

## ESTERSON Sarah \* ODOE

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**From:** Sarah.ESTERSON@energy.oregon.gov  
**Subject:** Leaning Juniper IIB Wind Power Facility - Request for Transfer Submittal  
**Attachments:** LJ IIB RFA4\_Transfer\_011526.pdf; Avangrid\_LeaningJuniperIIB\_PropertyInformation\_20251229\_reduced.pdf; LJIB\_PropertyInfo\_20251229.xlsx

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**From:** SOLSBY, ANNEKE <anneke.solsby@avangrid.com>  
**Sent:** Thursday, January 15, 2026 3:41 PM  
**To:** ESTERSON Sarah \* ODOE <Sarah.ESTERSON@energy.oregon.gov>  
**Cc:** CAVANAUGH, DARREN <darren.cavanaugh@avangrid.com>; Albrich, Elaine <ElaineAlbrich@dwt.com>  
**Subject:** Leaning Juniper IIB Wind Power Facility - Request for Transfer Submittal

Hi Sarah,

Please see the attached Request for Transfer for the Leaning Juniper IIB Wind Power Facility, including the updated list of property owners as described in OAR 345-021-0010(1)(f). Please don't hesitate to reach out if you have any questions.

Thank you,

Anneke Van der Mast Solsby  
Avangrid, Permitting & Environmental  
2701 NW Vaughn St, Suite 300  
Portland, OR 97210  
503.758.2220

Internal Use

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# **Request for Transfer of the Site Certificate for the Leaning Juniper IIB Wind Power Facility (Request for Amendment 4)**

**Prepared by  
Leaning Juniper 2B, LLC**



**January 2026**

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- Attachment 5. Evidence of Obtaining Bond or Letter of Credit
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## Acronyms and Abbreviations

Avangrid or Parent Company	Avangrid Power, LLC
Certificate Holder	Leaning Juniper Wind Power II, LLC
Council or EFSC	Oregon Energy Facility Siting Council
Facility	Leaning Juniper IIB Wind Power Facility
HMA	Habitat Mitigation Area
LJ2B or Applicant	Leaning Juniper 2B, LLC
LLC	limited liability company
OAR	Oregon Administrative Rules
ODOE or Department	Oregon Department of Energy



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# 1.0 Introduction

## 1.1 Project Summary and Request

Leaning Juniper IIB Wind Power Facility (Facility) is an operational wind power facility with 74 GE 1.5SLE wind turbines and a total peak generating capacity of approximately 111 megawatts (MW). The Facility Site Boundary consists of approximately 7,962 acres of land in Gilliam County, Oregon (Figure 1). The site is generally bounded by Eightmile Road to the north, 8 Mile Canyon Road to the east, Old Tree Road to the south, and Berthold Road to the west. Additionally, OR-19 passes through the middle of the Site Boundary.

Leaning Juniper Wind Power II, LLC (Certificate Holder) is submitting this Request for Amendment (RFA) 4 to transfer the Third Amended Site Certificate, dated July 18, 2025 (Site Certificate) from Certificate Holder to Leaning Juniper 2B, LLC, a new Delaware limited liability company created to hold the Facility assets (Transferee or LJ2B). The parent company, Avangrid Power, LLC (Avangrid), will remain the same.

## 1.2 Procedural History

The Facility was originally permitted as the Leaning Juniper II Wind Power Facility in 2007. Since the issuance of the original site certificate, there have been three amendments:

- Amendment 1 – On November 20, 2009, the Oregon Energy Facility Siting Council (Council) approved a request by the Certificate Holder to expand the Site Boundary, adding approximately 7,962 acres to the site and authorizing the construction and operation of up to 84 wind turbines and related infrastructure with the new area (EFSC 2009).
- Amendment 2 – On June 21, 2013, Council approved a request by the Certificate Holder to divide the Leaning Juniper II facility into two separate facilities, Leaning Juniper IIA Wind Power Facility and Leaning Juniper IIB Wind Power Facility, each having an individual site certificate (EFSC 2013).
- Amendment 3 – On July 18, 2025, Council approved a request by the Certificate Holder to repower the Facility (EFSC 2025).

## 1.3 Amendment Required under OAR 345-027-0350

### *OAR 345-027-0350 Changes Requiring an Amendment*

*Except for changes allowed under OAR 345-027-0353, an amendment to a site certificate is required to:*

- (1) Transfer ownership of the facility or the certificate holder as described in OAR 345-027-0400;*

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Response: The Facility is owned and operated by Certificate Holder, a wholly-owned subsidiary of Avangrid. Avangrid plans to transfer and assign the Facility assets to the Transferee. LJ2B will become the new certificate holder for the Facility. There will be no change to the parent company.

## 2.0 Transfer of Site Certificate Pursuant to OAR 345-027-0400

*(1) For the purpose of this rule:*

*(a) A request for amendment to a site certificate to transfer the site certificate is required for a transaction that results in a change in the ownership, possession or control of the facility or the certificate holder.*

Response: Pursuant to OAR 345-027-0400(4), the Certificate Holder and LJ2B submit this RFA4 to transfer ownership of the Facility and the Site Certificate from the Certificate Holder to LJ2B. LJ2B will therefore be the “new owner” within the meaning of OAR 34500270400(1)(b).

*(b) “New owner” means the person or entity that will gain ownership, possession or control of the facility or the certificate holder.*

Response: As previously stated, Avangrid intends to transfer and assign all Facility assets to a LJ2B. Upon completion of this transfer, LJ2B shall assume the role of certificate holder for the Facility. This change in certificate holder will necessitate an amendment to the existing Site Certificate to reflect the new legal entity.

*(2) When the certificate holder has knowledge that a transaction that requires a transfer of the site certificate as described in section (1)(a) of this rule is or may be pending, the certificate holder must notify the Department. In the notice, the certificate holder must include the name and contact information of the new owner, and the date of the transfer of ownership. If possible, the certificate holder must notify the Department at least 60 days before the date of the transfer of ownership.*

Response: The Certificate Holder notified the Oregon Department of Energy of the pending transfer at a pre application meeting on December 11<sup>th</sup>, 2025 and by letter dated December 16<sup>th</sup>, 2025. A copy of the letter is provided as Attachment 1 to this RFA. The transfer of ownership is anticipated to occur in April 2026. This requirement has been met.

*(3) A transaction that would require a transfer of the site certificate as described in subsection (1)(a) of this rule does not terminate the transferor’s duties and obligations under the site certificate until the Council approves a request for amendment to transfer the site certificate and issues an amended site certificate. The new owner may not construct or operate the facility until an amended site certificate as described in section (10) of this rule or a temporary amended site certificate as described in section (11) of this rule becomes effective.*

Response: LJ2B and the Certificate Holder acknowledge that any transaction requiring the transfer of a site certificate does not relieve the transferor of its duties and obligations under the existing site certificate until EFSC formally approves the transfer request in RFA4.

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*(4) To request an amendment to transfer the site certificate, the new owner must submit a written request to the Department that includes the information described in OAR 345-022-0010 and OAR 345-022-0050, a certification that the new owner agrees to abide by all terms and conditions of the site certificate currently in effect and, if known, the expected date of the transaction. If applicable, the new owner must include in the request the information described in 345-024-0500(4)(b)(O)(iv).*

## **2.1 OAR 345-022-0010 (Organizational Expertise)**

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

Response: The Council previously and as recently as July 2025 found that the Certificate Holder complies with the Organizational Expertise Standard and has demonstrated an ability to construct, operate, and retire the Facility in compliance with Council standards and applicable Site Certificate Conditions as reviewed during RFA3.<sup>1,2</sup> Because the parent company remains the same, the Council may make a similar finding for LJ2B. The following addresses LJ2B's ability to meet OAR 345-022-0010(Organizational Expertise).

LJ2B, like Certificate Holder, relies upon Avangrid's significant previous experience in construction and operation of other renewable energy generation facilities, including numerous facilities in Oregon. Avangrid has operated in Oregon since 2001 and has a long history of working under the jurisdiction of the Council. Avangrid operates 8.6 gigawatts of utility scale wind and solar generation facilities, of which 2.2 megawatts are in Oregon. Avangrid is the parent company to several other Council-permitted facilities including, but not limited to, the Leaning Juniper IIA Wind Power Facility, Bakeoven Solar Project, Daybreak Solar Project, Montague Wind Power Facility, Pachwáywit Fields, and Golden Hills Wind Power Facility, each of which are in various stages of operation.

*(2) The Council may base its findings under section (1) on a rebuttable presumption that an applicant has organizational, managerial and technical expertise, if the applicant has an ISO*

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<sup>1</sup> Final Order on AMD3. LJF, July 2025.

<sup>2</sup> Third Amended Site Certificate for the Leaning Juniper IIB Wind Power Facility (LJIIB), July 2025

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*9000 or ISO 14000 certified program and proposes to design, construct and operate the facility according to that program.*

Response: Although Avangrid participate in the ISO programs, they are not relying on the ISO 9000 or ISO 14000 certified programs for the purposes of this request.

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

Response: LJ2B and the Certificate Holder request Council approve the transfer of ownership for the Facility assets from the Certificate Holder to LJ2B. No third party permits or approvals are required in connection with this RFA4.

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

Response: LJ2B and the Certificate Holder request Council approve the transfer of ownership for the Facility assets from the Certificate Holder to LJ2B. No third party permits or approvals are required in connection with this RFA4.

*(5) To assist the Council in determining whether the standard outlined in (1) through (4) has been met, the Applicant must submit:*

*(a) Information about the applicant and participating persons, including:*

*(A) The name and address of the applicant including all co-owners of the proposed facility, the name, mailing address, email address and telephone number of the contact person for the application, and if there is a contact person other than the applicant, the name, title, mailing address, email address and telephone number of that person;*

#### **Name and Address of Transferee**

Leaning Juniper 2B, LLC

2701 NW Vaughn Street, Suite 300

Portland, OR 97210

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## **Contact Information**

Anneke Solsby  
Permitting and Environmental  
Avangrid Power, LLC  
2701 NW Vaughn Street, Suite 300  
Portland, OR 97210  
Anneke.Solsby@avangrid.com  
503-758-2220

*(B) The contact name, mailing address, email address and telephone number of all participating persons, other than individuals, including but not limited to any parent corporation of the applicant, persons upon whom the applicant will rely for third-party permits or approvals related to the facility, and, if known, other persons upon whom the applicant will rely in meeting any facility standard adopted by the Council;*

## **Parent Company**

Avangrid Power, LLC  
2701 NW Vaughn Street, Suite 300  
Portland, OR 97210

## **Contact persons other than the Transferee:**

Elaine Albrich  
Partner, Davis Wright Tremaine LLP  
560 SW 10th Avenue, Suite 700, Portland, OR 97205  
P 503.778.5423 C 503.250.4429  
elainealbrich@dwt.com

*(C) If the applicant is a corporation:*

- (i) The full name, official designation, mailing address, email address and telephone number of the officer responsible for submitting the application;*
- (ii) The date and place of its incorporation;*
- (iii) A copy of its articles of incorporation and its authorization for submitting the application; and*
- (iv) In the case of a corporation not incorporated in Oregon, the name and address of the resident attorney-in-fact in this state and proof of registration to do business in Oregon;*

Response: LJ2B is not a corporation. Therefore, the above criteria are not applicable to the Facility.

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*(D) If the applicant is a wholly owned subsidiary of a company, corporation or other business entity, in addition to the information required by paragraph (C), the full name and business address of each of the applicant's full or partial owners;*

Response: LJ2B is a wholly-owned subsidiary of:

Avangrid Power, LLC  
2701 NW Vaughn Street, Suite 300  
Portland, OR 97210

*(E) If the applicant is an association of citizens, a joint venture or a partnership:*

- (i) The full name, official designation, mailing address, email address and telephone number of the person responsible for submitting the application;*
- (ii) The name, business address and telephone number of each person participating in the association, joint venture or partnership and the percentage interest held by each;*
- (iii) Proof of registration to do business in Oregon;*
- (iv) A copy of its articles of association, joint venture agreement or partnership agreement and a list of its members and their cities of residence; and*
- (v) If there are no articles of association, joint venture agreement or partnership agreement, the applicant must state that fact over the signature of each member;*

Response: LJ2B is not an association of citizens, a joint venture, or partnership.

*(F) If the applicant is a public or governmental entity:*

- (i) The full name, official designation, mailing address, email address and telephone number of the person responsible for submitting the application; and*
- (ii) Written authorization from the entity's governing body to submit an application;*

Response: LB2B is not a public or governmental entity.

*(G) If the applicant is an individual, the individual's mailing address, email address and telephone number; and*

Response: LJ2B is not an individual.

*(H) If the applicant is a limited liability company:*

Response: LJ2B is a limited liability company. The contact information for the Certificate Holder and LJ2B submitting RFA4 for the transfer request is:

Anneke Solsby  
Permitting and Environmental  
Avangrid Power, LLC  
2701 NW Vaughn Street, Suite 300

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Portland, OR 97210

Anneke.Solsby@avangrid.com

503-758-2220

*(i) The full name, official designation, mailing address, email address and telephone number of the officer responsible for submitting the application;*

Response: The Officer for LJ2B is:

Sara Parsons

Vice President – Organic Growth

2701 NW Vaughn Street, Suite 300

Portland, OR 97210

Cell: 503-830-5160

[Sara.Parsons@avangrid.com](mailto:Sara.Parsons@avangrid.com)

*(ii) The date and place of its formation;*

Response: LJ2B was formed with the Secretary of State of the State of Delaware on September 5, 2025.

*(iii) A copy of its articles of organization and its authorization for submitting the application; and*

Response: A copy of the Articles of Incorporation are included as Attachment 2. The LLC registration to do business in Oregon are provided in Attachment 3.

*(iv) In the case of a limited liability company not registered in Oregon, the name and address of the resident attorney-in-fact in this state and proof of registration to do business in Oregon.*

Response: LJ2B is registered in Oregon; therefore, information for the resident attorney-in-fact is not required.

*(b) Information about the organizational expertise of the applicant to construct and operate the proposed facility, including:*

*(A) The applicant's previous experience, if any, in constructing and operating similar facilities;*

Response: LJ2B, like the Certificate Holder, will rely upon Avangrid's significant previous experience in construction and operation of other renewable energy generation facilities, including numerous facilities in Oregon.

Avangrid has operated in Oregon since 2001 and has a long history of working under the jurisdiction of the Council. Avangrid operates 8.6 gigawatts of utility scale wind and solar generation facilities, of which 2.2 megawatts are in Oregon. Avangrid is the parent company to several other Council-permitted facilities including, but not limited to, the Leaning Juniper IIA Wind

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Power Facility, Bakeoven Solar Project, Daybreak Solar Project, Montague Wind Power Facility, Pachwáywit Fields, and Golden Hills Wind Power Facility, each of which are in various stages of operation.

*(B) The qualifications of the applicant's personnel who will be responsible for constructing and operating the facility, to the extent that the identities of such personnel are known when the application is submitted;*

Response: LJ2B is staffed through Avangrid, which has extensive experience in reliably and cost-effectively delivering renewable energy products. Avangrid has a diverse staff whose individual areas of focus include renewable development, sales, trading, engineering, construction, operations, and financing. As a result of this fundamental approach, Avangrid is able to bring a depth and breadth of experience to all phases of project development. Avangrid draws on the resources of its extensive wind and solar resource analysis, forecasting, site assessment, and permitting staff; its experience in energy development origination, trading, financing, and operations and maintenance (O&M); and its experience with stakeholder outreach to ensure efficient and inclusive project development.

*(C) The qualifications of any architect, engineer, major component vendor, or prime contractor upon whom the applicant will rely in constructing and operating the facility, to the extent that the identities of such persons are known when the application is submitted;*

Response: LJ2B, like the Certificate Holder will work with contractors experienced with the construction, operation, and maintenance of wind, solar, and battery-storage facilities. Selection criteria centers on qualified engineers, manufacturers, and contractors who are experienced in these industries.

*(D) The past performance of the applicant, including but not limited to the number and severity of any regulatory citations in constructing or operating a facility, type of equipment, or process similar to the proposed facility;*

Response: Regarding regulatory compliance, the Council may look to Avangrid as LJ2B's parent company. Avangrid has generally maintained compliance for over 20 years for its 11 existing facilities operating under EFSC Site Certificates in Oregon, and also maintains numerous operating energy facilities permitted at the county level. However, Avangrid's Golden Hills Wind Project was issued two notices by the Oregon Department of Environmental Quality (ODEQ) in 2021 related to erosion control during construction that were addressed promptly, with no enforcement actions or penalties. Additionally, Golden Hills initiated a self-investigation of potential impacts to farming operations due to construction activities at the facility for which no 4 Final Order on AMD2. LJF, June 2013, p. 13. 5 Second Amended Site Certificate for the Leaning Juniper IIB Wind Power Facility (LJIIIB), June 2013 Final Request for Amendment 3 for the Leaning Juniper IIB Wind Power Facility Leaning Juniper IIB Wind Power Facility 21 Request for Amendment 3 to Site Certificate notice of violation has been issued. Further, in 2023, the Department issued a letter to Avangrid's Montague Solar Facility requiring corrective actions for soil protection and a warning letter regarding water quality violations. These issues have been resolved by the Certificate Holder

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*(E) If the applicant has no previous experience in constructing or operating similar facilities and has not identified a prime contractor for construction or operation of the proposed facility, other evidence that the applicant can successfully construct and operate the proposed facility. The applicant may include, as evidence, a warranty that it will, through contracts, secure the necessary expertise;*

Response: L2B relies on its parent company and Avangrid has extensive experience..

*(F) If the applicant has an ISO 9000 or ISO 14000 certified program and proposes to design, construct and operate the facility according to that program, a description of the program; and*

Response: LJ2B relies on its parent company and Avangrid has ISO programs, but is not relying on those programs for the purposes of this RFA4.

*(G) If the applicant relies on mitigation to demonstrate compliance with any standards of Division 22 or 24 of this chapter, evidence that the applicant can successfully complete such proposed mitigation, including past experience with other projects and the qualifications and experience of personnel upon whom the applicant will rely, to the extent that the identities of such persons are known at the date of submittal.*

Response: LJ2B and the Certificate Holder do not rely on any mitigation for this RFA4 request.

*(c) Information about permits needed for construction and operation of the facility, including:*

*(A) Identification of all federal, state and local government permits related to the siting of the proposed facility, a legal citation of the statute, rule or ordinance governing each permit, and the name, mailing address, email address and telephone number of the agency or office responsible for each permit;*

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

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

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

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

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

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

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

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

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

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

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

Response: No permits are needed for this transfer.

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

Response: LJ2B will comply with the monitoring provisions of the Third Amended Site Certificate. Monitoring requirements are included in following Site Certificate Conditions:

- 87 The certificate holder shall conduct wildlife monitoring as described in the Wildlife Monitoring and Mitigation Plan that is incorporated in the Final Order on Amendment #3 Attachment E and as amended from time to time. [ AMD2, AMD3]
- 113 Soil Protection Condition 113 (PRE): Prior to the facility repower, the certificate holder shall collect the data described in Sections 1.1 and 1.2 of the Soil Monitoring Plan as provided in Final Order on Amendment F Attachment C. Results shall be reported to the Department.
- 117 Fish and Wildlife Habitat Condition 117 (PRE): Prior to the facility repower, the certificate holder shall finalize the Repower Revegetation and Noxious Weed Control Plan as provided in Final Order on Amendment 3 Attachment C, subject to approval by the Department. Finalization includes selection of seed mix, predisturbance data collection, selection and documentation of monitoring and reference sites and final review of success criteria, as described in the plan. [AMD3]

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

**OAR 345-022-0050** To issue a site certificate, the Council must find that:

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

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

*(2) To assist the Council in determining whether the standard outlined in (1) has been met, the Applicant must submit information about site restoration, providing evidence to support a finding by the Council as required by this rule. The applicant must include:*

- (a) The estimated useful life of the proposed facility;*
- (b) Specific actions and tasks to restore the site to a useful, non-hazardous condition;*
- (c) An estimate, in current dollars, of the total and unit costs of restoring the site to a useful, non-hazardous condition;*
- (d) A discussion and justification of the methods and assumptions used to estimate site restoration costs; and*
- (e) For facilities that might produce site contamination by hazardous materials, a proposed monitoring plan, such as periodic environmental site assessment and reporting, or an explanation why a monitoring plan is unnecessary.*

Response: The proposed RFA4 changes will not change the decommissioning tasks and actions previously reviewed by Council in RFA 3 and used to establish the approved decommissioning estimate facility, including for the Facility as repowered at \$10.33 million (Q1 2024 dollars). To ensure that LJ2B as the new certificate holder has the ability to restore the site to useful, nonhazardous condition, LJ2B will post an updated financial assurance in.

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

*(4) To assist the Council in determining whether the standard outlined in (3) has been met, the Applicant must submit information:*

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

*(A) An opinion or opinions from legal counsel stating that, to counsel's best knowledge, the applicant has the legal authority to construct and operate the facility without violating its bond indenture provisions, articles of incorporation, common stock covenants, or similar agreements;*

Response: An opinion of legal counsel is provided as Attachment 4.

*(B) The type and amount of the applicant's proposed bond or letter of credit to meet the requirements of OAR 345-022-0050; and*

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*(C) Evidence that the applicant has a reasonable likelihood of obtaining the proposed bond or letter of credit in the amount proposed in paragraph (B), before beginning construction of the facility.*

Response: A performance bond has been maintained for the Facility. Attachment 5 provides evidence that LJ2B has reasonable likelihood of obtaining a bond or letter of credit by relying on its parent company Avangrid.

*(b) A materials analysis, including:*

- (A) An inventory of substantial quantities of industrial materials flowing into and out of the proposed facility during construction and operation;*
- (B) The applicant's plans to manage hazardous substances during construction and operation, including measures to prevent and contain spills; and*
- (C) The applicant's plans to manage non-hazardous waste materials during construction and operation.*

Response: The transfer of the Site Certificate to LJ2B does not change Council previously imposed Conditions 7, 68, 69, 99, and 100, and to provide construction and operations conditions requirements to ensure that the new certificate holder can restore the site to a useful, nonhazardous condition in accordance with the Retirement and Financial Assurance standard, as summarized below:

Condition 7 requires that the certificate holder prevent the development of any conditions on site that would preclude restoration of the site to a useful, nonhazardous condition.

Condition 68 - The certificate holder shall handle any hazardous materials used on the site in a manner that protects public health, safety and the environment and shall comply with all applicable local, state and federal environmental laws and regulations.

Condition 69 - If a reportable 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 make sure 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.

Council previously imposed site certificate condition 99 which identifies requirements specific to the disposal of concrete waste, and condition 100 which outlines requirements for an operational waste management plan for employee training and more house-hold solid waste and recycled materials; both conditions continue to apply to the facility.

The Council previously found that the Facility could be adequately restored to a non-hazardous condition following permanent cessation of construction and operations in compliance with the Retirement and Financial Assurance Standard and Site Certificate Condition 101. Transferring the

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site certificate to a new LLC will not alter the methods of decommissioning the Facility that were described and approved when the Facility was originally permitted, and a full decommissioning plan will be prepared for Department review and approval prior to decommissioning the Facility in accordance with Site Certificate Condition 9.

Therefore, the Council may find that RF4 does not alter the basis for the Council's prior findings and that the Facility as modified would continue to meet the Retirement and Financial Assurance Standard.

*(5) The Department may require the new owner to submit a written statement from the current certificate holder, or a certified copy of an order or judgment of a court of competent jurisdiction, verifying the new owner's right, subject to the provisions of ORS Chapter 469 and the rules of this chapter, to possession or control of the site or the facility.*

Response: A written statement is provided in Attachment 6.

### **3.0 OAR 345-027-0360(1)(f)**

*OAR 345-027-0360(1)(f) A list of the names and mailing addresses of property owners, as described in this rule:*

*OAR 345-027-0360(1)(f)(A) The list must include all owners of record, as shown on the most recent property tax assessment roll, of property located:*

- (i) Within 100 feet of property which is the subject of the request for amendment, where the subject property is wholly or in part within an urban growth boundary;*
- (ii) Within 250 feet of property which is the subject of the request for amendment, where the subject property is outside an urban growth boundary and not within a farm or forest zone; or*
- (iii) Within 500 feet of property which is the subject of the request for amendment, where the subject property is within a farm or forest zone; and*

*OAR 345-027-0360(1)(f)(B) In addition to incorporating the list in the request for amendment, the applicant must submit the list to the Department in an electronic format acceptable to the Department.*

Response: OAR 345-027-0360(f) requires a request for amendment to provide a current list of the names and mailing addresses of property owners in the Site Boundary. This will be provided under a separate cover.

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## **4.0 Conclusion**

This RFA4 demonstrates transferring the Site Certificate from Certificate Holder to the new LLC, LJ2B, complies with all applicable laws and Council standards.

## **Attachment 1 – Notification of Transfer**



December 16, 2025

Ms. Sarah Esterson  
Senior Policy Advisor  
Oregon Department of Energy  
550 Capital Street NE, First Floor  
Salem, OR 97301

Dear Ms. Esterson,

The Leaning Juniper IIB Wind Power Facility (Facility) is owned and operated by Leaning Juniper Wind Power II, LLC (Certificate Holder), a wholly-owned subsidiary of Avangrid Power, LLC (Avangrid). Avangrid plans to transfer and assign the Facility assets into a new wholly-owned subsidiary limited liability company called Leaning Juniper 2B, LLC (LJ2B). LJ2B will become the new Certificate Holder for the Facility. There will be no change to the parent company.

This letter is to confirm notice, as communicated at the pre-application meeting on December 11, 2025, and required by OAR 345-027-0400(2), that such transfer and assignment is anticipated for April 2026. The Certificate Holder and LJ2B intend to submit a formal request for transfer by early January 2026. The contact information for LJ2B is as follows:

**Leaning Juniper 2B, LLC**  
**2701 NW Vaughn Street, Suite 300**  
**Portland, OR 97210**

Sincerely,

Signed by:

  
F073637EFB0E460...

Jeffrey Durocher  
Deputy General Counsel

## **Attachment 2 – Certification of Formation**

# Delaware

Page 1

The First State

*I, CHARUNI PATIBANDA-SANCHEZ, SECRETARY OF STATE OF THE  
STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND  
CORRECT COPY OF THE CERTIFICATE OF FORMATION OF "LEANING  
JUNIPER 2B, LLC", FILED IN THIS OFFICE ON THE FIFTH DAY OF  
SEPTEMBER, A.D. 2025, AT 5:11 O'CLOCK P.M.*



*C. J. Sanchez*

Charuni Patibanda-Sanchez, Secretary of State

10323094 8100  
SR# 20253894024

You may verify this certificate online at [corp.delaware.gov/authver.shtml](http://corp.delaware.gov/authver.shtml)

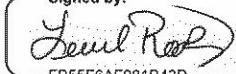
Authentication: 204683065  
Date: 09-08-25

STATE OF DELAWARE  
CERTIFICATE OF FORMATION  
OF LIMITED LIABILITY COMPANY

The undersigned authorized person, desiring to form a limited liability company pursuant to the Limited Liability Company Act of the State of Delaware, hereby certifies as follows:

1. The name of the limited liability company is Leaning Juniper 2B, LLC  
\_\_\_\_\_.

2. The Registered Office of the limited liability company in the State of Delaware is located at 251 Little Falls Drive (street), in the City of Wilmington, Zip Code 19808. The name of the Registered Agent at such address upon whom process against this limited liability company may be served is Corporation Service Company  
\_\_\_\_\_.

Signed by:  
By:   
FB66F6AF091B43D  
Authorized Person

Name: Leonard Rodriguez, Authorized Person  
Print or Type

# **Attachment 3 – Oregon Registration of Applicant**

# APPLICATION FOR AUTHORITY



Corporation Division  
[sos.oregon.gov/business](http://sos.oregon.gov/business)

E-FILED  
Dec 23, 2025  
OREGON SECRETARY OF STATE

**REGISTRY NUMBER**

250645695

**TYPE**

FOREIGN LIMITED LIABILITY COMPANY

**1. ENTITY NAME**

LEANING JUNIPER 2B, LLC

**2. MAILING ADDRESS**

2701 NW VAUGHN ST STE 300  
PORTLAND OR 97210 USA

**3. NAME & ADDRESS OF REGISTERED AGENT**

15872088 - CORPORATION SERVICE COMPANY  
  
1127 BROADWAY ST NE STE 310  
SALEM OR 97301 USA

**4. MANAGEMENT**

This Limited Liability Company will be member-managed by one or more members

**5. DATE OF ORGANIZATION**

09-05-2025

**6. DURATION**

PERPETUAL

**7. JURISDICTION**

DE

**8. PRIMARY PHYSICAL LOCATION**

2701 NW VAUGHN ST STE 300  
PORTLAND OR 97210 USA



---

I declare, under penalty of perjury, that this document does not fraudulently conceal, fraudulently obscure, fraudulently alter or otherwise misrepresent the identity of the person or any officers, managers, members or agents of the limited liability company on behalf of which the person signs. This filing has been examined by me and is, to the best of my knowledge and belief, true, correct, and complete. Making false statements in this document is against the law and may be penalized by fines, imprisonment, or both.

By typing my name in the electronic signature field, I am agreeing to conduct business electronically with the State of Oregon. I understand that transactions and/or signatures in records may not be denied legal effect solely because they are conducted, executed, or prepared in electronic form and that if a law requires a record or signature to be in writing, an electronic record or signature satisfies that requirement.

**ELECTRONIC SIGNATURE**

**NAME**

LEONARD RODRIGUEZ

**TITLE**

AUTHORIZED SIGNATORY

**DATE**

12-22-2025

## **Attachment 4 – Legal Opinion**



December 16, 2025

Ms. Sarah Esterson  
Senior Policy Advisor  
Oregon Department of Energy  
550 Capital Street NE, First Floor  
Salem, OR 97301

Dear Ms. Esterson:

I am Deputy General Counsel for Avangrid Power, LLC, a Delaware limited liability company, and also represent and act as counsel to its affiliate, Leaning Juniper 2B, LLC, a Delaware limited liability company ("LJ2B"). I have examined originals or copies certified or otherwise identified to my satisfaction as the books and records of LJ2B and such other documents, limited liability company records, certificates of public officials and other instruments regarding LJ2B as I have deemed necessary and appropriate for the purposes of this opinion letter.

In rendering this opinion expressed below, I have assumed (i) the authenticity of all the documents submitted to me as originals and (ii) the conformity to original documents of all documents submitted to me as copies. As to factual matters, I have relied to the extent deemed proper upon statements and certification of officers and managers of LJ2B.

Based on the foregoing, to the best of my knowledge, I am of the opinion that, subject to LJ2B satisfying all applicable federal, state and local laws (including all rules and regulations promulgated thereunder), LJ2B has the legal authority to construct, operate and repower the existing Leaning Juniper IIB Wind Power Facility ("Facility") without violating its articles of organization, covenants or similar agreements.

I am a member of the bar of the state of Oregon and other jurisdictions. For the purposes of this opinion, I do not hold myself out as an expert in, and do not express any opinion with respect to the law of any jurisdiction other than the law of the state of Oregon. The foregoing opinion is limited solely to whether LJ2B has the authority under its operating agreements to construct, own, operate, and repower the Facility. I express no opinion as to the applicability of any federal, state or local laws (including all rules and regulations promulgated thereunder) to such construction and operation or as to the effects of the foregoing laws on such construction, operation, and repower.

Please contact me if you have any additional questions regarding this matter.

Sincerely,

Signed by:

  
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Jeffrey Durocher

## **Attachment 5 - Evidence of Obtaining Bond or Letter of Credit**



December 16th, 2025

Ms. Sarah T. Esterson  
Energy Facility Siting Office  
Oregon Department of Energy  
550 Capitol St. NE, 1<sup>st</sup> Floor  
Salem, OR 97301-3742

**RE: Avangrid Power, LLC**

RE: Leaning Juniper 2B, LLC

Dear Ms. Esterson:

Avangrid Power, LLC is a highly regarded and valued client of Aon Risk Services and Liberty Mutual Insurance Company. Liberty Mutual Insurance Company (hereinafter, Liberty Mutual) is privileged to act as surety for Avangrid Power, LLC. Our surety relationship and experience with Avangrid Power, LLC has been superior in all respects and is qualified for issuance of a single bond in the amount of \$20,000,000 with an aggregate capacity of \$350,000,000.

Liberty Mutual is a national provider of surety bonds, enjoying an “Excellent” A.M. Best rating of “A”. Liberty Mutual is listed in the Federal Register as a surety acceptable on government projects.

If Avangrid Power, LLC is selected for any project, and we receive a request from them to provide decommissioning bonds, we are prepared to look favorably upon issuance of these bonds. Such pre-qualification and approval would be conditioned upon applicable underwriting procedures, which are routine at the time of the bond request. However, please understand that the surety assumes no liability to you or to third parties if for any reason we do not execute any required bonds.

Should you have any questions or comments, please feel free to contact our office.

Sincerely,

Liberty Mutual Insurance Company

Nathaniel Jakaitis, Attorney-In-Fact





## POWER OF ATTORNEY

Liberty Mutual Insurance Company  
The Ohio Casualty Insurance Company  
West American Insurance Company

Certificate No: 8214262-012022

**KNOWN ALL PERSONS BY THESE PRESENTS:** That The Ohio Casualty Insurance Company is a corporation duly organized under the laws of the State of New Hampshire, that Liberty Mutual Insurance Company is a corporation duly organized under the laws of the State of Massachusetts, and West American Insurance Company is a corporation duly organized under the laws of the State of Indiana (herein collectively called the "Companies"), pursuant to and by authority herein set forth, does hereby name, constitute and appoint, Bryan Huft; Jane Gilson; Jean Correia; Nathaniel Jakaitis; Theresan E. Rowedder

all of the city of Boston state of MA each individually if there be more than one named, its true and lawful attorney-in-fact to make, execute, seal, acknowledge and deliver, for and on its behalf as surety and as its act and deed, any and all undertakings, bonds, recognizances and other surety obligations, in pursuance of these presents and shall be as binding upon the Companies as if they have been duly signed by the president and attested by the secretary of the Companies in their own proper persons.

**IN WITNESS WHEREOF**, this Power of Attorney has been subscribed by an authorized officer or official of the Companies and the corporate seals of the Companies have been affixed thereto this 26th day of June, 2025.



Liberty Mutual Insurance Company  
The Ohio Casualty Insurance Company  
West American Insurance Company

Nathan J. Zangerle, Assistant Secretary

By:

State of PENNSYLVANIA ss  
County of MONTGOMERY

On this 26th day of June, 2025 before me personally appeared Nathan J. Zangerle, who acknowledged himself to be the Assistant Secretary of Liberty Mutual Insurance Company, The Ohio Casualty Company, and West American Insurance Company, and that he, as such, being authorized so to do, execute the foregoing instrument for the purposes therein contained by signing on behalf of the corporations by himself as a duly authorized officer.

**IN WITNESS WHEREOF**, I have hereunto subscribed my name and affixed my notarial seal at Plymouth Meeting, Pennsylvania, on the day and year first above written.



Commonwealth of Pennsylvania - Notary Seal  
Teresa Pastella, Notary Public  
Montgomery County  
My commission expires March 28, 2029  
Commission number 1126044  
Member, Pennsylvania Association of Notaries

  
Teresa Pastella, Notary Public

This Power of Attorney is made and executed pursuant to and by authority of the following By-laws and Authorizations of The Ohio Casualty Insurance Company, Liberty Mutual Insurance Company, and West American Insurance Company which resolutions are now in full force and effect reading as follows:

### ARTICLE IV – OFFICERS: Section 12. Power of Attorney.

Any officer or other official of the Corporation authorized for that purpose in writing by the Chairman or the President, and subject to such limitation as the Chairman or the President may prescribe, shall appoint such attorneys-in-fact, as may be necessary to act in behalf of the Corporation to make, execute, seal, acknowledge and deliver as surety any and all undertakings, bonds, recognizances and other surety obligations. Such attorneys-in-fact, subject to the limitations set forth in their respective powers of attorney, shall have full power to bind the Corporation by their signature and execution of any such instruments and to attach thereto the seal of the Corporation. When so executed, such instruments shall be as binding as if signed by the President and attested to by the Secretary. Any power or authority granted to any representative or attorney-in-fact under the provisions of this article may be revoked at any time by the Board, the Chairman, the President or by the officer or officers granting such power or authority.

### ARTICLE XIII – Execution of Contracts: Section 5. Surety Bonds and Undertakings.

Any officer of the Company authorized for that purpose in writing by the chairman or the president, and subject to such limitations as the chairman or the president may prescribe, shall appoint such attorneys-in-fact, as may be necessary to act in behalf of the Company to make, execute, seal, acknowledge and deliver as surety any and all undertakings, bonds, recognizances and other surety obligations. Such attorneys-in-fact subject to the limitations set forth in their respective powers of attorney, shall have full power to bind the Company by their signature and execution of any such instruments and to attach thereto the seal of the Company. When so executed such instruments shall be as binding as if signed by the president and attested by the secretary.

**Certificate of Designation** – The President of the Company, acting pursuant to the Bylaws of the Company, authorizes Nathan J. Zangerle, Assistant Secretary to appoint such attorneys-in-fact as may be necessary to act on behalf of the Company to make, execute, seal, acknowledge and deliver as surety any and all undertakings, bonds, recognizances and other surety obligations.

**Authorization** – By unanimous consent of the Company's Board of Directors, the Company consents that facsimile or mechanically reproduced signature of any assistant secretary of the Company, wherever appearing upon a certified copy of any power of attorney issued by the Company in connection with surety bonds, shall be valid and binding upon the Company with the same force and effect as though manually affixed.

I, Renee C. Llewellyn, the undersigned, Assistant Secretary, The Ohio Casualty Insurance Company, Liberty Mutual Insurance Company, and West American Insurance Company do hereby certify that the original power of attorney of which the foregoing is a full, true and correct copy of the Power of Attorney executed by said Companies, is in full force and effect and has not been revoked.

**IN TESTIMONY WHEREOF**, I have hereunto set my hand and affixed the seals of said Companies this 16th day of December, 2025.



By:

Renee C. Llewellyn, Assistant Secretary

## **Attachment 6 – Attestation Letter from Applicant**



December 16, 2025

Ms. Sarah Esterson  
Senior Policy Advisor  
Oregon Department of Energy  
550 Capital Street NE, First Floor  
Salem, OR 97301

Dear Ms. Esterson,

On behalf of Leaning Juniper 2B, LLC (LJ2B), this letter confirms LJ2B's commitment to comply with all applicable terms and conditions of the Third Amended Site Certificate for the Leaning Juniper IIB Wind Power Facility, when transferred per the Request for Transfer of the Leaning Juniper IIB Wind Power Facility (the "Facility") submitted by Leaning Juniper 2B, LLC and Leaning Juniper Wind Power II, LLC. LJ2B is an indirect, wholly owned subsidiary of Avangrid Power, LLC and there will be no change in the parent company.

Sincerely,

Signed by:

  
F073637EFB0E460...

Jeffrey Durocher  
Deputy General Counsel

