



Matt Hutchinson
Senior Permit Manager - West

April 20, 2020

Todd Cornett
Siting Division Administrator
Oregon Department of Energy
550 Capital Street NE
Salem, Oregon 97301

Re: Montague Wind Power Facility – Amendment Determination Request for Type B Review and Request for Amendment No. 5

Dear Mr. Cornett:

Montague Wind Power Facility, LLC (Montague), a wholly-owned subsidiary of Avangrid Renewables, LLC (Avangrid), is seeking a fifth amendment to the Montague Wind Power Facility (Facility) Site Certificate (Site Certificate) to implement Avangrid's commercial arrangements for the full buildout of the Facility. Overall, the proposed changes in Request for Amendment No. 5 (RFA 5) are consistent with the Facility modifications approved in Montague's Request for Amendment No. 4 (RFA 4) and are not anticipated to result in significant adverse impacts to resources protected by Energy Facility Siting Council (EFSC) standards. However, the proposed changes trigger an amendment under Oregon Administrative Rule (OAR) 345-027-0350(4)(b) and (4)(c) because the proposed changes will require modifications to the Site Certificate findings and conditions of approval.

Montague requests that EFSC review RFA 5 via a Type B review process per OAR 345-027-0351(3) and provides this Amendment Determination Request (ADR) for Type B Review pursuant to OAR 345-027-0357(3). Attached to this ADR is the RFA 5 narrative, which provides the maps illustrating the location of the proposed changes and additional information regarding compliance with EFSC standards. Together, this ADR and RFA 5, satisfy the requirements of OAR 345-027-0357(4) and demonstrate that RFA 5 warrants a Type B review under the factors in OAR 345-027-0357(8).

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Summary of the Proposed Changes

Phase 1 of the Facility is constructed and operational. As mentioned above, the proposed changes in RFA 5 are to facilitate development of the remaining facility (Phase 2) based on Avangrid's commercial arrangements. All proposed changes occur within the existing site boundary.

The specific changes sought by RFA 5 are:

- Reduce site boundary by 4,110 acres by removing a parcel with site constraints.
- Expand the solar micrositing area from 1,189 acres to 2,725 acres within the existing site boundary, and relocate a portion of the previously approved solar generation equipment onto the expanded solar micrositing area.
- Add a switching station to the expanded solar micrositing area.
- Modify a setback condition to use the previously considered Alternative 2 for the transmission line route, the preferred route recommended by Gilliam County.
- Split the Site Certificate and assign to Montague for Phase 1 and two new Avangrid project subsidiaries for Phase 2.

The focus of RFA 5 is addressing changes in solar panel technology and refining the project boundaries to align with the outputs for Avangrid's customers. Figures 2 and 3 in RFA 5 show the expanded solar micrositing area and revised solar array layout within the existing site boundary, respectively. Figure 4 in RFA 5 shows the previously considered Alternative 2 for the transmission line route as the preferred primary route. Figures 5 through 8 in RFA 5 present the redefined project site boundaries.

Reasons for Expanded Solar Micrositing Area

Montague proposes to expand the solar micrositing area within the existing site boundary but Montague does not propose to increase the electric generating capacity of the previously approved solar generation approved as Design Scenario C in RFA 4. Currently, the Site Certificate approves about 1,189 acres of solar or about 203 megawatts (MW) of generating capacity based on the underlying assumptions used in RFA 4. The need to expand the solar micrositing area is driven by technology changes in solar panels. Since RFA 4 was approved, there has been a dramatic shift toward the use of bifacial solar panels for utility-scale solar projects.¹ Unlike conventional monofacial solar panels (which were used in the assumptions for RFA 4), bifacial solar modules can generate electricity from both the front and the back sides of the panel, increasing the energy yield. Yet to best achieve this energy boost, the panel rows need to be wider spaced so as not to shade adjacent rows. Bifacial panels use the same racking system as a typical monofacial solar panel, such as a single-axis tracker, but the row spacing is 7 to 15 feet wider. This slightly wider row spacing results in the need for a larger array area and thus the expanded solar micrositing area. For example, in RFA 4, Montague assumed approximately 6 acres/MW was needed based on the solar technology at that time. Now, to take advantage of the new bifacial solar panels,

¹ <https://www.greentechmedia.com/articles/read/bifacial-solar-market-set-to-grow-tenfold-by-2024>

Montague assumes that approximately 9 acres/MW is needed. Therefore, a larger solar micro-siting area is needed to accommodate the 203 MW of solar generation (approved in RFA 4 under Design Scenario C). The generation capacity and number of components would remain the same as described in RFA 4 but now equipment would be spaced farther apart.

In RFA 5, Montague defines an expanded solar micro-siting area that is larger than the area that would actually be developed. The proposed expanded micro-siting area is about 2,725 acres of which about 1,800 to 1,900 acres would be needed to develop 203 MW of solar generation based on the new underlying assumptions described above. Having a larger micro-siting area allows for micro-siting considerations to minimize impacts on agricultural uses. In RFA 4, Montague committed to working with the affected landowners to preserve farm equipment access through the solar array. Based on its work to date with landowners, having more land upon which to micro-site the solar arrays would further help minimize impacts to ongoing agricultural operations and preserve farm access. Therefore, to keep its commitment to work with landowners on maintaining farming access, Montague seeks to expand the solar micro-siting area onto adjacent parcels. The expanded solar area is entirely within the approved site boundary and includes four landowners that were previously considered for Phase 2 wind turbine development in RFA 4.

Lastly, expanding the solar micro-siting area supports Avangrid's plans to split the Site Certificate by phase and assign Phase 2 to two new project subsidiaries. The proposed changes allow for efficient use of shared facilities while defining discrete project areas needed for Avangrid's commercial arrangements.

Evaluation of Type B Review Factors

OAR 345-027-0357(8) provides factors the Oregon Department of Energy (Department) may consider when determining whether RFA 5 justifies review under a Type B process. Specifically, the Department may consider factors including but not limited to: (a) the complexity of the changes proposed in RFA 5; (b) the level of anticipated public interest in RFA 5; (c) the anticipated level of interest reviewing agencies may have in RFA 5; (d) the likelihood of significant adverse impacts posed by the changes in RFA 5; and (e) the type and amount of any additional mitigation triggered by RFA 5. The following reasons demonstrate that RFA 5 is eligible for Type B review.

Proposed changes are minor and of the nature that were evaluated previously in RFA 4. EFSC previously approved in RFA 4 the construction and operation of a solar-only project in the Phase 2 portion of the site boundary with a generating capacity of up to 203 MW on up to 1,189 acres within a defined "solar micro-siting area" (Design Scenario C). In RFA 5, Montague seeks to relocate previously approved solar facilities within the approved site boundary onto lands adjacent to the approved solar micro-siting area. This expanded solar micro-siting area is entirely within the approved site boundary and mostly (95 percent) within the previously evaluated wind turbine micro-siting area (Design Scenario A in RFA 4). Lands within the expanded solar micro-siting area are of the same type (i.e., Category 6) and use (i.e., dryland wheat) as the land within the approved solar micro-siting area; therefore, no additional mitigation is required and no new impacts are anticipated. Montague proposes the same avoidance and

minimization measures to address potential adverse impacts to ongoing agricultural operations. There are no impacts from the proposed changes to resources protected by EFSC standards that Montague has not previously evaluated and EFSC found to meet the applicable EFSC standards. As described above, Montague proposes to expand the solar micro-siting area but it does not propose to increase the actual solar facility footprint other than adding a new switching station that is approximately 2 acres. Therefore, the evaluation of impacts from the expanded micro-siting area presented in RFA 5 is a theoretical worst-case scenario. Because RFA 5 can directly apply previous findings of compliance with EFSC standards, the proposed changes should not be complex and could be processed through a Type B review. Montague demonstrates in the attached RFA 5 that the proposed changes will not result in significant adverse impacts that EFSC did not previously consider.

In RFA 5, Montague confirms the use of previously approved Alternative 2 for the Phase 2 transmission line along the route paralleling Oregon Highway 19 and Old Tree Road and seeks to reduce the setback in Condition 89. This alternative route was previously described in a route comparison analysis presented in RFA 4. The Alternative 2 route was recommended by Gilliam County but was not selected as the preferred route in RFA 4 due to the lack of landowner agreements to construct the transmission line over buildings and lack of county rights-of-way along Old Tree Road. Montague has now secured these agreements and seeks to designate the Alternative 2 route described in RFA 4 as the preferred corridor. The change requires a modification to Site Certificate Condition 89 to remove the transmission line setback. This setback was imposed in the original Site Certificate because the Application for Site Certificate did not consider electromagnetic fields (EMF) impacts given that the transmission line corridor at that time was not proposed near structures. In RFA 5, Montague presents new analysis on EMF for the preferred route to demonstrate that EMF emissions are 30 times below EFSC standards. Because the proposed route was previously considered and the modification to the transmission line setback clearly complies with EFSC's EMF standards, the proposed change to the Site Certificate condition should not be considered complex and could be processed through a Type B review.

Montague considers splitting the Site Certificate and transferring portions of the Facility to different project subsidiaries as an administrative process because Avangrid would remain as the parent company for all project phases.

Anticipated public interest will likely be low. The public had the opportunity to review and comment on the proposed solar facilities at the Facility in proceedings on RFA 4. Public comments received on RFA 4 focused on the proposed Phase 2 wind turbines and related impacts on noise, scenic resources, recreational opportunities, and historic and cultural resources. RFA 5 does not involve any changes to these previously approved wind turbines. There were no specific public comments that opposed the



proposed solar facility, which is the focus of RFA 5. In fact, many commenters supported solar development rather than wind turbines.²

While Montague retains the ability to construct wind turbines for Phase 2, it does so at a reduced capacity. The maximum number of turbines for Phase 2 would be reduced from 81 turbines to 16 turbines.

Montague does not consider the split of the Site Certificate and transfer to new project subsidiaries as being of notable public interest because Avangrid would remain the parent company for each phase.

Anticipated level of input from reviewing agencies is low. Agency input on RFA 5 will likely be low because the purpose of this amendment is relocating already approved facilities within the same site boundary. Almost all areas (95 percent) of the proposed expanded solar micro-siting area have been surveyed, and remaining unsurveyed areas are farmed as dryland wheat, so are unlikely to hold unknown sensitive resources.

No new mitigation is needed. Montague would construct the solar array within the expanded solar micro-siting area in the same manner as described in RFA 4. As such, the solar array would be entirely located on Category 6 habitat that does not require compensatory habitat mitigation. Likewise, Montague would implement the approved Historic Resource Mitigation Plan for the placement of facilities near the historic Weatherford Barn. RFA 5 presents findings that support the conclusion that no additional mitigation is required as a result of the proposed changes.

For these reasons, combined with the attached RFA 5, Montague provides justification for a Type B review of this amendment request.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Matt Hutchinson".

Matt Hutchinson

Enclosure

² See, for example, Craig Buck letter, dated May 6, 2019; Elias Wisdom letter, dated May 13, 2019; Elaine Fitzner, letter, dated April 28, 2019; Community Renewable Energy Association letter, dated May 16, 2019.