural, and Archaeological Resources (OAR 345-022-0090)

In the *Final Order on the ASC*, the certificate holder surveyed the proposed turbine corridors and roads at a width of 500 feet, including the crane pads.¹¹ The surveys did not identify any cultural sites within the analysis area. The Council previously imposed conditions 69 through 73, which require in pertinent part, that the certificate holder (1) provide maps showing the final design location of all components, prior to construction of any phase; (2) ensure that qualified personnel instruct construction personnel of the identification of cultural resources; (3) ensure that an archaeologist is present on site during any ground disturbing activities, which includes grading and graveling and; (4) that ground disturbing activities cease if any archaeological or cultural resources are founding during construction. These conditions were met at the time of facility construction.

Since the construction and retention of crane pads would be immediately adjacent to turbines, on areas previously disturbed for facility construction, would naturally extend from access roads, and would be within areas that are currently disturbed by agricultural practices, any impacts are therefore within areas that have been previously evaluated by the Council. Based on the results of the pre-construction surveys, and compliance with existing site certificate conditions, the Department concludes that the proposed facility modifications would not be likely to result in a significant adverse impact that the Council has not addressed in an earlier order, nor would the proposed modifications result in a new impact affecting a resource protected by the Historic, Cultural and Archaeological Resources standard.

Other Standards

The Department does not anticipate that the proposed modification could result in a significant adverse impact that has not been previously evaluated by the Council, in relation to the following standards:

- OAR 345-022-0000: General Standard of Review
- OAR 345-022-0010: Organizational Expertise
- OAR 345-022-0020: Structural Standard
- OAR 345-022-0022: Soil Protection
- OAR 345-022-0040: Protected Areas
- OAR 345-022-0080: Scenic Resources
- OAR 345-022-0100: Recreation
- OAR 345-022-0110: Public Services
- OAR 345-022-0120: Waste Minimization
- OAR 345-024-0120: Public Health and Safety Standards for Wind Energy Facilities
- OAR 345-024-0015: Siting Standards for Wind Energy Facilities
- OAR 345-024-0090: Transmission Lines

IV. Evaluation under OAR 345-027-0050(4)(b)

The second factor under OAR 345-027-0050(4) requires a site certificate amendment if the proposed change “could impair the certificate holder’s ability to comply with a site certificate condition.” Based on the evaluation provided under OAR 345-027-0050(4)(a) above, the proposed change would not significantly impact any applicable Council standards. The Department evaluated all the existing site

¹¹ *Final Order on the ASC*, p. 114

certificate conditions for the Biglow Canyon Wind Farm, as amended, and finds that the proposed facility modifications would not impair the certificate holder's ability to comply with any site certificate condition.

V. Evaluation under OAR 345-027-0050(4)(c)

The final factor under OAR 345-027-0050(4) would require a site certificate amendment if the proposed change "could require a new condition or a change to a condition in the site certificate." Based on the reasoning and evaluation presented above, the Department concludes that the proposed modifications do not trigger an amendment under OAR 345-027-0050(4)(a) and OAR 345-027-0050(4)(b), as the proposed facility modification would not result in a significant adverse impact that the Council has not addressed in an earlier order, nor would the modifications result in a new impact affecting a resource protected by Council standards. Therefore, the Department finds that the proposed changes would not require any new or modified conditions.

VI. Determination

The Department finds that the proposed facility modifications included in this Amendment Determination Request do not require a site certificate amendment. The Department concludes that the proposed facility modifications would not cause a significant adverse impact to a resource protected by Council standards, and would not substantially impair the certificate holder's ability to comply with site certificate conditions. Compliance with applicable EFSC Standards, State and local laws, rules, and ordinances would not be expected to be affected by the proposed facility modifications. Based on the findings of fact, the Department determines that the proposed facility modifications would not require a site certificate amendment.

In accordance with the requirements of OAR 345-027-0055(4), the certificate holder shall include a description of the proposed facility modifications and the Department's Determination in its next annual report. ODOE will also document the change in an order associated with the next site certificate amendment.

OAR 345-027-0057(6) allows that at the request of a Council member, the Department's determination must be referred to the Council for concurrence, modification, or rejection. In compliance with this rule, the Department will provide its determination and inform the Council of its rights under the rule. Should a Council member request to review the determination, the determination would go before EFSC at an upcoming Council meeting. Verbal notice of the request and the written determination of this ADR will be provided to Council at the March 22, 2019 Council meeting during the consent calendar agenda item.

Attachment 1: Biglow Canyon Wind Farm, Amendment Determination Request



Portland General Electric Company
121 SW Salmon Street • Portland, Oregon 97204

December 17, 2018

Todd Cornett
Division Administrator
Oregon Department of Energy
550 Capitol Street NE
Salem, OR 97301

Re: Proposed Change to Biglow Canyon Wind Farm: Amendment Determination Request
Pursuant to OAR 345-027-0057(2)(a)

Dear Mr. Cornett:

Portland General Electric Company (PGE) is the holder of the Third Amended Site Certificate for the Biglow Canyon Wind Farm (the "Site Certificate"). PGE is proposing a minor modification of the approved facility to streamline continued maintenance and subsequently facilitate decommissioning. PGE is proposing to make crane pads (currently built on a temporary basis for maintenance) permanent features. As detailed further below, our analysis concludes that this modification does not require an amendment to the Site Certificate, and we are requesting a determination by the Oregon Department of Energy confirming our conclusion, pursuant to OAR 345-027-0057(2)(a).

Background on Crane Pads

As part of PGE's initial construction of the Biglow Canyon Wind Farm, crane pads were constructed at each tower to facilitate erection of the turbines. Crane pads were then removed post-construction and the areas were regraded and revegetated or converted to permanent roads and/or graveled turbine pad areas.

However, during routine maintenance it is often necessary to use a crane for tower / turbine repairs, wherein we must build and remove another crane pad to complete this work. We estimate that over the life of the facility, each tower will require at least one repair event requiring a crane, and the associated use of a crane pad. To be efficient, PGE proposes to retain a crane pad once constructed through the life of the facility. If a tower needs maintenance that requires a crane, a crane pad will be constructed and will remain in place and be available for use both for any additional maintenance and for eventual decommissioning. We believe this will streamline maintenance activities and be the least invasive solution to the project and its environment, as it will minimize crane pad construction activities.

PGE currently has 27 temporary crane pads that are currently in place at Biglow Canyon Wind Farm and is proposing to make them (and future pads) permanent for the life of the facility. There are a total of 217 turbines at the Biglow Canyon Wind Farm; therefore, there would eventually be up to 217 permanent crane pads as a result of this proposed change.

Additionally, crane pads will become necessary during decommissioning of the facility. Having some in place (from previous maintenance) prior to starting decommissioning reduces final crane pad construction activity and associated decommissioning costs.

Crane pads, whether temporary or permanent, are installed in a manner that makes maximum use of the existing road and turbine pad area so any additional disturbance necessary for the crane pad construction is minimal. Crane pads are constructed out of the same gravel used for roads and turbine pad areas and are installed in areas previously disturbed during initial construction. All turbines and current and future crane pad locations are within agricultural land; therefore, no additional mitigation will be necessary. Attachment 1 provides photos of several crane pads installed for maintenance to provide examples of an installed crane pad that PGE is proposing to make permanent. Attachment 2 provides a series of figures showing the locations of all turbines where the proposed change may occur.

Note that PGE does not intend to preemptively install crane pads at turbine locations that are not undergoing maintenance that requires the use of a crane. Crane pads will only be installed at turbine locations once a maintenance activity requires a crane.

Determination Request

Pursuant to OAR 345-027-0057(2)(a), PGE requests a determination by the Oregon Department of Energy that classifying temporary pads installed for maintenance as permanent related or supporting facilities does not require an amendment to the Site Certificate.

PGE has conducted an analysis and evaluated the proposed change under OAR 345-027-0050 (Changes Requiring an Amendment). These regulations require an amendment to the site certificate to:

- (1) Transfer ownership of the facility or the certificate holder as described in OAR 345-027-0100;
- (2) Apply later-adopted law(s) as described in OAR 345-027-0090;
- (3) Extend the construction beginning or completion deadline as described in OAR 345-027-0085;
- (4) Design, construct or operate a facility in a manner different from the description in the site certificate if the proposed change:
 - (a) Could result in a significant adverse impact that the Council has not addressed in an earlier order and the impact affects a resource or interest protected by a Council standard;
 - (b) Could impair the certificate holder's ability to comply with a site certificate condition;
 - (c) Could require a new condition or a change to a condition in the site certificate.

Sections (1), (2), and (3) are not applicable. PGE does not propose to transfer ownership of the facility or the certificate holder; therefore OAR 345-027-0050(1) is not applicable. The proposed change is not as a result of a request by any person for amendment to apply later-adopted laws; therefore OAR 345-027-0050(2) is not applicable. The facility has already been constructed in accordance with the beginning and completion deadlines; therefore OAR 345-027-0050(3) is not applicable.

PGE's analysis under OAR 345-027-0050 (4) is below:

The description in the Site Certificate describes major structures (up to 225 wind turbines) and related or supporting facilities such as power collection system, substations and interconnection system, meteorological towers, operations and maintenance building, control system, access roads, temporary laydown and staging areas, and temporary crane paths. Access roads are described as approximately 28 feet wide (Final Order on Site Certificate) and up to 44 miles long (Final Order on Amendment #3). Laydown and staging areas are described as approximately 18,500 square feet at the base of each turbine location and various other staging areas throughout the project area (Final Order on Site Certificate). Temporary crane paths are described as necessary to enable construction to proceed more efficiently by reducing the distance that large construction cranes would have to travel between turbine strings (Final Order on Amendment #2).

Although crane pads are not directly mentioned in the Site Certificate, based on the descriptions provided in the various Final Orders, the installation and removal of crane pads during initial construction would have been part of activities at the laydown and staging areas at the base of each turbine location which are indicated as being temporary disturbances. Therefore, the proposed change would be a change in the construction and operation of the facility that warrants evaluation of the "three could" under OAR 345-027-0050(4). The evaluation follows.

- (a) Could result in a significant adverse impact that the Council has not addressed in an earlier order and the impact affects a resource or interest protected by a Council standard:

The proposed change will not result in a significant adverse impact that the Council has not addressed in an earlier order. The crane pads would be constructed in areas that are entirely within the 500-foot wide turbine corridors evaluated and approved by the Council in the Final Order for Biglow Canyon Wind Farm, June 30, 2006, and Final Order on Amendment #2, May 10, 2007. As previously mentioned, all current and future crane pad locations are within agricultural land; therefore, there are no protected wildlife or plant species, or wetlands that would be impacted and no mitigation is required for Category 6 habitat. All current and future crane pads are within the laydown and staging areas disturbed at the base of each turbine during initial construction (approximately 18,500 square foot area at the base of each turbine). The construction methods for installing the crane pads as permanent features are the same used to temporarily install the crane pads during initial construction and used for constructing permanent roads and turbine pad areas; therefore, the construction method and material impacts have already been considered and addressed in an earlier order. The cost and time associated with installing crane pads would be necessary during decommissioning; any crane pads that are installed prior to decommissioning will reduce the cost of decommissioning. Therefore, the proposed change does not result in an increase to the decommissioning costs or associated letter of credit. Attachment 3 Table 1 provides a review of each Council standard and additional information supporting the conclusion that the proposed change would not result in a significant adverse impact that the Council has not addressed previously.

(b) Could impair the certificate holder's ability to comply with a site certificate condition:

PGE has reviewed each Site Certificate condition and determined that the proposed change will not impair PGE's ability to comply with any Site Certificate conditions. Attachment 3 Table 2 provides an analysis of each site certificate condition, whether the condition is applicable to the construction of crane pads, and an explanation why the proposed change does not impair PGE's ability to comply with the condition. Construction of crane pads for maintenance is already a necessary operational activity which PGE undertakes while maintaining compliance with all Site Certificate conditions; this change would simply make the crane pads permanent rather than temporary. There is no specific condition that expressly states that crane pads must be temporary disturbances.

(c) Could require a new condition or change to a condition in the site certificate:

The Site Certificate already contains adequate conditions to address the construction and maintenance of permanent crane pads; these conditions are flagged as applicable and listed in Attachment 3 Table 2. There are already conditions that require maintenance of gravel roads and turbine pad areas, and since the crane pads are constructed substantially like those related and supporting facilities the conditions that cover gravel roads and turbine pad areas are adequate to cover permanent crane pads. Since all crane pads are or will be constructed in Category 6 habitat, converting temporary pads to permanent does not require any additional conditions because there are no new habitat categories to be considered.

For the reasons set forth in this letter describing PGE's analysis, we request the Department's determination that the proposed crane pads do not require an amendment to the Site Certificate under OAR 345-027-0057. If you have any questions or need additional information, please feel free to contact me at (503) 464-2634, or Lenna.Cope@pgn.com.

Sincerely,



Lenna Cope, P.E.
Environmental Engineer
Portland General Electric Company

Attachment 1

Photos



Photo 1 – Example of a constructed crane pad at Turbine #61.



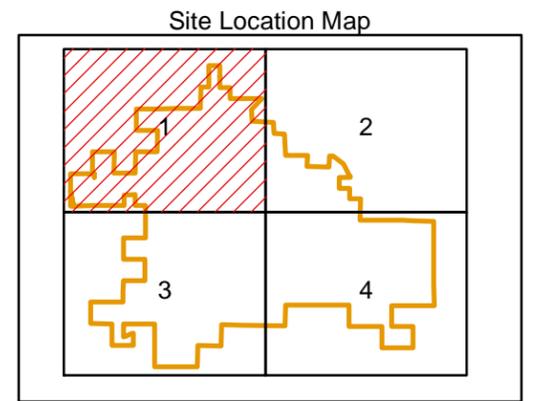
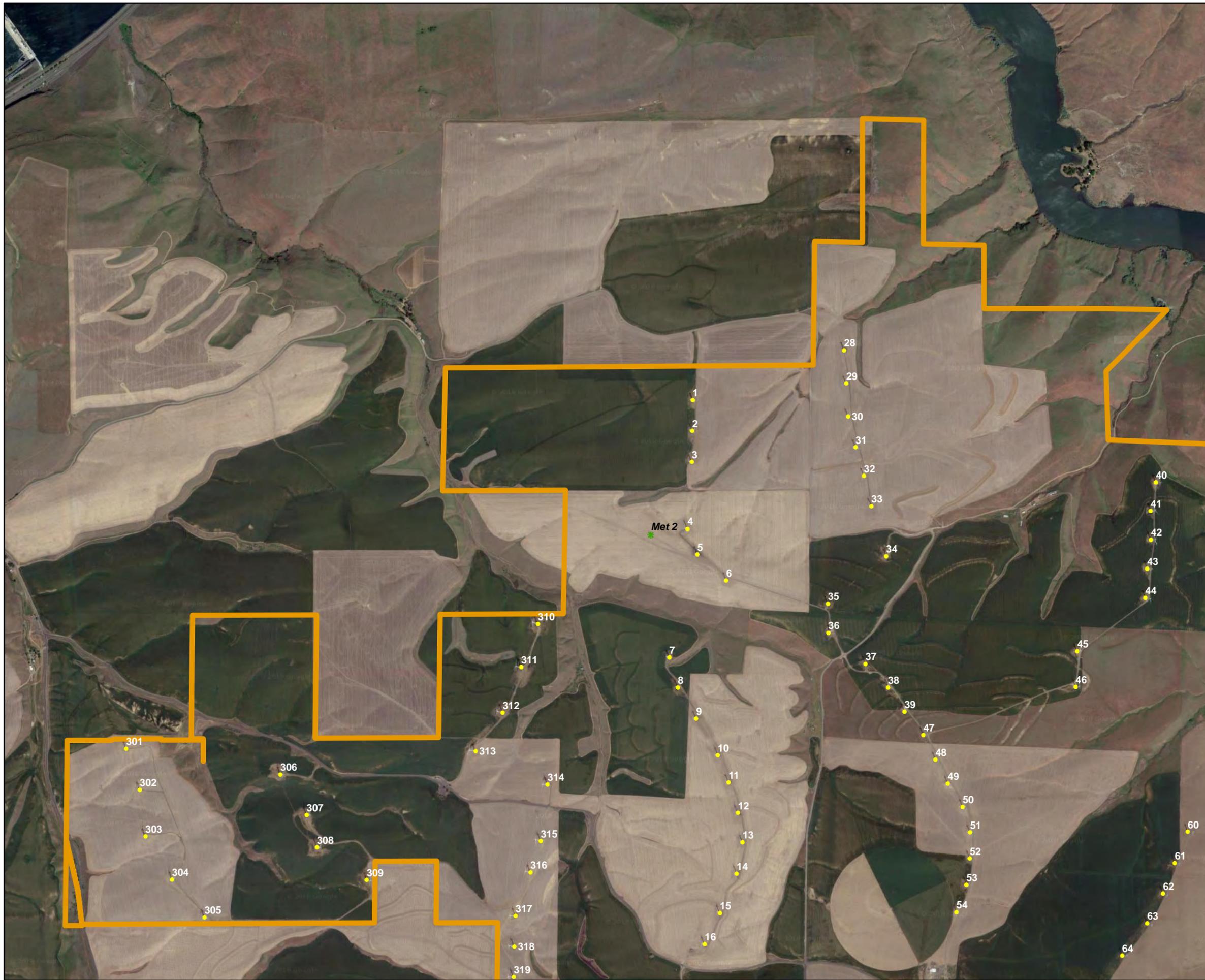
Photo 2 – Example of a constructed crane pad at Turbine #363.



Photo 3 – Example of a constructed crane pad at Turbine #354.

Attachment 2

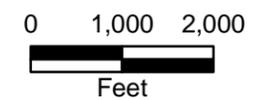
Figures



Map Features

- Turbine
- * Met Tower
- ▭ Project Boundary

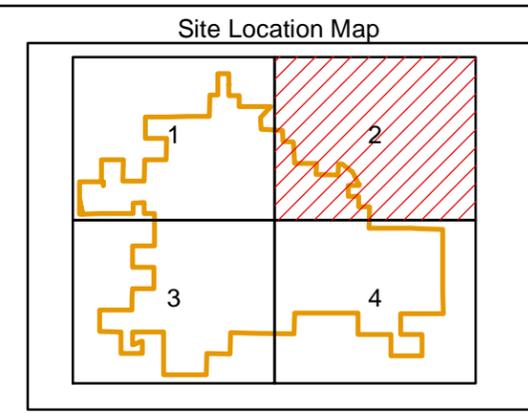
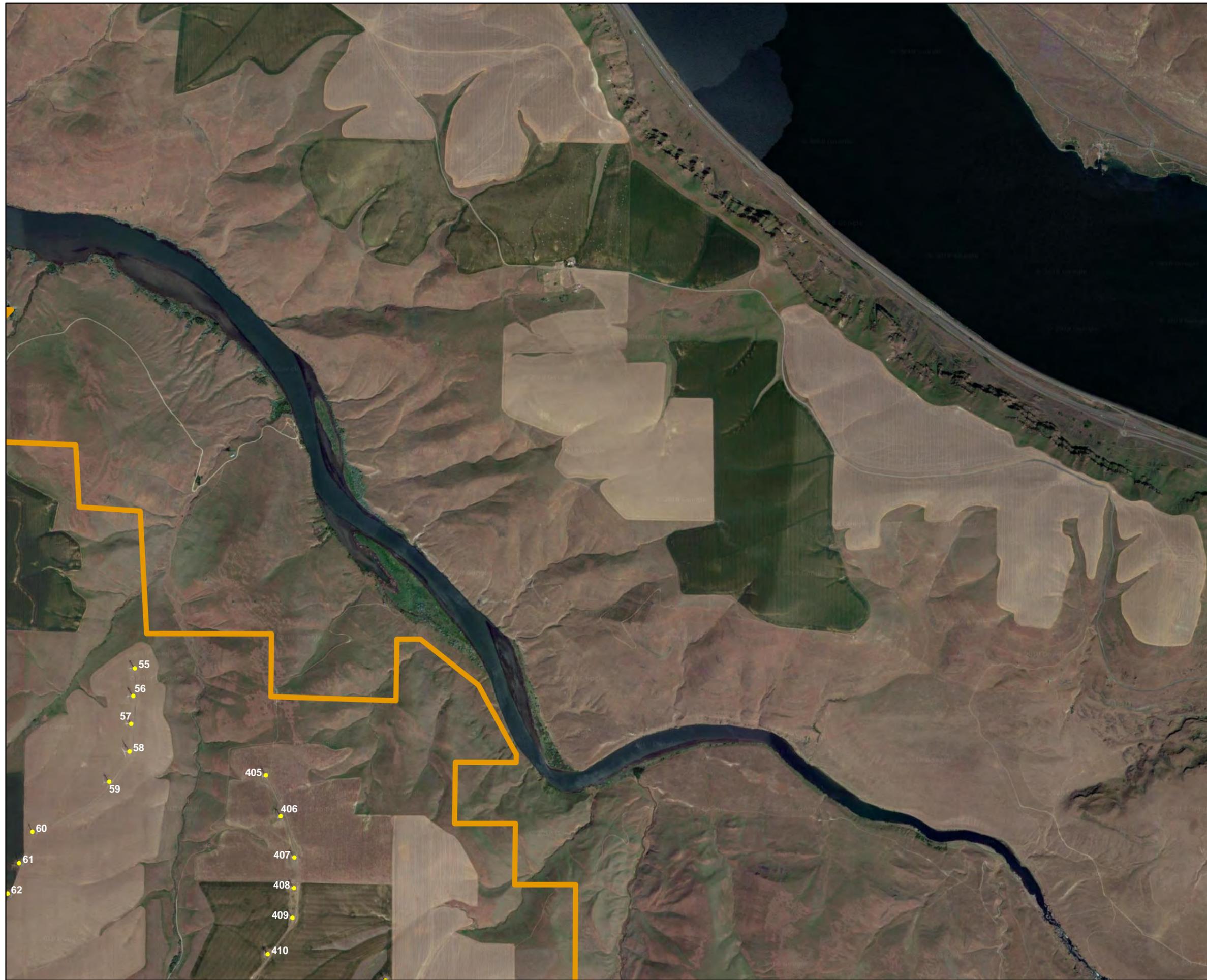
Sheet 1 of 4



Portland General Electric
Portland, Oregon

Site Plan

Biglow Canyon Wind Farm



- Map Features**
- Turbine
 - * Met Tower
 - ▭ Project Boundary

Sheet 2 of 4

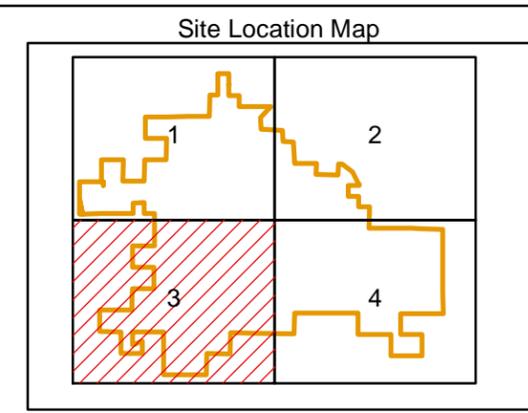
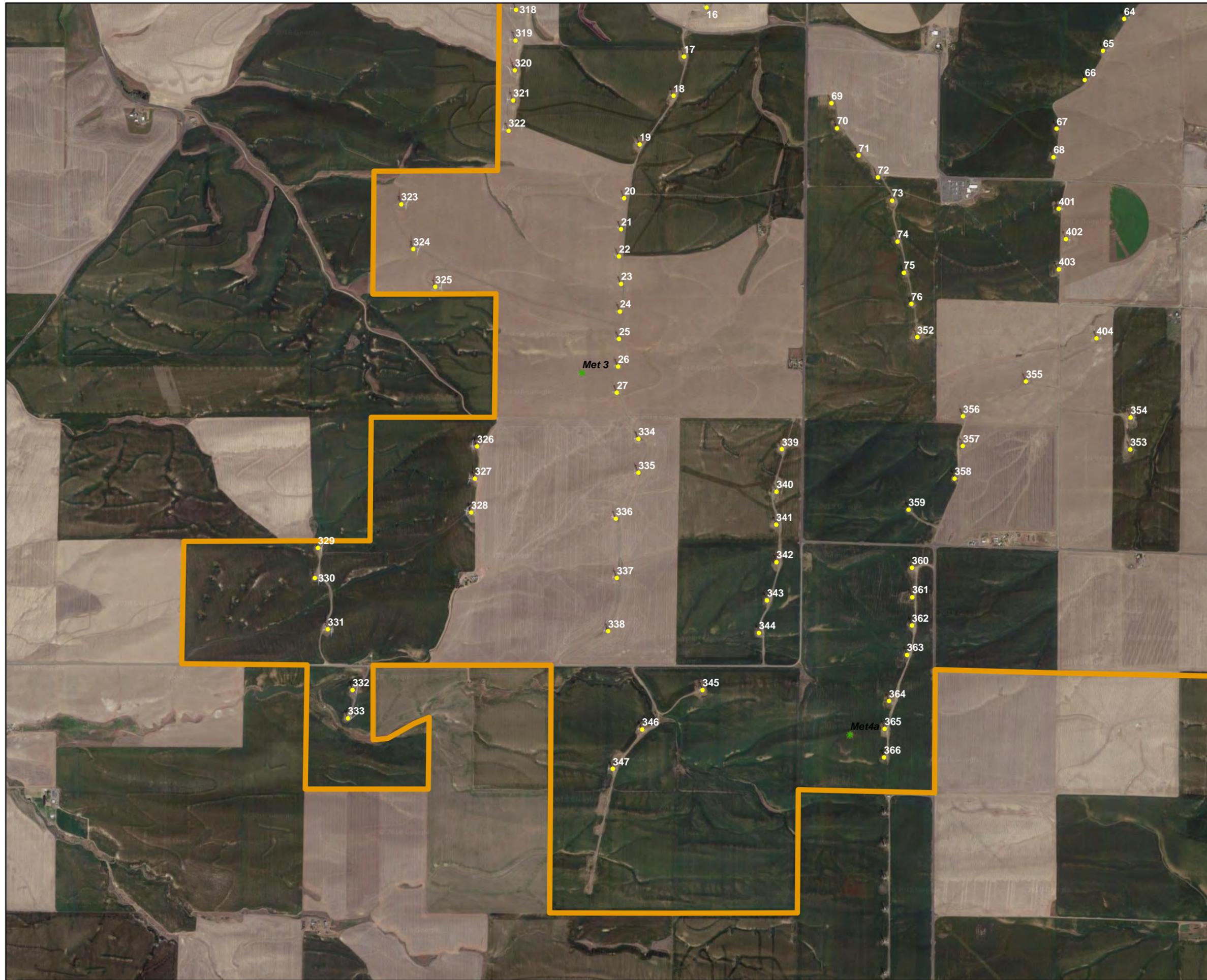


Portland General Electric
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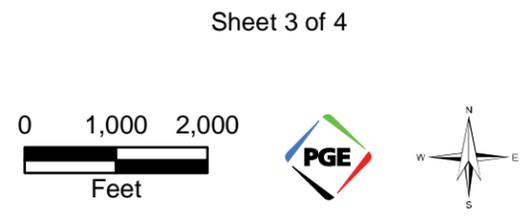
Site Plan

Biglow Canyon Wind Farm

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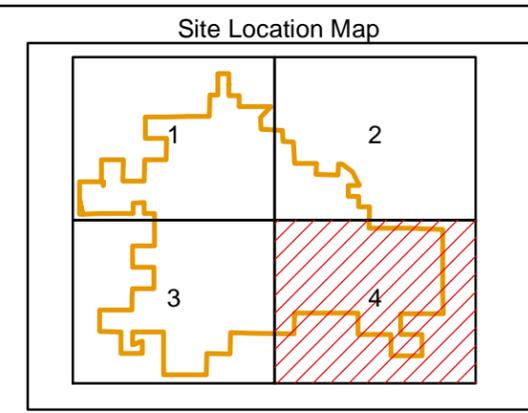
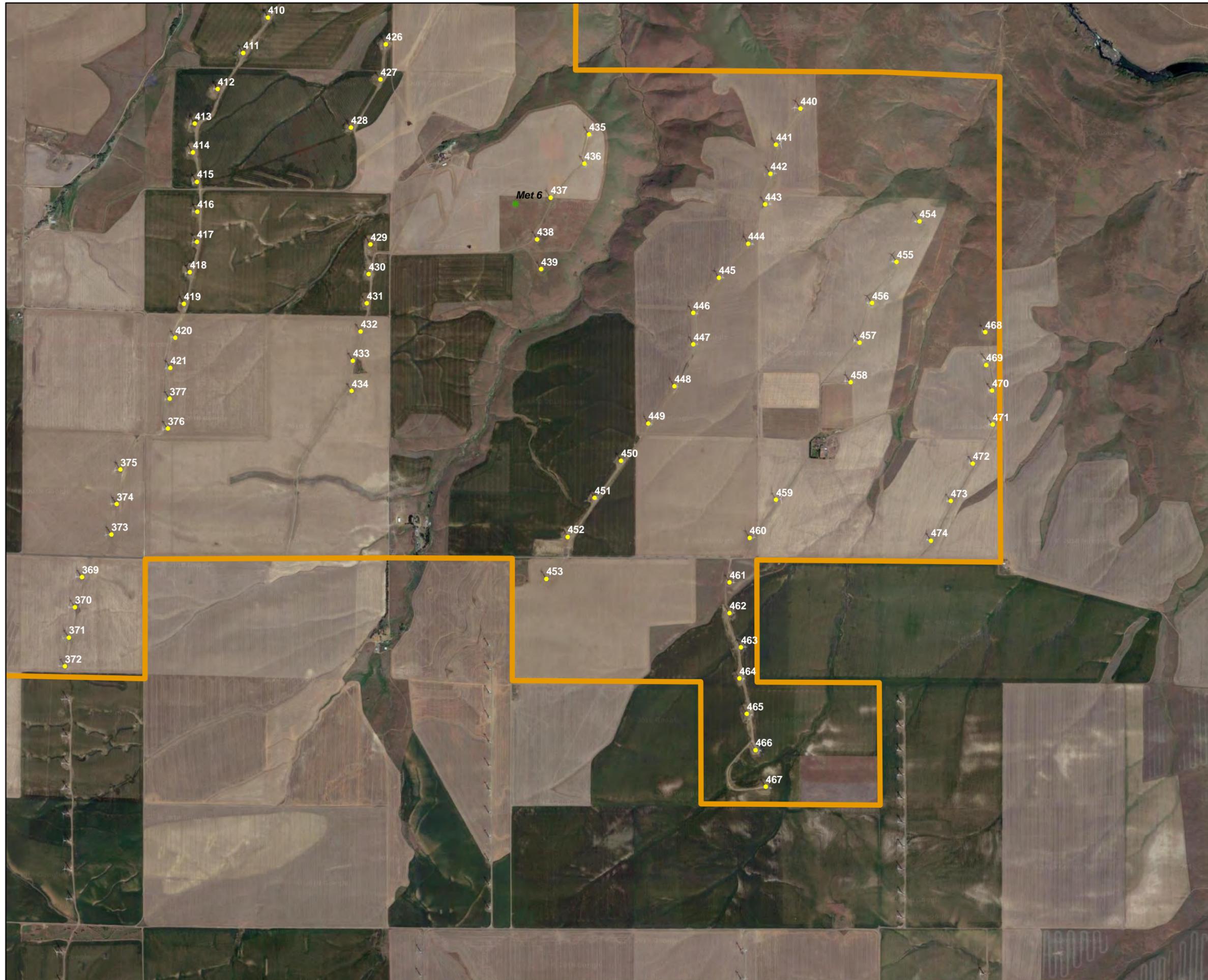


- Map Features**
- Turbine
 - * Met Tower
 - ▭ Project Boundary



Portland General Electric
Portland, Oregon

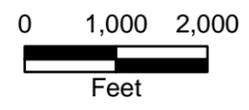
Site Plan
Biglow Canyon Wind Farm



Map Features

- Turbine
- * Met Tower
- ▭ Project Boundary

Sheet 4 of 4



Portland General Electric
Portland, Oregon

Site Plan

Biglow Canyon Wind Farm

Attachment 3

Tables

Table 1 – Review of Council Standards

Biglow Canyon Wind Farm Amendment Determination Request – December 17, 2018

Council Standard	Requirement	Supporting Information and Determination
OAR 345-022-0000 – General Standard of Review	Preponderance of evidence on the record supports the conclusions outlined in the Standard.	The Council addressed the requirements of this Standard in the findings of fact, reasoning, recommended conditions, and conclusions of law discussed in the subsequent Standards of prior findings.
OAR 345-022-0010 – Organizational Expertise	Demonstrated ability to construct, operate and retire facility	PGE already constructs temporary crane pads as part of facility maintenance; making temporary crane pads permanent is not a significant change that would alter the Council’s prior findings of compliance with this standard.
OAR 345-022-0020 – Structural	Seismic and site-specific soil analysis to guide safe design	Similar construction methods have previously been used to construct crane pads during the original construction of the facility, such construction methods are appropriate for supporting the weight of a crane. The proposed change does not alter the Council’s prior findings of compliance with this standard.
OAR 345-022-0022 – Soil Protection	Impacts to soil from erosion, facility operations/discharge	All crane pads will be covered in gravel to prevent erosion. PGE already inspects and maintains gravel turbine pad areas and roads at the facility per requirements of the site certificate. Soil disturbance during construction is isolated to the footprint of the crane pad and there are adequate existing site certificate conditions related to soil protection. The proposed change does not alter the Council’s prior findings of compliance with this standard.
OAR 345-022-0030 – Land Use	Compliance with State wide planning goals.	The proposed change does not impair PGE’s ability to comply with any land use site certificate conditions or alter the underlying facts upon which the previous land use was based. The crane pads are and will be constructed within the existing site boundary so no new evaluation of current land use regulations is necessary. The proposed change does not alter the Council’s prior findings of compliance with this standard.

Table 1 – Review of Council Standards

Biglow Canyon Wind Farm Amendment Determination Request – December 17, 2018

Council Standard	Requirement	Supporting Information and Determination
OAR 345-022-0040 – Protected Areas	No significant impacts to listed protected areas	All crane pads will be installed within the existing site certificate boundary and within the 500-foot wide turbine corridors previously evaluated. The proposed change does not alter the Council’s prior findings of compliance with this standard.
OAR 345-022-0050 – Retirement and Financial Assurance	Site can be restored following retirement and applicant is able to document financial assurance	Installation of crane pads would be necessary during retirement; therefore, any crane pads installed prior to retirement will reduce the cost and time necessary during retirement. Having permanent crane pads at the site would not have an impact on PGE’s ability to restore the site to a useful, non-hazardous condition. The proposed change does not alter the Council’s prior findings of compliance with this standard.
OAR 345-022-0060 – Fish and Wildlife Habitat	Facility construction and operation consistent with mitigation goals and standards	All crane pads would be installed in Category 6 Habitat (agricultural land); therefore, there are no mitigation requirements. The site certificate contains sufficient conditions applicable to the construction of crane pads to protect fish and wildlife habitat. The proposed change does not alter the Council’s prior findings of compliance with this standard.
OAR 345-022-0070 – Threatened and Endangered Species	Facility construction and operation will not cause significant reduction in likelihood of survival or recovery of species	All crane pads would be installed in Category 6 Habitat (agricultural land). In addition, the crane pads would not occupy areas that otherwise would have provided habitat for threatened or endangered species. The proposed change does not alter the Council’s prior findings of compliance with this standard.
OAR 345-022-0080 – Scenic Resources	No significant impacts to scenic resources	All crane pads will be installed within the existing site certificate boundary and within the 500-foot wide turbine corridors previously evaluated. The visual impact of the crane pads is negligible, as they are at ground level, adjacent to roads and turbine pad areas. The proposed change does not alter the Council’s prior findings of compliance with this standard.

Table 1 – Review of Council Standards

Biglow Canyon Wind Farm Amendment Determination Request – December 17, 2018

Council Standard	Requirement	Supporting Information and Determination
OAR 345-022-0090 – Historic, Cultural and Archaeological Resources	No significant impacts to cultural resources	All crane pads will be installed near existing turbines and in areas previously disturbed during initial construction and areas that are currently disturbed by agricultural practices. Should any resources be encountered, PGE implements a companywide Inadvertent Discovery Procedure to ensure appropriate methods. The proposed change does not alter the Council’s prior findings of compliance with this standard.
OAR 345-022-0100 – Recreation	No significant impact to recreational opportunities	All crane pads will be installed within the existing site certificate boundary and within the 500-foot wide turbine corridors previously evaluated. The proposed change does not alter the Council’s prior findings of compliance with this standard.
OAR 345-022-0110 – Public Services	No significant impact to public and private service providers	All crane pads will be installed within the existing site certificate boundary and within the 500-foot wide turbine corridors previously evaluated. Construction and maintenance of the crane pads would have no impact on sewage, storm water, solid waste, water supply, housing, police and fire protection, health care, schools and traffic safety. The proposed change does not alter the Council’s prior findings of compliance with this standard.
OAR 345-022-0120 – Waste Minimization	Solid waste and wastewater plans to minimize waste and provide recycling/reuse to the extent reasonably practical	Construction and maintenance of the crane pads does not generate any wastewater. Leaving the crane pads in place and reusing them for future maintenance needs minimizes the amount of gravel required throughout the life of the project because the crane pads would not need to be constructed and removed multiple times. The proposed change does not alter the Council’s prior findings of compliance with this standard.
OAR 345-024-0010 – Public Health and Safety Standards for Wind Energy Facilities	Exclude members of the public from close proximity to the turbine blades and electrical equipment.	Creating permanent crane pads does not provide the public any additional access to turbine blades or electrical equipment. The proposed change does not alter the Council’s prior findings of compliance with this standard.

Table 1 – Review of Council Standards

Biglow Canyon Wind Farm Amendment Determination Request – December 17, 2018

Council Standard	Requirement	Supporting Information and Determination
OAR 345-024-0015 – Siting Standards for Wind Energy Facilities	Reduce cumulative adverse environmental effects	The crane pads are constructed by making use of existing road and turbine pad areas to the extent possible and all crane pads are installed in Category 6 habitat. The proposed change does not alter the Council’s prior findings of compliance with this standard.
OAR 345-024-0090 – Transmission Lines	Can design, construct and operate proposed transmission lines per requirements outlined in the Standard	Creating permanent crane pads has no impact on the transmission lines. The proposed change does not alter the Council’s prior findings of compliance with this standard.

Table 2 Analysis of Each Site Certificate Condition for Applicability and Compliance with the Proposed Change

Biglow Canyon Wind Farm Amendment Determination Request – December 17, 2018

Condition Number	Condition Text	Applicable to Proposed Change?	Comments
Organizational Expertise OAR 345-022-0010			
1	Before beginning construction of the facility, the certificate holder shall notify the Department of the identity and qualifications of the engineering, procurement and construction (EPC) contractor(s) for specific portions of the work. The certificate holder shall select EPC contractors that have substantial experience in the design and construction of similar facilities. The certificate holder shall report to the Department any change of major construction contractors.	Not Applicable	Crane pads are not installed by an EPC contractor. This condition was only applicable during initial construction of each phase. Installation of crane pads is not technical in nature and is completed by an earthwork contractor on an as needed basis.
2	The certificate holder shall contractually require all construction contractors and subcontractors involved in the construction of the facility to comply with all applicable laws and regulations and with the terms and conditions of the site certificate. Such contractual provisions shall not operate to relieve the certificate holder of responsibility under the site certificate.	Not Applicable	Construction of the facility is complete.
3	During construction of the facility, the certificate holder shall have an on-site assistant construction manager who is qualified in environmental compliance to ensure compliance with all construction-related site certificate conditions. During operation, the certificate holder shall have a project manager who is qualified in environmental compliance to ensure compliance with all ongoing site certificate conditions. The certificate holder shall notify the Department of the name, telephone number, fax number and e-mail address of these managers and shall keep the Department informed of any change in this information.	Applicable	Portion of condition that requires an on-site assistant construction manager is not applicable. During operation PGE has a project manager who is qualified in environmental compliance; installation of crane pads occurs under the supervision of existing project managers required during operation.
4	Within 72 hours after discovery of conditions or circumstances that may violate the terms or conditions of the site certificate, the certificate holder shall report the conditions or circumstances to the Department.	Not Applicable	This condition is event triggered and installation of crane pads does not trigger this condition.
Retirement and Financial Assurance OAR 345-022-0050			
5, 6, and 7	[Condition removed by Amendment #2]	Not Applicable	Deleted

Table 2 Analysis of Each Site Certificate Condition for Applicability and Compliance with the Proposed Change

Biglow Canyon Wind Farm Amendment Determination Request – December 17, 2018

Condition Number	Condition Text	Applicable to Proposed Change?	Comments
8	<p>If the certificate holder elects to build the facility in more than one phase using any turbines other than the GE 1.5-MW turbines or GE 3.0-MW turbines, before beginning construction of any phase of the facility and after considering all micrositing factors, the certificate holder shall provide to the Department a detailed map of that phase of the facility showing the final locations where facility components are proposed to be built in relation to the features and micrositing corridors shown on Figures 2, 2a, 2b and 2c as identified in the Final Order on Amendment #3, shall identify on this map the facilities that would constitute that phase of construction, and shall provide documentation defining the quantities of each of the following components that would constitute that phase of construction: turbines, pad transformers, meteorological towers, substation, O&M facility, miles of aboveground 34.5-kV collector system, miles of access road, acres of turnarounds and access road intersections, acres of temporary laydown area and miles of temporary crane paths. For each turbine, the certificate shall define the turbine manufacturer, turbine capacity, weight of steel, height of tower, sweep of blade, and size of concrete foundation. [Amendments #2 and #3]</p>	Not Applicable	<p>PGE complied with the condition during construction of each phase. Compliance with this condition is not impacted by the minor change of making crane pads permanent.</p>
9	<p>In February 2007, in accordance with the terms and conditions of the First Amended Site Certificate, the certificate holder submitted to the State of Oregon through the Council a letter of credit in the amount of \$1.608 million before beginning construction of Phase 1 of the facility. The calculation of the amount of the letter of credit included a deduction from the estimated cost of site restoration for Phase 1 for the estimated value of scrap steel. In the Final Order on Amendment #2, the Council found that there should be no deduction of scrap or salvage value in calculating the amount of financial assurance required for site restoration. In June 2007, in accordance with the terms and conditions of the Second Amended Site Certificate, the certificate holder submitted an amended letter of credit for Phase 1 in the amount of \$5.001 million (3rd Quarter 2007 dollars). In January 2008, in accordance with the terms and conditions of the Second Amended Site Certificate, the certificate holder submitted an amended letter of credit for Phase 1 in the amount of \$5.058 million (1st Quarter 2008 dollars). Before beginning construction of any future phase of the facility, the certificate holder shall submit a bond or letter of credit for that phase in an amount approved by the Department and based on the costs shown in Table 1 of the Final Order on Amendment #3.</p>	Not Applicable	<p>Retaining crane pads installed for maintenance until decommissioning does not increase the decommissioning costs of the overall facility. Having the crane pads installed during operation of the facility decreases the decommissioning costs because they will not need to be constructed during decommissioning. The proposed change does not impact PGE's ability to comply with subsections (a)-(f) of Condition #9.</p>

Table 2 Analysis of Each Site Certificate Condition for Applicability and Compliance with the Proposed Change

Biglow Canyon Wind Farm Amendment Determination Request – December 17, 2018

Condition Number	Condition Text	Applicable to Proposed Change?	Comments
9.a	<p>The certificate holder shall adjust the amounts of all bonds or letters of credit submitted in compliance with this condition to present value as of the date of issuance, using the following calculation and subject to approval by the Department: i. Adjust the Subtotal (in 2005 dollars) to present value, using the U.S. Gross Domestic Product Implicit Price Deflator, Chain-Weight, as published in the Oregon Department of Administrative Services' Oregon Economic and Revenue Forecast or by any successor agency (the "Index"). If at any time the Index is no longer published, the Council shall select a comparable calculation to adjust 2005 dollars to present value. ii. Add 1 percent of the adjusted Subtotal (i) for the adjusted performance bond amount to determine the adjusted Gross Cost. iii. Add 10 percent of the adjusted Gross Cost (ii) for the adjusted administration and project management costs and 10 percent of the adjusted Gross Cost for the adjusted future developments contingency. iv. Add the adjusted Gross Cost (ii) to the sum of the percentages (iii) and round the resulting total to the nearest \$1,000 to determine the adjusted financial assurance amount.</p>	Not Applicable	See response to Condition #9.
9	<p>b. The certificate holder shall annually adjust all bonds or letters of credit submitted in compliance with this condition to present value as of the date of issuance as described in (a). c. The certificate holder shall use a form of bond or letter of credit approved by the Council. d. The certificate holder shall use an issuer of the bond or letter of credit approved by the Council. e. The certificate holder shall describe the status of all bonds or letters of credit for the facility in the annual report submitted to the Council under Condition (122). f. The bond or letter of credit shall not be subject to revocation or reduction before retirement of the facility. [Amendments #2 and #3]</p>	Not Applicable	See response to Condition #9.

Table 2 Analysis of Each Site Certificate Condition for Applicability and Compliance with the Proposed Change

Biglow Canyon Wind Farm Amendment Determination Request – December 17, 2018

Condition Number	Condition Text	Applicable to Proposed Change?	Comments
10	If the certificate holder elects to use a bond to meet the requirements of Condition (9), the certificate holder shall ensure that the surety is obligated to comply with the requirements of applicable statutes, Council rules and this site certificate when the surety exercises any legal or contractual right it may have to assume construction, operation or retirement of the facility. The certificate holder shall also ensure that the surety is obligated to notify the Council that it is exercising such rights and to obtain any Council approvals required by applicable statutes, Council rules and this site certificate before the surety commences any activity to complete construction, operate or retire the facility.	Not Applicable	PGE did not elect to use a bond; therefore, this condition is not applicable.
11	The certificate holder shall begin construction of the facility by June 30, 2009. Under OAR345-015-0085(9), a site certificate is effective upon execution by the Council Chair and the applicant. The Council may grant an extension of the deadline to begin construction in accordance with OAR 345-027-0030 or any successor rule in effect at the time the request for extension is submitted. [Amendment #2]	Not Applicable	PGE has already complied with the start of construction requirements. Installation of crane pads is an operational action and does not have start or end construction deadlines.
12	The certificate holder shall complete construction of the facility by June 30, 2011. Construction is complete when: (1) the facility is substantially complete as defined by the certificate holder’s construction contract documents; (2) acceptance testing has been satisfactorily completed; and (3) the energy facility is ready to begin continuous operation consistent with the site certificate. The certificate holder shall promptly notify the Department of the date of completion of construction. The Council may grant an extension of the deadline for completing construction in accordance with OAR 345-027-0030 or any successor rule in effect at the time the request for extension is submitted. [Amendment #2]	Not Applicable	PGE has already complied with the end of construction requirements. Installation of crane pads is an operational action and does not have start or end construction deadlines.
13	The certificate holder shall construct a facility substantially as described in the site certificate.	Applicable	PGE has constructed the facility substantially as described in the site certificate. Making temporary crane pads permanent is not a substantial change.
14	Notwithstanding OAR 345-027-0050(2), an amendment of the site certificate is required if the proposed change would increase the electrical generation capacity of the facility and would increase the number of wind turbines or the dimensions of existing wind turbines.	Not Applicable	The proposed change does not increase the electrical generating capacity or increase the number

Table 2 Analysis of Each Site Certificate Condition for Applicability and Compliance with the Proposed Change

Biglow Canyon Wind Farm Amendment Determination Request – December 17, 2018

Condition Number	Condition Text	Applicable to Proposed Change?	Comments
			of wind turbines or dimensions of the existing wind turbines.
15	The certificate holder shall obtain all necessary state and local permits or approvals required for construction, operation and retirement of the facility or ensure that its contractors obtain necessary state and local permits or approvals.	Not Applicable	There are no required building permits or construction permits applicable to installation of crane pads at Biglow.
16	Before beginning construction, the certificate holder shall notify the Department in advance of any work on the site that does not meet the definition of “construction” in OAR 345-001-0010 or ORS 469.300 and shall provide to the Department a description of the work and evidence that its value is less than \$250,000.	Not Applicable	This condition was applicable prior to each phase of construction and is not applicable to the operational phase.
Land Use OAR 345-022-0030			
17	The certificate holder shall construct the public road improvements described in the site certificate application to meet or exceed road standards for the road classifications in the County’s Transportation System Plan and Zoning Ordinance because roads will require a more substantial section to bear the weight of the vehicles and turbine components than would usually be constructed by the County.	Not Applicable	Crane pads would not be installed on any portion of County roads; all crane pads would be installed on private/facility specific access roads.
18	The certificate holder shall ensure that no equipment or machinery is parked or stored on any county road except while in use.	Applicable	No equipment or machinery associated with constructing crane pads would be parked or stored on any county road, except while in use.
19	The site certificate holder shall design and construct private access roads to minimize the division of existing farm units.	Applicable	PGE complied with this condition during initial design and construction of the turbine string layouts. Crane pads would be installed along the margins of existing roads and make maximum use of the existing road and turbine pad areas and

Table 2 Analysis of Each Site Certificate Condition for Applicability and Compliance with the Proposed Change

Biglow Canyon Wind Farm Amendment Determination Request – December 17, 2018

Condition Number	Condition Text	Applicable to Proposed Change?	Comments
			would not cause any further division of existing farm units.
20	The certificate holder shall not locate any aboveground facility structure (including wind turbines, O&M buildings, substations, and meteorological towers, but not including aboveground transmission and collector lines and junction boxes) within 30 feet from any property line or within 50 feet from the right-of-way of any arterial or major collector road or street and shall not allow any architectural feature, as described in Sherman County Zoning Ordinance Section 4.2, to project into these required setbacks by more than 2 feet. [Amendment #3]	Not Applicable	Crane pads are not facility structures; therefore, the setback requirements are not applicable.
21	The certificate holder shall locate access roads and temporary construction laydown and staging areas to minimize disturbance with farming practices and, wherever feasible, shall place turbines and transmission interconnection lines along the margins of cultivated areas to reduce the potential for conflict with farm operations. The certificate holder shall place aboveground collector lines and junction boxes along property lines and public road rights-of-way to the extent practicable. [Amendment #2]	Applicable	PGE complied with this condition during initial design and construction of the turbine string layouts. Crane pads would be installed along the margins of existing roads and make maximum use of the existing road and turbine pad area. Crane pad locations do not cause any additional disturbance to farming practices because they are located along the margins of cultivated areas.
22	During operation of the facility, the certificate holder, in cooperation with landowners, shall avoid impact on cultivated land to the extent reasonably possible when performing facility repair and maintenance activities.	Applicable	Crane pads would be installed along the margins of existing roads and make maximum use of the existing road and turbine pad area. All crane pads would be within PGE’s existing easement areas established in coordination with each landowner.

Table 2 Analysis of Each Site Certificate Condition for Applicability and Compliance with the Proposed Change

Biglow Canyon Wind Farm Amendment Determination Request – December 17, 2018

Condition Number	Condition Text	Applicable to Proposed Change?	Comments
23	Where necessary and feasible, the certificate holder shall provide access across construction trenches to fields within the facility site and otherwise provide adequate and timely access to properties during critical periods in the farming cycle, such as harvest.	Not Applicable	Construction of crane pads does not require any trenching.
24	Before beginning construction of the facility, the certificate holder shall record a Farm Management Easement covering the properties on which the certificate holder locates wind power generation facilities. The certificate holder shall record the easements in the real property records of Sherman County and shall file a copy of the recorded easement with the Sherman County Planning Director.	Not Applicable	PGE complied with this condition during initial construction; construction of crane pads does not impact the Farm Management Easement already in place.
25	The certificate holder shall remove from Special Farm Assessment the portions of parcels on which facilities are located and shall pay all property taxes due and payable after the Special Farm Assessment is removed from such properties.	Not Applicable	Construction of permanent crane pads does not impact compliance with this condition.
Soil Protection OAR 345-022-0022			
26	The certificate holder shall conduct all construction work in compliance with an Erosion and Sediment Control Plan (ESCP) satisfactory to the Oregon Department of Environmental Quality and as required under the National Pollutant Discharge Elimination System (NPDES) Storm Water Discharge General Permit #1200-C. The certificate holder shall include in the ESCP any procedures necessary to meet local erosion and sediment control requirements and storm water management requirements.	Not Applicable	The amount of disturbance to construct the individual crane pads, whether temporary or permanent, does not meet the threshold that requires permitting (1 acre). Construction of the crane pads is not part of a common plan of development, because they are built on an as needed basis during maintenance of the facility, and the level of ground disturbance is minimal. .
27	During construction of the facility, the certificate holder shall limit truck traffic to designated existing and improved road surfaces to avoid soil compaction, to the extent possible.	Applicable	During construction of the crane pads truck traffic is limited to

Table 2 Analysis of Each Site Certificate Condition for Applicability and Compliance with the Proposed Change

Biglow Canyon Wind Farm Amendment Determination Request – December 17, 2018

Condition Number	Condition Text	Applicable to Proposed Change?	Comments
			designated existing and improved road surfaces.
28	The certificate holder shall cover turbine pad areas with gravel or other non-erosive material immediately following exposure during construction and shall maintain the pad area covering during operation of the facility.	Applicable	When crane pads are constructed the surface is lightly graded for bumps and berms and then immediately graveled. Once constructed the crane pads will be maintained similar to existing roads and turbine pad areas.
29	During construction of the facility, the certificate holder shall restore areas that are temporarily disturbed in accordance with the methods, monitoring procedures and success criteria described in the Revegetation Plan that is incorporated in this order as Attachment B and as that Revegetation Plan may be amended from time to time. During operation of the facility, the certificate holder shall restore areas that are temporarily disturbed during facility maintenance or repairs according to the same methods and monitoring procedures.	Applicable	All areas disturbed during construction of gravel crane pads become part of the permanent disturbance associated with the pad. If additional disturbance occurs to vegetation not associated with the final foot print of the pad, PGE will revegetate according to the Revegetation Plan.
30	During operation of the facility, the certificate holder shall routinely inspect and maintain all roads, pads and trenched areas and, as necessary, maintain or repair erosion control measures.	Applicable	When crane pads are constructed the surface is lightly graded for bumps and berms and then immediately graveled. Once constructed the crane pads will be maintained like existing roads and turbine pad areas.
31	During construction of the underground collector system, the certificate holder shall open the smallest necessary sections of trench during each day of construction and backfill the trenches as soon as is practical after power lines have been set in the trenches.	Not Applicable	The proposed change does not include any changes to the underground collector system.

Table 2 Analysis of Each Site Certificate Condition for Applicability and Compliance with the Proposed Change

Biglow Canyon Wind Farm Amendment Determination Request – December 17, 2018

Condition Number	Condition Text	Applicable to Proposed Change?	Comments
32	During construction of the facility, the certificate holder shall strip and stockpile soil from laydown areas only during the time of year when rainfall is lowest, minimizing erosion from precipitation.	Not Applicable	No soil is stripped or stockpiled during construction of crane pads.
33	During construction of the facility, the certificate holder shall use straw bales or similar containment features to protect soil stockpiles from erosion, as needed.	Not Applicable	There are no soil stockpiles associated with construction of crane pads.
34	During construction of the facility, the certificate holder shall keep wind-borne erosion to a minimum by using water trucks for dust suppression, as necessary.	Applicable	Crane pads are constructed in approximately one day which minimizes the amount of time any bare soil is exposed to wind erosion. Dust control measures (e.g. application of water) will be implemented on an as needed basis.
35	During construction of the facility, the certificate holder shall restore staging locations by bringing them back to their original contours, covering them with topsoil, and revegetating or preparing them for planting of wheat or barley or use as range land.	Not Applicable	There are no staging areas associated with construction of the gravel pads, all equipment or material are staged on the existing gravel roads or turbine pad areas.
Protected Areas OAR 345-022-0040			
36	Without Department approval, the certificate holder shall not move any turbines within its micro-siting corridors such that a worst-case visual impact beyond that stated in the ASC and ASC Supplement would occur for the John Day Wildlife Refuge, the John Day Federal Wild and Scenic River, or the John Day State Scenic Waterway (Parrish Creek to Tumwater Falls). Before constructing any turbines in the northward extension of Corridor 3 shown on Figure 2a of the Request for Amendment #3, the certificate holder shall provide a visual impact analysis that includes the proposed turbines and demonstrates to the satisfaction of the Department that the requirements of this condition are met. [Amendment #3]	Not Applicable	The proposed change does not move any turbines.

Table 2 Analysis of Each Site Certificate Condition for Applicability and Compliance with the Proposed Change

Biglow Canyon Wind Farm Amendment Determination Request – December 17, 2018

Condition Number	Condition Text	Applicable to Proposed Change?	Comments
Public Health and Safety Standards for Wind Energy Facilities OAR 345-024-0010			
37	During construction, operation or retirement of the facility, the certificate holder shall notify the Department within 72 hours of any accidents that may result in public health and safety concerns, including mechanical failures on the site associated with construction or operation of the facility.	Applicable	PGE will continue to comply with this condition during construction and use of crane pads.
38	Before beginning construction of any phase of the facility, the certificate holder shall submit a Notice of Proposed Construction or Alteration to the Federal Aviation Administration (FAA) identifying the proposed final locations of the turbines and related or supporting facilities for that phase of the facility. The certificate holder shall notify the Department of the FAA’s response as soon as it has been received.	Not Applicable	Construction of each phase of the project is already completed and crane pads to not require FAA determinations.
39	The certificate holder shall enclose the facility substation with appropriate fencing and locked gates to protect the public from electrical hazards.	Not Applicable	The proposed change does not involve any changes to the substation.
40	The certificate holder shall not locate turbine towers within 450 feet of any residence. The certificate holder shall not locate turbine towers within 450 feet of any public road, unless the certificate holder demonstrates to the Department’s satisfaction that a lesser setback is consistent with the protection of public health and safety.	Not Applicable	The proposed change does not impact the locations of turbines.
41	The certificate holder shall construct turbine towers that are smooth steel structures with no exterior ladders or access to the turbine blades and shall install locked access doors accessible only to authorized personnel.	Not Applicable	The proposed change does not impact the type of material from which the turbines are constructed.
42	During construction of the facility, the certificate holder shall follow manufacturers’ recommended handling instructions and procedures to prevent damage to towers or blades that could lead to failure.	Not Applicable	The proposed change does not require handling of towers or blades.
43	During operation of the facility, the certificate holder shall have an operational safety monitoring program and shall inspect turbine blades on a regular basis for signs of wear. The certificate holder shall repair turbine blades as necessary to protect public safety.	Not Applicable	The proposed change does not impact turbine blade inspections.

Table 2 Analysis of Each Site Certificate Condition for Applicability and Compliance with the Proposed Change

Biglow Canyon Wind Farm Amendment Determination Request – December 17, 2018

Condition Number	Condition Text	Applicable to Proposed Change?	Comments
44	During operation of the facility, the certificate holder shall install and maintain self monitoring devices on each turbine, connected to a fault annunciation panel or supervisory control and data acquisition (SCADA) system at the O&M facility, to alert operators to potential dangerous conditions, and the certificate holder shall remedy any dangerous conditions immediately.	Not Applicable	The proposed change does not impact any components connected to the SCADA system.
45	During construction of the facility, the certificate holder shall install generator step-up transformers at the base of each turbine tower in locked cabinets designed to protect the public from electrical hazards and to avoid creation of artificial habitat for raptor prey.	Not Applicable	The proposed change does not impact any generator step-up transformers.
46	During construction of the facility, the certificate holder shall require that all on-site construction contractors develop and implement a site health and safety plan that informs on-site workers and others what to do in case of an emergency and that includes the locations of fire extinguishers and nearby hospitals, important telephone numbers, and first aid techniques.	Not Applicable	Construction of the facility is complete.
47	During operation of the facility, the certificate holder shall develop and implement a site health and safety plan that informs on-site employees and others what to do in case of an emergency and that includes the locations of fire extinguishers and nearby hospitals, important telephone numbers, and first aid techniques.	Applicable	During operations contractors are given PGE site safety, excavation, and wildland fire training prior to starting work on the site.
Siting Standards for Wind Energy Facilities OAR 345-024-0015			
48	The certificate holder shall construct turbines on concrete foundations and shall cover the ground within a minimum 10-foot radius with non-flammable material. The certificate holder shall maintain the non-flammable pad area covering throughout operation of the facility.	Not Applicable	The proposed change does not reduce the size of the 10-foot radius of non-flammable material at the base of each turbine; therefore, PGE continues to be in compliance with this condition.
49	During construction and operation of the facility, the certificate holder shall implement a plan to control the introduction and spread of noxious weeds. The certificate holder shall develop the weed control plan in consultation with the Sherman County Weed Control District and the Department.	Applicable	Once installed the crane pads become part of the area maintained under contract with the Sherman County Weed Control District to manage noxious weeds.

Table 2 Analysis of Each Site Certificate Condition for Applicability and Compliance with the Proposed Change

Biglow Canyon Wind Farm Amendment Determination Request – December 17, 2018

Condition Number	Condition Text	Applicable to Proposed Change?	Comments
50	During construction of the facility, to reduce the visual impact of the facility, the certificate holder shall: (a) Paint turbine towers, nacelles, rotors, meteorological towers, and cabinets containing pad-mounted equipment with a low-reflectivity, neutral gray, white, off-white or earth tone finish to reduce contrast with the surrounding background. (b) Apply a low-reflectivity finish to the exterior of the O&M building and substation equipment to control their visual integration into the surrounding background. (c) With the exception of the turbine manufacturer’s logo that may appear on turbine nacelles, not allow any advertising to be used on any part of the facility or on any signs posted at the facility. In addition, if the Council amends OAR 345-024-0015 by eliminating the restriction in Section (1)(a) of that rule and not otherwise prohibiting the use of a logo, the certificate holder may place its logo on the nacelles of not more than 20 percent of the wind turbines.(d) Use only those signs required by law or for facility safety or security, except that the certificate holder may erect a sign near the O&M facility or substation to identify the wind energy facility.	Not Applicable	The proposed change does not impact any facility components covered by this condition.
51	The certificate holder shall design and construct the O&M building to be generally consistent with the character of similar buildings used by commercial farmers or ranchers in the area and shall paint the building in a neutral color to blend with the surrounding background.	Not Applicable	The proposed change does no impact any of the O&M buildings.
52	The certificate holder shall not use exterior nighttime lighting except: (a) The minimum turbine tower lighting required by the Federal Aviation Administration. (b) Security lighting at the O&M building and substation, provided that such lighting is shielded or directed downward to reduce glare. (c) Minimum lighting necessary for repairs or emergencies. (d) The certificate holder may use lighting only at the work location and only directed downward to illuminate the work area at the turbine base or upward from the base to illuminate the turbine tower; construction lighting shall not be directed outward. The certificate holder shall use nighttime lighting only with the approval of the owner of the property on which the work is conducted and shall provide notice of nighttime construction to occupants of all residences within one-half mile of the construction site.	Not Applicable	The proposed change does not require the use of any nighttime lighting.
Siting Standards for Transmission Lines OAR 345-024-0090			
53	The certificate holder shall design the transmission lines so that alternating current electric fields shall not exceed 9 kV per meter at one meter above the ground surface in areas accessible to the public.	Not Applicable	The proposed change does not impact any transmission lines.

Table 2 Analysis of Each Site Certificate Condition for Applicability and Compliance with the Proposed Change

Biglow Canyon Wind Farm Amendment Determination Request – December 17, 2018

Condition Number	Condition Text	Applicable to Proposed Change?	Comments
54	The certificate holder shall design the transmission lines so that induced voltages resulting from the transmission lines are as low as reasonably achievable.	Not Applicable	The proposed change does not impact any transmission lines.
Threatened and Endangered Species OAR 345-024-0090			
55	The certificate holder shall design the transmission lines so that induced voltages resulting from the transmission lines are as low as reasonably achievable.	Not Applicable	The proposed change does not impact any transmission lines.
56	If construction of the facility begins after 2006, the certificate holder shall review the ONHIC and USFWS databases and consult with an expert designated by ODFW on an annual basis before beginning construction to determine whether nesting bald eagles or peregrine falcons have been documented to occur within two miles of the facility. The certificate holder shall report the results of the database review and consultation to the Department and to ODFW and, if there have been new documentations of nesting bald eagles or peregrine falcons within two miles of the facility, the certificate holder shall implement appropriate measures to protect the species from adverse impact, as approved by the Department and ODFW.	Not Applicable	Construction of the facility is complete.
57	The certificate holder shall implement measures to mitigate impacts to sensitive wildlife habitat during construction including, but not limited to, the following: (a) Preparing maps to show sensitive areas, such as nesting or denning areas for sensitive wildlife species, that are off limits to construction personnel. (b) Ensuring that a qualified person instructs construction personnel to be aware of wildlife in the area and to take precautions to avoid injuring or destroying wildlife or significant wildlife habitat. (c) Avoiding unnecessary road construction, temporary disturbance and vehicle use.	Not Applicable	All current and potential future crane pads are located or would be in areas already disturbed by agricultural practices. Therefore, there is no possibility that the crane pads are built in sensitive wildlife habitat, and no additional measures would be needed for continued compliance with this condition.
Fish and Wildlife Habitat OAR 345-022-0060			
58	The certificate holder shall design and construct all aboveground transmission line support structures following the practices suggested by the Avian Powerline Interaction Committee (APLIC 1996, referenced in the site certificate application, p. P-33) and shall install anti-perching devices on transmission pole tops and cross arms where the poles are located within one-half mile of any wind turbine.	Not Applicable	The proposed change does not impact any transmission lines or support structures.

Table 2 Analysis of Each Site Certificate Condition for Applicability and Compliance with the Proposed Change

Biglow Canyon Wind Farm Amendment Determination Request – December 17, 2018

Condition Number	Condition Text	Applicable to Proposed Change?	Comments
59	<p>The certificate holder may construct turbines and other facility components within the 500-foot turbine corridors shown on Figures P-1 through P-10 of the site certificate application and March 2006 supplement and within the “Permitted Areas” and “Amendment III Areas” as shown on Figures 2, 2a, 2b and 2c of the Request for Amendment #3, subject to the following requirements addressing potential habitat impact: (a) The certificate holder shall not construct any facility components within areas of Category 1 or Category 2 habitat and shall avoid temporary disturbance of Category 1 or Category 2 habitat. (b) The certificate holder shall design and construct facility components that are the minimum size needed for safe operation of the energy facility. (c) Prior to constructing any turbines or permanent related or supporting facilities within the northward extension of Corridor 3 shown on Figure 2a of the Request for Amendment #3, the certificate holder shall provide the Department with maps and calculations documenting the additional permanent impacts, if any, to Category 3 and Category 4 habitat predicted to result from construction. If the construction would result in additional permanent impacts, the certificate holder shall increase the area of mitigation for permanent loss of Category 3 and Category 4 habitat as described in the Habitat Mitigation Plan incorporated herein by Condition 63.[Amendment #3]</p>	Applicable	<p>All current and potential future crane pads are located or would be located within the 500-foot turbine corridors previously approved and in areas already disturbed by agricultural practices (Category 6); therefore, there will be no disturbance to Category 1 or 2 habitat. Construction of the crane pads maximizes the existing road and turbine pad area to minimize area needed for safe operation and maintenance of the facility. Since all areas for the crane pads are habitat Category 6 there is no need for additional mitigation.</p>
60	<p>During construction, the certificate holder shall protect the area within a 1300-foot buffer around any active nests of the following species during the sensitive period, as provided in this condition: The 1300-foot buffer may be reduced, with Department approval, if there is an adequate physical barrier between the nest site and the construction impacts such that a 1300-foot buffer proves to be excessive. During the year in which construction of any phase occurs, the certificate holder shall use a protocol approved by the Oregon Department of Fish and Wildlife (ODFW) to determine whether there are any active nests of these species within a half-mile of any areas that would be disturbed during construction. If a nest is occupied by any of these species after the beginning of the sensitive period, the certificate holder shall not engage in high-impact construction activities (activities that involve blasting, grading or other major ground disturbance) or allow high levels of construction traffic within 1300 feet of the nest site, or such lesser</p>	Not Applicable	<p>Construction of the facility is complete.</p>

Table 2 Analysis of Each Site Certificate Condition for Applicability and Compliance with the Proposed Change

Biglow Canyon Wind Farm Amendment Determination Request – December 17, 2018

Condition Number	Condition Text	Applicable to Proposed Change?	Comments
	distance as may be approved by the Department in the event there is an adequate physical barrier between the nest site and the construction impacts.		
60	In addition, the certificate holder shall flag the boundaries of the 1300-foot buffer area, or such lesser distance as may be approved by the Department in the event there is an adequate physical barrier between the nest site and the construction impacts, and shall instruct construction personnel to avoid any unnecessary activity within the buffer area. The certificate holder shall direct a qualified biologist, approved by the Department, to observe the active nest sites during the sensitive period for signs of disturbance and to notify the Department of any non-compliance with this condition. The Department has approved the qualifications of the four biologists identified in the Final Order on Amendment #2. The certificate holder may select other qualified biologists to observe the nest sites, subject to Department approval. If the biologist observes nest site abandonment or other adverse impact to nesting activity, the certificate holder shall implement appropriate mitigation, in consultation with ODFW and subject to the approval of the Department, unless the adverse impact is clearly shown to have a cause other than construction activity. The certificate holder may begin or resume high impact construction activities before the ending day of the sensitive period if any known nest site is not occupied by the early release date. If a nest site is occupied, then the certificate holder may begin or resume high-impact construction before the ending day of the sensitive period with the approval of ODFW, after the young are fledged. The certificate holder shall use a protocol approved by ODFW to determine when the young are fledged (the young are independent of the core nest site). [Amendment #2]	Not Applicable	Construction of the facility is complete.
61	The certificate holder shall conduct wildlife monitoring and mitigation in accordance with the Wildlife Monitoring and Mitigation Plan that is incorporated in the Final Order on Amendment #2 as Attachment A and as may be amended from time to time. [Amendment #2]	Not Applicable	The proposed change does not impact any of the monitoring or mitigation implemented at the facility.
62	The certificate holder shall restore areas that are temporarily disturbed during construction in accordance with the methods, monitoring procedures and success criteria set forth in the Revegetation Plan that is incorporated in the Final Order on Amendment #2 as Attachment B and as may be amended from time to time. [Amendment #2]	Not Applicable	The proposed change is to add permanent disturbance; therefore, the restoration of temporary disturbance is not applicable.

Table 2 Analysis of Each Site Certificate Condition for Applicability and Compliance with the Proposed Change

Biglow Canyon Wind Farm Amendment Determination Request – December 17, 2018

Condition Number	Condition Text	Applicable to Proposed Change?	Comments
63	Before beginning construction of the facility, the certificate holder shall acquire the legal right to create, maintain and protect a habitat mitigation area for the life of the facility by means of an outright purchase, conservation easement or similar conveyance and shall provide a copy of the documentation to the Department. Within the habitat mitigation area, the certificate holder shall improve the habitat quality in accordance with the Habitat Mitigation Plan that is incorporated in the Final Order on Amendment #3 as Attachment C and as may be amended from time to time. [Amendments #2 and #3]	Not Applicable	This condition was applicable prior to construction; the proposed change does not change the size of the habitat mitigation area.
64	For the life of the project, the certificate holder shall provide to the appropriate staff of the Confederated Tribes of the Warm Springs Reservation of Oregon the same annual mitigation and monitoring reports it submits to the Department.	Not Applicable	The proposed change does not impact the annual mitigation and monitoring reports submitted to the Department or to the Confederated Tribes of the Warm Springs Reservation of Oregon.
65	For the life of the project, the certificate holder shall consult annually with the appropriate staff of the Confederated Tribes of the Warm Springs Reservation of Oregon to discuss noxious weed or other issues that may arise from the close proximity of the facility site and tribal lands. The certificate holder shall provide a summary of that consultation in the annual report it provides to the Department.	Not applicable	The proposed change does not impact PGE's annual communications with the Confederated Tribes of the Warm Springs Reservation of Oregon.
Structural Standard OAR 345-022-0020			
66	Before beginning construction of the facility, the certificate holder shall conduct a site-specific geotechnical investigation and shall report its findings to the Oregon Department of Geology & Mineral Industries (DOGAMI). The certificate holder shall conduct the geotechnical investigation after consultation with DOGAMI and in accordance with the Oregon Board of Geologists Examiners guidelines entitled: Guidelines for Engineering Geology Reports and Site-Specific Seismic Hazard Report.	Not Applicable	The proposed change does not impact any facility features that required detailed geotechnical investigations. Additionally, the crane pads are constructed using the same material and techniques that were deemed adequate during initial construction of the facility.

Table 2 Analysis of Each Site Certificate Condition for Applicability and Compliance with the Proposed Change

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Condition Number	Condition Text	Applicable to Proposed Change?	Comments
67	The certificate holder shall design and construct the facility in accordance with requirements set forth by the State of Oregon’s Building Code Division and any other applicable codes and design procedures.	Not Applicable	There are no building code requirements for the crane pads.
68	The certificate holder shall design, engineer and construct the facility to avoid dangers to human safety presented by non-seismic hazards. As used in this condition, “non-seismic hazards” include settlement, landslides, flooding and erosion.	Applicable	Construction of crane pads does not create a feature that would typically pose a danger to human safety. They do not have any "occupancy" like a building or turbine tower. However, the crane pads would occasionally support large heavy cranes and therefore are constructed in locations that are stable and capable of supporting a temporary crane.

Table 2 Analysis of Each Site Certificate Condition for Applicability and Compliance with the Proposed Change

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Condition Number	Condition Text	Applicable to Proposed Change?	Comments
Historic, Cultural, and Archaeological Resources OAR 345-022-0090			
69	<p>Before beginning construction of any phase of the facility, the certificate holder shall provide to the Department a map showing the final design locations of all components of that phase of the facility and areas that would be temporarily disturbed during construction and also showing the areas surveyed by CH2M Hill and Archaeological Investigations Northwest, Inc. (AINW) in preparing the Cultural Resources Surveys for Biglow Canyon Wind Farm included in the site certificate application as Attachment S-1 and in Request for Amendment #2 as Attachment 15. The certificate holder shall hire qualified personnel to conduct field investigation of all areas of permanent or temporary disturbance that CH2M Hill and AINW did not previously survey and shall provide to the Department a written report of the field investigation. If any significant historic, cultural or archaeological resources are found during the field investigation, the certificate holder shall ensure that construction and operation of the facility will have no impact on the resources. The certificate holder shall instruct all construction personnel to avoid areas where the resources were found and shall implement other appropriate measures to protect the resources. [Amendment #2]</p>	Applicable	<p>PGE complied with this condition during construction. All crane pads are located within the approved 500-foot corridors and at the margins of existing access roads and turbine pad areas in areas that were originally disturbed during initial tower erection. All crane pads are or will be constructed on agricultural land (Category 6 habitat).</p>
70	<p>The certificate holder shall ensure that a qualified person instructs construction personnel in the identification of cultural resources.</p>	Not Applicable	<p>PGE complied with this condition during construction of each phase. Construction of the crane pads does not disturb any areas that were not previously disturbed.</p>
71	<p>The certificate holder shall ensure that a qualified archaeologist is present on site during any ground-disturbing activities, including grading and graveling; or, the certificate holder shall implement an alternate monitoring procedure, including a testing strategy, as agreed to in consultation with the Department, SHPO, and the tribes.</p>	Not Applicable	<p>PGE complied with this condition during construction of each phase. Construction of the crane pads does not disturb any areas that were not previously disturbed during initial construction and all crane pads</p>

Table 2 Analysis of Each Site Certificate Condition for Applicability and Compliance with the Proposed Change

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Condition Number	Condition Text	Applicable to Proposed Change?	Comments
			are or will be constructed on agricultural land (Category 6 habitat).
72	The certificate holder shall ensure that construction personnel cease all ground-disturbing activities in the immediate area if any archaeological or cultural resources are found during construction of the facility until a qualified archaeologist can evaluate the significance of the find. The certificate holder shall notify the Department and the State Historic Preservation Office (SHPO) of the find. If the archaeologist determines that the resource is significant, the certificate holder shall make recommendations to the Council for mitigation, including avoidance or data recovery, in consultation with the Department, SHPO, and other appropriate parties. The certificate holder shall not restart work in the affected area until the certificate holder has demonstrated to the Department that it has complied with the archaeological permit requirements administered by SHPO.	Applicable	PGE has a companywide Inadvertent Discovery Plan (IDP) on which all personnel are trained. PGE will continue to comply with this condition if any archaeological or cultural resources are found during construction of any crane pads.
73	The certificate holder shall ensure that construction personnel proceed carefully in the vicinity of the mapped alignment of the Oregon Trail. If any intact physical evidence of the trail is discovered, the certificate holder shall avoid any disturbance to the intact segments, by redesign, re-engineering or restricting the area of construction activity. The certificate holder shall promptly notify the Department and SHPO of the discovery. The certificate holder shall consult with the Department and with SHPO to determine appropriate mitigation measures.	Not Applicable	PGE complied with is condition during construction of each phase. Construction of crane pads has or will occur in areas already disturbed during initial construction.
Public Services OAR 345-022-0110			
74	During construction of the facility, the certificate holder and its contractors shall obtain all water required for construction activities from off-site sources previously permitted for such uses.	Not Applicable	This condition was applicable during initial construction of the facility; crane pads would be constructed during the operation phase of the facility. If water is needed to control dust it will either be brought onsite by the earthwork contractor or provided from the PGE O&M well.

Table 2 Analysis of Each Site Certificate Condition for Applicability and Compliance with the Proposed Change

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Condition Number	Condition Text	Applicable to Proposed Change?	Comments
75	Before beginning operation of the facility, the certificate holder shall have in operation a well suitable for delivering water, not exceeding 5,000 gallons per day, for domestic use at the facility's O&M buildings and, provided the rate of extraction would not exceed 5,000 gallons per day, blade-washing activities. The certificate holder shall not change the source of water for the facility's domestic use without prior Council approval. [Amendment #3]	Not Applicable	The proposed change does not impact the onsite water well.
76	During operation of the facility, the certificate holder and its contractors shall obtain all water required for blade-washing activities from off-site sources previously permitted for such uses or from the on-site well, provided such use of well water would not cause the rate of extraction to exceed 5,000 gallons in any one-day period.	Not Applicable	The proposed change is not associated with blade washing.
77	Before beginning construction of the facility, the certificate holder shall develop a system for monitoring state highways and local roads that would serve as transporter routes for delivering equipment to the facility site for degradation, e.g., major potholes, so that safe travel paths may be maintained. The monitoring system shall include site inspection and photographic cataloguing of existing road conditions so that pre-construction conditions can be compared with conditions after construction has been completed. The certificate holder shall coordinate monitoring methods and preferred mitigation efforts with Sherman County Public Works and the Oregon Department of Transportation. [Amendment #1]	Not Applicable	PGE complied with this condition during construction of each phase; the minor amount of material necessary for construction of the occasional crane pad does not trigger a need to monitoring state highways and local roads.
78	After completing construction of the facility, the certificate holder shall restore state highways and county roads affected by facility construction activities to at least their pre-construction conditions, to the satisfaction of Sherman County Public Works and the Oregon Department of Transportation.	Not Applicable	PGE complied with this condition during construction of each phase; the minor amount of material necessary for construction of the occasional crane pad does not trigger a need to monitoring state highways and local roads.

Table 2 Analysis of Each Site Certificate Condition for Applicability and Compliance with the Proposed Change

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Condition Number	Condition Text	Applicable to Proposed Change?	Comments
79	During construction of the facility, the certificate holder shall implement the following measures to reduce traffic delays on county roads serving as transporter routes for delivery of equipment to the facility site: (a) Provide notice to adjacent landowners when construction takes place to help minimize access disruptions; (b) Provide proper road signage and warnings of “Equipment on Road,” “Truck Access,” or “Road Crossings;” (c) Implement traffic diversion equipment, such as advance signage and pilot cars, whenever possible when slow or oversized loads are being hauled; (d) Encourage carpooling for the construction workforce to reduce traffic volume; (e) Employ flaggers, as necessary, to direct traffic when large equipment is entering or exiting public roads to minimize risk of accidents; and (f) Maintain at least one travel lane at all times so that roadways will not be closed to traffic as a result of construction vehicles entering or exiting public roads.	Not Applicable	PGE complied with this condition during construction of each phase; the minor amount of material necessary for construction of the occasional crane pad does not trigger a need implement the listed measures.
Waste Minimization OAR 345-022-0120			
80	The certificate holder shall use hazardous materials in a manner that protects public health, safety and the environment and shall comply with applicable local, state and federal environmental laws and regulations.	Not Applicable	Construction of crane pads does not utilize any hazardous materials.
81	If a spill or release of hazardous materials occurs during construction or operation of the facility, the certificate holder shall notify the Department within 72 hours and shall clean up the spill or release and dispose of any contaminated soil or other materials according to applicable regulations. The certificate holder shall ensure that spill kits containing items such as absorbent pads are located on equipment and storage facilities to respond to accidental spills and shall instruct employees handling hazardous materials in the proper handling, storage and cleanup of these materials.	Applicable	PGE will continue to comply with this condition during construction and use of crane pads.
82	During construction of the facility, the certificate holder shall provide portable toilets for on-site sewage handling and shall ensure that the portable toilets are pumped and cleaned regularly by a licensed contractor that is qualified to pump and clean portable toilet facilities.	Not Applicable	Construction of the crane pads takes approximately one day and the earthwork contractor has access to the PGE O&M buildings during that time.

Table 2 Analysis of Each Site Certificate Condition for Applicability and Compliance with the Proposed Change

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Condition Number	Condition Text	Applicable to Proposed Change?	Comments
83	During operation of the facility, the certificate holder shall discharge sanitary wastewater generated at the O&M buildings to a licensed on-site septic system in compliance with county permit requirements. The certificate holder shall design the septic system with a capacity that is less than 2,500 gallons per day. [Amendment #3]	Not Applicable	The proposed change does not impact the existing septic system.
84	During construction of the facility, the certificate holder shall implement a waste management plan that includes but is not limited to the following measures: (a) Training employees to minimize and recycle solid waste; (b) Minimizing the generation of wastes from construction through detailed estimating of materials needs and through efficient construction practices; (c) Recycling steel and other metal scrap; (d) Recycling wood waste; (e) Recycling packaging wastes, such as paper and cardboard; (f) Collecting non-recyclable waste for transport to a landfill by a licensed waste hauler; and (g) Segregating all hazardous wastes, such as used oil, oily rags and oil-absorbent materials, mercury-containing lights and lead-acid and nickel-cadmium batteries for disposal by a licensed firm specializing in the proper recycling or disposal of hazardous wastes.	Not Applicable	Construction of the crane pads does not produce any waste.
85	The certificate holder may dispose of waste concrete on site with the permission of the landowner and in accordance with OAR 340-093-0080 and other applicable regulations. The certificate holder shall dispose of waste concrete on site by placing the material in an excavated hole, covering the concrete with at least 3 feet of topsoil, and grading the area to match existing contours. If the waste concrete is not disposed of on site, the certificate holder shall arrange for proper disposal in a licensed landfill.	Not Applicable	Construction of the crane pads does not require any concrete.
86	During construction of the facility, the certificate holder shall ensure that the wash down of concrete trucks occurs only at a contractor-owned batch plant or at tower foundation locations. If such wash down occurs at tower foundation locations, then the certificate holder shall ensure that wash down wastewater does not run off the construction site into otherwise undisturbed areas and that the wastewater is disposed of on backfill piles and buried underground with the backfill over the tower foundation.	Not Applicable	Construction of the crane pads does not require any concrete.

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Condition Number	Condition Text	Applicable to Proposed Change?	Comments
87	<p>(a) During operation of the facility, the certificate holder shall implement a waste management plan that includes but is not limited to the following measures:(a) Training employees to minimize and recycle solid waste;</p> <p>(b) Recycling paper products, metals, glass and plastics;</p> <p>(c) Collecting non-recyclable waste for transport to a landfill by a licensed waste hauler; and</p> <p>(d) Segregating all hazardous wastes, such as used oil, oily rags and oil-absorbent materials, mercury-containing lights and lead-acid and nickel-cadmium batteries for disposal by a licensed firm specializing in the proper recycling or disposal of hazardous wastes.</p>	Not Applicable	The proposed change does not change PGE's current method of complying with this condition.
88	During operation of the facility, the certificate holder may engage in blade-washing activities but shall ensure that these activities do not cause runoff of washwater from the site or discharges to surface waters, storm sewers or dry wells. The certificate holder shall not use acids, bases or metal brighteners with the wash water. The certificate may use biodegradable, phosphate-free cleaners sparingly. [Amendment #2]	Not Applicable	The proposed change does not impact blade washing.
Noise Control Regulations OAR 340-035-0035			
89	To reduce noise impacts at nearby residential areas, the certificate holder shall: (a) Confine the noisiest operation of heavy construction equipment to the daylight hours; (b) Require contractors to install and maintain exhaust mufflers on all combustion engine-powered equipment; and (c) Establish a complaint response system at the construction manager's office to address noise complaints.	Applicable	Construction of the crane pads has and will continue to occur during daylight hours.

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Condition Number	Condition Text	Applicable to Proposed Change?	Comments
90	If the GE 1.5-MW turbines (for which the certificate holder states the maximum sound power level warranted by the manufacturer is 104 dBA) or the GE 3.0-MW turbines (provided the certificate holder is able to demonstrate, by means of the manufacturer’s warranty or other means acceptable to the Department, that the maximum sound power level of the GE 3.0-MW turbine is 106 dBA) will be used at the facility, before beginning construction, the certificate holder shall present information demonstrating to the satisfaction of the Department that the following requirements have been met at the 24 identified noise sensitive properties. The identified noise sensitive properties are the properties listed in Table 12 of the Final Order on the Application and further identified in the Final Order on Amendment #2, except for property R14... (remainder of condition not summarized here, see original site certificate text for full condition.	Not Applicable	The proposed change does not impact sound levels at any noise sensitive properties.
91	Before beginning construction using turbines other than GE 1.5-MW or GE 3.0-MW turbines, the certificate holder shall...(remainder of condition not summarized here, see original site certificate text for full condition).	Not Applicable	The proposed change does not impact sound levels at any noise sensitive properties.
Public Health and Safety			
92	During operation of the facility, the certificate holder shall maintain built-in fire prevention measures in each turbine that would shut down the turbine automatically before mechanical problems create excess heat or sparks.	Not Applicable	The proposed change does not impact fire prevention measures maintained in each turbine.
93	During construction and operation of the facility, the certificate holder shall develop and implement fire management plans in consultation with local fire control authorities to minimize the risk of fire and to respond appropriately to any fires that occur on the facility site. In developing the fire management plans, the certificate holder should take into account the dry nature of the region and should address risks on a seasonal basis.	Not Applicable	The proposed change does not impact the existing fire management plan.
94	During construction and operation of the facility, the certificate holder shall ensure that each on-site company vehicle contains a fire extinguisher, water spray can, shovel, emergency response procedures book, and two-way radio for immediate communication with the O&M facility.	Not Applicable	Construction of crane pads does not result in any new on-site company vehicles.
95	During construction of the facility, the certificate holder shall clear vegetation from a laydown area adjacent to each wind turbine where welding, cutting, grinding, or other flame- or spark-producing operations are likely to occur.	Not Applicable	Construction of crane pads does not require any "hot" work.

Table 2 Analysis of Each Site Certificate Condition for Applicability and Compliance with the Proposed Change

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Condition Number	Condition Text	Applicable to Proposed Change?	Comments
96	Upon beginning operation of the facility, the certificate holder shall provide to all local fire departments maps of the facility site. During operation of the facility, the certificate holder shall provide to all local fire departments the names and telephone numbers of facility personnel available to respond on a 24-hour basis in case of an emergency on the facility site.	Not Applicable	Construction of the crane pads does not change the maps that have been provided to local fire departments.
97	During operation of the facility, the certificate holder shall ensure that all on-site employees receive annual fire prevention and response training by qualified instructors or members of the local fire department and that all employees are instructed to keep vehicles on roads and off dry grassland, except when off-road operation is required for emergency purposes.	Not Applicable	The proposed change does not impact the ongoing annual fire prevention and response training.
98	During operation of the facility, the certificate holder shall comply with the written fire protection recommendations of the Fire Chief of the applicable Rural Fire Protection District and shall promptly provide to the Department any correspondence from the Fire Chief regarding those recommendations. [Amendment #3]	Not Applicable	The proposed change does not impact PGE's compliance with written fire protection recommendations.
99	The certificate holder shall take reasonable steps to reduce or manage exposure to electromagnetic fields (EMF), consistent with Council findings presented in the "Report of EMF Committee to the Energy Facility Siting Council," March 30, 1993, and subsequent findings. Effective on the date of this site certificate, the certificate holder shall provide information to the public, upon request, about EMF levels associated with the energy facility and related transmission lines.	Not Applicable	The proposed change does not impact any facility transmission lines.
100	At least 30 days before beginning preparation of detailed design and specifications for the electrical transmission lines, the certificate holder shall consult with the Oregon Public Utility Commission staff to ensure that its designs and specifications are consistent with applicable codes and standards.	Not Applicable	The proposed change does not impact any facility transmission lines.
Conditions Required by Council Rules			
101	OAR 345-027-0020(1): The Council shall not change the conditions of the site certificate except as provided for in OAR Chapter 345, Division 27.	Not Applicable	General condition not specifically applicable to any facility features.
102	OAR 345-027-0020(2): The certificate holder shall submit a legal description of the site to the Department of Energy within 90 days after beginning operation of the facility. The legal description required by this rule means a description of metes and bounds or a description	Not Applicable	Crane pad construction operations are within the facility

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	of the site by reference to a map and geographic data that clearly and specifically identifies the outer boundaries that contain all parts of the facility. [Amendment #3]		boundary, and do not change the legal site description.
103	OAR 345-027-0020(3): The certificate holder shall design, construct, operate and retire the facility: (a) Substantially as described in the site certificate; (b) In compliance with the requirements of ORS Chapter 469, applicable Council rules, and applicable state and local laws, rules and ordinances in effect at the time the site certificate is issued; and (c) In compliance with all applicable permit requirements of other state agencies.	Applicable	Constructing the crane pads to be permanent rather than temporary is a change to how the facility is described in the site certificate; which is what triggered the evaluation of the “three could’s” under OAR 345-027-0050(4). The evaluation supports that the change is not a substantial change to the description since it does not result in a significant adverse impact not previously addressed by the Council, does not affect PGE’s ability to comply with a site certificate condition and does not require any new or changed conditions in the site certificate.
104	OAR 345-027-0020(4): The certificate holder shall begin and complete construction of the facility by the dates specified in the site certificate.	Not Applicable	PGE has previously complied with this condition.

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105	OAR 345-027-0020(5): Except as necessary for the initial survey or as otherwise allowed for wind energy facilities, transmission lines or pipelines under this section, the certificate holder shall not begin construction, as defined in OAR 345-001-0010, or create a clearing on any part of the site until the certificate holder has construction rights on all parts of the site. For the purpose of this rule, “construction rights” means the legal right to engage in construction activities. For wind energy facilities, transmission lines or pipelines, if the certificate holder does not have construction rights on all parts of the site, the certificate holder may nevertheless begin construction, as defined in OAR 345-001-0010, or create a clearing on a part of the site if the certificate holder has construction rights on that part of the site and: (a) The certificate holder would construct and operate part of the facility on that part of the site even if a change in the planned route of a transmission line or pipeline occurs during the certificate holder’s negotiations to acquire construction rights on another part of the site; or (b) The certificate holder would construct and operate part of a wind energy facility on that part of the site even if other parts of the facility were modified by amendment of the site certificate or were not built.[Amendment #3]	Not Applicable	Construction of the facility is complete.
106	OAR 345-027-0020(6): If the Council requires mitigation based on an affirmative finding under any standards of Division 22 or Division 24 of OAR Chapter 345, the certificate holder shall consult with affected state agencies and local governments designated by the Council and shall develop specific mitigation plans consistent with Council findings under the relevant standards. The certificate holder must submit the mitigation plans to the Office and receive Office approval before beginning construction or, as appropriate, operation of the facility. [Amendment #3]	Not Applicable	The proposed change does not cause a need to any additional mitigation.
107	OAR 345-027-0020(7): The certificate holder shall prevent the development of any conditions on the site that would preclude restoration of the site to a useful, non-hazardous condition to the extent that prevention of such site conditions is within the control of the certificate holder.	Applicable	The proposed change does not prevent the site from being restored to a useful, non-hazardous condition.
108	OAR 345-027-0020(8): Before beginning construction of the facility, the certificate holder shall submit to the State of Oregon, through the Council, 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. The certificate holder shall maintain a bond or letter of credit in effect at all times until the facility has been retired. The Council may specify different amounts for the	Not Applicable	The proposed change does not impact the existing letter of credit PGE maintains.

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	bond or letter of credit during construction and during operation of the facility. [Amendment #3]		
109	OAR 345-027-0020(9): The certificate holder shall retire the facility if the certificate holder permanently ceases construction or operation of the facility. The certificate holder shall retire the facility according to a final retirement plan approved by the Council, as described in OAR 345-027-0110. The certificate holder shall pay the actual cost to restore the site to a useful, non-hazardous condition at the time of retirement, notwithstanding the Council’s approval in the site certificate of an estimated amount required to restore the site.	Not Applicable	The proposed change is not related to retirement of the facility.
110	OAR 345-027-0020(10): The Council shall include as conditions in the site certificate all representations in the site certificate application and supporting record the Council deems to be binding commitments made by the applicant.	Not Applicable	General condition not specifically applicable to any facility features.
111	OAR 345-027-0020(11): Upon completion of construction, the certificate holder shall restore vegetation to the extent practicable and shall landscape all areas disturbed by construction in a manner compatible with the surroundings and proposed use. Upon completion of construction, the certificate holder shall remove all temporary structures not required for facility operation and dispose of all timber, brush, refuse and flammable or combustible material resulting from clearing of land and construction of the facility. [Amendment #3]	Not Applicable	Construction of the facility is complete.
112	OAR 345-027-0020(12): The certificate holder shall design, engineer and construct the facility to avoid dangers to human safety presented by seismic hazards affecting the site that are expected to result from all maximum probable seismic events. As used in this rule “seismic hazard” includes ground shaking, landslide, liquefaction, lateral spreading, tsunami inundation, fault displacement and subsidence.		Construction of crane pads does not create a feature that would typically pose a danger to human safety. They do not have any "occupancy" like a building or turbine tower. However, the crane pads would occasionally support large heavy cranes and therefore are constructed in locations that are stable and capable of supporting a temporary crane.

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113	OAR 345-027-0020(13): The certificate holder shall notify the Department, the State Building Codes Division and the Department of Geology and Mineral Industries promptly if site investigations or trenching reveal that conditions in the foundation rocks differ significantly from those described in the application for a site certificate. After the Department receives the notice, the Council may require the certificate holder to consult with the Department of Geology and Mineral Industries and the Building Codes Division and to propose mitigation actions. [Amendment #3]	Not Applicable	The proposed change does not include any additional site investigations.
114	OAR 345-027-0020(14): The certificate holder shall notify the Department, the State Building Codes Division and the Department of Geology and Mineral Industries promptly if shear zones, artesian aquifers, deformations or clastic dikes are found at or in the vicinity of the site. [Amendment #3]	Not Applicable	The proposed change does not include any site work that would identify shear zones, artesian aquifers, deformations or clastic dikes.
115	OAR 345-027-0020(15): Before any transfer of ownership of the facility or ownership of the site certificate holder, the certificate holder shall inform the Department of the proposed new owners. The requirements of OAR 345-027-0100 apply to any transfer of ownership that requires a transfer of the site certificate. [Amendment #3]	Not Applicable	The proposed change does not include any transfer of ownership.
116	OAR 345-027-0020(16): If the Council finds that the certificate holder has permanently ceased construction or operation of the facility without retiring the facility according to a final retirement plan approved by the Council, as described in OAR 345-027-0110, the Council shall notify the certificate holder and request that the certificate holder submit a proposed final retirement plan to the Office within a reasonable time not to exceed 90 days. If the certificate holder does not submit a proposed final retirement plan by the specified date, the Council may direct the Department to prepare a proposed a final retirement plan for the Council’s approval. Upon the Council’s approval of the final retirement plan, the Council may draw on the bond or letter of credit described in OAR 345-027-0020(8) to restore the site to a useful, non-hazardous condition according to the final retirement plan, in addition to any penalties the Council may impose under OAR Chapter 345, Division 29. If the amount of the bond or letter of credit is insufficient to pay the actual cost of retirement, the certificate holder shall pay any additional cost necessary to restore the site to a useful, non-hazardous condition. After completion of site restoration, the Council shall issue an order to terminate the site certificate if the Council	Not Applicable	The proposed change is not related to retirement of the facility.

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	finds that the facility has been retired according to the approved final retirement plan. [Amendment #3]		
117	[Condition removed by Amendment #3]	Not Applicable	Deleted.
118	OAR 345-027-0023(4): If the facility includes any transmission line under Council jurisdiction:(a) The certificate holder shall design, construct and operate the transmission line in accordance with the requirements of the National Electrical Safety Code (American National Standards Institute, Section C2, 1997 Edition); and(b) The certificate holder shall develop and implement a program that provides reasonable assurance that all fences, gates, cattle guards, trailers, or other objects or structures of a permanent nature that could become inadvertently charged with electricity are grounded or bonded throughout the life of the line.[Amendment #3]	Not Applicable	The proposed change has no impact to transmission lines.
119	OAR 345-027-0023(5): If the proposed energy facility is a pipeline or a transmission line or has, as a related or supporting facility, a pipeline or transmission line, the Council shall specify an approved corridor in the site certificate and shall allow the certificate holder to construct the pipeline or transmission line anywhere within the corridor, subject to the conditions of the site certificate. If the applicant has analyzed more than one corridor in its application for a site certificate, the Council may, subject to the Council’s standards, approve more than one corridor. [Amendment #3]	Not Applicable	The proposed change has no impact to transmission lines.
120.a	OAR 345-027-0028: The following general monitoring conditions apply: (a) The certificate holder shall consult with affected state agencies, local governments and tribes and shall develop specific monitoring programs for impacts to resources protected by the standards of Divisions 22 and 24 of OAR Chapter 345 and resources addressed by applicable statutes, administrative rules and local ordinances. The certificate holder must submit the monitoring programs to the Department of Energy and receive Department approval before beginning construction or, as appropriate, operation of the facility.	Not Applicable	The proposed change does not impact existing or require additional monitoring conditions.
120.b	The certificate holder shall implement the approved monitoring programs described in section (a) and monitoring programs required by permitting agencies and local governments.	Not Applicable	The proposed change does not impact existing or require additional monitoring conditions.

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120.c	For each monitoring program described in sections (a) and (b), the certificate holder shall have quality assurance measures approved by the Department before beginning construction or, as appropriate, before beginning commercial operation.	Not Applicable	The proposed change does not impact existing or require additional monitoring conditions.
120.d	If the certificate holder becomes aware of a significant environmental change or impact attributable to the facility, the certificate holder shall, as soon as possible, submit a written report to the Department describing the impact on the facility and any affected site certificate conditions. [Amendment #3]	Not Applicable	The proposed change does not impact existing or require additional monitoring conditions.
121	OAR 345-026-0048: Following receipt of the site certificate or an amended site certificate, the certificate holder shall implement a plan that verifies compliance with all site certificate terms and conditions and applicable statutes and rules. As a part of the compliance plan, to verify compliance with the requirement to begin construction by the date specified in the site certificate, the certificate holder shall report promptly to the Department of Energy when construction begins. Construction is defined in OAR 345-001-0010. In reporting the beginning of construction, the certificate holder shall describe all work on the site performed before beginning construction, including work performed before the Council issued the site certificate, and shall state the cost of that work. For the purpose of this exhibit, “work on the site” means any work within a site or corridor, other than surveying, exploration or other activities to define or characterize the site or corridor. The certificate holder shall document the compliance plan and maintain it for inspection by the Department or the Council. [Amendment #3]	Not Applicable	The proposed change does not impact the methods PGE uses to verify compliance with site certificate terms and conditions.
122.a	OAR 345-026-0080: The certificate holder shall report according to the following requirements:(a) General reporting obligation for energy facilities under construction or operating:	Not Applicable	The proposed change does not impact the type or timing of reporting required by Condition 122.
122.a.i	(i) Within six months after beginning construction, and every six months thereafter during construction of the energy facility and related or supporting facilities, the certificate holder shall submit a semiannual construction progress report to the Department of Energy. In each construction progress report, the certificate holder shall describe any significant changes to major milestones for construction. The certificate holder shall include such information related to construction as specified in the site certificate. When the reporting	Not Applicable	Construction of the facility is complete.

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	date coincides, the certificate holder may include the construction progress report within the annual report described in this Condition.		
122.a.ii	(ii) By April 30 of each year after beginning construction, the certificate holder shall submit an annual report to the Department addressing the subjects listed in this Condition. The Council Secretary and the certificate holder may, by mutual agreement, change the reporting date.	Not Applicable	The proposed change does not impact the type or timing of reporting required by Condition 122.
122.a.iii	(iii) To the extent that information required by this rule is contained in reports the certificate holder submits to other state, federal or local agencies, the certificate holder may submit excerpts from such other reports to satisfy this rule. The Council reserves the right to request full copies of such excerpted reports.	Not Applicable	The proposed change does not impact the type or timing of reporting required by Condition 122.
122.b.i	(b) In the annual report, the certificate holder shall include the following information for the calendar year preceding the date of the report: (i) Facility Status: An overview of site conditions, the status of facilities under construction, and a summary of the operating experience of facilities that are in operation. In this section of the annual report, the certificate holder shall describe any unusual events, such as earthquakes, extraordinary windstorms, major accidents or the like that occurred during the year and that had a significant adverse impact on the facility.	Not Applicable	The proposed change does not impact the type or timing of reporting required by Condition 122.
122.b.ii	(ii) Reliability and Efficiency of Power Production: For electric power plants, the plant availability and capacity factors for the reporting year. The certificate holder shall describe any equipment failures or plant breakdowns that had a significant impact on those factors and shall describe any actions taken to prevent recurrence of such problems;	Not Applicable	The proposed change does not impact the type or timing of reporting required by Condition 122.
122.b.iii	(iii) Fuel Use: For thermal power plants: (A) The efficiency with which the power plant converts fuel into electric energy. If the fuel chargeable to power heat rate was evaluated when the facility was sited, the certificate holder shall calculate efficiency using the same formula and assumptions, but using actual data; and (B) The facility's annual hours of operation by fuel type and, every five years after beginning operation, a summary of the annual hours of operation by fuel type as described in OAR 345-024-0590(5).	Not Applicable	The proposed change does not impact the type or timing of reporting required by Condition 122.
122.b.iv	(iv) Status of Surety Information: Documentation demonstrating that bonds or letters of credit as described in the site certificate are in full force and effect and will remain in full force and effect for the term of the next reporting period;	Not Applicable	The proposed change does not impact the type or timing of reporting required by Condition 122.

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122.b.v	(v) Monitoring Report: A list and description of all significant monitoring and mitigation activities performed during the previous year in accordance with site certificate terms and conditions, a summary of the results of those activities, and a discussion of any significant changes to any monitoring or mitigation program, including the reason for any such changes.	Not Applicable	The proposed change does not impact the type or timing of reporting required by Condition 122.
122.b.vi	(vi) Compliance Report: A description of all instances of noncompliance with a site certificate condition. For ease of review, the certificate holder shall, in this section of the report, use numbered subparagraphs corresponding to the applicable sections of the site certificate.	Not Applicable	The proposed change does not impact the type or timing of reporting required by Condition 122.
122.b.vii	(vii) Facility Modification Report: A summary of changes to the facility that the certificate holder has determined do not require a site certificate amendment in accordance with OAR 345-027-0050.	Applicable	A summary of the Amendment Determination Request will be included in the next annual report (2018 report submitted by April 30, 2019).
122.b.viii	(viii) Nongenerating Facility Carbon Dioxide Emissions: For nongenerating facilities that emit carbon dioxide, a report of the annual fuel use by fuel type and annual hours of operation of the carbon dioxide emitting equipment as described in OAR 345-024-0630(4). [Amendment #3]	Not Applicable	Not applicable to Biglow Canyon Wind Farm.
123	[Condition removed by Amendment #3]	Not Applicable	Deleted.
124	OAR 345-026-0105: The certificate holder and the Department of Energy shall exchange copies of all correspondence or summaries of correspondence related to compliance with statutes, rules and local ordinances on which the Council determined compliance, except for material withheld from public disclosure under state or federal law or under Council rules. The certificate holder may submit abstracts of reports in place of full reports; however, the certificate holder shall provide full copies of abstracted reports and any summarized correspondence at the request of the Department. [Amendment #3]	Not Applicable	General condition not specifically applicable to any facility features.

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125	(125) OAR 345-026-0170: The certificate holder shall notify the Department of Energy within 72 hours of any occurrence involving the facility if: (a) There is an attempt by anyone to interfere with its safe operation; (b) A natural event such as an earthquake, flood, tsunami or tornado, or a human-caused event such as a fire or explosion affects or threatens to affect the public health and safety or the environment; or (c) There is any fatal injury at the facility.[Amendment #3]	Applicable	PGE will continue to comply with this condition during construction and use of crane pads.
Conditions Relating to Amendment #2			
126	Prior to any disturbance in the areas of the site added in the Final Order for Amendment #2, the certificate holder shall deliver to the Department the results of a spring survey of Crossing G, conducted during the appropriate bloom time for Northern wormwood and Henderson’s ricegrass. If Northern wormwood or any other protected rare plant species are observed during the spring survey, the certificate holder shall ensure that construction and operation of the facility will have no impact on the rare plant habitat. [Amendment #2]	Not Applicable	Construction of the facility is complete and all crane pads are or will be installed in agricultural land (Category 6 habitat).
127	The certificate holder shall avoid any disturbance, including the placement of poles for the collector line, within 25 feet of the stream channel in the area identified as Crossing G in the Request for Amendment #2 and within a wetland area identified as “POWHX” on Figure J-1 of the site certificate application. [Amendment #2]	Not Applicable	The proposed change does not impact any collector line poles.
Conditions Relating to Amendment #3			
128	With respect to any turbine constructed within a micrositing corridor approved by the Council after November 21, 2007, the certificate holder shall not locate such turbine within the setback prescribed by Section 4 of the Sherman County Wind Power Set Back Ordinance (Ordinance No. 39-2007) unless the Council has approved a variance to such setback for the turbine or the certificate holder has negotiated a setback agreement with the affected adjacent property owner and wind project developer. [Amendment #3]	Not Applicable	The proposed change is not subject to setbacks.
129	The certificate holder shall avoid any disturbance within 25 feet of the stream channel in the area identified as “Stream Crossing H” in the Request for Amendment #3 and shall install any collector line through the area by tunneling or drilling beneath the stream channel. [Amendment #3]	Not Applicable	The proposed change does not include construction of any crane pads with 25 feet of the stream channel identified as "Stream Crossing H".