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Wildfire Prevention and Risk Mitigation Exhibit

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CONTENTS

APPENDICES

ABBREVIATIONS

BPA	Bonneville Power Administration
CWPP	Community Wildfire Protection Plan
EFSC	Energy Facility Siting Council
Facility	Solar photovoltaic power generation facility and related or supporting facilities in Wasco County, Oregon
kV	Kilovolt
MW	Megawatt
MWh	Megawatt-hour
NEC	National Electric Code
NFPA	National Fire Protection Association
NOAA	National Oceanic and Atmospheric Administration
OAR	Oregon Administrative Rules
ODOE	Oregon Department of Energy
OFC	Oregon Fire Code
UL	Underwriters Laboratories

1 INTRODUCTION

DECH bn, LLC (Applicant) plans to construct a solar photovoltaic power generation facility and related or supporting facilities in Wasco County, Oregon (Facility). The Facility will include up to 1,000 megawatts of solar capacity and a battery energy storage system (BESS) with up to 4,000 megawatt hours storage capacity. This Wildfire Prevention and Risk Mitigation Exhibit has been prepared to meet the requirements in OAR 345-022-0115.

1.1 Facility Overview

As described in more detail in the Background Information Exhibit, the Facility will consist of up to 1,000 MW of solar generation and include a BESS with a capacity of up to 1,000 MW. The Facility will interconnect via a short (i.e., approximately a half mile) generation tie (gen-tie) line to a newly proposed 500-kilovolt (kV) switchyard that will connect to the existing 500-kV Bonneville Power Administration (BPA) Marion-Buckley transmission line in the southern portion of the site boundary.

The Facility will have solar arrays (or blocks) consisting of solar modules, perimeter fencing, racking systems, posts/piles, and related electrical equipment (i.e., inverters and transformers). The modules will be connected in series to form rows or strings. The rows of modules will then be connected via combiners, cables, and switchboards. The strings of panels will be mounted on tracking systems separated by open space. The transformers will connect the generation output of the solar modules to the high-capacity 34.5-kV collector lines which will carry power to the proposed collector substation.

As described further in the Background Information Exhibit, the Facility is expected to use lithium-ion (Li-ion) batteries, which are non-toxic but do present a flammability hazard as they are susceptible to overheating and require cooling systems. The BESS will be designed and equipped with UL-compliant operation energy and safety management equipment, and integrated fire suppression systems designed to manage and prevent the risk of fire. In the unlikely event of a fire, the Facility equipment, systems, and operational procedures are designed so that fire does not propagate to surrounding batteries, cabinets, or neighboring areas.

The BESS will comply with all county and State codes and regulations related to health, fire, and safety at the time of project entitlement. Specifically, the 2022 Oregon Fire Code, Chapter 1207 applies to Stationary Electric Energy Storage Systems and addresses development standards for design, installation, commission, operation, maintenance, and decommissioning of these systems. These standards include National Fire Protection Association (NFPA) 70 – National Electric Code (NEC), NFPA 72 – National Alarm and Signaling Code, and NFPA 855 – Standard for the Installation of Stationary Energy Storage Systems. Code-related evaluations, such as the Hazard Mitigation Analysis, required per OFC-2022 Section 1207.1.4, and an Emergency Response Plan, required per National Fire Protection Association 855 will be developed and submitted to the appropriate authorities as part of the fire permitting effort.

Compliance will include fire and safety equipment requirements such as: fire department access, defensible space, and code required clearances for egress pathways, aisleways, and distances to property lines, fences, equipment, and other exposures to be approved by the fire code officials having authority over the Facility with established performance standards for approval, equipment, and system fire testing in accordance with nationally adopted UL standards, specifically UL 9540 – Energy Storage Systems and Equipment. UL standards are

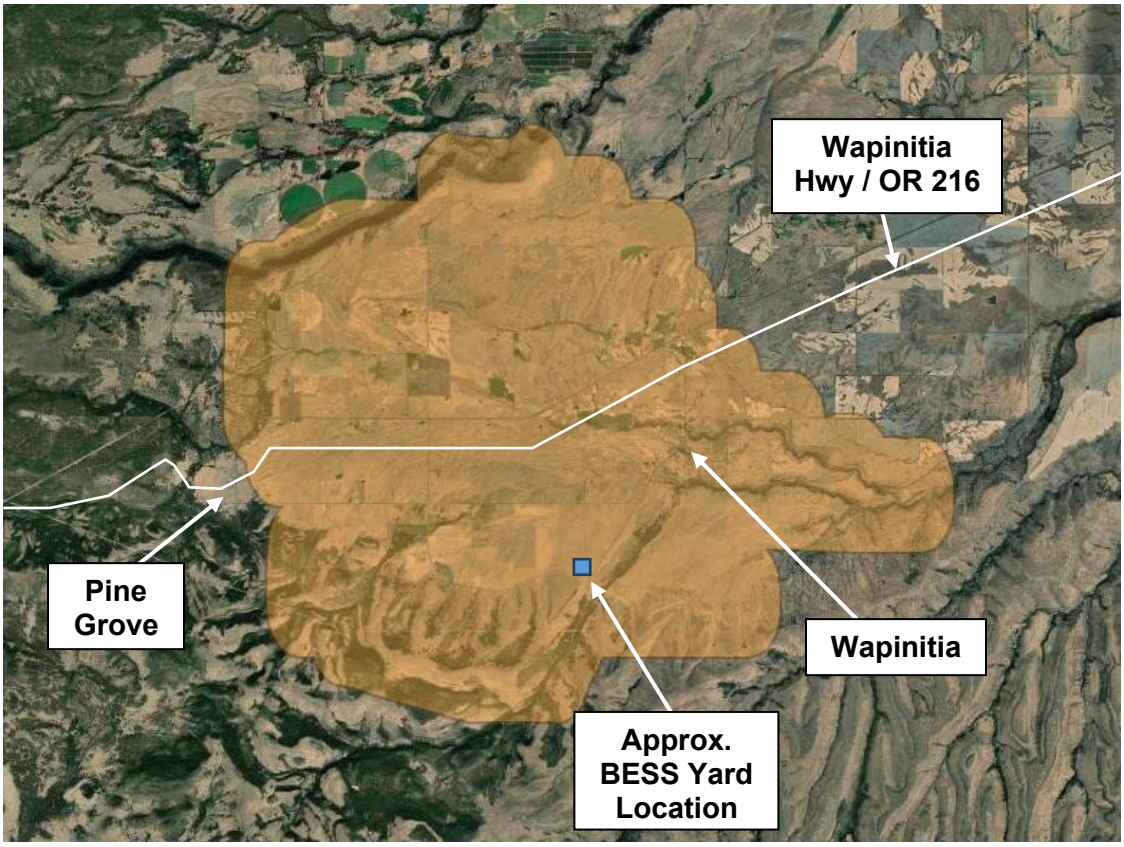
stringent for commissioning, operation and maintenance, on-going inspection and testing, decommissioning, seismic and structural design, signage, security installations, fire detection and suppression systems, vegetation control and appropriate setbacks from lot lines, roads, and adjacent buildings. Compliance with these advanced, nationally adopted standards is designed to ensure the site installation and operation of battery energy storage systems for operators, first responders and the neighboring communities are safe. As a result of implementing these advanced standards, BESS projects operate safety and efficiently throughout the United States.

1.2 Analysis Area and Wildfire Mapping

The analysis area for this exhibit is the site boundary plus a half mile. The mapping of wildfire risk and hazards includes this entire 24,491 acre analysis area.

The data sources for the wildfire mapping include the Oregon Community Wildfire Protection Plan (CWPP) Planning Tool, a resource managed by the Oregon Department of Forestry and the US Forest Service, the Oregon Wildfire Risk Explorer, and the Wasco County Community Wildfire Prevention Plan. Appendix A includes maps that show data within the analysis area relating to overall wildfire risk, slope, fuel models, burn probability, average flame length, and hazard to potential structures.

Figure 1.2 – Analysis Area



2 WILDFIRE RISK – OAR 345-022-0115(1)

The Applicant provides the following analysis to adequately characterize the overall wildfire risk within the analysis area through evaluation of baseline wildfire risk, seasonal wildfire risk, areas subject to a heightened risk of wildfire, and high fire consequence areas in the following sections.

2.1 Baseline Wildfire Risk

OAR 345-022-0115(1)(a)(A) Baseline wildfire risk, based on factors that are expected to remain fixed for multiple years, including but not limited to topography, vegetation, existing infrastructure, and climate;

Response: Wildfire risk is the combination of likelihood and intensity (together called "hazard") and exposure and susceptibility (together called "vulnerability"). The baseline wildfire risk is based upon factors that remain constant for long durations and is best quantified by the "Hazard to Potential Structures" data layer in the Oregon CWPP Planning Tool (see Appendix Figure A-1). The Hazard to Potential Structures refers to the potential hazard a wildfire could pose to existing or potential structures within a given area, based on the amount and type of flammable vegetation (burnable fuel) present in that location.

The baseline wildfire risk for the analysis area varies significantly. The analysis area is best characterized as having moderate (39 percent of analysis area) to low (39 percent of analysis and area) hazard to potential structures as summarized in the table below.

Table 2.1 - Hazard to Potential Structures

Hazard to Potential Structures	Acres of Analysis Area	Percent of Analysis Area	Acres of Micrositing Corridor	Percent of Micrositing Corridor
Very High (Top 5 percent)	884	4%	296	2%
High (80th - 95th percentile)	4,314	18%	2,277	18%
Moderate (50th - 80th percentile)	9,594	39%	5,686	45%
Low (up to the 50th percentile)	9,666	39%	4,261	34%
Non-Burnable	33	0%	13	<1%

2.1.1 Topography

The baseline wildfire risk data incorporates the topography, vegetation, infrastructure, and climate as noted below. Topography impacts wildfire risk by influencing how fires spread, with features like slope, aspect (direction a slope faces), elevation, and the presence of ridges and valleys acting as natural barriers or pathways for fire spread, ultimately determining the intensity and speed of a wildfire in a given area; steeper slopes and south-facing aspects generally increase fire risk, while features like valleys and streams can act as firebreaks depending on wind patterns.

The analysis area lies within the Juniper Flat west of Maupin, Oregon. Per CWPP planning tool data, the landscape is primarily flat (i.e., less than 25-degrees) with few slopes ranging between 25-degrees and 76-degrees. For more detailed slope descriptions, see the Structural Standard Exhibit. This exhibit shows that approximately 85% of the site has a

slope less than 15%, and approximately 75% of the site has a slope less than 5%. The steeper slopes primarily occur near the White River to the north of the site boundary. Some steeper slopes occur on the Laughlin Hills on the Facility's southern boundary as well as near Wapinitia Creek to the east of the Facility. See Appendix A, Figure A-1 for the topography in the analysis area. Slope angles are described in Table 2.1.1, below.

Table 2.1.1 - Slope Angles

Slope (degrees)	Acres of Analysis Area	Percent of Analysis Area	Acres of Micrositing Corridor	Percent of Micrositing Corridor
0 to 25[1]	23,999	98%	12,532	100%
25 to 50	490	2%	0	0%
50 to 76	2	<1%	0	0%

[1]Most of the slope within the analysis layer is significantly less than 25 degrees.

2.1.2 Vegetation

As discussed in the Fish and Wildlife Habitat Exhibit, most of the analysis area is comprised of grasses and shrubs. There are portions of the analysis area that contain timber understory and timber litter. The timber understory and timber litter vegetation areas occur primarily on the south and west boundaries of the Facility and continue towards the forested region of the Cascade mountains to the west. Grasses and shrubs continue to the east of the Facility. The vegetation types within the analysis area, as mapped by the Oregon CWPP planning tool, are listed in Table 2.1.2(a), below.

Wildfire behavior varies depending on the type of vegetation that is burning. Grass and shrub wildfires are quick-spreading and can cover a greater area in a shorter time frame. Additionally, grass and shrublands can recover from wildfire more quickly than wooded areas, increasing the chances of repeat burns. Timber wildfires move more slowly but burn with greater temperatures and intensity. However, wildfires in wooded areas can be beneficial to the ecosystem, while being harmful to nearby infrastructure. For this reason, overall fire risk in wooded areas is described by the Oregon CWPP planning tool as "benefit" for the ecological benefits a forest may see from wildfires occurring on a natural cycle such as increased soil fertility. See Appendix A, Figure A-3 for vegetation types in the analysis area.

For reference, the following vegetation descriptions have been copied out of the 2024 CWPP prepared by the Wasco County Planning Department:

> **Grasslands** - These areas can carry fire throughout different parts of the year, but extended periods of fire threat happen in the late spring through early fall. Historic fire frequency would have been less than 40 years, with lower fire intensities but usually causing replacement events. In places where these grasslands have burned more frequently, native species aren't able to fully repopulate the area and have become invaded by non-native species such as cheat grass. These non-native species can become cured out easily and may be susceptible to burning both hotter and more frequently than the area would have seen historically.
>
> **Shrub Land** - The main carrier of fire is typically grass but can also be carried by the brush depending on its continuity and density across the landscape. Historic fire

frequency would have generally ranged from 10 to 40 years. Fire intensity would have been mostly low intensity but would cause a replacement event.

Conifer Forests - Historic fire frequency was highly variable within this group, with fire return intervals in the 10-to-25-year range on relatively dry sites, and up to 300+ years at wetter sites. Fire of all intensities would have occurred historically, with intensity at any location driven by time since the previous fire and amount of fuel accumulation.

Table 2.1.2(a) - Vegetation Types based on CWPP Planning Tool Data

Vegetation Type (Fuel Model)	Acres of Analysis Area	Percent of the Analysis Area	Acres of Micrositing Corridor	Percent of Micrositing Corridor
Grass (101-104)	9,648	39%	5,100	41%
Grass/Shrub (121-123)	9,732	40%	6,035	48%
Shrub (141-147)	1,208	5%	524	4%
Timber Litter (181-189)	1,127	5%	106	<1%
Timber – Understory (161-163, 165)	1,545	6%	113	<1%
Non-Burnable – Other (91-93, 99)	1,214	5%	650	5%
Non-Burnable – Water (98)	16	<1%	4	<1%
Slash – Blowdown (202)	0	0%	0	0%

In addition to the CWPP Planning Tool data on vegetation, the Applicant conducted a site survey in 2024 and 2025 of vegetation within the micrositing corridor. The survey indicates a smaller portion of Grass/Shrub (Fuel models 121-123) vegetation and more Grass (Fuel models 101-104) vegetation than the CWPP Planning Tool data shows. Additionally, site survey acreage of Non-burnable (Fuel models 91-93, 98-99 [Note all non-burnable categories have been combined]), Shrub (Fuel models 141-147), and Timber – Litter (Fuel models 181-189) vegetation groups are all greater than that represented within the CWPP Planning Tool data for the micrositing corridor. The acreage of site survey recorded Timber – Understory (Fuel model 161-163, 165) within the micrositing corridor is less than that of the CWPP Planning Tool data. Table 2.1.2(b) table shows the difference in CWPP Planning Tool data and the 2024/2025 site survey data.

Table 2.1.2(b) – Vegetation Types – Site Survey data Compared to CWPP Data

Vegetation Type (Fuel Model)	Acres of Micrositing Corridor (Survey Data)	Percent of Micrositing Corridor (Survey Data)	Acres of Micrositing Corridor (CWPP)	Percent of Micrositing Corridor (CWPP)
Grass (101-104)	10,414.4	83%	5,101	41%
Grass/Shrub (121-123)	760.6	6%	6,036	48%
Shrub (141-147)	69.5	1%	655	5%
Timber Litter (181-189)	67.6	1%	524	4%
Timber – Understory (161-163, 165)	51.7	0%	106	1%
Non-Burnable (91-93, 98-99)	1,172.3	9%	113	1%
Slash – Blowdown (202)	0	0%	0	0%

The results of the 2024 and 2025 site survey indicate that the micrositing corridor is comprised of more Grass vegetation (Fuel models 101-104) and non-burnable areas than the CWPP Planning Tool data indicates. This survey result would indicate that in the event of a wildfire, the fire would likely burn with less intensity than displayed on the maps in Appendix A, which are based on the CWPP Planning Tool data. However, for a conservative approach for this Exhibit, the data from the CWPP Planning Tool is used for the figures in Appendix A.

2.1.3 Existing Infrastructure

Existing infrastructure within the analysis area includes state highways, local roads, electric transmission lines, residential structures, commercial structures, and agricultural structures including agricultural ditches.

The highway through the analysis area is Wapinitia Highway (OR 216). Local roads through the analysis area that may also act as firebreaks include Reservation Road, Walters Road, Back Walters Road, Victors Road, Claymier Lane, and Endersby Road.

There are three Bonneville Power Administration (BPA) transmission lines that cross over the analysis area, the 500-kV Marion-Buckley transmission line that crosses over the southern portion of the analysis area, the 500-kV John Day-Marion transmission line that crosses over the northern portion of the analysis area, and the 230-kV Jones Canyon-Santiam transmission line that crosses over the southeast portion of the analysis area.

There are sparse residential and agricultural structures throughout the analysis area with the greatest densities occurring in the communities of Pine Grove and Wapinitia.

2.1.4 Climate

The climate within the analysis area is categorized as Csa-Mediterranean on the Köppen-Geiger climate classification. This climate category is described as mild with dry, hot summers. The warmest month has an average temperature warmer than 72°F, at least four months have an average temperature greater than 50°F, there is a frost danger in winter, and the wettest winter months have at least three times as much precipitation as the driest summer month. Climate can increase wildfire risk by creating warmer, drier conditions, leading to longer fire seasons, more frequent wildfires, and increased severity of fires. Wasco County's wildfire season usually runs from mid-May through October. National Oceanic and Atmospheric Administration (NOAA) weather data from 1991 to 2020 from The Dalles, Oregon weather station located approximately 36 miles north of the Facility is summarized in Table 2.1.4 below

Table 2.1.4 - NOAA Climate Data (1991-2020)

Month	Avg. Max. Temp. (°F)	Avg. Temp. (°F)	Precipitation (in)
January	43	36	2.45
February	49.1	39.5	1.64
March	57.2	45.5	1.25
April	64.7	51.9	0.96
May	73.4	60.1	0.76
June	79.4	66.2	0.41
July	88.3	73.3	0.15
August	88.6	73	0.19
September	81	65	0.32
October	67.2	53.4	1.07
November	51.6	42.4	1.88
December	42.8	36.1	2.91
Average / Total	**65.5**	**53.5**	**13.99**

2.1.5 Burn Probability

Burn probability is defined by the CWPP Planning Tool as the annual likelihood that a wildfire greater than 250 acres will occur. Burn probability ranges from Low to Very High, with the likelihood of wildfire being a 1 in 10,000 (0.01%) chance of a wildfire greater than 250 acres in the Low category and a 1 in 50 (2%) chance of a wildfire greater than 250 acres for the Very High category. Non-burnable areas are also included in the analysis and indicated as "0" on Figure A-4 in Appendix A. Note that burn probability considers likelihood, but does not consider other factors such as infrastructure, slope, etc. that contribute to overall hazard.

Construction of Facility will likely decrease burn probability due to removal of vegetation for the construction of graveled areas for equipment placement and vegetation management practices done in accordance with the Wildfire Mitigation Plan. Table 2.1.5 shows burn probability for baseline conditions, not accounting for removal of vegetation for Facility construction.

Table 2.1.5 - Burn Probability – Baseline Conditions

Burn Probability	Acres of Analysis Area	Percent of Analysis Area	Acres of Micrositing Corridor	Percent of Micrositing Corridor
Non-burnable "0"	1,236	5%	659	5%
Low / Low-Moderate	0	0%	0	0%
Moderate / High-Moderate	6	0%	6	<1%
High / Very High	20,466	84%	11,559	92%
Very High	2,784	11%	308	2%

2.2 Seasonal Wildfire Risk

OAR 345-022-0115(1)(a)(B) Seasonal wildfire risk, based on factors that are expected to remain fixed for multiple months but may be dynamic throughout the year, including but not limited to, cumulative precipitation and fuel moisture content.

Response: Seasonal fire risk is dynamic and impacted by seasonal precipitation. From the NOAA weather data, the summer months of July and August present the greatest seasonal wildfire risk, with the highest maximum and average temperatures and low precipitation levels, following a period of higher precipitation that may facilitate vegetation growth and increase the landscape's fuel load. See Table 2.1.4 above for monthly weather data.

2.2.1 Cumulative Precipitation

Precipitation decreases the likelihood of wildfire in various ways as it may extinguish any open flames, it wets surfaces and may prevent the ignition of a fire, and it cools the area, further decreasing the likelihood of fire. In addition to high temperatures, July and August have low precipitation levels and therefore have a higher wildfire risk than other months. These months also follow a period of higher precipitation that may facilitate vegetation growth and increase the landscape's fuel load. See Table 2.1.4 above for monthly weather data.

2.2.2 Fuel Moisture Content

Fuel moisture content depends greatly on regional weather history throughout the year, including variables such as snowpack, sunshine, temperature and wind. Different species of plants also retain moisture at different rates and have different burning characteristics. Fuel moisture content measurements may be made with fuel moisture meters or scales by testing or weighing pre-manufactured, standardized "fuel moisture sticks". These fuel moisture sticks are standardized to be made of ponderosa pine and have standard dimensions and oven-dried weights and may be placed among vegetation until a moisture content equilibrium is reached with the surrounding vegetation at which point the moisture content measurement may be made. For prescribed burns, target moisture content is

generally between 8 and 17 percent. Below 8% moisture content, fires may be intense and erratic depending on vegetation type, wind, and topography.[1]

To simplify this analysis, it is assumed that the fuel moisture content trends with recent precipitation levels. As precipitation levels decrease, the moisture content within vegetation decreases. Decreased fuel moisture content then results in a greater wildfire risk by increasing the fuel load's flammability. This further identifies July and August as the two months of highest wildfire risk due to the high average temperatures (88.3°F and 88.6°F) and low levels of precipitation (0.15 inches and 0.19 inches) during these months, as shown in Table 2.1.4 of this document.

While fuel moisture content is dynamic and can fluctuate with weather conditions, the fuel model groups discussed in Section 2.1.2 of this document take into consideration typical fuel moisture content of the fuel models. As such, the maps in Appendix A are created with consideration of the fuel moisture content of the fuel models.

Note that while July and August are expected to be the months with the lowest fuel moisture content on average, fuel moisture content may be of concern at any time of year. The National Weather Service issues "Red Flag Warnings" when conditions are expected to be conducive to wildfires due to high temperatures and winds, and low humidity.

2.2.3 Flame Length

The fuel moisture content contributes to wildfire intensity, which can be described with flame length. Figure A-5 in Appendix A displays average flame lengths from the CWPP Planning Tool, with most of the analysis area displaying Moderate intensity flame length. Modeled flame lengths within the analysis area are listed in Table 2.2.3 below.

Table 2.2.3 – Average Flame Length

Flame Length (feet)	Acres of Analysis Area	Percent of Analysis Area	Acres of Micrositing Corridor	Percent of Micrositing Corridor
Non-burnable (0)	1,236	5%	659	5%
>0 to 4	3,325	14%	1,288	10%
4 to 8	18,089	74%	10,166	81%
8 to 11	976	4%	357	3%
>11	864	4%	62	0%

A description of each of these flame lengths is described below:

- >0 to 4 feet - Low intensity. Expected to be low to moderately difficult to control.
- 4 to 8 feet - Moderate intensity. Moderately to highly difficult to control. Fires are too intense to work at the front of the flame.
- 8 to 11 feet - High intensity. Highly to extremely difficult to control. Additional fires may ignite away from the main fire as ember travel is increased.

[1] *https://www.fs.usda.gov/t-d/pubs/htmlpubs/htm05512347/index.htm*

- Over 11 feet - Extreme intensity - Extremely difficult to control. Major fire movement and ember travel.

Note that the flame lengths shown in Figure A-5 are an average, and flame lengths may vary depending on current conditions, especially winds.

2.3 Areas Subject to a Heightened Risk of Wildfire

OAR 345-022-0115(1)(a)(C) Areas subject to a heightened risk of wildfire, based on the information provided under paragraphs (A) and (B) of this subsection;

Response: Areas subject to a heightened risk of wildfire are areas that present a combination of hazards, including slope, fuel models, and infrastructure. Due to the entire analysis area containing similar topography and being within 40 miles (standard radio forecast broadcasting radius) of the weather station where climate data was obtained, it is assumed that the analysis area experiences equivalent climate and weather (i.e. one portion does not receive substantially more rainfall than another). Climate parameters are therefore excluded in the analysis of areas subject to heightened risk of wildfire.

The "Overall Fire Risk" data layer shown in Appendix Figure A-6 shows the baseline likelihood and consequence of wildfire on all mapped highly valued assets. Essentially, this data layer shows the combined effects of CMPP tool mapped vegetation types, hazard to potential structures, and burn probability. Information on these three topics is discussed in Sections 2.1.2, 2.1.3, 2.1.5, respectively. Maps of these data types may be found in Appendix A.

For this analysis, a fast-spreading wildfire that has the potential to reach more infrastructure (homes) is determined as the worst-case scenario. The factors that increase wildfire spread rate are steep topography (>25-degrees) and vegetation (grasses and shrubs).

Analyzing the slope, fuel model, and infrastructure data from the Oregon CWPP Planning Tool for the analysis area, indicates that the infrastructure along the Wapinitia Highway (OR 216) corridor is at the highest risk of damage due to wildfire. This area runs east-west approximately through the center of the analysis area and is approximately 1.75 miles away from the BESS. The existing conditions, as mapped by the Oregon CWPP Planning Tool, show that the area is surrounded by quick-burning grasses and shrubs. The slope along this roadway is mostly flat, as there are only small portions of the analysis area that contain steep grades.

Further areas of higher risk are along the path of the electrical transmission lines as this critical infrastructure may be damaged during a wildfire.

2.4 High Fire Consequence Areas

OAR 345-022-0115(1)(a)(D) High-fire consequence areas, including but not limited to areas containing residences, critical infrastructure, recreation opportunities, timber and agricultural resources, and fire-sensitive wildlife habitat; and

Response: The CWPP "Overall Potential Impact" layer was used to identify high-fire consequence areas. Note that this data is limited to the presence or absence of high value assets and does not include the risk associated with fire ignition, spread, or intensity.

The CWPP Planning Tool defines "Overall Potential Impact" as the consequence of wildfire, if it occurs, on all mapped highly valued assets and resources combined: critical infrastructure, developed recreation, housing unit density, seed orchards, sawmills, historic structures, timber, municipal watersheds, vegetation condition, and terrestrial and aquatic wildlife habitat. Overall wildfire risk is described in Table 2.4, below.

Table 2.4 – Overall Wildfire Risk

Overall Risk	Acres of Analysis Area	Percent of Analysis Area	Acres of Micrositing Corridor	Percent of Micrositing Corridor
Very High (Top 5%)	1,807	7%	1,332	11%
High (80-95th percentile)	1,338	5%	281	2%
Moderate (50-80th percentile)	571	2%	50	0%
Low (29-50th percentile)	294	1%	32	0%
Low Benefit (14.5-29th percentile)	1,692	7%	66	1%
Benefit (0-14.5th percentile)	1,827	7%	612	5%
No data[1]	16,963	69%	10,161	81%

[1]There are no mapped highly valued assets, which combined, include critical infrastructure, developed recreation, housing unit density, seed orchards, sawmills, historic structures, timber, municipal watersheds, vegetation condition, and terrestrial and aquatic wildlife habitat (CWPP 2022).

2.4.1 Residential Areas

The residential areas mentioned in Section 2.3 along the Wapinitia Highway (OR 216) corridor are high-consequence fire areas. The greatest concentration of residences is in the community of Pine Grove, followed by the community of Wapinitia.

2.4.2 Critical Infrastructure

Critical infrastructure is any infrastructure that is vital for the health and wellbeing of day-to-day life. Types of critical infrastructure within the analysis area include the transportation infrastructure, energy infrastructure, and emergency services. The specific components of these types of infrastructure within the analysis area are listed below.

- Transportation
  - Wapinitia Highway (OR 216)
  - Reservation Road
  - Walters Road
  - Back Walters Road
  - Victors Road
  - Claymier Lane
  - Endersby Road
- Energy

    - Marion-Buckley transmission line
    - John Day-Marion transmission line
    - Jones Canyon-Santiam transmission line
- Emergency Services
    - Juniper Flat Fire Station #1
    - Juniper Flat Fire Station #3

2.4.3 Recreation Areas

Recreation areas located within the analysis area include:

- Lower White River Wilderness Area

The overall fire risk within this wilderness area includes all ranges between "very high" and "benefit". It is therefore determined that this area qualifies as a high consequence area due to the presence of vegetation that would be adversely affected by wildfire, resulting in ecosystem degradation and potential reductions in recreation enjoyment.

2.4.4 Timber and Agricultural Resources

Based on data from the Oregon CWPP Planning Tool, risk for timber and agricultural resources is considered equivalent to the baseline fire risk described in Section 2.1.

2.4.5 Fire-Sensitive Wildlife Habitat

When analyzing the Overall Fire Risk map, the highest risk areas that are not infrastructure related are within the White River corridor to the north of the Facility. This river corridor contains the Lower White River Wilderness Area and wildfire in this river canyon may have harmful effects on terrestrial and aquatic life.

2.5 Wildfire Hazard

The passage of Senate Bill 83 repealed a previously published map of wildfire hazard that displayed wildfire hazard in 3 categories: low, moderate, and high. The wildfire hazard was defined as "potential for wildfire to damage a structure" and therefore indicated potential consequence levels. This map is no longer available through the state of Oregon. Potential consequences can be seen in Appendix A with figures A-1 'Hazard to Potential Structures', and A-5 'Average Flame Length'. The potential consequences combined with likelihood (see Figure A-4 'Burn Probability') result in the overall fire risk.

The average hazard to potential structures throughout the analysis area is low to moderate. The average flame lengths throughout the analysis area are low to moderate intensity. Together, the average hazard would be described as low to moderate.

While the likelihood, or average burn probability, is high to very high throughout the analysis area, the hazard, or consequence, is low to moderate. Together, these result in a moderate wildfire risk for the analysis area as seen in figure A-6.

3 DATA SOURCES AND METHODS

OAR 345-022-0115(1)(a)(E) All data sources and methods used to model and identify risks and areas under paragraphs (A) through (D) of this subsection.

The data sources used in this analysis were the 2022 CWPP Planning Tool[2] and NOAA climate normal[3].

The CWPP Planning Tool creates maps using wildfire simulation modeling based off spatial datasets that include climate, weather, topography and vegetation. The CWPP Planning Tool utilizes weather data collected from automated weather stations in Oregon. Climate and weather data referenced in this exhibit is also from automated weather stations.

4 WILDFIRE MITIGATION

OAR 345-022-0115(1)(b) That the proposed facility will be designed, constructed, and operated in compliance with a Wildfire Mitigation Plan approved by the Council. The Wildfire Mitigation Plan must, at a minimum,

(A) Identify areas within the site boundary that are subject to a heightened risk of wildfire, using current data from reputable sources, and discuss data and methods used in the analysis;

The Wildfire Mitigation Plans for Construction and Operation, provided as Appendix B, include a map as Attachment A, which shows the Overall Fire Risk within the Facility site boundary and the surrounding area. This map was developed using CWPP Planning Tool data as described in more detail above, in Section 2.3. Attachment (Appendix B).

(B) Describe the procedures, standards, and time frames that the applicant will use to inspect facility components and manage vegetation in the areas identified under subsection (a) of this section;

To mitigate wildfire risk during Facility construction and operation, vegetation will be managed according to the Vegetation and Soil Management Plan for construction and operation provided as Attachments 2 and 3 of the Soil Protection Standard Exhibit. Vegetation near, at, or taller than 10 to 12 inches high will be removed or mowed. Mowing will be done in advance of fire season or in accordance with any fire restrictions. Vegetation will be maintained so it does not contact electrical equipment and any vegetation removed will be promptly disposed of off-Site, so it does not accumulate in burn piles. Service roads, defensible space along the fenced perimeter of the solar array blocks, the substation, BESS, and switchyard areas will be graveled. Vegetation will be inspected biannually. These procedures are described in Section 2.7 of the Construction and Operation Wildfire Mitigation Plan (Appendix B).

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[2] *https://tools.oregonexplorer.info/OE_HtmlViewer/index.html?viewer=wildfireplanning*

[3] *https://www.ncei.noaa.gov/access/us-climate-normals/#dataset=normals-monthly&timeframe=30&location=OR&station=USW00024230*

During Facility construction and operation, Facility components will be inspected quarterly for damage and wildfire risk, and one of those inspections will occur annually prior to wildfire season. These inspections will be recorded in a log as required by Section 2.8.2 of the Construction and Operation Wildfire Mitigation Plan. Additionally, during Facility operation, inspection and/or O&M staff will conduct regular inspections and maintenance. Attachment E of the Operation Wildfire Mitigation Plan is a checklist of inspection and maintenance tasks which will be used to demonstrate compliance with the Wildfire Mitigation Plan and to determine if changes to that plan are needed.

(C) Identify preventative actions and programs that the applicant will carry out to minimize the risk of facility components causing wildfire, including procedures that will be used to adjust operations during periods of heightened wildfire risk;

Preventative actions and programs to minimize the risk of Facility components causing wildfire include vegetation maintenance, regular inspections, and routine maintenance, as described above. Additionally, the Applicant will adjust construction activities and operations during periods of heightened wildfire risk. These adjustments will include restrictions on and/or additional monitoring for hot work activities, depending on the level of fire risk; requirements to add fire watch duties; restrictions on smoking; and restrictions on parking and driving, as detailed in Section 2.6 of the Wildfire Mitigation Plans (Appendix B).

(D) Identify procedures to minimize risks to public health and safety, the health and safety of responders, and damages to resources protected by Council standards in the event that a wildfire occurs at the facility site, regardless of ignition source; and

Preventative actions and programs to minimize the risk of Facility components causing wildfire include vegetation maintenance, regular inspections, routine maintenance, and restrictions during periods of heightened wildfire risk – as described above. These preventative actions and programs will minimize the risk of fire and will in turn minimize risks to public health and safety, the health and safety of responders, and damage to resources protected by Council standard in the event of a fire at the Facility. Additionally, interior access roads will be sufficiently wide to allow for fire apparatus access, fire suppression equipment will be stored on site and in vehicles conducting maintenance, and Facility components will be monitored 24 hours-a-day and 7 days-a-week by the SCADA system which will detect and alarm if a fire condition is detected to enable timely emergency response. The Facility will also have remote shutdown capabilities to isolate affected battery cells to prevent the spread of fire in the BESS. These prevention procedures are detailed in the Wildfire Mitigation Plans provided as Appendix B.

(E) Describe methods the applicant will use to ensure that updates of the plan incorporate best practices and emerging technologies to minimize and mitigate wildfire risk.

The Wildfire Mitigation Plans provided as Attachment B are considered evergreen documents which will be regularly reviewed and updated to incorporate best practices and emerging technologies to minimize and mitigate wildfire risk. The Applicant will review the Wildfire Mitigation Plan at least annually to determine if any plan updates are needed. Additional information about this review process, including standards for future review, is provided in Section 4 of the Wildfire Mitigation Plans. Additionally, the Applicant has shared the draft

Wildfire Mitigation Plans with the Juniper Flat Rural Fire Protection District to seek their feedback on the contents of the plans and will incorporate relevant feedback provided into the Wildfire Mitigation Plans prior to issuance of the final Application for Site Certificate. Additional information about engagement with Juniper Flat Rural Fire Protection District is provided in the Public Services Exhibit.

5 CONCLUSION

Based on the data from the Oregon CWPP Planning Tool that includes wildfire likelihood and consequence based on topography, vegetation, existing infrastructure, climate, cumulative precipitation, fuel moisture content, residential areas, critical infrastructure, recreation areas, timber and agricultural resources, and fire-sensitive wildlife habitat, the wildfire risk is considered to be moderate. Note that risk is defined as the combination of consequence and likelihood. While burn probability throughout the analysis area is high (average for any specific area in Wasco County per Wasco County's Community Wildfire Protection Plan), the flame intensities and hazards to potential structures are both considered low to medium. The combined effect of high probability with low to moderate consequence results in an overall moderate risk.

Construction of the Facility will increase hazard to potential Facility structures due to the presence of additional Facility infrastructure (e.g., the solar panels, substation and BESS) but will also increase the area of non-burnable surfaces, thus decreasing the burn probability from a vegetation standpoint. In addition to vegetation being removed, vegetation within the Facility will also be maintained to 10 to 12 inches in height, thus decreasing the vegetation fuel. Human activity and electrical equipment can increase burn probability, however, these factors are addressed through various programs and practices that are described in the Construction and Operation Wildfire Mitigation Plans, respectively. As a result, the overall wildfire risk of the analysis area is considered to remain moderate throughout the construction and operation of the Facility.

6 SUBMITTAL REQUIREMENTS AND APPROVAL STANDARDS

The Applicant has satisfied the standards for the Wildfire Prevention and Risk Mitigation Exhibit outlined in OAR 345-022-0115. Approval standards are summarized in Table 2.5.

Table 2.5 – Approval Standards

Requirement	Location
OAR 345-022-0115 Wildfire Prevention and Risk Mitigation	-
(1) To issue a site certificate, the Council must find, by way of supporting evidence from the applicant, that:	-
(a) The applicant has adequately characterized wildfire risk within the analysis area using current data from reputable sources, by identifying:	Section 2.0
(A) Baseline wildfire risk, based on factors that are expected to remain fixed for multiple years, including but	Section 2.1

not limited to topography, vegetation, existing infrastructure, and climate;	
(B) Seasonal wildfire risk, based on factors that are expected to remain fixed for multiple months but may be dynamic throughout the year, including but not limited to, cumulative precipitation and fuel moisture content;	Section 2.2
(C) Areas subject to a heightened risk of wildfire, based on the information provided under paragraphs (A) and (B) of this subsection;	Section 2.3
(D) High-fire consequence areas, including but not limited to areas containing residences, critical infrastructure, recreation opportunities, timber and agricultural resources, and fire-sensitive wildlife habitat; and	Section 2.4
(E) All data sources and methods used to model and identify risks and areas under paragraphs (A) through (D) of this subsection.	Section 3.0
(b) That the proposed facility will be designed, constructed, and operated in compliance with a Wildfire Mitigation Plan approved by the Council. The Wildfire Mitigation Plan must, at a minimum:	Section 4.0, and Appendix B
(A) Identify areas within the site boundary that are subject to a heightened risk of wildfire, using current data from reputable sources, and discuss data and methods used in the analysis;	Section 4.0, and Appendix B
(B) Describe the procedures, standards, and time frames that the applicant will use to inspect facility components and manage vegetation in the areas identified under subsection (a) of this section;	Section 4.0, and Appendix B
(C) Identify preventative actions and programs that the applicant will carry out to minimize the risk of facility components causing wildfire, including procedures that will be used to adjust operations during periods of heightened wildfire risk;	Section 4.0, and Appendix B
(D) Identify procedures to minimize risks to public health and safety, the health and safety of responders, and damages to resources protected by Council standards in the event that a wildfire occurs at the facility site, regardless of ignition source; and	Section 4.0, and Appendix B
(E) Describe methods the applicant will use to ensure that updates of the plan incorporate best practices and emerging technologies to minimize and mitigate wildfire risk.	Section 4.0, and Appendix B

(2) The Council may issue a site certificate without making the findings under section (1) if it finds that the facility is subject to a Wildfire Protection Plan that has been approved in compliance with OAR chapter 860, division 300.	Section 1.0
(3) This Standard does not apply to the review of any Application for Site Certificate or Request for Amendment that was determined to be complete under OAR 345-015-0190 or 345-027-0363 on or before the effective date of this rule.	Section 1.0

APPENDICES

Appendix A

OREGON CWPP PLANNING TOOL MAPS

LEGEND:

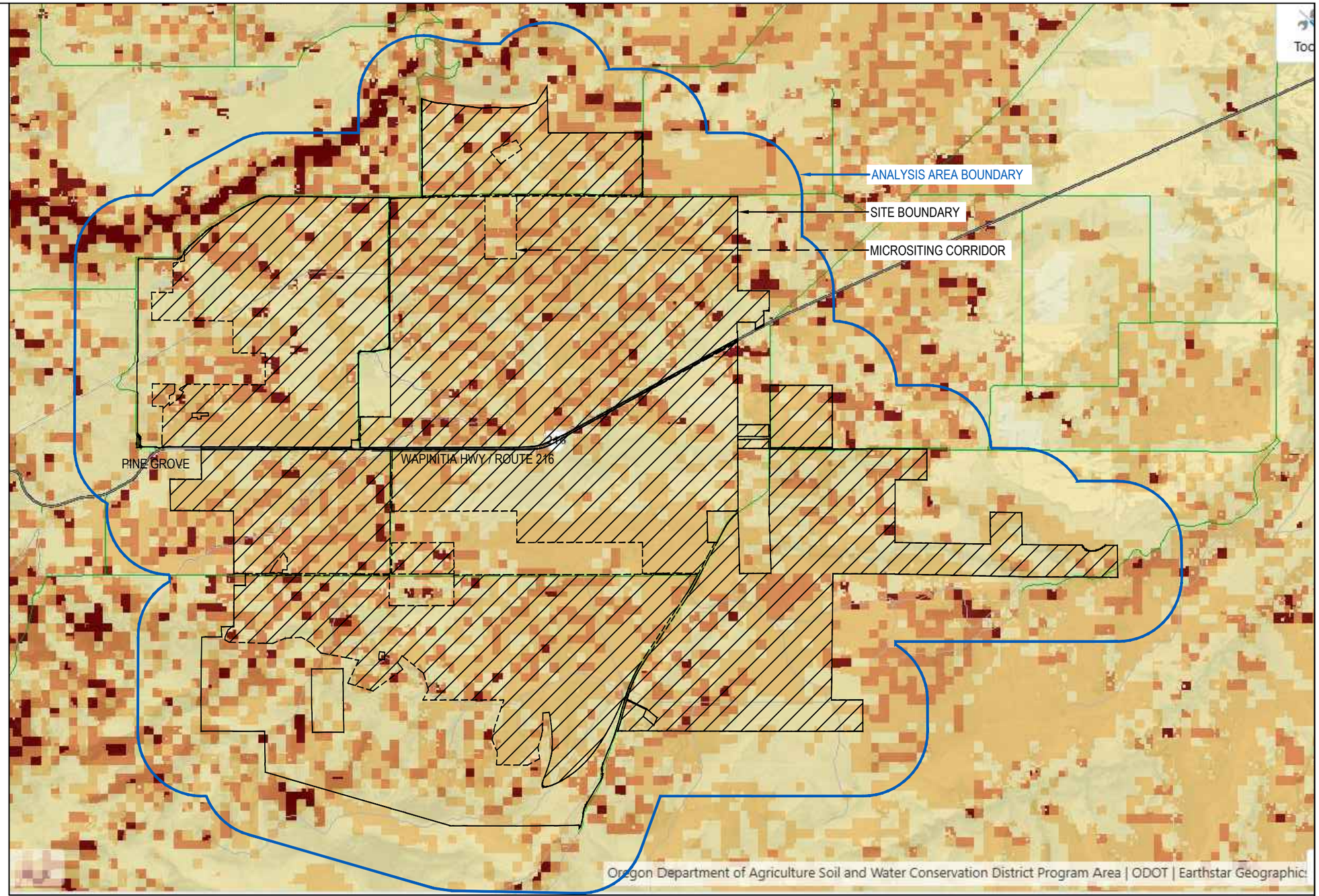
- VERY HIGH
- HIGH
- MODERATE
- LOW
- NON-BURNABLE / VERY LOW

FIGURE SUMMARY:

AVERAGE HAZARD TO POTENTIAL STRUCTURES THROUGHOUT THE ANALYSIS AREA IS CONSIDERED 'LOW' AND 'MODERATE'.

NOTES:

THE DATA DISPLAYED ON THIS FIGURE COMES FROM THE COMMUNITY WILDFIRE PREVENTION PLAN (CWPP) PLANNING TOOL.



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TITLE: HAZARD TO POTENTIAL STRUCTURES

PROJECT: DESCHUTES SOLAR AND BESS		LOCATION: WASCO COUNTY, OR
CLIENT: BRIGHTNIGHT		FIGURE NO: A-1
PROJ. NO.: 243075	DATE: NOVEMBER 2025	

LEGEND:

- 0-25 DEGREES
- 25-50 DEGREES
- 50-76 DEGREES

FIGURE SUMMARY:

THE ANALYSIS AREA IS MOSTLY FLAT.

NOTES:

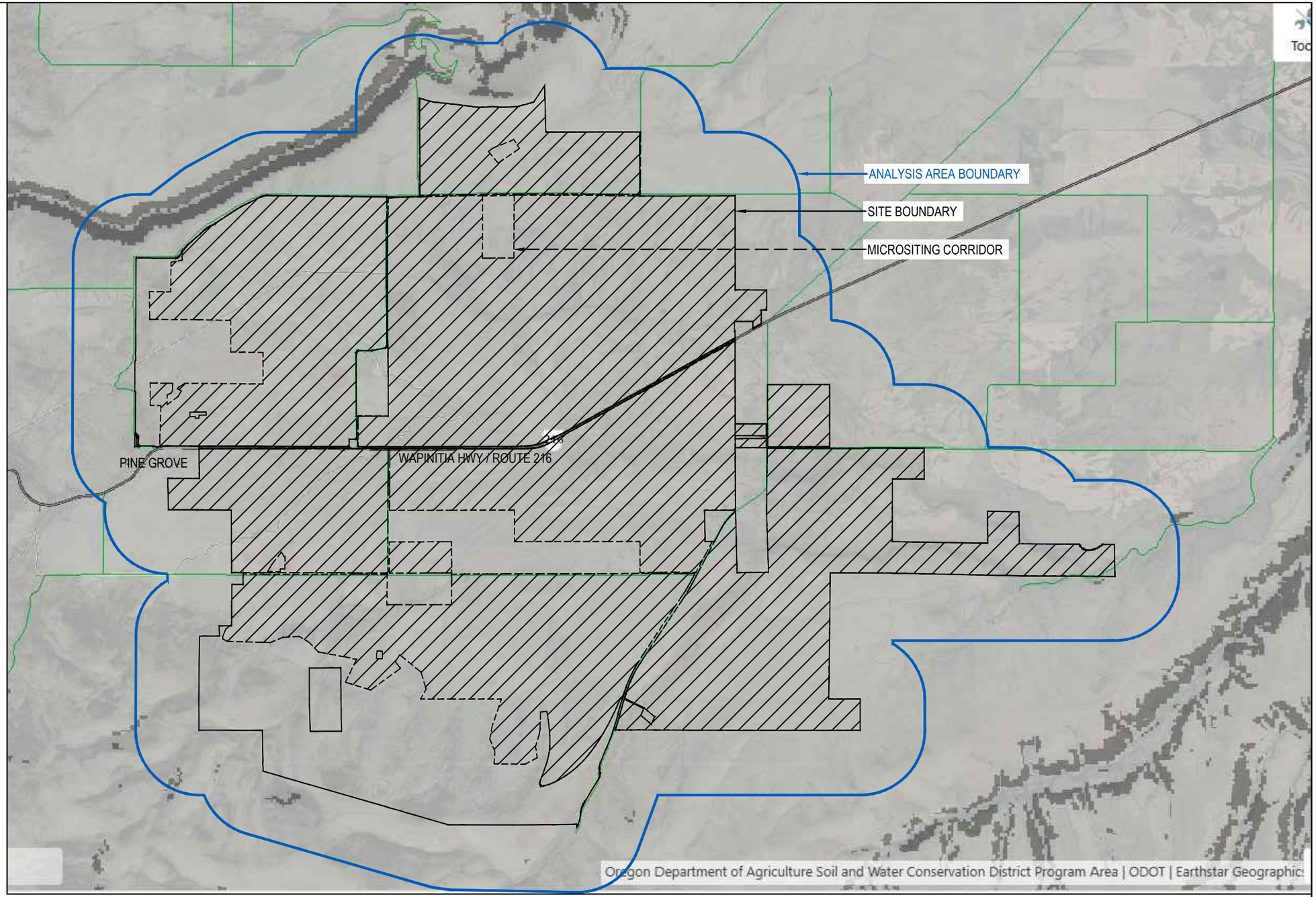
THE DATA DISPLAYED ON THIS FIGURE COMES FROM THE COMMUNITY WILDFIRE PREVENTION PLAN (CWPP) PLANNING TOOL.

THE CWPP PLANNING TOOL ONLY DISPLAYS SLOPES IN THE 3 CATEGORIES ABOVE AS DEGREE SLOPES. THE STRUCTURAL STANDARD EXHIBIT PROVIDES A MORE DETAILED DESCRIPTION OF SITE SLOPES IN SLOPE PERCENTAGES. IN SUMMARY, THE PERCENTAGE OF SITE ACREAGE COMPRISED OF THE FOLLOWING SLOPES ARE:

0% TO 5% SLOPE:	74.7%
5% TO 10% SLOPE:	6.7%
10% TO 15% SLOPE:	3.8%
GREATER THAN 15%:	14.7%
TOTAL:	99.9%*

*DOES NOT EQUAL 100% DUE TO ROUNDING

NORTH



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TITLE: SLOPE

PROJECT: DESCHUTES SOLAR AND BESS

LOCATION: WASCO COUNTY, OR

CLIENT: BRIGHTNIGHT

FIGURE NO: A-2

PROJ. NO.: 243075

DATE: NOVEMBER 2025

LEGEND:

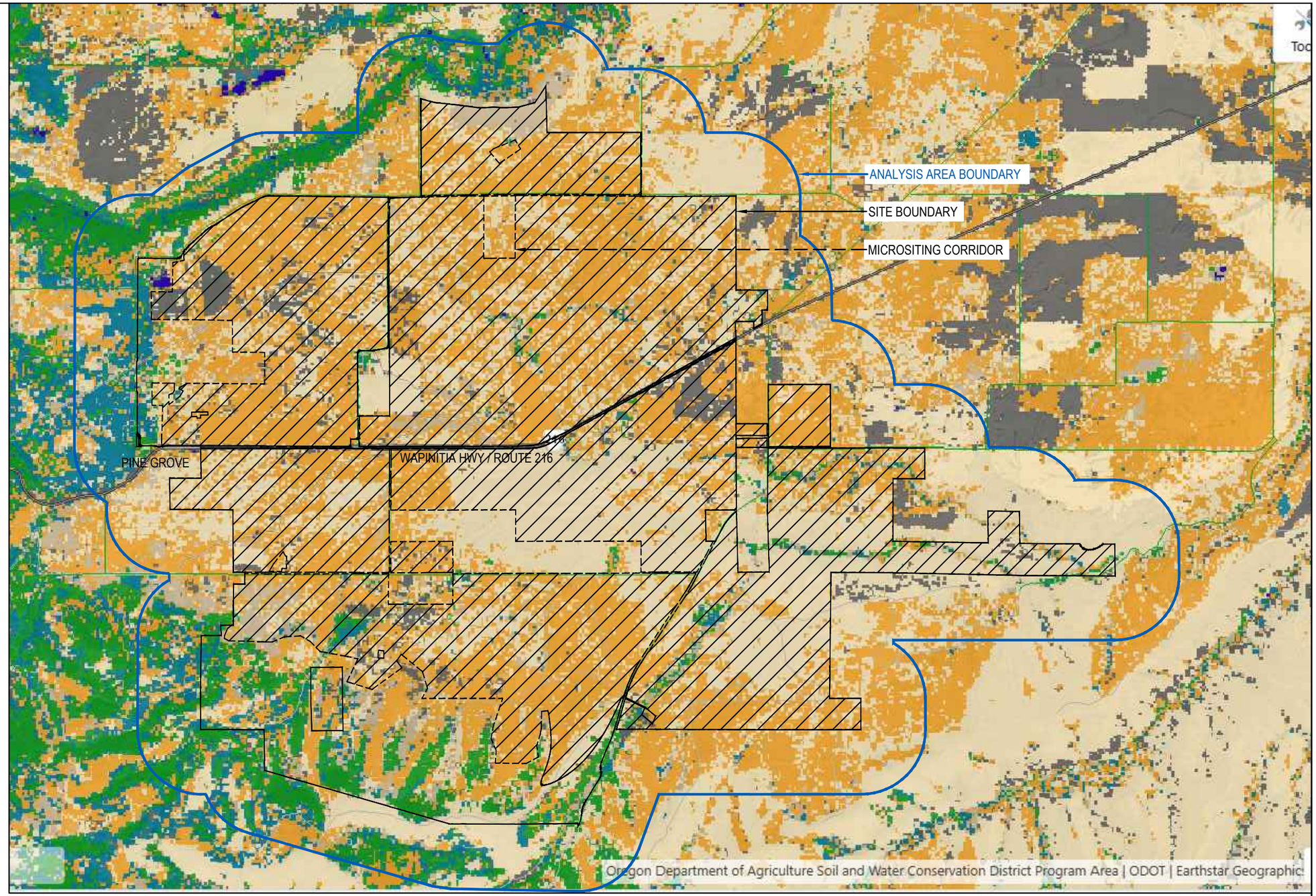
- GRASS
- GRASS/SHRUB
- SHRUB
- TIMBER LITTER
- TIMBER UNDERSTORY
- NON-BURNABLE-OTHER
- NON-BURNABLE-WATER
- SLASH-BLOWDOWN

FIGURE SUMMARY:

THE ANALYSIS AREA IS COMPRISED MOSTLY OF 'GRASS' AND 'GRASS/SHRUB' FUEL MODEL GROUPS.

NOTES:

THE DATA DISPLAYED ON THIS FIGURE COMES FROM THE COMMUNITY WILDFIRE PREVENTION PLAN (CWPP) PLANNING TOOL.



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TITLE: VEGETATION TYPES / FUEL MODELS

PROJECT: DESCHUTES SOLAR AND BESS		LOCATION: WASCO COUNTY, OR
CLIENT: BRIGHTNIGHT		FIGURE NO: A-3
PROJ. NO.: 243075	DATE: NOVEMBER 2025	

LEGEND:

- 0*
- LOW (< = 1-IN-10,000)
- LOW - MODERATE (1-IN-10,000 TO 1-IN-5,000)
- MODERATE (1-IN-5,000 TO 1-IN-1,000)
- MODERATE - HIGH (1-IN-1,000 TO 1-IN-500)
- HIGH (1-IN-500 TO 1-IN-100)
- HIGH - VERY HIGH (1-IN-100 TO 1-IN-50)
- VERY HIGH (1-IN-50 TO 1-IN-25)

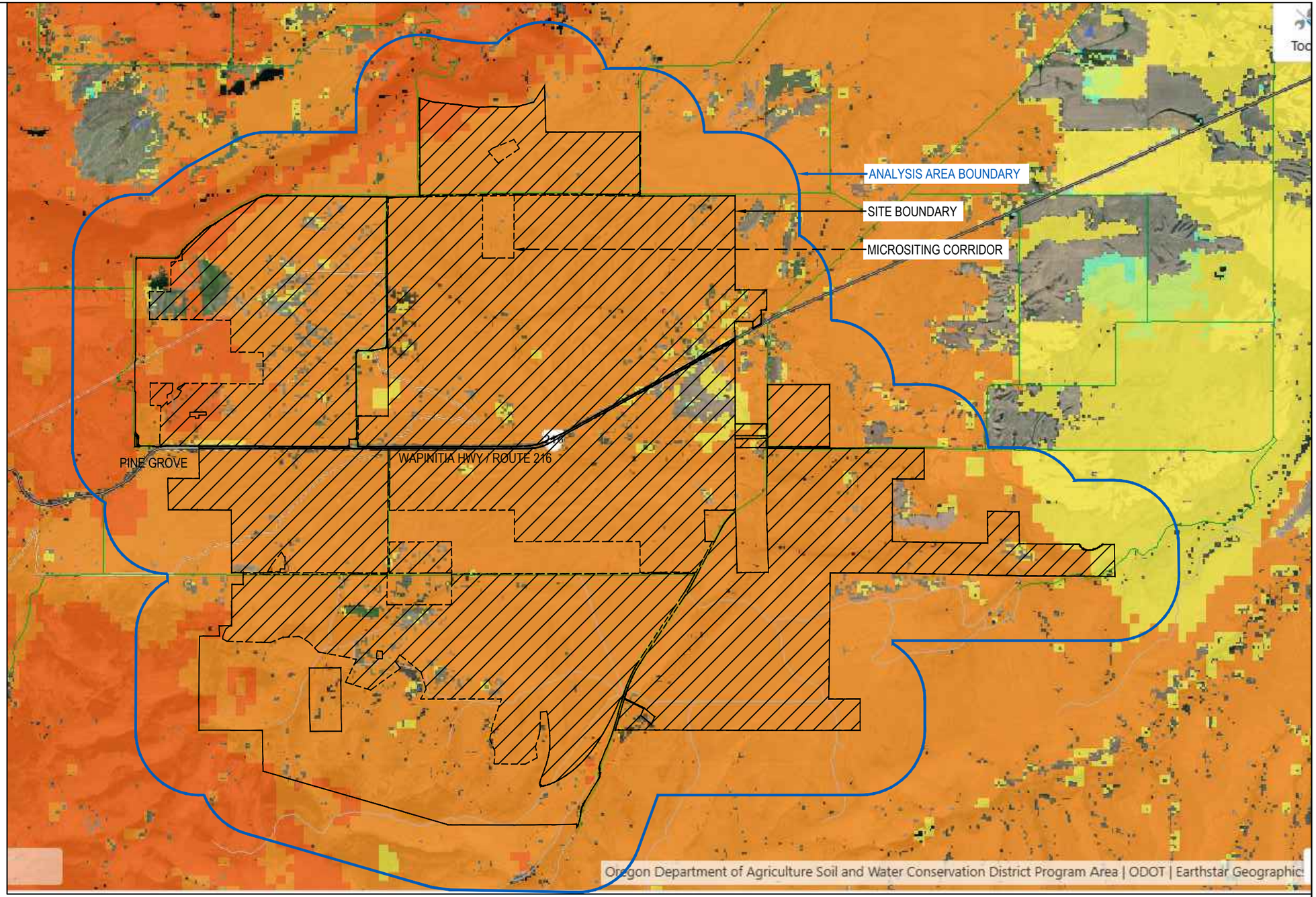
FIGURE SUMMARY:

THE ANALYSIS AREA DISPLAYS TYPICAL BURN PROBABILITY FOR THE MORE ARID PLAINS EAST OF THE CASCADE MOUNTAINS.

NOTES:

THE DATA DISPLAYED ON THIS FIGURE COMES FROM THE COMMUNITY WILDFIRE PREVENTION PLAN (CWPP) PLANNING TOOL.

LAYER '0' IS INDICATED ON THE FIGURE AS AN ABSENCE OF THE LEGEND COLORS OVERLAID ONTO THE OREGON BASE MAP, RESULTING IN A BROWN/GREY COLOR ON THE FIGURE. THIS LAYER INDICATES NONBURNABLE AREAS SUCH AS WATER, BARREN ROCK, ETC.



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TITLE: BURN PROBABILITY

PROJECT: DESCHUTES SOLAR AND BESS

LOCATION: WASCO COUNTY, OR

CLIENT: BRIGHTNIGHT

FIGURE NO: A-4

PROJ. NO.: 243075

DATE: NOVEMBER 2025

LEGEND:

- 0
- > 0 - 4 FT
- 4 - 8 FT
- 8 - 11 FT
- > 11 FT

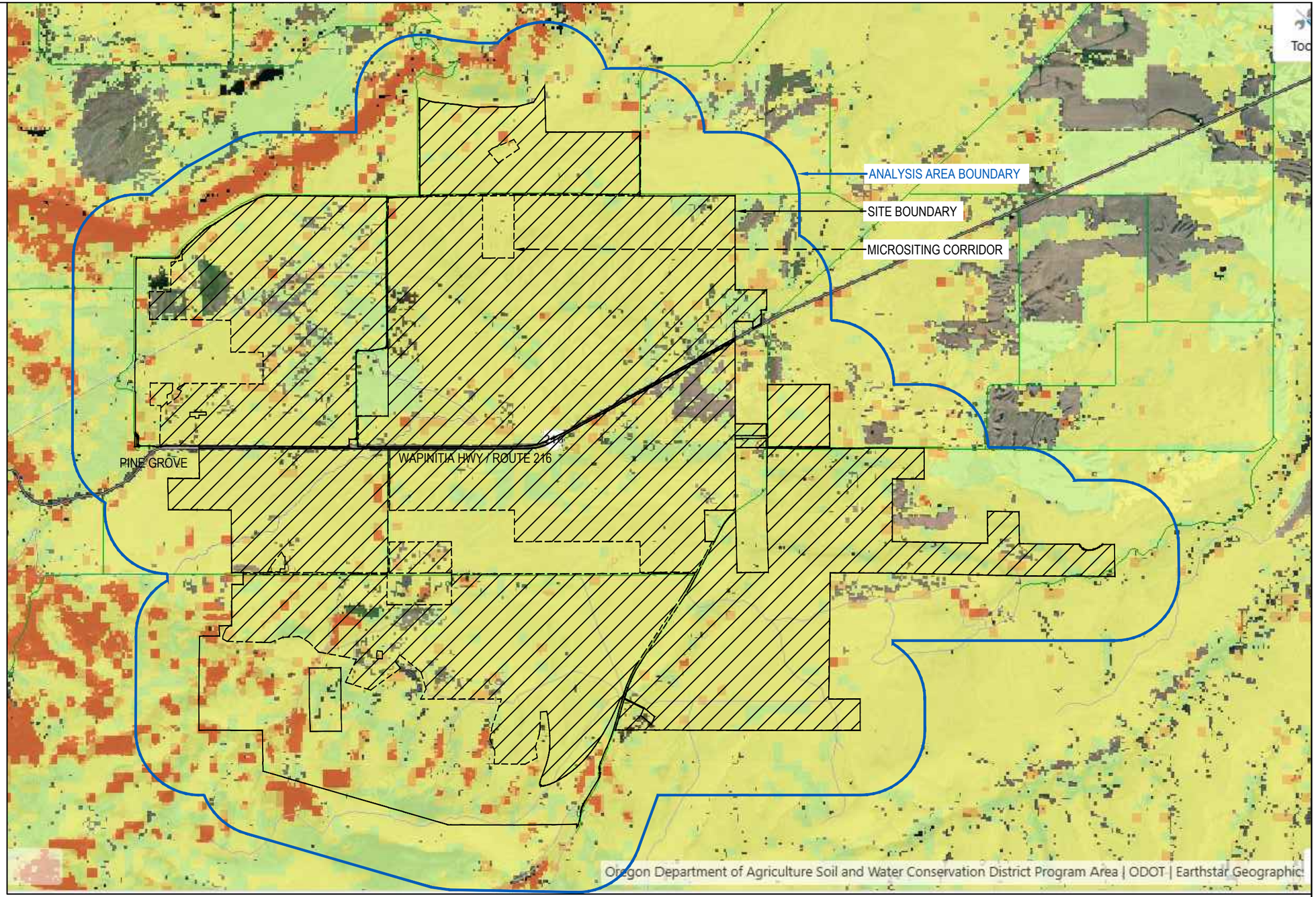
FIGURE SUMMARY:

AVERAGE FLAME LENGTHS THROUGHOUT THE ANALYSIS AREA ARE CLASSIFIED AS 'LOW INTENSITY' (>0 - 4 FT) OR 'MODERATE INTENSITY' (4 - 8 FT).

NOTES:

THE DATA DISPLAYED ON THIS FIGURE COMES FROM THE COMMUNITY WILDFIRE PREVENTION PLAN (CWPP) PLANNING TOOL.

LAYER '0' IS INDICATED ON THE FIGURE AS AN ABSENCE OF THE LEGEND COLORS OVERLAID ONTO THE OREGON BASE MAP, RESULTING IN A BROWN/GREY COLOR ON THE FIGURE.



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TITLE: AVERAGE FLAME LENGTH

PROJECT: DESCHUTES SOLAR AND BESS	LOCATION: WASCO COUNTY, OR
CLIENT: BRIGHTNIGHT	FIGURE NO: A-5
PROJ. NO.: 243075 / DATE: NOVEMBER 2025	

LEGEND:

- VERY HIGH
- HIGH
- MODERATE
- LOW
- LOW BENEFIT
- BENEFIT

FIGURE SUMMARY:

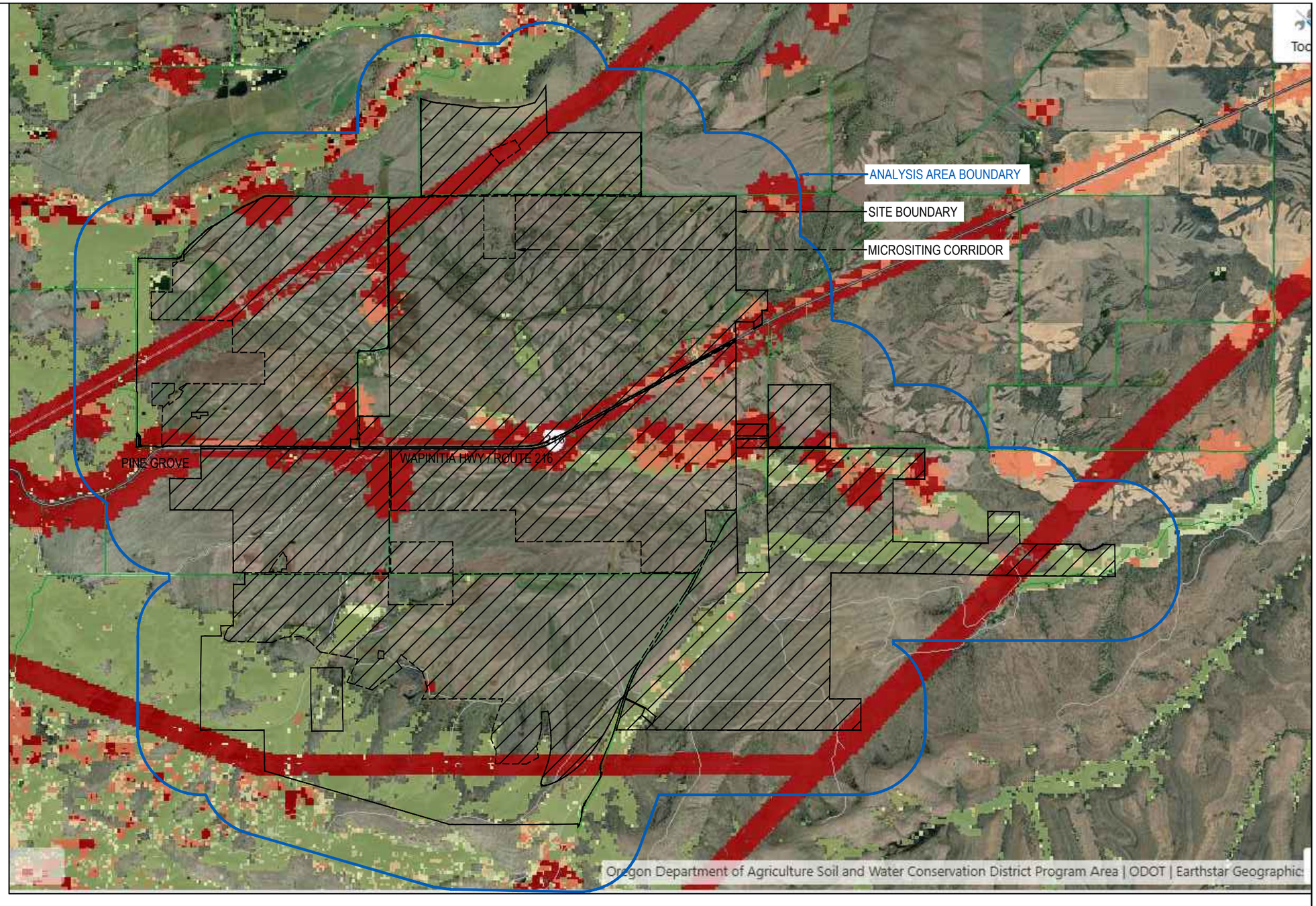
OVERALL RISK IS MODERATE. RISK IS THE COMBINATION OF CONSEQUENCE AND LIKELIHOOD AND THIS FIGURE TAKES INTO ACCOUNT THE TOPOGRAPHY, VEGETATION AND BURN PROBABILITY SHOWN IN PREVIOUS FIGURES. ELECTRICAL TRANSMISSION LINES AND STRUCTURES ALONG WAPINITIA HIGHWAY ARE THE AREAS OF MOST DETRIMENTAL IMPACT FROM WILDFIRE. ECOLOGICAL EFFECTS VARY, WITH THE MAJORITY OF LAND SURFACE AREA WITHIN THE ANALYSIS AREA EXPERIENCING ECOLOGICAL BENEFITS FROM WILDFIRE.

NOTES:

THE DATA DISPLAYED ON THIS FIGURE COMES FROM THE COMMUNITY WILDFIRE PREVENTION PLAN (CWPP) PLANNING TOOL.

AREAS WITHOUT AN OVERLAID COLOR FROM THE LEGEND INDICATE THAT ASSETS AND RESOURCES ARE NOT ANTICIPATED TO EXPERIENCE DETRIMENTAL EFFECTS FROM WILDFIRE TO STRUCTURES, INFRASTRUCTURE, EARLY SERAL STATE AND/OR SENSITIVE FORESTS, NOR ARE THE RESOURCES WITHIN THE AREA ANTICIPATED TO EXPERIENCE AN ECOLOGICAL BENEFIT FROM WILDFIRE SUCH AS IMPROVEMENT OF VEGETATION CONDITION/FOREST HEALTH OR WILDLIFE HABITAT.

NORTH



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TITLE: OVERALL FIRE RISK (BASELINE)

PROJECT: DESCHUTES SOLAR AND BESS	LOCATION: WASCO COUNTY, OR
CLIENT: BRIGHTNIGHT	FIGURE NO: A-6
PROJ. NO.: 243075	DATE: NOVEMBER 2025

Appendix B

WILDFIRE MITIGATION PLAN

COFFMAN ENGINEERS

DESCHUTES SOLAR AND BATTERY ENERGY STORAGE SYSTEM PROJECT

Construction Wildfire Mitigation Plan (WMP)

COFFMAN PROJECT NO. 243075

ISSUED FOR PERMIT

December 2025

Prepared for: BRIGHTNIGHT

CONSTRUCTION WILDFIRE MITIGATION PLAN

FOR

BRIGHTNIGHT
DESCHUTES SOLAR AND BATTERY ENERGY STORAGE SYSTEM PROJECT

Project Number: 243075

TABLE OF CONTENTS

ATTACHMENTS

ABBREVIATIONS

BESS	Battery Energy Storage System
BMP	Best Management Practices
CWPP	Community Wildfire Protection Plan
EFSC	Energy Facility Siting Council
ERP	Emergency Response Plan
LOTO	Lock Out / Tag Out
MW	Megawatt
MWh	Megawatt-hour
NFPA	National Fire Protection Association
OAR	Oregon Administrative Rules
ODOE	Oregon Department of Energy
ORS	Oregon Revised Statutes
O&M	Operations and Maintenance
PMO	Project Management Office
PV	Photovoltaic
QEW	Qualified Electrical Worker
RACE	Rescue, Alarm, Contain and Extinguish
SOC	State of Charge
WMP	Wildfire Mitigation Plan

DEFINED ROLES

Authorized Person	Senior Qualified Electrical Worker (QEW), internal to the Operator, Owner, or external that is responsible for applying Lock Out / Tag Out (LOTO) and verifying absence of voltage and other hazardous energy sources.
PMO	An internal or external group that defines and maintains project management standards, schedules, and activities for decommissioning.
Contractor	An internal or external group who is tasked or hired to perform the physical construction activities.
Operator	An internal or external group, whether onsite or remote, that performs the day-to-day reporting, planned, and unplanned maintenance for the Facility.
Owner	Persons, companies, and or investors that are the legal representatives for the Facility and in charge of making major investment and divestment decisions.

EXECUTIVE SUMMARY

This Wildfire Mitigation Plan (WMP) has been developed for DECH bn, LLC (a subsidiary of BrightNight Power, LLC) for the proposed Deschutes Solar and Battery Energy Storage System (BESS) Facility, with a capacity of up to 1,000 MW of solar and up 4,000 MWh of battery storage (hereafter referred to as the Facility), located in Wasco County, Oregon. This plan outlines procedures prior to and during construction to mitigate the likelihood of wildfire in the vicinity of the Facility.

It is anticipated that the Facility will have a design life of approximately 30 years. Construction is anticipated to start in Q2 of 2027 and therefore, changes should be expected. This document shall be updated as necessary based on new standards and local requirements. It is the Certificate Holder's responsibility to review this document at minimum on an annual basis.

The wildfire risk analysis which is based on the data from Oregon's Community Wildfire Protection Plan (CWPP) Planning Tool, shows that the wildfire risk within the analysis area (site boundary plus a half mile) is moderate. This risk assessment incorporates likelihood and consequence based on topography, vegetation, existing infrastructure, climate, cumulative precipitation, fuel moisture content, residential areas, critical infrastructure, recreation areas, timber and agricultural resources and fire-sensitive wildlife habitat. Specific areas of high risk within the analysis area include existing residences, buildings, roadways and electrical transmission lines.

To mitigate the consequences of wildfire which could potentially damage existing and proposed infrastructure, recreation areas, agricultural resources, and fire-sensitive wildlife habitat, this WMP presents various programs to be implemented during the construction of the Facility. These programs include regular inspections and maintenance of vegetation and electrical equipment to maintain proper equipment function and equipment clearances to vegetation.

1 PRIOR TO CONSTRUCTION WILDFIRE MITIGATION TASK LIST (PRE)

Prior to construction of the Facility, complete the activities in Sections 2.1 and 2.2.

1.1 Training (PRE)

Organize and hold an on-site training with Certificate Holder, contractors and construction personnel, inviting specialty contractors, local fire department(s), participating and adjacent landowners, emergency management office personnel, Oregon Department of Energy (ODOE), and any other emergency management agency that covers:

- Description of construction sequencing;
- The type, location, and proper use of fire protection equipment;
- Fire protection equipment usage and maintenance requirements;
- The location(s) of water source(s) and proper usage, storing and maintenance for the pump, hose nozzle; and water hose;
- Overview of smoking policy and locations;
- Overview of procedures and restrictions of construction maintenance activities during Fire Season and Red Flag Warnings designated in this Plan;
- Rescue, Alarm, Contain and Extinguish ("RACE") procedures including:
    - Rescue anyone in danger (if safe to do so);
    - Alarm – call the control room, who will then determine if 911 should be alerted;
    - Contain the fire (if safe to do so); and
    - Extinguish the incipient fire stage (if safe to do so).
- Juniper Flat Rural Fire Protection District Wildland Fire Fighting and Apparatus Tactics.
- Provide information and encourage attendees to sign up for the County's Citizen Alert Emergency Notification system.

A training attendee list and training materials must be provided to ODOE to demonstrate compliance.

Provide ODOE the template residence outreach letter referenced as Attachment B of this WMP. Once ODOE confirms the letter to be sufficient, mail the completed form to each residence within the analysis area (i.e., within the site boundary and 0.5-mile from the site boundary). Confirm mailing and submit proof to ODOE.

1.2 Facility Site Map(s) Submission (PRE)

Concurrently submit updated site maps from Section 2.2 to local fire departments and ODOE.

2 CONSTRUCTION WILDFIRE MITIGATION PLAN (CON)

2.1 Summary of Facility Description with Design Features and Location of Fire Protection Equipment

Construction at the Facility will be supported by the existing roadways and the construction of on-site temporary laydown areas. Vegetation at the laydown areas will be removed and replaced with gravel to facilitate construction vehicles and wildfire mitigation. Vegetation will also be completely removed for non-vegetated Facility features including the areas immediately around the operation and maintenance (O&M) building, proposed substation, switchyard and BESS. Vegetation will be removed with construction machinery. Any vegetation removed from the site will be disposed of and removed from the site. Certificate Holder and contractors will prevent the accumulation of combustible “burn piles” on site.

After construction completion, the temporary laydown areas and other construction areas where vegetation was disturbed during construction shall be revegetated following the Construction Soil and Vegetation Management Plan, provided as Attachment 2 of the Soil Protection Exhibit. The vegetation in these areas shall be managed in accordance with Section 2.7 of this document during operation of the Facility.

The finished Facility will be comprised of the following features:

- Solar array areas
- Transformers (271 transformers located throughout solar array areas)
- BESS yard
- O&M Building
- Collector substation and switchyard
- Access roads
- Perimeter Fencing and gates

The BESS area within the Facility is subject to the highest wildfire risk due to the flammability of the Lithium-ion batteries. There are several design features within the BESS to mitigate the risk of wildfire to and from the Lithium-ion batteries. These features are listed below:

- Service roads, including a perimeter road (24 feet wide, sufficient for fire apparatus access)
- Setback (10 feet from BESS equipment to service roads and 10 feet from service roads to BESS fence)
- 2 entrance/entrance exit locations for BESS area

Reference the Emergency Response Plan (ERP) for firefighting guidance on battery fires.

Non-BESS-specific setback distances for the Facility are shown in the table below:

Setback details	
Setback Description	**Setback (feet)**
Participating landowner property line	50
OR 216 right of way[1], and non-participating landowner property line	200
Existing overhead powerline	75
Wetlands, streams (perennial or intermittent), ponds	25 to 100
Irrigation ditches	50
County road[1]	50
Cultural resource	25
Floodplain	25
Wasco County Structure Fire Fuel Break	50

Table 2.1 – Facility setback distances

Note: Setbacks from existing overhead powerlines, OR 216 and county roads are measured from the edge of the right-of-way. Setbacks from irrigation ditches are measured from the centerline of the ditch.

[1] The county required setback from public roads and OR 216 is 25 feet. The Certificate Holder is planning to exceed this setback.

2.2 Facility Site Map(s)

The baseline wildfire risk maps, as mapped by the CWPP Planning Tool are provided as Attachment A. A preliminary Facility layout is provided as Attachment B. Prior to construction, this WMP will be updated with more detailed Facility layout maps that will include the following information:

- Location and dimensions of Facility roads
- Location of vegetation free, noncombustible, defensible spaces
- High-fire consequence areas/resources (includes existing infrastructure, residences, sensitive habitat, or cultural resources)
- The location of Facility access points
- Entrance points and site access procedures for emergency responders
- The type and location of fire protection equipment on site
- The location(s) of water source(s) that will be on-site during construction

2.3 Specifications for Fire Protection Equipment

The following fire suppression equipment will be carried in construction vehicles and always stored on-site:

- Fire Extinguisher: Dry chemical. 2A:10BC (5 pound), properly mounted or secured;
- McCleod, Shasta, or Rhino Tool;
- Hand Shovel: Round point. 26 to 28 in "D" Handle, blade - 12 inches long and 10 inches wide;
- Collapsible backpack with hand pump: 5-gallon capacity; and
- Drip Can: 5-gallon capacity.

During fire season (designated Fire Season or May to October each year) water truck(s)/water source, water buffalo, or tank with minimum 500-gallon capacity must be on site. The water truck or water supply shall be compatible with JFRFPD firefighting resources and include the following, unless approved by ODOE:

- Pump should be maintained ready to operate and capable of providing a discharge of not less than 20 gallons per minute at 115 psi at pump level. Note: Volume pumps will not produce the necessary pressure to effectively attack a fire start. Pressure pumps are recommended.
- Provide enough hose and nozzle (500 feet minimum) not less than 1-inch inside diameter to reach areas where power-driven machinery has been used.
- Water supply, pump, and at least 250 feet of 1½-inch hose with nozzle must be maintained as a connected, operating unit ready for immediate use.

Refer to the Emergency Response Plan (ERP) for firefighting considerations of battery fires.

All internal combustion engines must be equipped with exhaust systems, mufflers and screens, or include an appropriate spark arrestor, and must be kept in good operating condition. All combustion engines (including but not limited to off road vehicles, chainsaws, and generators) will be equipped with a spark arrester that meets U.S. Forest Service Standard 5100-1.

All power-driven machinery will be kept free of excess flammable material which may create a risk of fire.

2.4 Facility Contact Information and Emergency Response Procedures

In an emergency call 911. Certificate Holder shall then be called after calling 911. Additional phone numbers are provided and may be called if determined necessary by the Certificate Holder. All fire and EMS incidents shall be reported to Juniper Flat Rural Fire Protection District (JFRFPD) regardless of response type.

Contact	Address	Telephone Number
Emergency Fire/Sheriff/Ambulance	**n/a**	**911**
Bijan Damavandi (BrightNight Development Director)	**515 N Flagler Dr, Ste P200 West Palm Beach, FL 33401**	**(773) 392-7423**
Additional Phone Numbers		
Juniper Flat Fire Station #1 (Closest) Response time: ~5 min	53333 Reservation Rd, Maupin, OR 97037	Chief, Walters (541) 980-8241
Juniper Flat Fire Station #3 Response time: ~5 min	52517 Kelly Springs Rd, Maupin, OR 97037	Chief, Walters (541) 980-8241
Juniper Flat Fire Station #2 Response time: ~15 min	Juniper Flat Rd & Old Wapinitia Rd, Maupin, OR 97037	Chief, Walters (541) 980-8241
Tygh Valley Fire Station Response time: ~40 min	57723 Fairgrounds Rd, Tygh Valley, OR 97063	Chief, LaPlante (541) 993-4266
Wamic Fire Station Response time: ~45 min	11 S County Rd, Wamic, OR 97063	Chief, Magill (541) 993-9824
Wasco County Emergency Management Department	511 Washington Street, Suite 102 The Dalles, OR 97058	(541) 298-5507
Construction Contractor Manager	To be Selected	To be Selected

Residence/landowner outreach letter is provided as Attachment C of this WMP as well as a list of residence addresses within the analysis area. Use this letter when communicating with new or updated residences within the analysis area defined in Section 4.0, Plan Updates and Reporting Requirements.

Contact 911 in the event of:

- A fire or emergency on-site that cannot be addressed by personnel on-site and requires the assistance of fire or emergency medical personnel.
- A fire ignition on-site that spreads out of the fence line.
- Any fire off-site that does not have emergency responders on site.
    - To the extent that construction personnel can safely assist and/or provide equipment to help extinguish off-site fires until emergency responders are on site, it is encouraged to do so to assist in the spread of the fire, loss of life, property and damage to the environment.

2.5 Use of Vehicles and Power Driven Machinery at Site

The following best management practices (BMPs) to minimize fire risk from vehicle travel, equipment use, and fueling activities will be implemented at the site during construction:

- The movement of vehicles will be planned and managed to minimize fire risk.
- The contractor(s) will be responsible for identifying and marking paths for all off-road vehicle travel. All off-road vehicle travel will be required to stay on the identified paths. No off-road vehicle travel will be permitted while working alone. Travel off road or parking in vegetated areas will be restricted during fire season as designated in this Plan.
- Areas with grass that are as tall as or taller than the vehicle's exhaust system must be wetted before vehicles travel through them.
- Workers will be instructed to shut off the engine of any vehicle that gets stuck and periodically inspect the area adjacent to the exhaust system for evidence of ignition of vegetation. Stuck vehicles will be pulled out rather than "rocked" free and the area will be inspected again after the vehicle has been moved.
- The contractor(s) will designate a location for field fueling operations at the temporary construction yards. Any fueling of generators, pumps, etc. shall take place at these locations only.
- Fuel containers, if used, shall remain in a vehicle or equipment trailer, parked at a designated location.
- All power-driven machinery will be kept free of excess flammable material which may create a risk of fire.

2.6 Fire Precaution Levels and Restrictions during Fire Season

Definitions:

Non-Fire Season - Approximately November 1st to May 1st

Fire Season- Approximately May through September, formally designated by the Oregon Department of Forestry (ODF). Under ORS 478.960 (4), a Fire Chief can establish Fire Season within a Fire District when ODF, under ORS 477.505, declares Fire Season. Begin seasonal restrictions for public and industry.

 **Fire Weather Watch** - A fire weather watch is issued when there is a high potential for the development of a red flag event. A watch is issued 18 to 96 hours in advance of the expected onset of criteria. Intent of a fire weather watch is to alert forecast users at least a day in advance for the purposes of resource allocation and fire fighter safety. A watch means critical fire weather conditions are possible but not imminent or occurring.

 **Red Flag Weather Warning** - A red flag warning is used to warn of impending or occurring red flag conditions. Its issuance denotes a high degree of confidence that weather and fuel conditions consistent with local red flag event criteria will occur within 48 hours or less. Specific Red Flag criteria differ for each situation and district in Oregon, however Red Flag Weather Warnings issued from either National Weather Service zones OR701 Eastern Columbia River Gorge of Oregon (ORZ701) or OR691 Lower Columbia Basin of Oregon (ORZ691) shall be considered applicable. Be extremely careful with open flames and other activities that emit sparks.

Hot Work - Any cutting, grinding, welding, or other activity that creates spark or open flame

Fire Watch Service -

Fire watch shall:

- Be physically capable and experienced operating firefighting equipment.
- Have facilities for transportation and communications to summon assistance.
- Observe portions of the construction site where equipment activity occurred during the day.

Upon discovery of a fire, fire watch personnel must: first report the fire, summon any necessary firefighting assistance, describe intended fire suppression activities. After determining a safety zone and an escape route that will not be cut off if the fire increases or changes direction, fire watch personnel will immediately proceed to control and extinguish the fire, consistent with firefighting training and safety.

Fire-Prevention Measures and Restrictions Associated with Fire Season:

Certificate Holder shall maintain a log when construction activities are impacted by Fire Restrictions during Fire Season as designed in this Section. The log will include:

- The date;
- Fire Precaution Level; and
- Description of actions taken, including if any measures were taken to reduce wildfire risk that are not identified in this Plan.

Non-Fire Season

- All hot work must be conducted on roads or on non-combustible surfaces.
- Smoking will take place in designated areas only.

 **Fire Season**

- No hot work will be permitted.
- Water source meeting specifications in this Plan will be on site during fire season.

- Following the completion of hot work, the Certificate Holder or contractor(s) must maintain a fire watch for 60 minutes to monitor for potential ignition.
- Fire watch personnel shall be on duty during any breaks and for one hour after all power-driven machinery used by the Certificate Holder has been shut down for the day.
- Smoking will take place in designated areas only.
- No parking on dry grass.

Fire Weather Watch

- No hot work will be permitted.
- Driving and parking will only be permitted on graveled surfaces.
- Fire watch shall be on duty during any breaks and for one hour after all power-driven machinery used by the Certificate Holder has been shut down for the day.
- No smoking will take place on site.

Red Flag Weather Warning

- No hot work will be permitted.
- On-site personnel must be aware of Red Flag Warning.
- Driving and parking will only be permitted on graveled surfaces.
- Fire watch shall be on duty during any breaks and for one hour after all power-driven machinery used by the Certificate Holder has been shut down for the day.
- No smoking will take place on site.

Table 2.6: Fire Prevention Measures During Fire Season Summary

Requirement	Non-Fire Season	Fire Season	Fire Weather Watch	Red Flag Warning
Fire weather advisory	Not required	Not required	Not required	On-site personnel must be aware of Red Flag Warning.
On-site water source	N/A	As specified in Section 2.2	As specified in Section 2.2 and 2.3.	As specified in Section 2.2 and 2.3.
Hot work	Only permitted on roads or on non-combustible surfaces.	Only permitted on roads or on non-combustible surfaces; fire watch required for 60 minutes after completion	Not Permitted	Not Permitted

Table 2.6: Fire Prevention Measures During Fire Season Summary

Requirement	Non-Fire Season	Fire Season	Fire Weather Watch	Red Flag Warning
Fire Watch Service	Not required	During breaks and for 60 minutes after all power-driven machinery has been shut down for the day.	During breaks and for 60 minutes after all power-driven machinery has been shut down for the day.	During breaks and for 60 minutes after all power-driven machinery has been shut down for the day.
Driving and Parking	As described in Section 2.5.	As described in Section 2.5.	Only permitted on roads or on non-combustible surfaces and Section 2.5.	Only permitted on roads or on non-combustible surfaces and Section 2.5.
Smoking	Designated areas only	Designated areas only	Not permitted	Not permitted

2.7 Vegetation Management

2.7.1 Vegetation-free, Noncombustible Space, and Vegetation Standards

Vegetation within the construction site will be maintained in accordance with the approved Vegetation and Soil Management Plans for the Facility. Vegetation near, at, or taller than the maximum height shall be removed or mowed. Mowing must be done in advance of fire season or in accordance with any fire restrictions. At no point shall vegetation come in contact with electrical equipment. Any vegetation removed from the site will be disposed of and not stored on site. Certificate Holder and contractors will prevent the accumulation of combustible “burn piles” on site.

The following areas will be managed to be vegetation-free, noncombustible space, or gravel surface:

- 16-foot-wide service roads within solar array area - graveled
- 24-foot-wide service roads within BESS area - graveled
- 10-foot noncombustible, defensible space clearance along the fenced perimeter of the solar array blocks - vegetation free
- Within a 10-foot perimeter of the inverter/transformer pads, collector substation and BESS -- graveled similar noncombustible base, or vegetation free
- Parking and O&M building perimeter - graveled

- Vegetation along service roads will be managed by mowing or other vegetation removal

Vegetation inspections shall be conducted biannually throughout the site and monthly during the growing season (i.e., April through July).

2.8 Electrical Safety

2.8.1 Safety Training

All contractors servicing electrical components within the construction site shall have received certification of electrical safety training. Certification shall be presented to the Certificate Holder prior to any work on-site.

2.8.2 Inspections

Facility electrical components shall be inspected quarterly for damage and wildfire risk and one of the quarterly inspections must occur prior to wildfire season. Inspections shall be documented and recorded, with records available in both the O&M building on-site as well as electronically, accessible to the Certificate Holder off-site.

Specific fire protection features within the BESS area shall be inspected by the installing contractor or other licensed fire alarm contractor in accordance with NFPA 72.

2.8.3 Lock Out / Tag Out (LOTO)

Prior to any initial work on any electrical components, the components shall be de-energized and appropriately locked out and tagged out. The following steps shall be performed during LOTO:

- Communicate and prepare for equipment shutdown
- Shut down equipment
- Isolate equipment from energy sources
- Apply LOTO device
- Dissipate stored energy
- Verify electrical isolation and energy dissipation
- Perform maintenance
- Release from LOTO

2.9 Construction Safety Training(s)

Once construction begins, organize and hold an on-site training with the Certificate Holder and construction personnel, inviting equipment manufacturers, specialty contractors, local fire department(s), participating and adjacent landowners, emergency management office personnel, ODOE, and any other emergency management agency that covers:

- The location of electrical facility components and the fire safety measures associated with each component that have been constructed;
- Description of remaining construction sequencing;
- The type, location, and proper use of fire protection equipment;

- Fire protection equipment usage and maintenance requirements;
- The location(s) of water source(s) and proper usage, storing and maintenance for the pump, hose nozzle; and water hose;
- Overview of smoking policy and locations;
- Overview of procedures and restrictions of construction activities during Fire Season, Fire Weather Watches, and Red Flag Warnings designated in this Plan;
- Rescue, Alarm, Contain and Extinguish (RACE) procedures including:
    - Rescue anyone in danger (if safe to do so);
    - Alarm – call the control room, who will then determine if 911 should be alerted;
    - Contain the fire (if safe to do so); and
    - Extinguish the incipient fire stage (if safe to do so).
- Provide information and encourage attendees to enroll in the County's emergency management notification system.

3 CONCLUSION

The wildfire risk analysis based on the data from Oregon's CWPP Planning Tool shows that the wildfire risk within the analysis area is moderate. Note that risk is defined as the combination of consequence and likelihood. This risk assessment incorporates both the likelihood and consequence based on topography, vegetation, existing infrastructure, climate, cumulative precipitation, fuel moisture content, residential areas, critical infrastructure, recreation areas, timber and agricultural resources, and fire-sensitive wildlife habitat. Specific areas of high risk within the analysis area include existing residences, buildings, roadways and electrical transmission lines.

To mitigate the potential impacts of wildfire on existing and proposed infrastructure, as well as recreation areas, agricultural resources, and fire-sensitive wildlife habitat, this WMP presents a series of programs to be implemented during the construction of the Facility. These programs include regular inspections and maintenance of vegetation and electrical equipment to maintain proper function and safe clearances.

With consistent application of these measures, wildfire risk within the analysis area is expected to remain stable within the moderate classification throughout the construction of the Facility.

4 PLAN UPDATES: AMENDMENTS AND REPORTING REQUIREMENTS

The following will be provided to ODOE in the semi-annual construction report required per OAR 345-026-0080:

- Section 2.1 and 2.2, any changes in wildfire risk at the site or changes in Facility components or preventative features.
- Section 2.4, any changes in local fire protection agency personnel and operational managers.
- Section 2.4, any changes in analysis area residence/landowner addresses or contact information.
- A copy of the Fire Season Restriction Log identified in Section 2.6.
- Changes in wildfire risk if different from the Site Plan provided prior to construction. Evaluation of wildfire risk will be consistent with the requirements of OAR 345-022-0115(1) using current data from reputable sources.

This information may be used to establish the performance of the WMP. If determined by the Certificate Holder or ODOE, adjustments or improvements must be proposed to ensure the WMP provides wildfire mitigation. Any ODOE required updates shall be implemented within 14 days, unless otherwise agreed to by ODOE based on a good faith effort to address wildfire hazard.

This WMP may be amended from time to time by agreement of the Certificate Holder and the Oregon Energy Facility Siting Council (EFSC) or ODOE, acting within its delegated authority of EFSC. Such amendments may be made without amendment of the site certificate. EFSC authorizes ODOE to agree to amendments to this WMP. ODOE will notify EFSC of all amendments, and EFSC retains the authority to approve, reject, or modify any amendment of this WMP agreed to by ODOE.

ATTACHMENTS

Attachment A

OREGON CWPP PLANNING TOOL MAPS

LEGEND:

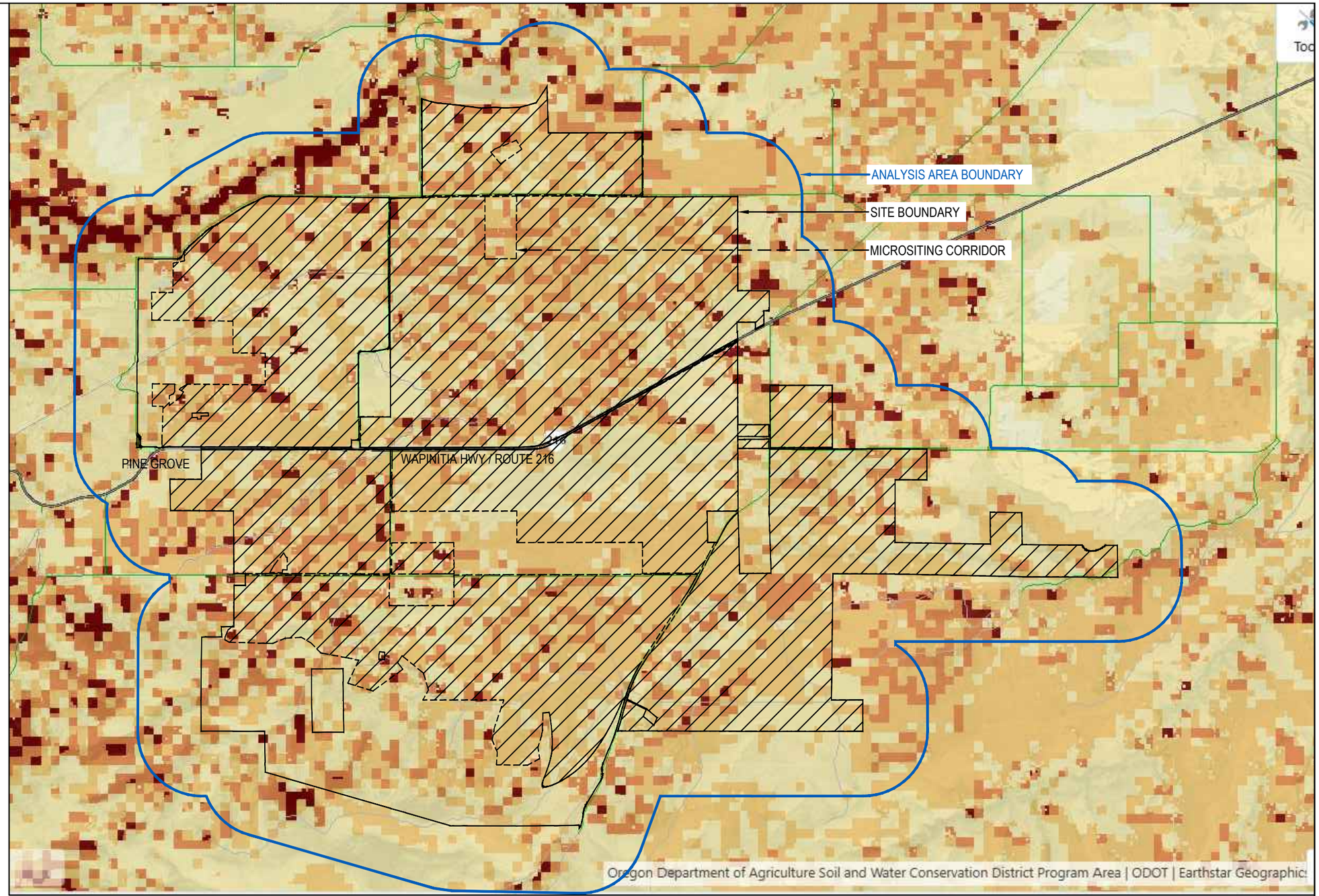
- VERY HIGH
- HIGH
- MODERATE
- LOW
- NON-BURNABLE / VERY LOW

FIGURE SUMMARY:

AVERAGE HAZARD TO POTENTIAL STRUCTURES THROUGHOUT THE ANALYSIS AREA IS CONSIDERED 'LOW' AND 'MODERATE'.

NOTES:

THE DATA DISPLAYED ON THIS FIGURE COMES FROM THE COMMUNITY WILDFIRE PREVENTION PLAN (CWPP) PLANNING TOOL.



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ph 503.552.3800
www.coffman.com

TITLE: HAZARD TO POTENTIAL STRUCTURES

PROJECT: DESCHUTES SOLAR AND BESS		LOCATION: WASCO COUNTY, OR
CLIENT: BRIGHTNIGHT		FIGURE NO: A-1
PROJ. NO.: 243075	DATE: NOVEMBER 2025	

LEGEND:

- 0-25 DEGREES
- 25-50 DEGREES
- 50-76 DEGREES

FIGURE SUMMARY:

THE ANALYSIS AREA IS MOSTLY FLAT.

NOTES:

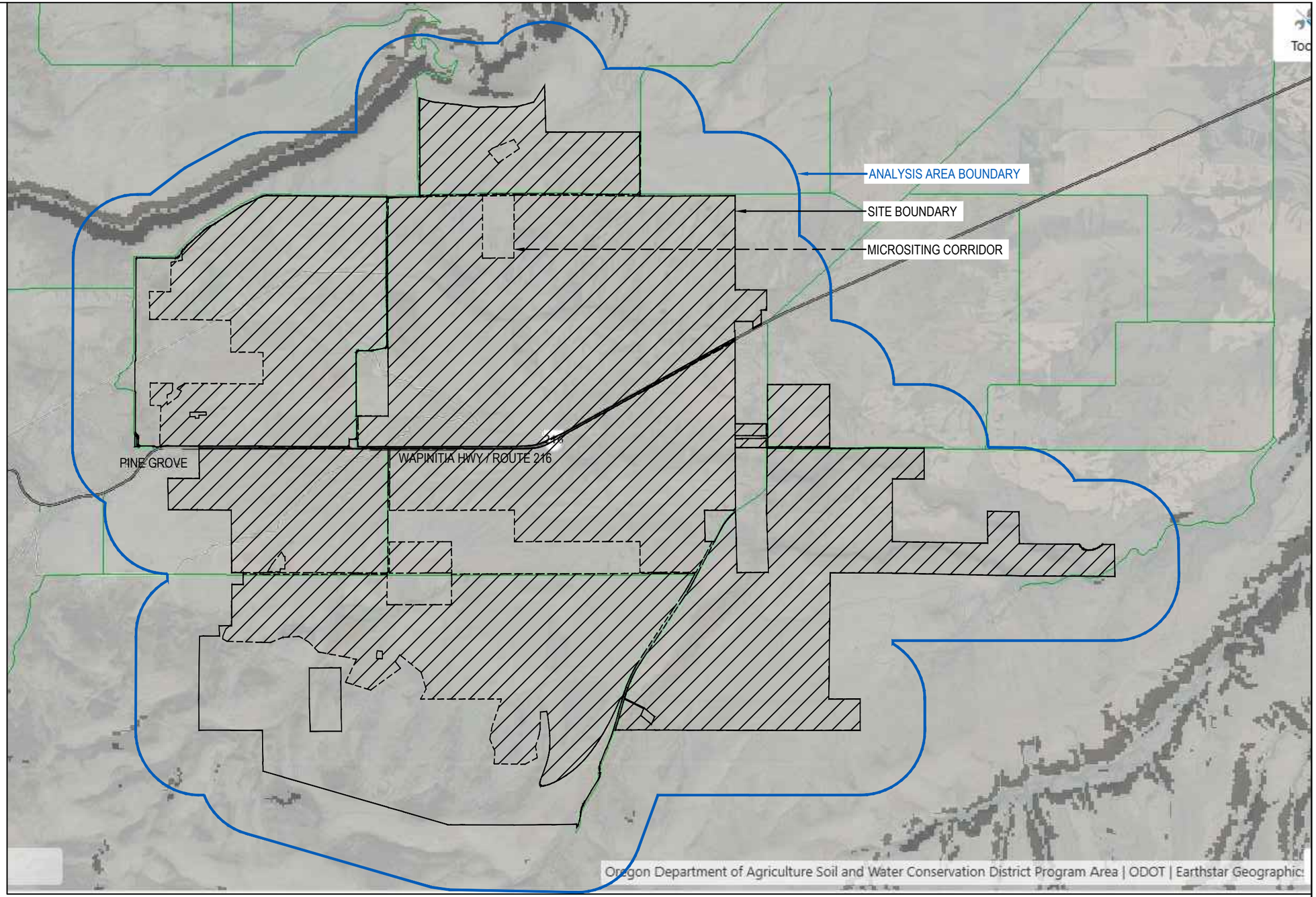
THE DATA DISPLAYED ON THIS FIGURE COMES FROM THE COMMUNITY WILDFIRE PREVENTION PLAN (CWPP) PLANNING TOOL.

THE CWPP PLANNING TOOL ONLY DISPLAYS SLOPES IN THE 3 CATEGORIES ABOVE AS DEGREE SLOPES. THE STRUCTURAL STANDARD EXHIBIT PROVIDES A MORE DETAILED DESCRIPTION OF SITE SLOPES IN SLOPE PERCENTAGES. IN SUMMARY, THE PERCENTAGE OF SITE ACREAGE COMPRISED OF THE FOLLOWING SLOPES ARE:

0% TO 5% SLOPE:	74.7%
5% TO 10% SLOPE:	6.7%
10% TO 15% SLOPE:	3.8%
GREATER THAN 15%:	14.7%
TOTAL:	99.9%*

*DOES NOT EQUAL 100% DUE TO ROUNDING

NORTH



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TITLE: SLOPE

PROJECT: DESCHUTES SOLAR AND BESS

LOCATION: WASCO COUNTY, OR

CLIENT: BRIGHTNIGHT

FIGURE NO: A-2

PROJ. NO.: 243075

DATE: NOVEMBER 2025

LEGEND:

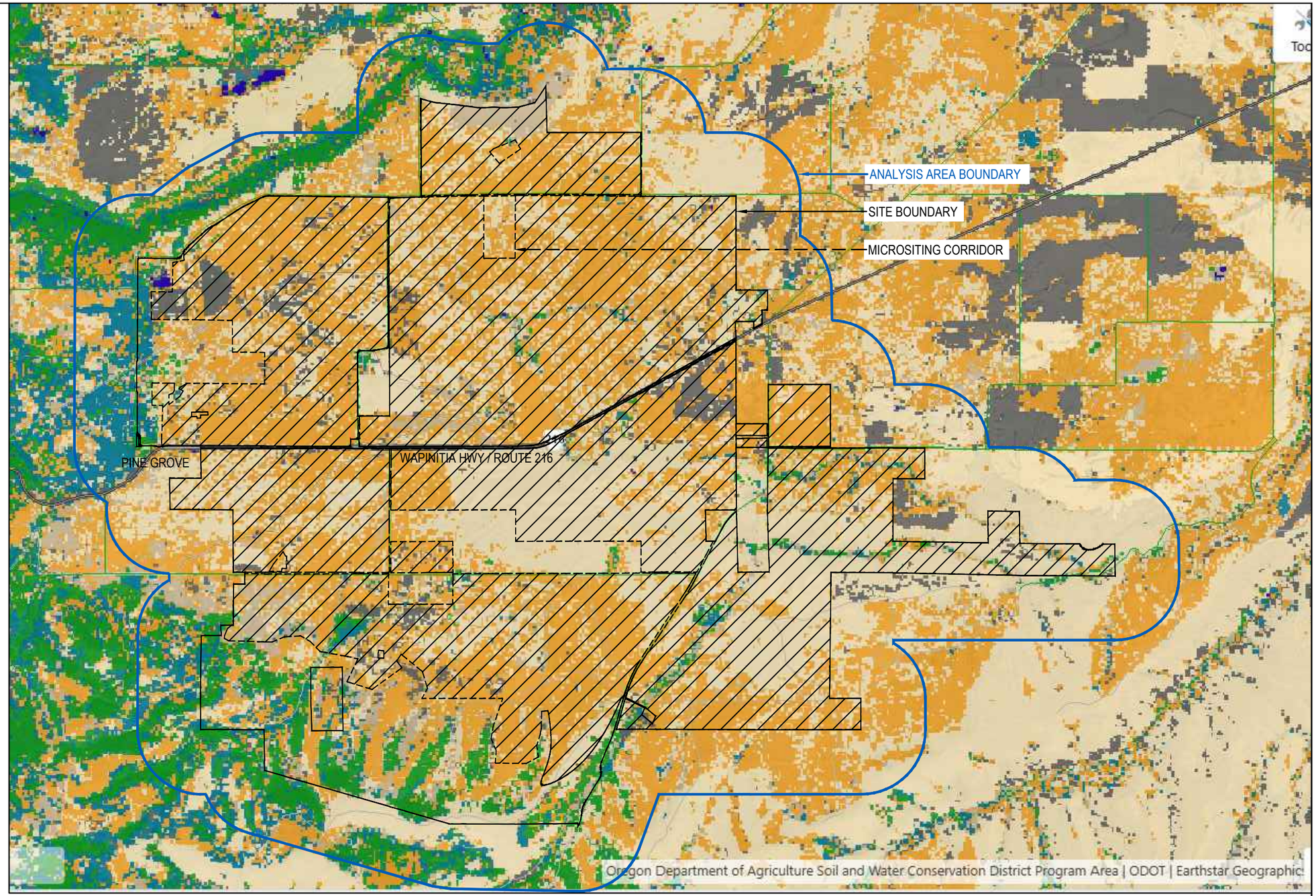
- GRASS
- GRASS/SHRUB
- SHRUB
- TIMBER LITTER
- TIMBER UNDERSTORY
- NON-BURNABLE-OTHER
- NON-BURNABLE-WATER
- SLASH-BLOWDOWN

FIGURE SUMMARY:

THE ANALYSIS AREA IS COMPRISED MOSTLY OF 'GRASS' AND 'GRASS/SHRUB' FUEL MODEL GROUPS.

NOTES:

THE DATA DISPLAYED ON THIS FIGURE COMES FROM THE COMMUNITY WILDFIRE PREVENTION PLAN (CWPP) PLANNING TOOL.



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TITLE: VEGETATION TYPES / FUEL MODELS

PROJECT: DESCHUTES SOLAR AND BESS		LOCATION: WASCO COUNTY, OR
CLIENT: BRIGHTNIGHT		FIGURE NO: A-3
PROJ. NO.: 243075	DATE: NOVEMBER 2025	

LEGEND:

- 0*
- LOW (< = 1-IN-10,000)
- LOW - MODERATE (1-IN-10,000 TO 1-IN-5,000)
- MODERATE (1-IN-5,000 TO 1-IN-1,000)
- MODERATE - HIGH (1-IN-1,000 TO 1-IN-500)
- HIGH (1-IN-500 TO 1-IN-100)
- HIGH - VERY HIGH (1-IN-100 TO 1-IN-50)
- VERY HIGH (1-IN-50 TO 1-IN-25)

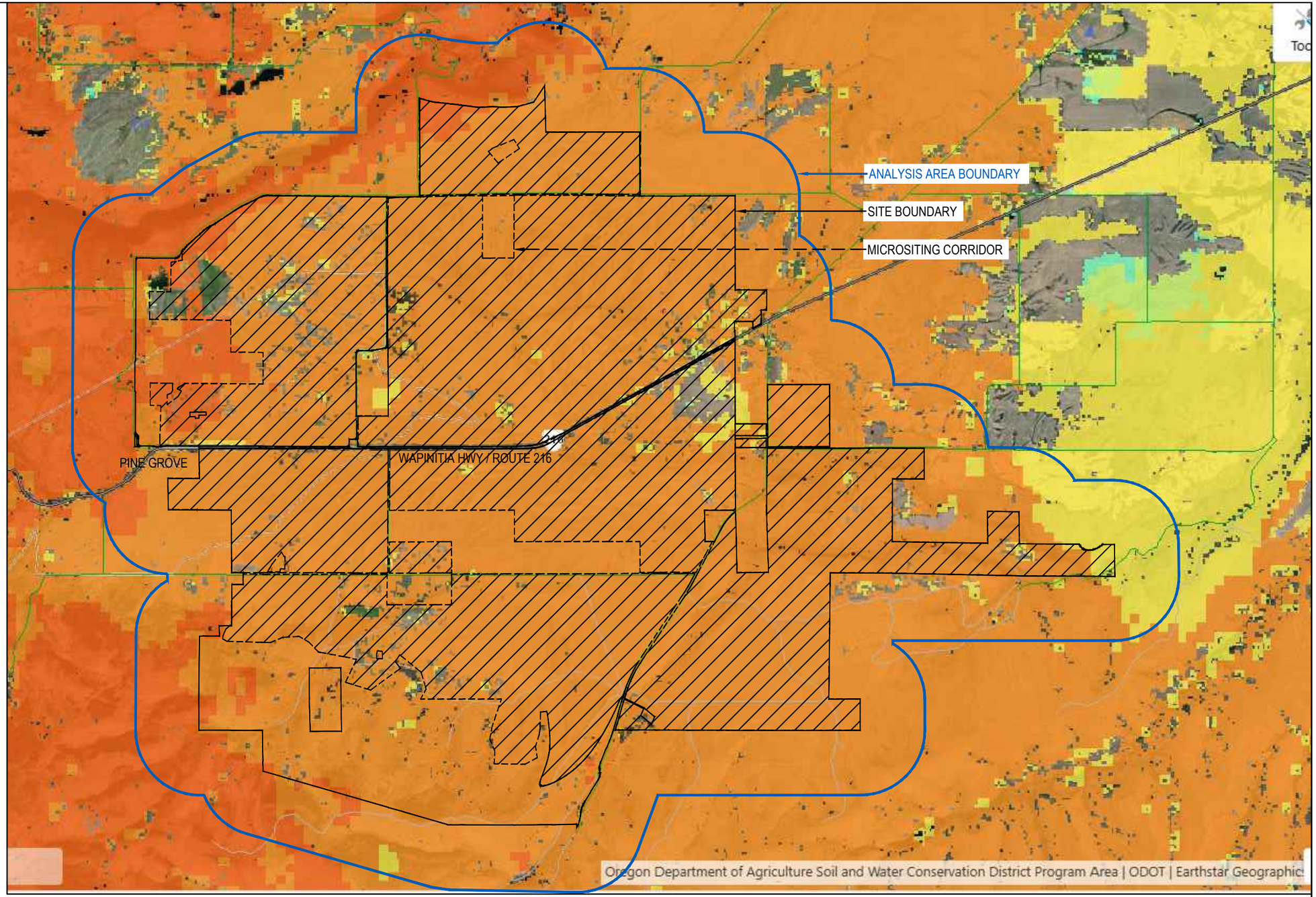
FIGURE SUMMARY:

THE ANALYSIS AREA DISPLAYS TYPICAL BURN PROBABILITY FOR THE MORE ARID PLAINS EAST OF THE CASCADE MOUNTAINS.

NOTES:

THE DATA DISPLAYED ON THIS FIGURE COMES FROM THE COMMUNITY WILDFIRE PREVENTION PLAN (CWPP) PLANNING TOOL.

LAYER '0' IS INDICATED ON THE FIGURE AS AN ABSENCE OF THE LEGEND COLORS OVERLAID ONTO THE OREGON BASE MAP, RESULTING IN A BROWN/GREY COLOR ON THE FIGURE. THIS LAYER INDICATES NONBURNABLE AREAS SUCH AS WATER, BARREN ROCK, ETC.



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TITLE: BURN PROBABILITY

PROJECT: DESCHUTES SOLAR AND BESS

LOCATION: WASCO COUNTY, OR

CLIENT: BRIGHTNIGHT

FIGURE NO: A-4

PROJ. NO.: 243075

DATE: NOVEMBER 2025

LEGEND:

- 0
- > 0 - 4 FT
- 4 - 8 FT
- 8 - 11 FT
- > 11 FT

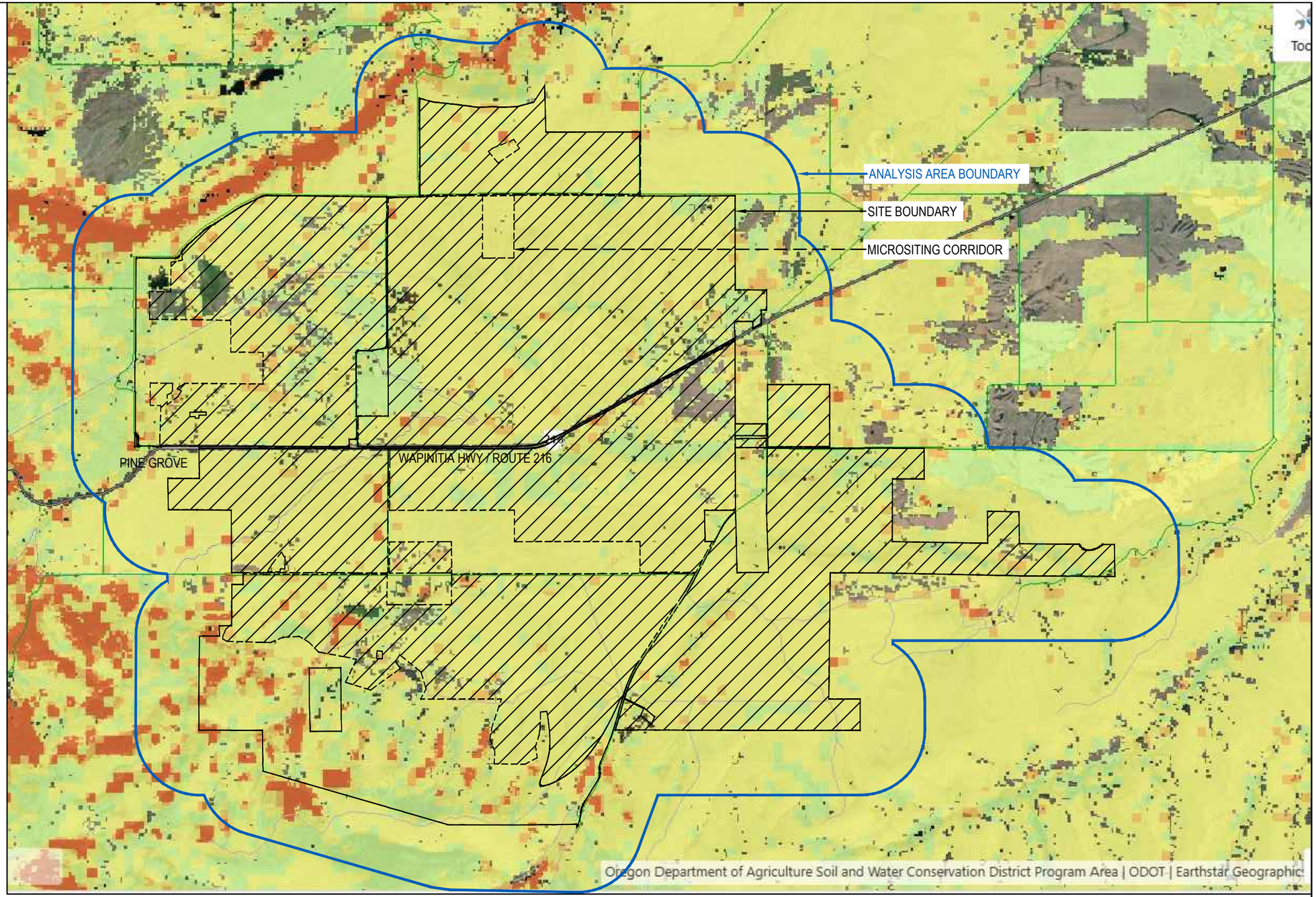
FIGURE SUMMARY:

AVERAGE FLAME LENGTHS THROUGHOUT THE ANALYSIS AREA ARE CLASSIFIED AS 'LOW INTENSITY' (>0 - 4 FT) OR 'MODERATE INTENSITY' (4 - 8 FT).

NOTES:

THE DATA DISPLAYED ON THIS FIGURE COMES FROM THE COMMUNITY WILDFIRE PREVENTION PLAN (CWPP) PLANNING TOOL.

LAYER '0' IS INDICATED ON THE FIGURE AS AN ABSENCE OF THE LEGEND COLORS OVERLAID ONTO THE OREGON BASE MAP, RESULTING IN A BROWN/GREY COLOR ON THE FIGURE.



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TITLE: AVERAGE FLAME LENGTH

PROJECT: DESCHUTES SOLAR AND BESS	LOCATION: WASCO COUNTY, OR
CLIENT: BRIGHTNIGHT	FIGURE NO: A-5
PROJ. NO.: 243075 / DATE: NOVEMBER 2025	

LEGEND:

- VERY HIGH
- HIGH
- MODERATE
- LOW
- LOW BENEFIT
- BENEFIT

FIGURE SUMMARY:

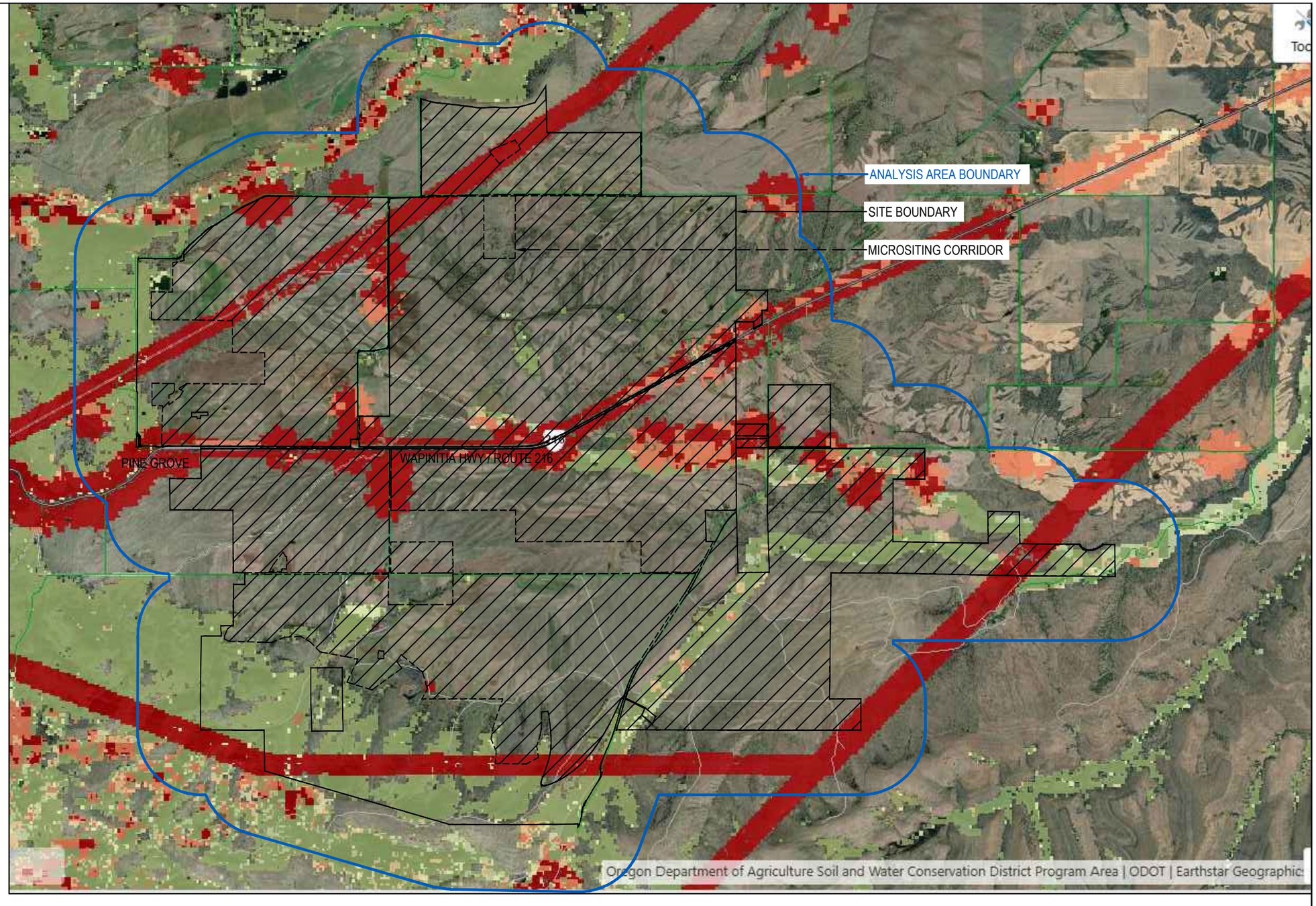
OVERALL RISK IS MODERATE. RISK IS THE COMBINATION OF CONSEQUENCE AND LIKELIHOOD AND THIS FIGURE TAKES INTO ACCOUNT THE TOPOGRAPHY, VEGETATION AND BURN PROBABILITY SHOWN IN PREVIOUS FIGURES. ELECTRICAL TRANSMISSION LINES AND STRUCTURES ALONG WAPINITIA HIGHWAY ARE THE AREAS OF MOST DETRIMENTAL IMPACT FROM WILDFIRE. ECOLOGICAL EFFECTS VARY, WITH THE MAJORITY OF LAND SURFACE AREA WITHIN THE ANALYSIS AREA EXPERIENCING ECOLOGICAL BENEFITS FROM WILDFIRE.

NOTES:

THE DATA DISPLAYED ON THIS FIGURE COMES FROM THE COMMUNITY WILDFIRE PREVENTION PLAN (CWPP) PLANNING TOOL.

AREAS WITHOUT AN OVERLAID COLOR FROM THE LEGEND INDICATE THAT ASSETS AND RESOURCES ARE NOT ANTICIPATED TO EXPERIENCE DETRIMENTAL EFFECTS FROM WILDFIRE TO STRUCTURES, INFRASTRUCTURE, EARLY SERAL STATE AND/OR SENSITIVE FORESTS, NOR ARE THE RESOURCES WITHIN THE AREA ANTICIPATED TO EXPERIENCE AN ECOLOGICAL BENEFIT FROM WILDFIRE SUCH AS IMPROVEMENT OF VEGETATION CONDITION/FOREST HEALTH OR WILDLIFE HABITAT.

NORTH



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TITLE: OVERALL FIRE RISK (BASELINE)

PROJECT: DESCHUTES SOLAR AND BESS	LOCATION: WASCO COUNTY, OR
CLIENT: BRIGHTNIGHT	FIGURE NO: A-6
PROJ. NO.: 243075	DATE: NOVEMBER 2025

Attachment B

FACILITY MAPS

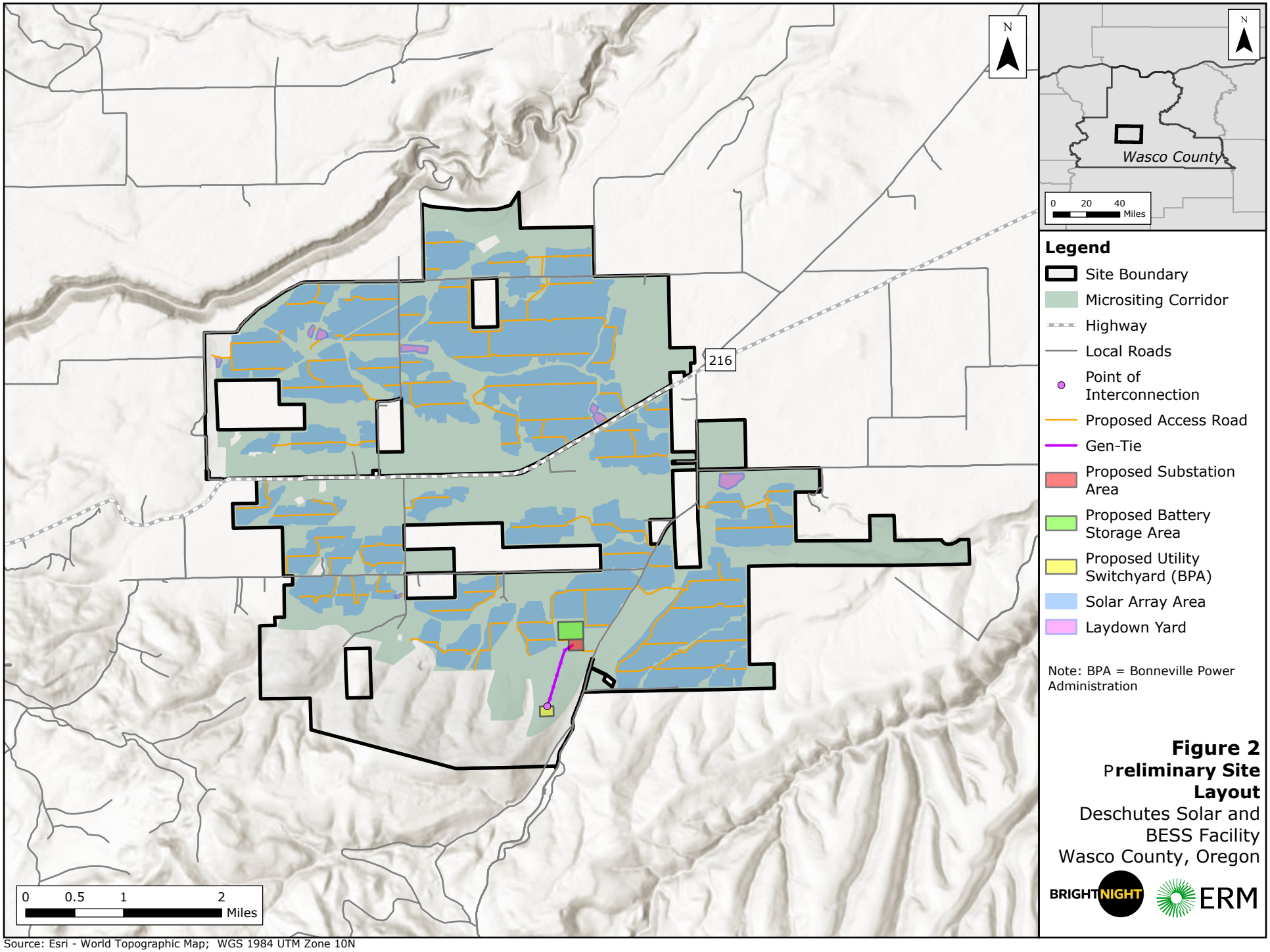


Figure 2
Preliminary Site Layout
Deschutes Solar and BESS Facility
Wasco County, Oregon

Source: Esri - World Topographic Map; WGS 1984 UTM Zone 10N

Attachment C

RESIDENCE / LANDOWNER OUTREACH LETTER

RE: Community Outreach Letter for Deschutes Solar and BESS Energy Facility

My name is Bijan Damavandi and I'm the Development Director for BrightNight LLC. We are the certificate holder of the Deschutes Solar and BESS Energy Facility, approved by the Oregon Energy Facility Siting Council (EFSC). Construction of the facility will start in 2027. The facility is a 1000 megawatt solar facility located in Wasco County. You are receiving this letter because your address is within 0.5 miles from the facility site boundary and we want to make sure you are aware of the following information:

- Safety at the facility is our highest priority. We have emergency procedures in place in the event of an emergency on site or off site that may impact the facility and adjacent areas. This includes an EFSC Wildfire Mitigation Plan (WMP) that addresses vegetation management, facility inspections, and maintenance protocols to ensure that the facility minimizes fire risk. The WMP also requires fire protection equipment to be on site and allows for emergency access for fire departments in the event of a fire on site or off site.
- In the event of an emergency on site or off site that cannot be addressed by facility personnel, local emergency and law enforcement will be contacted and procedures designated by the Wasco County's Office of emergency management will be followed, if necessary.
- If you have not already done so, we recommend you sign up for Wasco County emergency notification system. You may sign up via the County's webpage or directly via this link: Link: https://member.everbridge.net/453003085612392/login

Please contact me if you have any questions about the facility, BrightNight company, or any other concerns regarding construction and operation of the facility. Further, the Oregon Department of Energy (ODOE) is staff to EFSC and can be contacted if you have questions. Follow the link below for contact information:

https://www.oregon.gov/energy/facilities-safety/facilities/Pages/Compliance-Program.aspx

Thank you,
Bijan Damavandi
Development Director, BrightNight

(773) 392-7423

Attachment D

LIST OF MAILING ADDRESSES

Map Tax Lot ID	Last Name 1	First & Middle Names 1	Last Name 2	First & Middle Names 2	Company/Organization	Mailing Address	City	State	Zip Code
5S 11E 0 1100					State of Oregon	4034 Fairview Industrial Dr SE	Salem	Oregon	97302
5S 11E 0 1200					State of Oregon	4034 Fairview Industrial Dr SE	Salem	Oregon	97302
5S 11E 0 1700					State of Oregon	4034 Fairview Industrial Dr SE	Salem	Oregon	97302
5S 11E 0 2500					State of Oregon	4034 Fairview Industrial Dr SE	Salem	Oregon	97302
5S 11E 0 2600	Miller	Lawrence C	Miller	Gloria		77891 Hwy 216	Maupin	Oregon	97037
5S 11E 24 100					State of Oregon	4034 Fairview Industrial Dr SE	Salem	Oregon	97302
5S 11E 24 300					State of Oregon	4034 Fairview Industrial Dr SE	Salem	Oregon	97302
5S 11E 24 400	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
5S 11E 24 500	Jones	James E				53006 Endersby Rd	Maupin	Oregon	97037
5S 11E 24 800	Miller	Lawrence C	Miller	Gloria		77891 Hwy 216	Maupin	Oregon	97037
5S 11E 24 900	Miller	Lawrence C	Miller	Gloria		77891 Hwy 216	Maupin	Oregon	97037
5S 12E 0 1500					United States of America	3050 NE 3rd St	Prineville	Oregon	97754
5S 12E 0 1700	Mead	Kimberly S				78901 Victor Rd	Maupin	Oregon	97037
5S 12E 0 1701	Ambrose	Barbara	Ambrose	Melvin		78901 Victor Rd	Maupin	Oregon	97037
5S 12E 0 1800					United States of America	3050 NE 3rd St	Prineville	Oregon	97754
5S 12E 0 1900	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 2000	Dodge	Richard T				74125 Johns Ln	Pendleton	Oregon	97801
5S 12E 0 2100	Dodge	Richard E	Dodge	Janie P	Cemetery	78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 2200	Ambrose	Barbara	Ambrose	Melvin		78901 Victor Rd	Maupin	Oregon	97037
5S 12E 0 2300					Loren & Sandra Mcleod Revocable Trust	1208 Toliver Rd	Molalla	Oregon	97038
5S 12E 0 2700	Williamson	Claude L	Williamson	Emilie S		80691 Old Wapinitia Rd	Maupin	Oregon	97037
5S 12E 0 2702	Ogilvie	Gregory L				PO Box 315	Eagle Creek	Oregon	97022
5S 12E 0 2703	Williamson	Claude L	Williamson	Emilie S		80691 Old Wapinitia Rd	Maupin	Oregon	97037
5S 12E 0 2900	Carter	Nancy H				53231 Reservation Rd	Maupin	Oregon	97037
5S 12E 0 3000	Fullington	Neil A	Fullington	Kayla M		14485 S Union Hall Rd	Mulino	Oregon	97042
5S 12E 0 3100	Fullington	Neil A	Fullington	Kayla M		14485 S Union Hall Rd	Mulino	Oregon	97042
5S 12E 0 3200	Groce	Gregory S				80242 Claymier Lane	Maupin	Oregon	97037
5S 12E 0 3300	Groce	Gregory S				80242 Claymier Lane	Maupin	Oregon	97037
5S 12E 0 3400	Groce	Gregory S				80242 Claymier Lane	Maupin	Oregon	97037
5S 12E 0 3500	Fullington	Neil A	Fullington	Kayla M		14485 S Union Hall Rd	Mulino	Oregon	97042
5S 12E 0 3600	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 3700	Woodside	Van L	Woodside	Sandra S		81551 Victor Rd	Maupin	Oregon	97037
5S 12E 0 3800	Wills	Benjamin	Wills	Tess		78903 Victor Rd	Maupin	Oregon	97037
5S 12E 0 3900	Waine	Michael T	Waine	Juliane I		78769 Victor Rd	Maupin	Oregon	97037
5S 12E 0 400					Fjr LLC	PO Box 189	Boring	Oregon	97009
5S 12E 0 4000	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 4100	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 4200	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 4300	Dodge	Richard	Dodge	Janie		78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 4400					United States of America	3050 NE 3rd St	Prineville	Oregon	97754
5S 12E 0 4500	Dodge	Richard	Dodge	Janie		78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 4600	Johnson	Carol Ann				52973 Endersby Rd	Maupin	Oregon	97037
5S 12E 0 4700	Dodge	Richard	Dodge	Janie		78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 4800	Elmer	Garren G			Trustee	2536 Lewis River Rd	Woodland	Washington	98674
5S 12E 0 4900	Brown	Lonny D	Brown	Pamela A		PO Box 879	Fairview	Oregon	97024
5S 12E 0 5000	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 5100					Northern Wasco County Public Utilities	2345 River Road	The Dalles	Oregon	97058
5S 12E 0 5200	Waine	Michael T	Waine	Juliane I		78769 Victor Rd	Maupin	Oregon	97037
5S 12E 0 5300	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 5400	Waine	Michael T	Waine	Juliane I		78769 Victor Rd	Maupin	Oregon	97037
5S 12E 0 5500	Waine	Michael T	Waine	Juliane I		78769 Victor Rd	Maupin	Oregon	97037
5S 12E 0 5600	Waine	Michael T	Waine	Juliane I		78769 Victor Rd	Maupin	Oregon	97037
5S 12E 0 5700	Holder	Traci				1116 SE Lambert St	Portland	Oregon	97202
5S 12E 0 5800	Paulk	Kevin D				79702 Hwy 216	Maupin	Oregon	97037

Map Tax Lot ID	Last Name 1	First & Middle Names 1	Last Name 2	First & Middle Names 2	Company/Organization	Mailing Address	City	State	Zip Code
5S 12E 0 5900					Snodgrass Mickey L et al	13051 SW Foran Hills Ct	Tigard	Oregon	97224
5S 12E 0 6000	Aschoff	Dallas	Aschoff	Tara		53228 Reservation Rd	Maupin	Oregon	97037
5S 12E 0 6100	Richley	Elizabeth L				80377 Hwy 216	Maupin	Oregon	97037
5S 12E 0 6200	Walters	Eugene				81213 Old Wapinitia Rd	Maupin	Oregon	97037
5S 12E 0 6300					Juniper Flat Rural Fire Protection	53333 Reservation Rd	Maupin	Oregon	97037
5S 12E 0 6400					Snodgrass Mickey L et al	13051 SW Foran Hills Ct	Tigard	Oregon	97224
5S 12E 0 6501	Campbell	Gregory D	Campbell	Laura C		81025 E Wapinitia Rd	Maupin	Oregon	97037
5S 12E 0 6600					Snodgrass Mickey L et al	13051 SW Foran Hills Ct	Tigard	Oregon	97224
5S 12E 0 6700	Silvey	Brian D	Silvey	Lisa M		52802 Reservation Rd	Maupin	Oregon	97037
5S 12E 0 6800	White	Earl E	White	Sharon V		290 NE Ninth St	Irrigon	Oregon	97844
5S 12E 0 6900	Beebe	Malcolm J	Beebe	Debra K		52590 Reservation Rd	Maupin	Oregon	97037
5S 12E 0 7000					Snodgrass Mickey L et al	13051 SW Foran Hills Ct	Tigard	Oregon	97224
5S 12E 0 7100	Hein	Kenneth W				PO Box 29	Maupin	Oregon	97037
5S 12E 0 7200	Skogrand	Richard	Lamirande	Pamela Lt		3107 SE Knapp St	Portland	Oregon	97202
5S 12E 0 7300	Tolentino	John A	Tolentino	Virginia		PO Box 94	Maupin	Oregon	97037
5S 12E 0 7400	Wentzel	Duane	Wentzel	Dorothy		79205 Back Walters Rd	Maupin	Oregon	97037
5S 12E 0 7401					SMI Group LLC	1255 NW 9Th Ave Apt 115	Portland	Oregon	97209
5S 12E 0 7500	Soskin	Steven				1435 Windy Knoll Lane	Deland	Florida	32724
5S 12E 0 7600	Soskin	Steven L				1435 Windy Knoll Lane	Deland	Florida	32724
5S 12E 0 7700	Wassenmiller	Gary L	Wassenmiller	Luann M		PO Box 237	Maupin	Oregon	97037
5S 12E 0 7800	Dodge	Richard T				78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 7900	Dodge	Richard T				78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 7901	Dodge	Richard T				78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 7902	Dodge	Richard T				78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 8000					Sterling Trust	1435 Windy Knoll Lane	Deland	Florida	32724
5S 12E 0 8100					Sterling Trust	1435 Windy Knoll Lane	Deland	Florida	32724
5S 12E 0 8200					Sterling Trust	1435 Windy Knoll Lane	Deland	Florida	32724
5S 12E 0 8300	Lewis	Andrew M	Lewis	Joyce K		78451 Walters Rd	Maupin	Oregon	97037
5S 12E 0 8301	Lam	Stanley				2525 Coconut Dr	San Jose	California	95148
5S 12E 0 8400	Hill Jr	Leland W	Hill	Betty J		14991 S Macksburg Rd	Molalla	Oregon	97038
5S 12E 0 8500	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 8600					Parman Trust RLT	PO Box 324	Maupin	Oregon	97037
5S 12E 0 8700	Kruger	Donald	Kruger	Sandra		12508 NW Mtn View Rd	Portland	Oregon	97231
5S 12E 0 8800	Johnson	Dale F	Johnson	Sharon F		79116 Back Walters Rd	Maupin	Oregon	97037
5S 12E 0 8900	Watson	Henry A				79118 Back Walters Rd	Maupin	Oregon	97037
5S 12E 0 9000	Dodge	Chad E				74125 Johns Ln	Pendleton	Oregon	97801
5S 12E 0 9100	Treanor	Paul E				1040 Yorkshire Ct SE	Salem	Oregon	97317
5S 12E 0 9200	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 9300	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 9400	Wisenbaker	Jamie D	Wisenbaker	Shellee		822 Alder Rd	Washougal	Washington	98671
5S 12E 23 DD 100					Snodgrass Mickey L et al	13051 SW Foran Hills Ct	Tigard	Oregon	97224
5S 12E 23 DD 1000	Cole	David R				4186 SE Filbert	Milwaukie	Oregon	97222
5S 12E 23 DD 1100					Snodgrass Mickey L et al	13051 SW Foran Hills Ct	Tigard	Oregon	97224
5S 12E 23 DD 200					Snodgrass Mickey L et al	13051 SW Foran Hills Ct	Tigard	Oregon	97224
5S 12E 23 DD 300	Woodside	Carlotta I				13051 SW Foran Hills Ct	Tigard	Oregon	97224
5S 12E 23 DD 400					Snodgrass Mickey L et al	13051 SW Foran Hills Ct	Tigard	Oregon	97224
5S 12E 23 DD 500					Snodgrass Mickey L et al	13051 SW Foran Hills Ct	Tigard	Oregon	97224
5S 12E 23 DD 600	Wall	Salina				4745 Lockwood St	The Dalles	Oregon	97058
5S 12E 23 DD 700	Blackford	Ray				8839 NW Springville Rd	Portland	Oregon	97231
5S 12E 23 DD 800	Mc Coy	Donna J				PO Box 133	Maupin	Oregon	97037
5S 12E 23 DD 900	Blackford	William				6410 SE Needham St	Portland	Oregon	97222
5S 12E 25 B 100	Bryce	Paul A				2520 SEven Mile Hi Rd	The Dalles	Oregon	97058
5S 12E 25 B 200	Woodside	Carlotta I				13051 SW Foran Hills Ct	Tigard	Oregon	97224
5S 12E 30 100	Miller	Lawrence C	Miller	Gloria		77891 Hwy 216	Maupin	Oregon	97037
5S 12E 30 B 100					State Highway Commission	4040 Fairview Industrial Dr SE	Salem	Oregon	97302-1142

Map Tax Lot ID	Last Name 1	First & Middle Names 1	Last Name 2	First & Middle Names 2	Company/Organization	Mailing Address	City	State	Zip Code
5S 12E 30 B 1000	Ertel	Keith				5414 SE Roethe St	Milwaukie	Oregon	97267
5S 12E 30 B 1100	Ayers	Jack	Ayers	Patricia		77925 Hwy 216	Maupin	Oregon	97037
5S 12E 30 B 200	Johnson	Stephanie				10511 NE 215Th Ct	Vancouver	Washington	98682
5S 12E 30 B 300	Beebe	John E				77982 Hwy 216	Maupin	Oregon	97037
5S 12E 30 B 400	Penson	Alan R			RLT	8930 NW Cornell Rd	Portland	Oregon	97229
5S 12E 30 B 500	Udey	Rosalee	Udey	James C		77898 Hwy 216	Maupin	Oregon	97037
5S 12E 30 B 700	Miller	Lawrence C	Miller	Gloria		77891 Hwy 216	Maupin	Oregon	97037
5S 12E 30 B 800	Ayers	Jonathan E				12621 SE Holgate Blvd	Portland	Oregon	97236
5S 12E 30 B 900	Campbell	Gregory D				81025 E Wapinitia Rd	Maupin	Oregon	97037
5S 12E 31 100	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
5S 12E 31 200					Malay George W et al	78264 Walters Rd	Maupin	Oregon	97037
5S 12E 31 300	Wolfe	Vernon L	Wolfe	Mary Jo		78190 Walters Rd	Maupin	Oregon	97037
5S 12E 31 400	Miller	Richard L	Miller	Kristie L		69332 Camp Polk Rd	Sisters	Oregon	97759
5S 12E 31 500	Skellenger	Scott J				78060 Walters Rd	Maupin	Oregon	97037
5S 12E 31 800					USA in Trust for	PO Box 1329	Warm Springs	Oregon	97761-1329
5S 13E 0 3000					Dulings Natural Pasture LLC	54909 Natural Pasture Rd	Maupin	Oregon	97037
5S 13E 0 4502	Campbell	Gregory D	Campbell	Laura C		81025 E Wapinitia Rd	Maupin	Oregon	97037
5S 13E 0 6200					Snodgrass Mickey L et al	13051 SW Foran Hills Ct	Tigard	Oregon	97224
5S 13E 0 6300	Gabel	Henry E				3300 Main St #101	Forest Grove	Oregon	97116
5S 13E 0 6400					Hang Belly Ranch LLC	6134 NE Alameda St	Portland	Oregon	97213
5S 13E 0 6500					Snodgrass Mickey L et al	13051 SW Foran Hills Ct	Tigard	Oregon	97224
5S 13E 0 6600					Nelson Dan L Trust	30737 SE Waybill Rd	Boring	Oregon	97009
5S 13E 0 6700					Snodgrass Mickey L et al	13051 SW Foran Hills Ct	Tigard	Oregon	97224
5S 13E 0 6800	Wisenbaker	Jamie D	Wisenbaker	Shellee		822 Alder Rd	Washougal	Washington	98671
6S 12E 0 100	Wisenbaker	Jamie D	Wisenbaker	Shellee		822 Alder Rd	Washougal	Washington	98671
6S 12E 0 1000					Oregon Department of Transportation	355 Capitol Street NE	Salem	Oregon	97301
6S 12E 0 1100					USA in Trust for	PO Box 1329	Warm Springs	Oregon	97761-1329
6S 12E 0 1200	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
6S 12E 0 1300	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
6S 12E 0 1400					Parman Trust Rlt	78902 Walters Rd	Maupin	Oregon	97037
6S 12E 0 1500	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
6S 12E 0 1600	Dodge	Richard	Dodge	Janie		78888 Walters Rd	Maupin	Oregon	97037
6S 12E 0 1700					USA in Trust for	PO Box 1329	Warm Springs	Oregon	97761-1329
6S 12E 0 1900					USA in Trust for	PO Box 1329	Warm Springs	Oregon	97761-1329
6S 12E 0 200	Wisenbaker	Jamie D	Wisenbaker	Shellee		822 Alder Rd	Washougal	Washington	98671
6S 12E 0 2100					Indian Allotment	1233 Veterans Street PO Box C	Warm Springs	Oregon	97761
6S 12E 0 2200					Indian Allotment	1233 Veterans Street PO Box C	Warm Springs	Oregon	97761
6S 12E 0 300	Glass	David C				PO Box 777	Banks	Oregon	97106
6S 12E 0 600	Hein	Kenneth W				PO Box 29	Maupin	Oregon	97037
6S 12E 0 601	Yanez	Isaac A				52237 Reservation Rd	Maupin	Oregon	97037
6S 12E 0 700					State Highway Commission	4040 Fairview Industrial Dr SE	Salem	Oregon	97302-1142
6S 12E 0 900	Campbell	Lori				PO Box 391	Maupin	Oregon	97037

COFFMAN ENGINEERS

DESCHUTES SOLAR AND BATTERY ENERGY STORAGE SYSTEM PROJECT

Operational Wildfire Mitigation Plan (WMP)

COFFMAN PROJECT NO. 243075

ISSUED FOR PERMIT

December 2025

Prepared for: BRIGHTNIGHT

OPERATIONAL WILDFIRE MITIGATION PLAN

FOR

BRIGHTNIGHT
DESCHUTES SOLAR AND BATTERY ENERGY STORAGE SYSTEM PROJECT

Project Number: 243075

TABLE OF CONTENTS

ATTACHMENTS

ABBREVIATIONS

BESS	Battery Energy Storage System
BMP	Best Management Practices
CWPP	Community Wildfire Protection Plan
EFSC	Energy Facility Siting Council
ERP	Emergency Response Plan
kV	Kilovolt
LOTO	Lock Out / Tag Out
NFPA	National Fire Protection Association
OAR	Oregon Administrative Rules
ODOE	Oregon Department of Energy
ORS	Oregon Revised Statutes
O&M	Operations and Maintenance
PMO	Project Management Office
PV	Photovoltaic
QEW	Qualified Electrical Worker
RACE	Rescue, Alarm, Contain and Extinguish
SCADA	Supervisory Control and Data Acquisition

DEFINED ROLES

Authorized Person	Senior Qualified Electrical Worker (QEW), internal to the Operator, Owner, or external that is responsible for applying Lock Out / Tag Out (LOTO) and verifying absence of voltage and other hazardous energy sources.
Contractor	An internal or external group who is tasked or hired to perform the physical decommissioning activities.
Operator	An internal or external group, whether onsite or remote, that performs the day-to-day reporting, planned, and unplanned maintenance for the Facility.
Owner	Persons, companies, and or investors that are the legal representatives for the Facility and in charge of making major investment and divestment decisions.

EXECUTIVE SUMMARY

This Wildfire Mitigation Plan (WMP) has been developed for DECH bn, LLC (a subsidiary of BrightNight Power, LLC) for the proposed Deschutes Solar and Battery Energy Storage System (BESS) Facility, with a capacity of up to 1,000 megawatts of solar and 4,000 megawatt hours of battery storage (hereafter referred to as the Facility), located in Wasco County, Oregon. This plan outlines procedures during the operation of the Facility to mitigate the possibility of wildfire in the vicinity of the Facility.

It is anticipated that the Facility will have a design life of approximately 30 years. Construction is anticipated to start in Q2 of 2027 and therefore changes should be expected. This document shall be updated as necessary based on new standards and local requirements. It is the Certificate Holder's responsibility to review this document at minimum on an annual basis.

The wildfire risk analysis based on the data from Oregon's Community Wildfire Protection Plan (CWPP) Planning Tool shows that the wildfire risk within the analysis area is moderate. This risk assessment incorporates likelihood and consequence based on topography, vegetation, existing infrastructure, climate, cumulative precipitation, fuel moisture content, residential areas, critical infrastructure, recreation areas, timber and agricultural resources, and fire-sensitive wildlife habitat. Specific areas of high risk within the analysis area include existing residences, buildings, roadways and electrical transmission lines.

To mitigate the consequence of wildfire damaging existing and proposed infrastructure, as well as recreation areas, agricultural resources, and fire-sensitive wildlife habitat, this WMP presents various programs to be implemented during the operation of the Facility. These programs include regular inspections and maintenance of vegetation and electrical equipment to maintain proper equipment function and equipment clearances to vegetation.

With regular inspections and maintenance, it is anticipated that the overall fire risk within the analysis area, which includes the site boundary plus a half mile, will remain moderate based on maintaining the average flame lengths of the available fuel within the analysis area.

1 PRIOR TO OPERATION WILDFIRE MITIGATION TASK LIST (PRO)

Prior to operation of the Facility, complete the activities in Sections 1.1 and 1.2.

1.1 Training (PRO)

Organize and hold an on-site training with the Certificate Holder, operation and maintenance personnel, inviting specialty contractors, local fire department(s), participating and adjacent landowners, emergency management office personnel, Oregon Department of Energy (ODOE), and any other emergency management agency that covers:

- Description of Facility operation;
- The type, location, and proper use of fire protection equipment;
- Fire protection equipment usage and maintenance requirements;
- The location(s) of water source(s) and proper usage, storing and maintenance for the pump, hose nozzle; and water hose;
- Overview of smoking policy and locations;
- Overview of procedures and restrictions of maintenance and operation activities during Fire Season and Red Flag Warnings designated in this Plan;
- Rescue, Alarm, Contain and Extinguish ("RACE") procedures including:
    - Rescue anyone in danger (if safe to do so);
    - Alarm – call the control room, who will then determine if 911 should be alerted;
    - Contain the fire (if safe to do so); and
    - Extinguish the incipient fire stage (if safe to do so).
- Provide information and encourage attendees to sign up for the County's Citizen Alert Emergency Notification system.

A training attendee list and training materials must be provided to ODOE to demonstrate compliance.

Provide ODOE the template residence outreach letter provided as Attachment B of this WMP. Once ODOE confirms the letter to be sufficient, mail the completed form to each residence within the analysis area (i.e., within the site boundary and 0.5-mile from the site boundary). Confirm mailing and submit proof to ODOE.

Facility Site Map(s) Submission (PRE

1.2 Facility Site Map(s) Submission (PRO)

Concurrently submit updated site maps from Section 2.2 to local fire departments and ODOE.

2 OPERATIONAL WILDFIRE MITIGATION PLAN (OPR)

2.1 Summary of As-Built Facility Description with Design Features and Location of Fire Protection Equipment

Operation of the Facility will be supported by the existing and constructed roadways. Vegetation will be completely removed for non-vegetated Facility features including the areas immediately around the operation and maintenance (O&M) building, proposed substation and switchyard and BESS. Vegetation will be removed with construction machinery. Any vegetation removed from the site will be disposed of and removed from the site. The Certificate Holder and contractors will prevent the accumulation of combustible “burn piles” on site.

After construction completion, the temporary laydown areas and other construction areas where vegetation was disturbed during construction, shall be revegetated with the use of native plants in accordance with local codes or contractual requirements. The vegetation in these areas shall be managed in accordance with Section 2.7 of this document during operation of the Facility.

The finished Facility will be comprised of the following features:

- Solar array areas
- Transformers (271 transformers located throughout the solar array areas)
- BESS yard
- O&M Building
- Collector substation and switchyard
- Access roads
- Perimeter Fencing and gates

The BESS area within the Facility is subject to the highest wildfire risk due to the flammability of the Lithium-ion batteries. There are several design features within the BESS yard to mitigate the risk of wildfire to and from the Lithium-ion batteries. These features are listed below:

- Service roads, including a perimeter road (24 feet wide, sufficient for fire apparatus access)
- Setback (10 feet from BESS equipment to service roads and 10 feet from service roads to BESS yard fence)
- 2 entrance/exit locations for BESS area

Reference the Emergency Response Plan (ERP) for firefighting guidance on battery fires.

Non-BESS-specific setback distances for the Facility are shown in the table below:

Setback details	
Setback Description	**Setback (feet)**
Participating landowner property line	50
OR 216 right of way[1], and non-participating landowner property line	200
Existing overhead powerline	75
Wetlands, streams (perennial or intermittent), ponds	25 to 100
Irrigation ditches	50
County road[1]	50
Cultural resource	25
Floodplain	25
Wasco County Structure Fire Fuel Break	50

Table 2.1 – Facility setback distances

Note: Setbacks from existing overhead powerlines, OR 216 and county roads are measured from the edge of the right-of-way. Setbacks from irrigation ditches are measured from the centerline of the ditch.

[1] The county required setback from public roads and OR 216 is 25 feet. The Certificate Holder is planning to exceed this setback.

2.2 Facility Site Map(s)

This Operational WMP includes the baseline wildfire risk maps from the CWPP Planning Tool (Attachment A) and a preliminary Facility layout map (Attachment B). The Facility layout map will be updated prior to Facility operation to include additional information, including:

- Location and dimensions of Facility roads
- Location of vegetation free, noncombustible, defensible spaces
- High-fire consequence areas/resources (includes existing infrastructure, residences, sensitive habitat, or cultural resources)
- The location of Facility access points and procedures for emergency responders to access the Facility
- The type and location of fire protection equipment
- The location(s) of water source(s) that will be on-site during operation

2.3 Specifications for Fire Protection Equipment

The following fire suppression equipment will be carried in vehicles conducting maintenance activities and will be stored on-site at the O&M building:

- Fire Extinguisher: Dry chemical. 2A:10BC (5 pound), properly mounted or secured;

- McCleod, Shasta, or Rhino Tool;
- Hand Shovel: Round point. 26 to 28 in "D" Handle, blade - 12 inches long and 10 inches wide;
- Collapsible backpack with hand pump: 5-gallon capacity; and
- Drip Can: 5-gallon capacity.

During fire season (designated Fire Season or May to October each year) water truck(s)/water source, water buffalo, or tank with minimum 500-gallon capacity must be on site. The water truck or water supply shall be compatible with JFRFPD firefighting resources and include the following, unless approved by ODOE:

- Pump should be maintained ready to operate and capable of providing a discharge of not less than 20 gallons per minute at 115 psi at pump level. Note: Volume pumps will not produce the necessary pressure to effectively attack a fire start. Pressure pumps are recommended.
- Provide enough hose (500 feet minimum) not less than 1-inch inside diameter to reach areas where power driven machinery has been used
- Water supply, pump, and at least 250 feet of 1½-inch hose with nozzle must be maintained as a connected, operating unit ready for immediate use.

Refer to the Emergency Response Plan (ERP) for firefighting considerations of battery fires.

All internal combustion engines must be equipped with exhaust systems, mufflers and screens, or include an appropriate spark arrestor, and must be kept in good operating condition. All combustion engines (including but not limited to off road vehicles, chainsaws, and generators) will be equipped with a spark arrester that meets U.S. Forest Service Standard 5100-1.

All power-driven machinery will be kept free of excess flammable material which may create a risk of fire.

2.4 Facility Contact Information and Emergency Response Procedures

In an emergency call 911. Certificate Holder shall then be called after calling 911. Additional phone numbers are provided and may be called if determined necessary by the Certificate Holder. All fire and EMS incidents shall be reported to Juniper Flat Rural Fire Protection District (JFRFPD) regardless of response type.

Contact	Address	Telephone Number
Emergency Fire/Sheriff/Ambulance	**n/a**	**911**
Bijan Damavandi (BrightNight Development Director)	**515 N Flagler Dr, Ste P200 West Palm Beach, FL 33401**	**(773) 392-7423**
Additional Phone Numbers		
Juniper Flat Fire Station #1 (Closest) Response time: ~5 min	53333 Reservation Rd, Maupin, OR 97037	Chief, Walters (541) 980-8241
Juniper Flat Fire Station #3 Response time: ~5 min	52517 Kelly Springs Rd, Maupin, OR 97037	Chief, Walters (541) 980-8241
Juniper Flat Fire Station #2 Response time: ~15 min	Juniper Flat Rd & Old Wapinitia Rd, Maupin, OR 97037	Chief, Walters (541) 980-8241
Tygh Valley Fire Station Response time: ~40 min	57723 Fairgrounds Rd, Tygh Valley, OR 97063	Chief, LaPlante (541) 993-4266
Wamic Fire Station Response time: ~45 min	11 S County Rd, Wamic, OR 97063	Chief, Magill (541) 993-9824
Wasco County Emergency Management Department	511 Washington Street, Suite 102 The Dalles, OR 97058	(541) 298-5507

Residence/landowner outreach letter is provided as Attachment C of this WMP as well as a list of residence addresses within the analysis area. Use this letter when communicating with new or updated residences within the analysis area defined in Section 4.0, Plan Updates and Reporting Requirements.

Contact 911 in the event of:

- A fire or emergency on-site that cannot be addressed by personnel on-site and requires the assistance of fire or emergency medical personnel;

- A fire ignition on-site that spreads out of the fence line;
- Any fire off-site that does not have emergency responders on site.
    - To the extent that construction personnel can safely assist and/or provide equipment to help extinguish off-site fires until emergency responders are on site, it is encouraged to do so to assist in the spread of the fire, loss of life, property and damage to the environment.

2.5 Use of Vehicles and Power Driven Machinery at Site

The following best management practices (BMPs) to minimize fire risk from vehicle travel, equipment use, and fueling activities will be implemented at the site during operations and maintenance:

- The movement of vehicles will be planned and managed to minimize fire risk.
- Workers will be instructed to shut off the engine of any vehicle that gets stuck and periodically inspect the area adjacent to the exhaust system for evidence of ignition of vegetation. Stuck vehicles will be pulled out rather than “rocked” free and the area will be inspected again after the vehicle has been moved.
- Fuel containers, if used, shall remain in a vehicle or equipment trailer, parked at a designated location. No fuel containers shall be in the vehicles that exit the right-of-way except the five-gallon container that is required for the water truck pump.
- All power-driven machinery will be kept free of excess flammable material which may create a risk of fire.

2.6 Fire Precaution Levels and Restrictions during Fire Season

Definitions:

Non-Fire Season - Approximately November 1st to May 1st

Fire Season - Approximately May through September, formally designated by the Oregon Department of Forestry (ODF). Under ORS 478.960 (4), a Fire Chief can establish Fire Season within a Fire District when ODF, under ORS 477.505, declares Fire Season. Begin seasonal restrictions for the public and industry.

Fire Weather Watch - A fire weather watch is issued when there is a high potential for the development of a red flag event. A watch is issued 18 to 96 hours in advance of the expected onset of criteria. The intent of a fire weather watch is to alert forecast users at least a day in advance for the purposes of resource allocation and fire fighter safety. A watch means critical fire weather conditions are possible but not imminent or occurring.

Red Flag Weather Warning - A red flag warning is used to warn of impending or occurring red flag conditions. Its issuance denotes a high degree of confidence that weather and fuel conditions consistent with local red flag event criteria will occur in 48 hours or less. Specific Red Flag criteria differ for each situation and district in Oregon, however Red Flag Weather Warnings issued from either National Weather Service zones OR701 Eastern Columbia River Gorge of Oregon (ORZ701) or OR691 Lower Columbia Basin of Oregon (ORZ691) shall be considered applicable. Be extremely careful with open flames and other activities that emit sparks.

Hot Work - Any cutting, grinding, welding, or other activity that creates spark or open flame,

Fire Watch Service -

Fire watch shall:

- Be physically capable and experienced to operate firefighting equipment.
- Have facilities for transportation and communications to summon assistance.
- Observe portions of the Facility where equipment activity occurred during the day.

Upon discovery of a fire, fire watch personnel must: first report the fire, summon any necessary firefighting assistance, describe intended fire suppression activities; then, after determining a safety zone and an escape route that will not be cut off if the fire increases or changes direction, immediately proceed to control and extinguish the fire, consistent with firefighting training and safety.

Fire-Prevention Measures and Restrictions Associated with Fire Season:

Certificate Holder shall maintain a log when Facility operation is impacted by Fire Restrictions during Fire Season as designed in this Section. The log will include:

- The date;
- Fire Precaution Level;

- Description of actions taken, including if any measures were taken to reduce wildfire risk that are not identified in this Plan.

Non-Fire Season

- All hot work (must be conducted on roads or on non-combustible surfaces.
- Smoking in designated areas only.

Fire Season

- No hot work will be permitted.
- Water source meeting specifications in this Plan will be on site during fire season.
- Following the completion of hot work, the Certificate Holder or contractor(s) must maintain a fire watch for 60 minutes to monitor for potential ignition.
- Fire watch shall be on duty during any breaks and for one hour after all power-driven machinery used by the Certificate Holder has been shut down for the day.
- Smoking in designated areas only.
- No parking on dry grass.

Fire Weather Watch

- No hot work permitted.
- Driving and parking only permitted on graveled surfaces.
- Fire watch shall be on duty during any breaks and for one hour after all power-driven machinery used by the Certificate Holder has been shut down for the day.
- No smoking on site.

Red Flag Weather Warning

- No hot work permitted.
- On-site personnel must be aware of Red Flag Warning.
- Driving and parking only permitted on graveled surfaces.
- Fire watch shall be on duty during any breaks and for one hour after all power-driven machinery used by the Certificate Holder has been shut down for the day.
- No smoking will take place on site.

Table 2.6: Fire Prevention Measures During Fire Season Summary

Requirement	Non-Fire Season	Fire Season	Fire Weather Watch	Red Flag Warning
Fire weather advisory	Not required	Not required	Not required	On-site personnel must be aware of Red Flag Warning.

Table 2.6: Fire Prevention Measures During Fire Season Summary

Requirement	Non-Fire Season	Fire Season	Fire Weather Watch	Red Flag Warning
On-site water source	N/A	As specified in Section 2.2	As specified in Section 2.2 and 2.3.	As specified in Section 2.2 and 2.3.
Hot work	Only permitted on roads or on non-combustible surfaces.	Only permitted on roads or on non-combustible surfaces; fire watch required for 60 minutes after completion	Not Permitted	Not Permitted
Fire Watch Service	Not required	During breaks and for 60 minutes after all power-driven machinery has been shut down for the day.	During breaks and for 60 minutes after all power-driven machinery has been shut down for the day.	During breaks and for 60 minutes after all power-driven machinery has been shut down for the day.
Driving and Parking	As described in Section 2.5.	As described in Section 2.5.	Only permitted on roads or on non-combustible surfaces and Section 2.5.	Only permitted on roads or on non-combustible surfaces and Section 2.5.
Smoking	Designated areas only	Designated areas only	Not permitted	Not permitted

2.7 Vegetation Management

2.7.1 Vegetation-free, Noncombustible Space, and Vegetation Standards

Vegetation within the fence line and below the solar arrays and gen-tie line will be maintained in accordance with the approved Operation Soil and Vegetation Management Plan for the Facility. Vegetation will be limited to a height of 10 to 12 inches, with a minimum clearance of 12 inches from electrical equipment. Vegetation near, at, or taller than the maximum height shall be removed or mowed. Mowing must be done in advance of fire season or in accordance with any fire restrictions. At no point shall vegetation come in contact with electrical equipment. Any vegetation removed from the site will be disposed of and not stored on site. Certificate Holder and contractors will prevent the accumulation of combustible “burn piles” on site.

The following areas will be managed to be vegetation-free, noncombustible space, gravel surface, or maintained to act as a fuel break:

- 16-foot-wide service roads within solar array area - graveled
- 24-foot-wide service roads within BESS area - graveled
- 10-foot noncombustible, defensible space clearance along the fenced perimeter of the site boundary - vegetation free
- Within a 10-foot perimeter of the inverter/transformer pads, collector substation and BESS - graveled, similar noncombustible base, or vegetation free
- Parking and O&M building perimeter – graveled
- Vegetation will be maintained within 50 feet of the Facility structures to provide a fire fuel break.
- Vegetation along service roads will be managed by mowing or other vegetation removal
- Vegetation inspections shall be conducted biannually throughout the site and monthly during the growing season (i.e., April through July).

2.8 Electrical Safety

2.8.1 Safety Training

All contractors servicing electrical components within the Facility shall have received certification of electrical safety training. Certification shall be presented to the Certificate Holder prior to any work on-site.

2.8.2 Inspections

The electrical components of the Facility will be constantly monitored via a Supervisory Control and Data Acquisition (SCADA) system. Any anomalies shall be reported to the Certificate Holder for inspection and remediation.

Facility components shall otherwise be inspected quarterly for damage and wildfire risk. Ensure that an inspection is carried out prior to Wildfire season. Inspections shall be documented and recorded, with records available in both the O&M building on-site as well as electronically, accessible to the Certificate Holder staff off-site.

Specific fire protection features within the BESS area shall be inspected by the installing contractor or other licensed fire alarm contractor in accordance with NFPA 72.

2.8.3 Lock Out / Tag Out (LOTO)

Prior to any maintenance or decommissioning work on any electrical components, the components shall be de-energized and appropriately locked out and tagged out. The following steps shall be performed during LOTO:

- Communicate and prepare for equipment shutdown

- Shut down equipment
- Isolate equipment from energy sources
- Apply LOTO device
- Dissipate stored energy
- Verify electrical isolation and energy dissipation
- Perform maintenance
- Release from LOTO

2.9 Inspections and Maintenance

The tables in Attachment E include an operational check list that will be filled out designating which personnel conducted inspections and maintenance, the dates of inspections and maintenance, and results. As designated in Section 4.0, of this WMP, this table checklist will be submitted to demonstrate compliance with the WMP and used to determine if changes to the WMP are necessary. Other checklists may be provided prior to operation and in the annual review of the WMP, as approved by ODOE.

Manufacturers' recommendations, or excerpts for inspections and maintenance will be included as Attachment F to this WMP.

Lock Out/Tag Out Program:
During maintenance activities, electrical equipment is de-energized and physically locked or tagged in the de-energized positions to avoid inadvertent events that could result in arc flash.

- Ensure equipment is maintained to prevent and control sources of ignition.

2.10 Annual Operational Safety Training(s)

Once a year after Facility operation begins, organize and hold an on-site training with Certificate Holder and operation and maintenance personnel, inviting equipment manufacturers, specialty contractors, local fire department(s), participating and adjacent landowners, emergency management office personnel, ODOE, and any other emergency management agency that covers:

- The location of electrical facility components and the fire safety measures associated with each component;
- Battery-specific safety protocols, including how to appropriately address chemical fires, in the event of an emergency;
- The type, location, and proper use of fire protection equipment;
- Fire protection equipment usage and maintenance requirements;
- The location(s) of water source(s) and proper usage, storing and maintenance for the pump, hose nozzle; and water hose;
- Overview of smoking policy and locations;
- Overview of procedures and restrictions of maintenance activities during Fire Season, Fire Weather Watches, and Red Flag Warnings designated in this Plan;
- Rescue, Alarm, Contain and Extinguish (RACE) procedures including:
    - Rescue anyone in danger (if safe to do so);
    - Alarm – call the control room, who will then determine if 911 should be alerted;
    - Contain the fire (if safe to do so); and

    - Extinguish the incipient fire stage (if safe to do so).
- Provide information and encourage attendees to enroll in the County's emergency management notification system.

Training attendee list and training materials must be provided to ODOE to demonstrate compliance.

2.11 Facility Monitoring

Facility components that are monitored via the SCADA system are the solar inverters, collector substation, BESS, and overhead electrical lines associated with the gen-tie line. Facility components will be monitored remotely with the SCADA system 24 hours a day, 7 days a week. Fire alarm control panels will be connected to the SCADA system and will contact local firefighting services if needed. The BESS will also be monitored by fire safety monitoring systems to detect and alarm if a fire condition is detected.

The Facility has remote shutdown capabilities that involve isolating affected battery cells to cease charging and discharging.

3 CONCLUSION

The wildfire risk analysis based on the data from Oregon's CWPP Planning Tool shows that the wildfire risk within the analysis area is moderate. Note that risk is defined as the combination of consequence and likelihood. This risk assessment incorporates both the likelihood and consequence based on topography, vegetation, existing infrastructure, climate, cumulative precipitation, fuel moisture content, residential areas, critical infrastructure, recreation areas, timber and agricultural resources, and fire-sensitive wildlife habitat. Specific areas of high risk within the analysis area include existing residences, buildings, roadways and electrical transmission lines.

To mitigate the potential impacts of wildfire on existing infrastructure, as well as recreation areas, agricultural resources, and fire-sensitive wildlife habitat, this WMP presents a series of programs to be implemented during the operation and maintenance of the Facility. These programs include regular inspections and maintenance of vegetation and electrical equipment to maintain proper function and safe clearances.

With consistent application of these measures, wildfire risk within the analysis area is expected to remain stable within the moderate classification throughout the operations and lifecycle of the Facility.

4 PLAN UPDATES: AMENDMENTS AND REPORTING REQUIREMENTS

The following will be provided to ODOE in the semi-annual construction report required per OAR 345-026-0080:

- Section 2.1 and 2.2, any changes in wildfire risk at the site or changes in Facility components or preventative features.
- Section 2.4, any changes in local fire protection agency personnel and operational managers.
- Section 2.4, any changes in analysis area residence/landowner addresses or contact information.
- Fill out the Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results tables in Attachment E, with the dates, personnel, and results of inspections and maintenance performed. A different form or checklist of operational inspection, vegetation management, and maintenance may be used if approved by the Oregon Department of Energy.
- A copy of the Fire Season Restriction Log identified in Section 2.6.

The Certificate Holder must review this WMP annually to determine if updates to the WMP are necessary. In its annual review, the Certificate Holder will evaluate changes in standards, policies, future technologies or best practices that could be implemented at the facility to address wildfire prevention or protection, including but not limited to those identified in Table 4, below.

Information from the annual reporting and from the Certificate Holder or ODOE review of sources in Table 4 may be used to establish the performance of the WMP. If determined by Certificate Holder or ODOE, adjustments or improvements must be proposed to ensure the WMP provides wildfire mitigation. Any ODOE required updates shall be implemented within 14 days, unless otherwise agreed to by ODOE based on a good faith effort to address wildfire hazard.

This WMP may be amended from time to time by agreement of the Certificate Holder and the Oregon Energy Facility Siting Council (EFSC) or ODOE, acting within its delegated authority of EFSC. Such amendments may be made without amendment of the site certificate. EFSC authorizes ODOE to agree to amendments to this Plan. ODOE will notify EFSC of all amendments, and EFSC retains the authority to approve, reject, or modify any amendment of this Plan agreed to by ODOE.

Table 4: Standards for Future Review

Reference	Description	Method
National Electric Reliability	Corporation develops electrical standards for large energy facilities.	The applicant will follow NERC. Standard FAC-003-0 for its vegetation management program of transmission lines[1], or updates to this standard as approved by NERC.
Oregon Specialty Building Codes	Building codes applicable to inhabitable spaces, including the O&M building and the substation enclosure.	Remodeling to the O&M and enclosure structure that requires permits will follow any updates to the OSPC at that time.

Oregon Fire Code	The Oregon State Fire Marshal adopts the Oregon Fire Code, establishing minimum fire prevention and protection systems requirements applicable to certain structures, including but not limited to, energy systems.	The applicant will adhere to any applicable standards of the Oregon Fire Code and will incorporate features necessary to meet those standards into the design of the Facility. Certificate Holder will annually review and apply applicable standards that may apply to an operational Facility.
NFPA Codes and Standards	The National Fire Protection Association publishes codes and standards intended to minimize the possibility and effects of fire and other risks.	The applicant will identify and adhere to any applicable codes and standards and will incorporate features necessary to meet those standards into the design of the Facility. Certificate Holder will annually review and apply applicable standards that may apply to an operational Facility.
ORS chapter 477, OAR chapter 629-043	Standards and rules for fire prevention in forest and range land administered by Oregon Department of Forestry	The applicant will be familiar with and operate consistently with the applicable standards, including any updates to rules or standards and will provide a summary of standards that are updated and implemented at the Facility.
OAR chapter 860, division 024	Safety standards for transmission lines adopted by Oregon PUC	The applicant will maintain consistency with any applicable vegetation clearance requirements, pruning standards, and high fire risk zone safety standards and will provide a summary of standards that are updated and implemented at the Facility.
1. NERC FAC-003-0: https://www.nerc.com/pa/Stand/Reliability%20Standards/FAC-003-0.pdf.		

ATTACHMENTS

Attachment A

OREGON CWPP PLANNING TOOL MAPS

LEGEND:

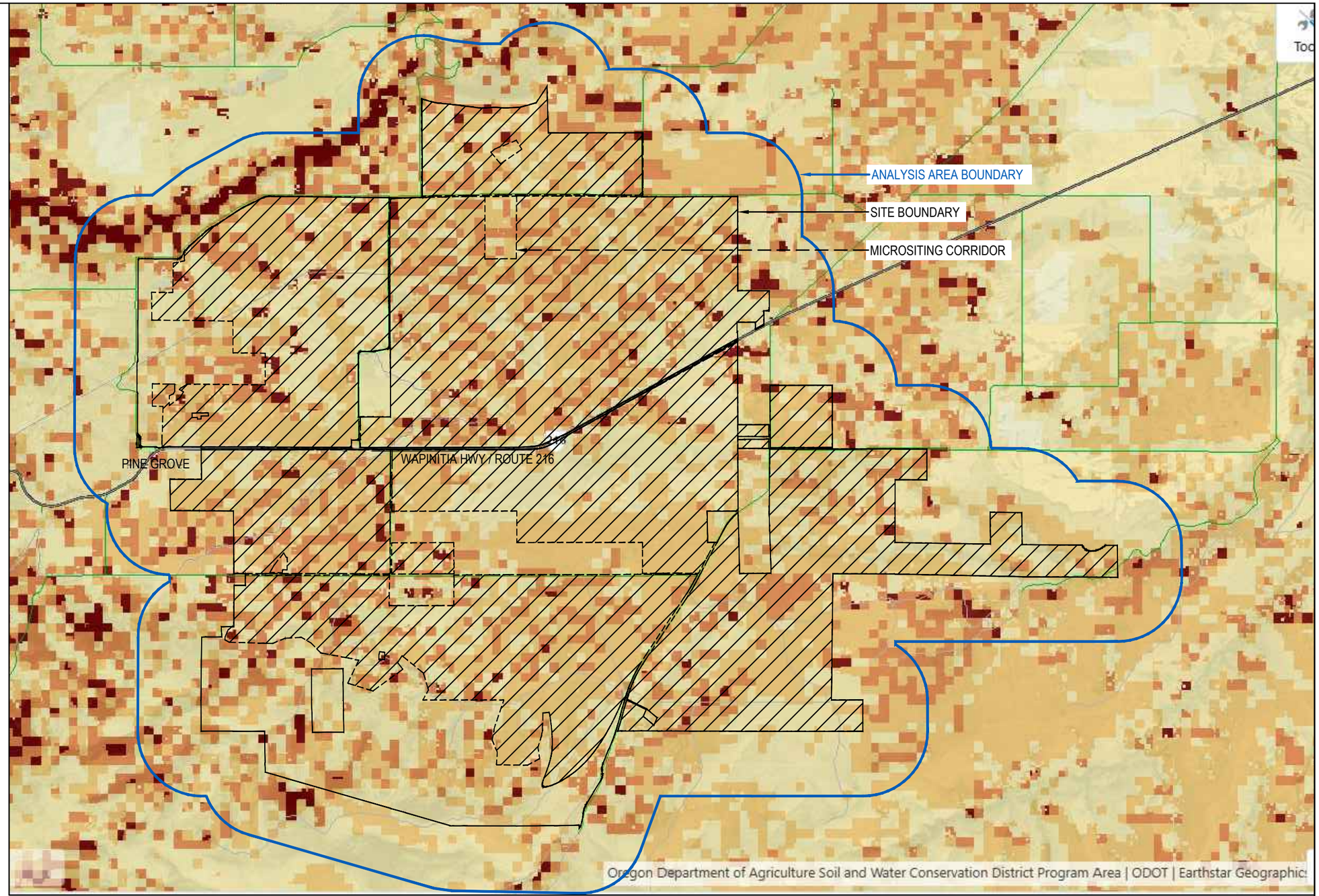
- VERY HIGH
- HIGH
- MODERATE
- LOW
- NON-BURNABLE / VERY LOW

FIGURE SUMMARY:

AVERAGE HAZARD TO POTENTIAL STRUCTURES THROUGHOUT THE ANALYSIS AREA IS CONSIDERED 'LOW' AND 'MODERATE'.

NOTES:

THE DATA DISPLAYED ON THIS FIGURE COMES FROM THE COMMUNITY WILDFIRE PREVENTION PLAN (CWPP) PLANNING TOOL.



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TITLE: HAZARD TO POTENTIAL STRUCTURES

PROJECT: DESCHUTES SOLAR AND BESS		LOCATION: WASCO COUNTY, OR
CLIENT: BRIGHTNIGHT		FIGURE NO: A-1
PROJ. NO.: 243075	DATE: NOVEMBER 2025	

LEGEND:

- 0-25 DEGREES
- 25-50 DEGREES
- 50-76 DEGREES

FIGURE SUMMARY:

THE ANALYSIS AREA IS MOSTLY FLAT.

NOTES:

THE DATA DISPLAYED ON THIS FIGURE COMES FROM THE COMMUNITY WILDFIRE PREVENTION PLAN (CWPP) PLANNING TOOL.

THE CWPP PLANNING TOOL ONLY DISPLAYS SLOPES IN THE 3 CATEGORIES ABOVE AS DEGREE SLOPES. THE STRUCTURAL STANDARD EXHIBIT PROVIDES A MORE DETAILED DESCRIPTION OF SITE SLOPES IN SLOPE PERCENTAGES. IN SUMMARY, THE PERCENTAGE OF SITE ACREAGE COMPRISED OF THE FOLLOWING SLOPES ARE:

0% TO 5% SLOPE:	74.7%
5% TO 10% SLOPE:	6.7%
10% TO 15% SLOPE:	3.8%
GREATER THAN 15%:	14.7%
TOTAL:	99.9%*

*DOES NOT EQUAL 100% DUE TO ROUNDING

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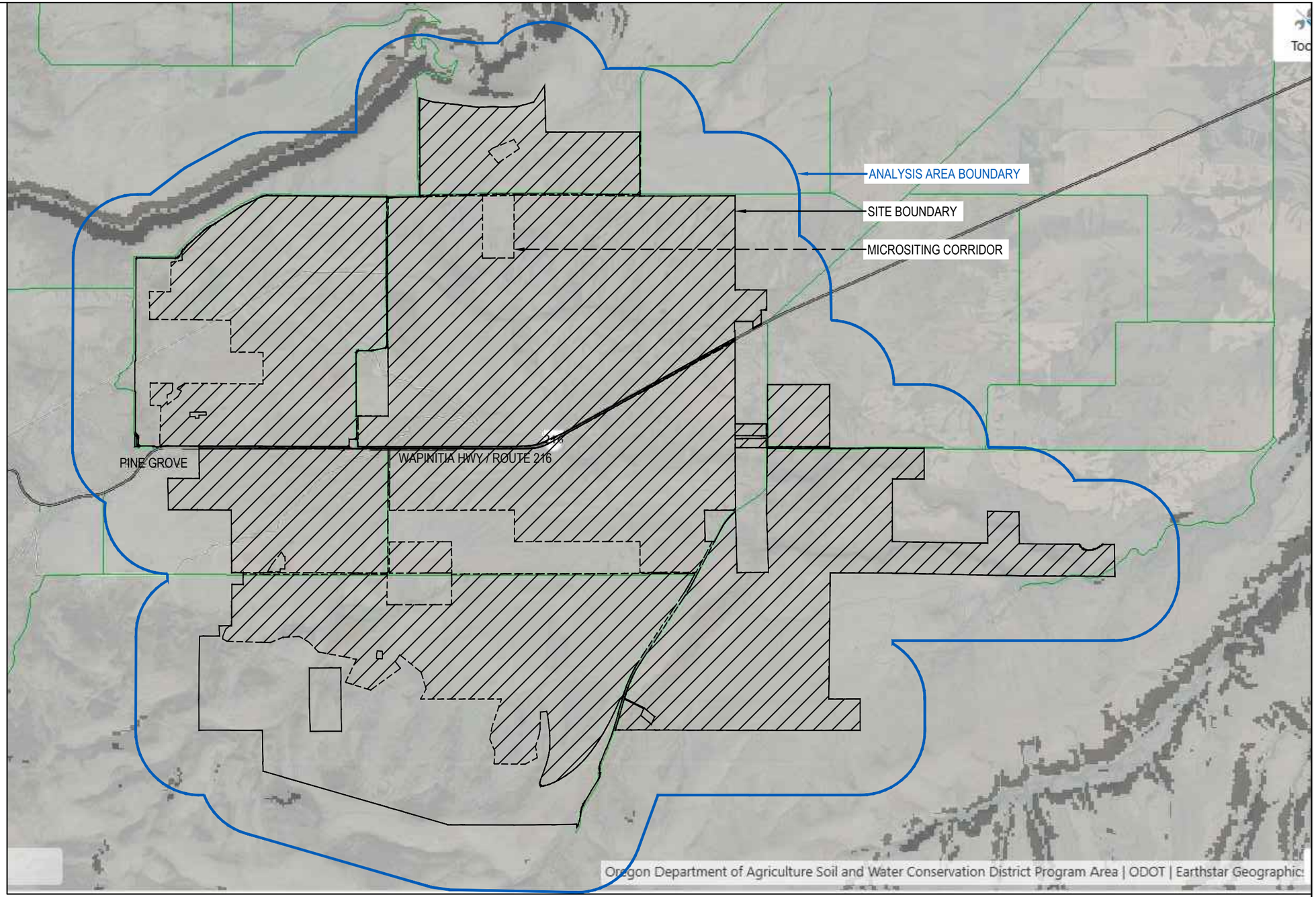

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TITLE: SLOPE

PROJECT: DESCHUTES SOLAR AND BESS

LOCATION: WASCO COUNTY, OR

CLIENT: BRIGHTNIGHT

FIGURE NO: A-2

PROJ. NO.: 243075

DATE: NOVEMBER 2025

LEGEND:

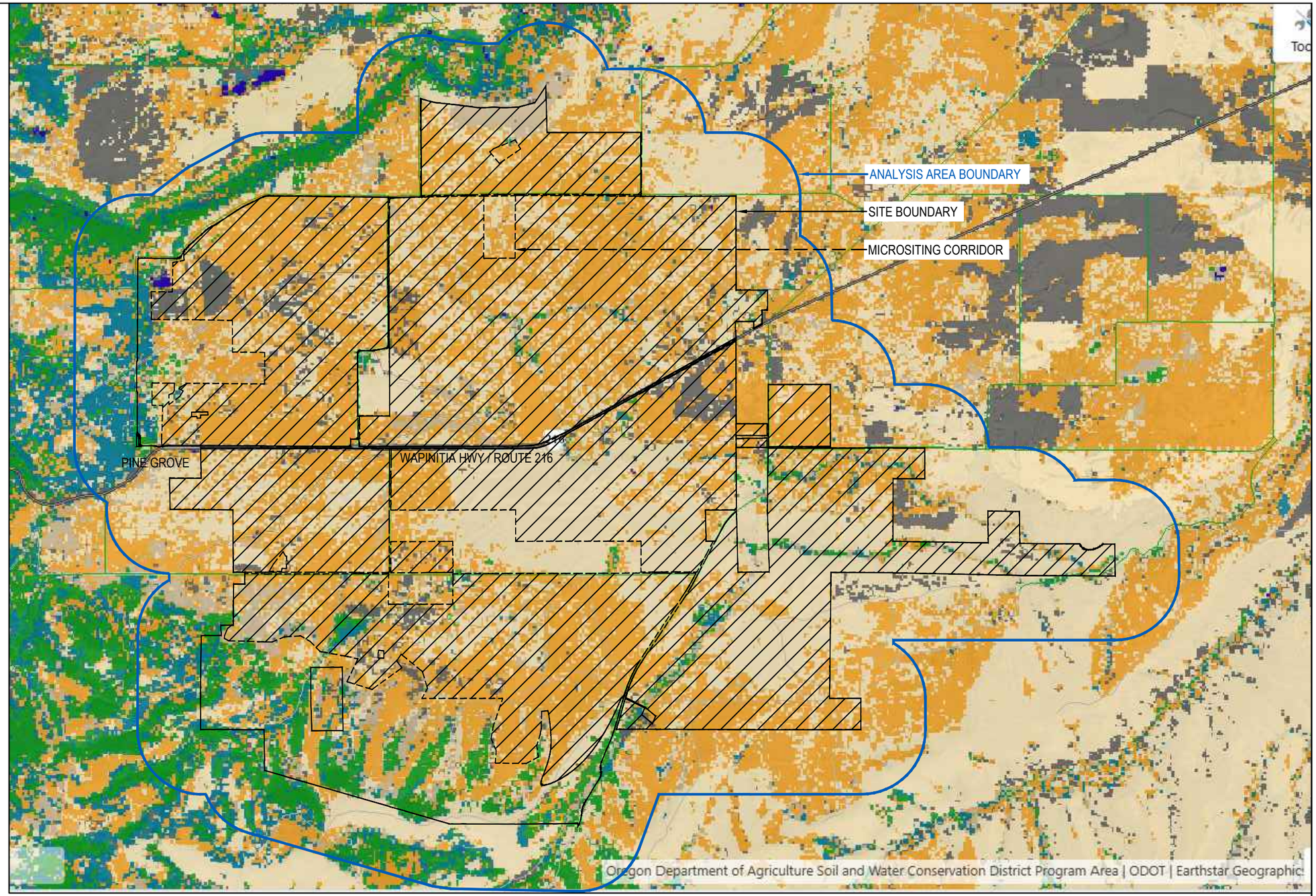
- GRASS
- GRASS/SHRUB
- SHRUB
- TIMBER LITTER
- TIMBER UNDERSTORY
- NON-BURNABLE-OTHER
- NON-BURNABLE-WATER
- SLASH-BLOWDOWN

FIGURE SUMMARY:

THE ANALYSIS AREA IS COMPRISED MOSTLY OF 'GRASS' AND 'GRASS/SHRUB' FUEL MODEL GROUPS.

NOTES:

THE DATA DISPLAYED ON THIS FIGURE COMES FROM THE COMMUNITY WILDFIRE PREVENTION PLAN (CWPP) PLANNING TOOL.



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TITLE: VEGETATION TYPES / FUEL MODELS

PROJECT: DESCHUTES SOLAR AND BESS		LOCATION: WASCO COUNTY, OR
CLIENT: BRIGHTNIGHT		FIGURE NO: A-3
PROJ. NO.: 243075	DATE: NOVEMBER 2025	

LEGEND:

- 0*
- LOW (< = 1-IN-10,000)
- LOW - MODERATE (1-IN-10,000 TO 1-IN-5,000)
- MODERATE (1-IN-5,000 TO 1-IN-1,000)
- MODERATE - HIGH (1-IN-1,000 TO 1-IN-500)
- HIGH (1-IN-500 TO 1-IN-100)
- HIGH - VERY HIGH (1-IN-100 TO 1-IN-50)
- VERY HIGH (1-IN-50 TO 1-IN-25)

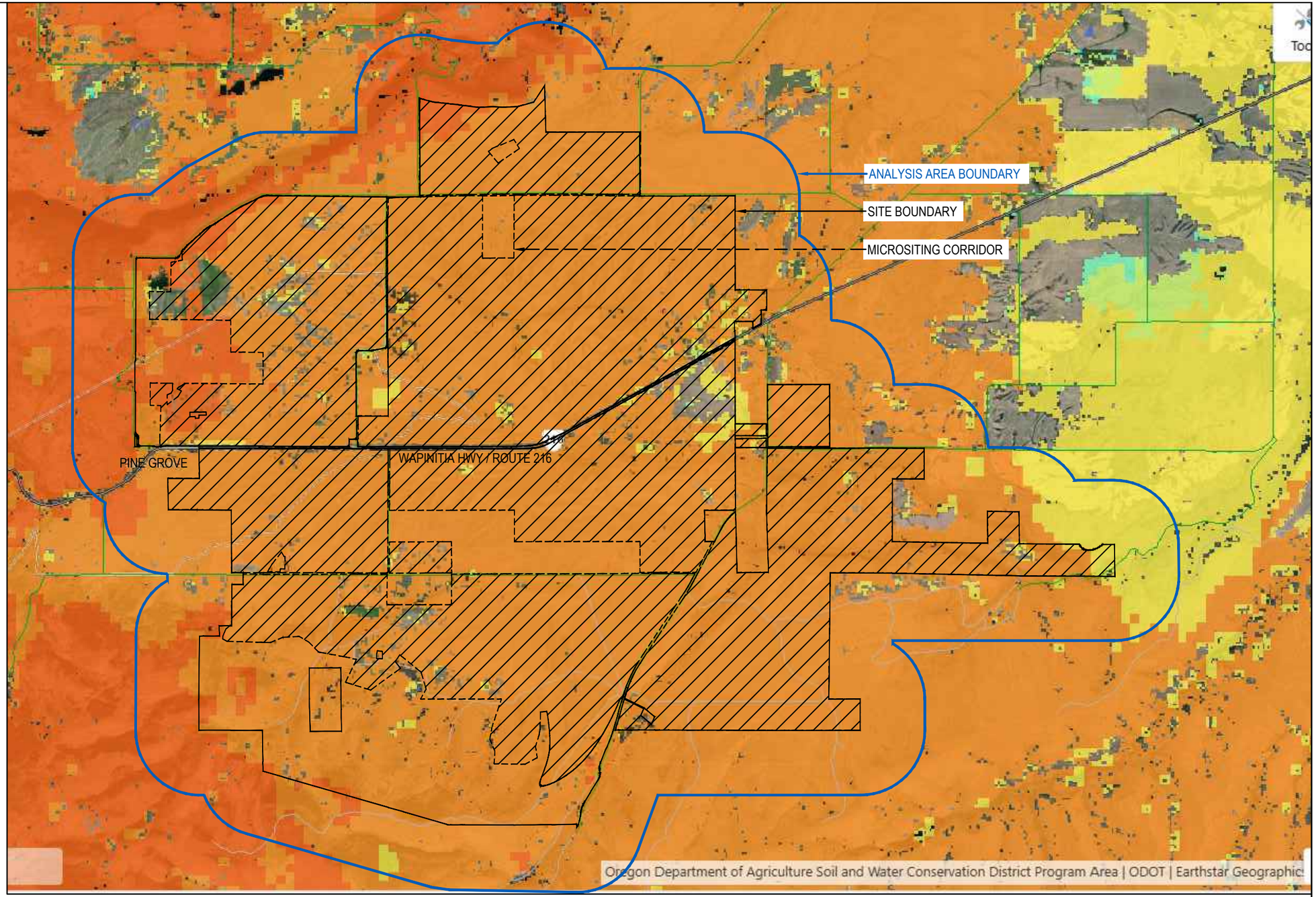
FIGURE SUMMARY:

THE ANALYSIS AREA DISPLAYS TYPICAL BURN PROBABILITY FOR THE MORE ARID PLAINS EAST OF THE CASCADE MOUNTAINS.

NOTES:

THE DATA DISPLAYED ON THIS FIGURE COMES FROM THE COMMUNITY WILDFIRE PREVENTION PLAN (CWPP) PLANNING TOOL.

LAYER '0' IS INDICATED ON THE FIGURE AS AN ABSENCE OF THE LEGEND COLORS OVERLAID ONTO THE OREGON BASE MAP, RESULTING IN A BROWN/GREY COLOR ON THE FIGURE. THIS LAYER INDICATES NONBURNABLE AREAS SUCH AS WATER, BARREN ROCK, ETC.



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TITLE: BURN PROBABILITY

PROJECT: DESCHUTES SOLAR AND BESS

LOCATION: WASCO COUNTY, OR

CLIENT: BRIGHTNIGHT

FIGURE NO: A-4

PROJ. NO.: 243075

DATE: NOVEMBER 2025

LEGEND:

- 0
- > 0 - 4 FT
- 4 - 8 FT
- 8 - 11 FT
- > 11 FT

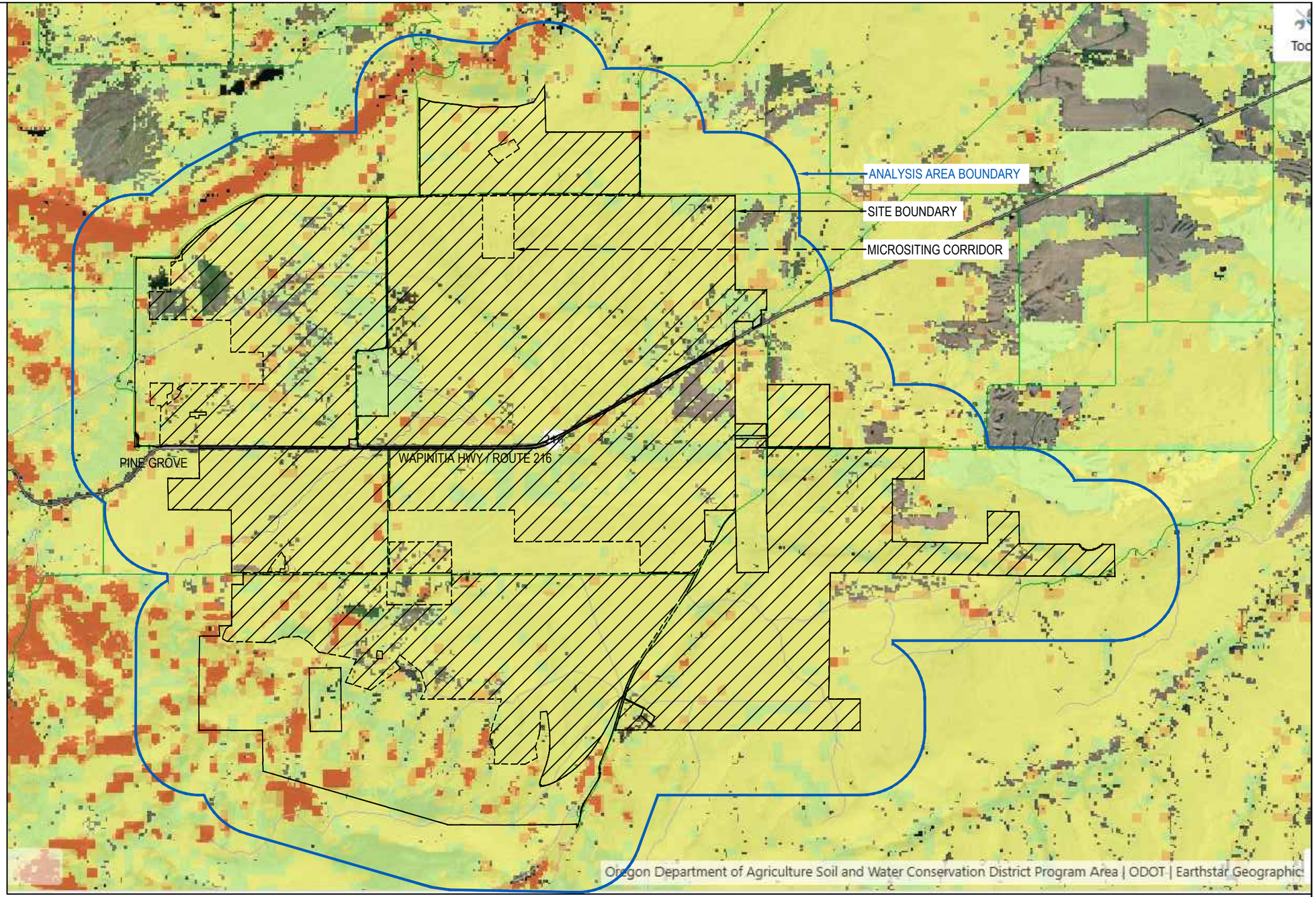
FIGURE SUMMARY:

AVERAGE FLAME LENGTHS THROUGHOUT THE ANALYSIS AREA ARE CLASSIFIED AS 'LOW INTENSITY' (>0 - 4 FT) OR 'MODERATE INTENSITY' (4 - 8 FT).

NOTES:

THE DATA DISPLAYED ON THIS FIGURE COMES FROM THE COMMUNITY WILDFIRE PREVENTION PLAN (CWPP) PLANNING TOOL.

LAYER '0' IS INDICATED ON THE FIGURE AS AN ABSENCE OF THE LEGEND COLORS OVERLAID ONTO THE OREGON BASE MAP, RESULTING IN A BROWN/GREY COLOR ON THE FIGURE.



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TITLE: AVERAGE FLAME LENGTH

PROJECT: DESCHUTES SOLAR AND BESS	LOCATION: WASCO COUNTY, OR
CLIENT: BRIGHTNIGHT	FIGURE NO: A-5
PROJ. NO.: 243075 / DATE: NOVEMBER 2025	

LEGEND:

- VERY HIGH
- HIGH
- MODERATE
- LOW
- LOW BENEFIT
- BENEFIT

FIGURE SUMMARY:

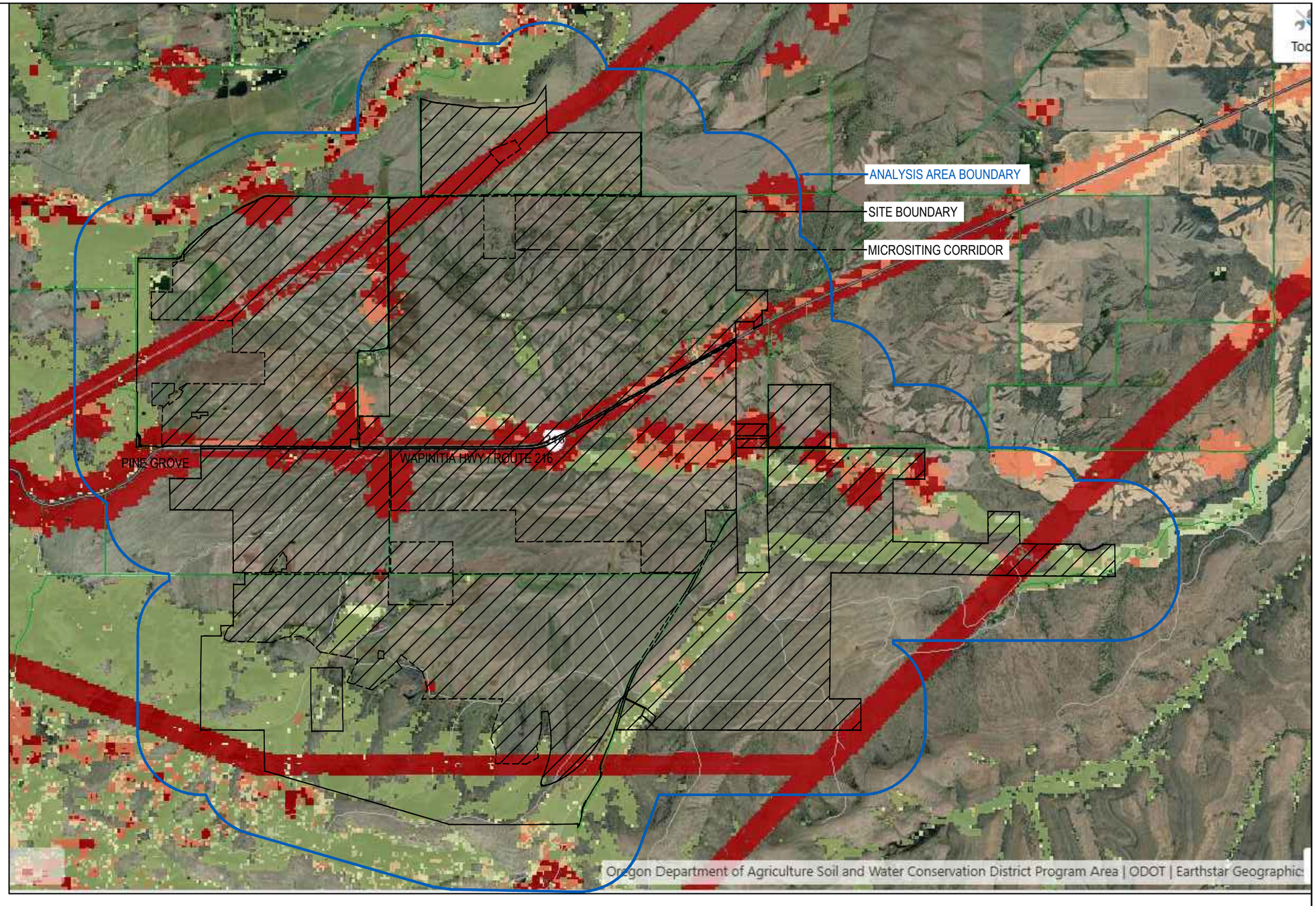
OVERALL RISK IS MODERATE. RISK IS THE COMBINATION OF CONSEQUENCE AND LIKELIHOOD AND THIS FIGURE TAKES INTO ACCOUNT THE TOPOGRAPHY, VEGETATION AND BURN PROBABILITY SHOWN IN PREVIOUS FIGURES. ELECTRICAL TRANSMISSION LINES AND STRUCTURES ALONG WAPINITIA HIGHWAY ARE THE AREAS OF MOST DETRIMENTAL IMPACT FROM WILDFIRE. ECOLOGICAL EFFECTS VARY, WITH THE MAJORITY OF LAND SURFACE AREA WITHIN THE ANALYSIS AREA EXPERIENCING ECOLOGICAL BENEFITS FROM WILDFIRE.

NOTES:

THE DATA DISPLAYED ON THIS FIGURE COMES FROM THE COMMUNITY WILDFIRE PREVENTION PLAN (CWPP) PLANNING TOOL.

AREAS WITHOUT AN OVERLAID COLOR FROM THE LEGEND INDICATE THAT ASSETS AND RESOURCES ARE NOT ANTICIPATED TO EXPERIENCE DETRIMENTAL EFFECTS FROM WILDFIRE TO STRUCTURES, INFRASTRUCTURE, EARLY SERAL STATE AND/OR SENSITIVE FORESTS, NOR ARE THE RESOURCES WITHIN THE AREA ANTICIPATED TO EXPERIENCE AN ECOLOGICAL BENEFIT FROM WILDFIRE SUCH AS IMPROVEMENT OF VEGETATION CONDITION/FOREST HEALTH OR WILDLIFE HABITAT.

NORTH



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TITLE: OVERALL FIRE RISK (BASELINE)

PROJECT: DESCHUTES SOLAR AND BESS	LOCATION: WASCO COUNTY, OR
CLIENT: BRIGHTNIGHT	FIGURE NO: A-6
PROJ. NO.: 243075	DATE: NOVEMBER 2025

Attachment B

FACILITY MAPS

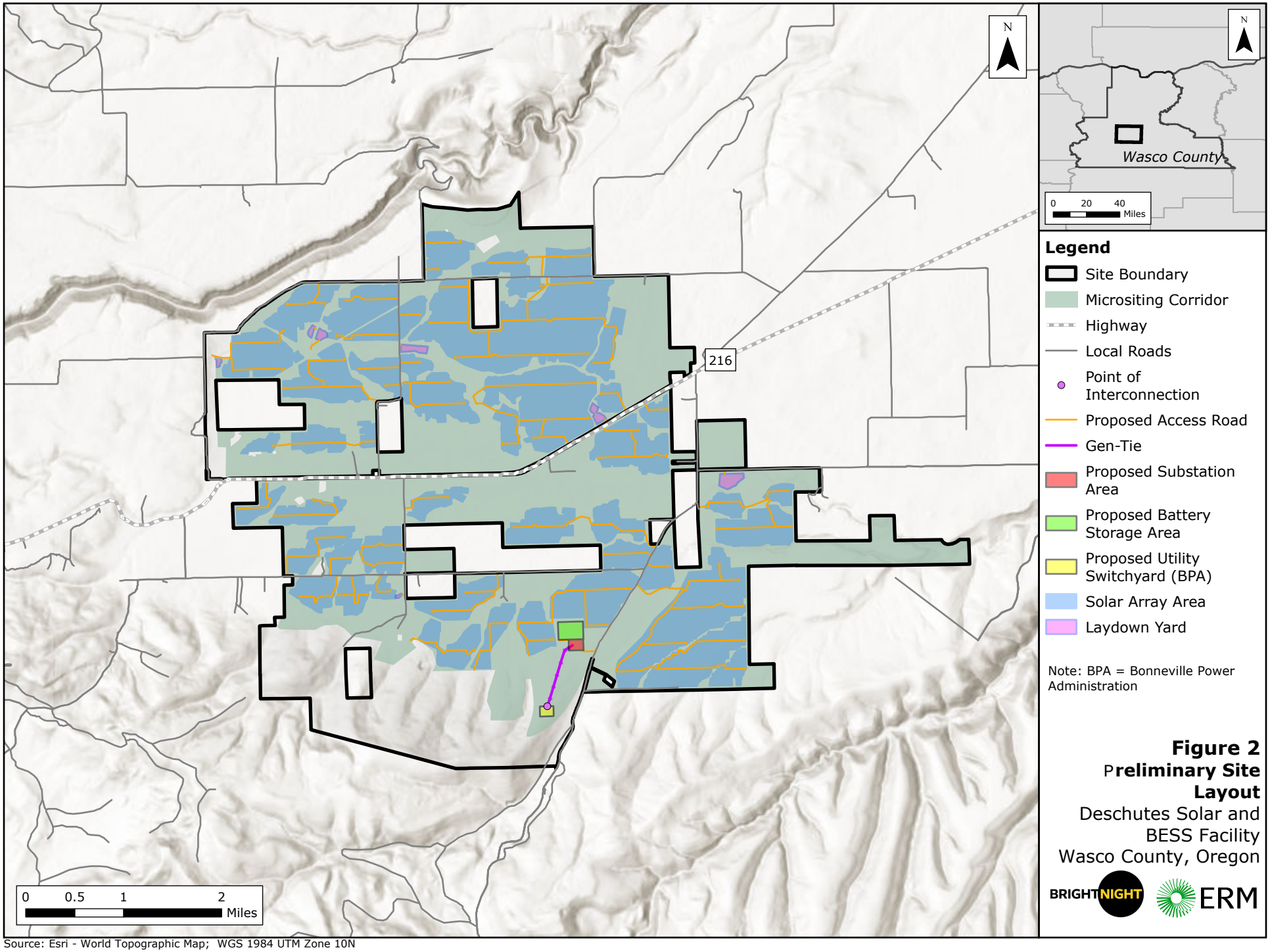

Figure 2
Preliminary Site Layout
Deschutes Solar and BESS Facility
Wasco County, Oregon

Source: Esri - World Topographic Map; WGS 1984 UTM Zone 10N

Attachment C

RESIDENCE / LANDOWNER OUTREACH LETTER

RE: Community Outreach Letter for Deschutes Solar and BESS Energy Facility

My name is Bijan Damavandi and I'm the Development Director for BrightNight LLC. We are the certificate holder of the Deschutes Solar and BESS Energy Facility, approved by the Oregon Energy Facility Siting Council (EFSC). Construction of the facility will start in 2027. The facility is a 1000 megawatt solar facility located in Wasco County. You are receiving this letter because your address is within 0.5 miles from the facility site boundary and we want to make sure you are aware of the following information:

- Safety at the facility is our highest priority. We have emergency procedures in place in the event of an emergency on site or off site that may impact the facility and adjacent areas. This includes an EFSC Wildfire Mitigation Plan (WMP) that addresses vegetation management, facility inspections, and maintenance protocols to ensure that the facility minimizes fire risk. The WMP also requires fire protection equipment to be on site and allows for emergency access for fire departments in the event of a fire on site or off site.
- In the event of an emergency on site or off site that cannot be addressed by facility personnel, local emergency and law enforcement will be contacted and procedures designated by the Wasco County's Office of emergency management will be followed, if necessary.
- If you have not already done so, we recommend you sign up for Wasco County emergency notification system. You may sign up via the County's webpage or directly via this link: Link: https://member.everbridge.net/453003085612392/login

Please contact me if you have any questions about the facility, BrightNight company, or any other concerns regarding construction and operation of the facility. Further, the Oregon Department of Energy (ODOE) is staff to EFSC and can be contacted if you have questions. Follow the link below for contact information:

https://www.oregon.gov/energy/facilities-safety/facilities/Pages/Compliance-Program.aspx

Thank you,
Bijan Damavandi
Development Director, BrightNight

(773) 392-7423

Attachment D

LIST OF MAILING ADDRESSES

Map Tax Lot ID	Last Name 1	First & Middle Names 1	Last Name 2	First & Middle Names 2	Company/Organization	Mailing Address	City	State	Zip Code
5S 11E 0 1100					State of Oregon	4034 Fairview Industrial Dr SE	Salem	Oregon	97302
5S 11E 0 1200					State of Oregon	4034 Fairview Industrial Dr SE	Salem	Oregon	97302
5S 11E 0 1700					State of Oregon	4034 Fairview Industrial Dr SE	Salem	Oregon	97302
5S 11E 0 2500					State of Oregon	4034 Fairview Industrial Dr SE	Salem	Oregon	97302
5S 11E 0 2600	Miller	Lawrence C	Miller	Gloria		77891 Hwy 216	Maupin	Oregon	97037
5S 11E 24 100					State of Oregon	4034 Fairview Industrial Dr SE	Salem	Oregon	97302
5S 11E 24 300					State of Oregon	4034 Fairview Industrial Dr SE	Salem	Oregon	97302
5S 11E 24 400	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
5S 11E 24 500	Jones	James E				53006 Endersby Rd	Maupin	Oregon	97037
5S 11E 24 800	Miller	Lawrence C	Miller	Gloria		77891 Hwy 216	Maupin	Oregon	97037
5S 11E 24 900	Miller	Lawrence C	Miller	Gloria		77891 Hwy 216	Maupin	Oregon	97037
5S 12E 0 1500					United States of America	3050 NE 3rd St	Prineville	Oregon	97754
5S 12E 0 1700	Mead	Kimberly S				78901 Victor Rd	Maupin	Oregon	97037
5S 12E 0 1701	Ambrose	Barbara	Ambrose	Melvin		78901 Victor Rd	Maupin	Oregon	97037
5S 12E 0 1800					United States of America	3050 NE 3rd St	Prineville	Oregon	97754
5S 12E 0 1900	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 2000	Dodge	Richard T				74125 Johns Ln	Pendleton	Oregon	97801
5S 12E 0 2100	Dodge	Richard E	Dodge	Janie P	Cemetery	78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 2200	Ambrose	Barbara	Ambrose	Melvin		78901 Victor Rd	Maupin	Oregon	97037
5S 12E 0 2300					Loren & Sandra Mcleod Revocable Trust	1208 Toliver Rd	Molalla	Oregon	97038
5S 12E 0 2700	Williamson	Claude L	Williamson	Emilie S		80691 Old Wapinitia Rd	Maupin	Oregon	97037
5S 12E 0 2702	Ogilvie	Gregory L				PO Box 315	Eagle Creek	Oregon	97022
5S 12E 0 2703	Williamson	Claude L	Williamson	Emilie S		80691 Old Wapinitia Rd	Maupin	Oregon	97037
5S 12E 0 2900	Carter	Nancy H				53231 Reservation Rd	Maupin	Oregon	97037
5S 12E 0 3000	Fullington	Neil A	Fullington	Kayla M		14485 S Union Hall Rd	Mulino	Oregon	97042
5S 12E 0 3100	Fullington	Neil A	Fullington	Kayla M		14485 S Union Hall Rd	Mulino	Oregon	97042
5S 12E 0 3200	Groce	Gregory S				80242 Claymier Lane	Maupin	Oregon	97037
5S 12E 0 3300	Groce	Gregory S				80242 Claymier Lane	Maupin	Oregon	97037
5S 12E 0 3400	Groce	Gregory S				80242 Claymier Lane	Maupin	Oregon	97037
5S 12E 0 3500	Fullington	Neil A	Fullington	Kayla M		14485 S Union Hall Rd	Mulino	Oregon	97042
5S 12E 0 3600	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 3700	Woodside	Van L	Woodside	Sandra S		81551 Victor Rd	Maupin	Oregon	97037
5S 12E 0 3800	Wills	Benjamin	Wills	Tess		78903 Victor Rd	Maupin	Oregon	97037
5S 12E 0 3900	Waine	Michael T	Waine	Juliane I		78769 Victor Rd	Maupin	Oregon	97037
5S 12E 0 400					Fjr LLC	PO Box 189	Boring	Oregon	97009
5S 12E 0 4000	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 4100	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 4200	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 4300	Dodge	Richard	Dodge	Janie		78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 4400					United States of America	3050 NE 3rd St	Prineville	Oregon	97754
5S 12E 0 4500	Dodge	Richard	Dodge	Janie		78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 4600	Johnson	Carol Ann				52973 Endersby Rd	Maupin	Oregon	97037
5S 12E 0 4700	Dodge	Richard	Dodge	Janie		78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 4800	Elmer	Garren G			Trustee	2536 Lewis River Rd	Woodland	Washington	98674
5S 12E 0 4900	Brown	Lonny D	Brown	Pamela A		PO Box 879	Fairview	Oregon	97024
5S 12E 0 5000	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 5100					Northern Wasco County Public Utilities	2345 River Road	The Dalles	Oregon	97058
5S 12E 0 5200	Waine	Michael T	Waine	Juliane I		78769 Victor Rd	Maupin	Oregon	97037
5S 12E 0 5300	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 5400	Waine	Michael T	Waine	Juliane I		78769 Victor Rd	Maupin	Oregon	97037
5S 12E 0 5500	Waine	Michael T	Waine	Juliane I		78769 Victor Rd	Maupin	Oregon	97037
5S 12E 0 5600	Waine	Michael T	Waine	Juliane I		78769 Victor Rd	Maupin	Oregon	97037
5S 12E 0 5700	Holder	Traci				1116 SE Lambert St	Portland	Oregon	97202
5S 12E 0 5800	Paulk	Kevin D				79702 Hwy 216	Maupin	Oregon	97037

Map Tax Lot ID	Last Name 1	First & Middle Names 1	Last Name 2	First & Middle Names 2	Company/Organization	Mailing Address	City	State	Zip Code
5S 12E 0 5900					Snodgrass Mickey L et al	13051 SW Foran Hills Ct	Tigard	Oregon	97224
5S 12E 0 6000	Aschoff	Dallas	Aschoff	Tara		53228 Reservation Rd	Maupin	Oregon	97037
5S 12E 0 6100	Richley	Elizabeth L				80377 Hwy 216	Maupin	Oregon	97037
5S 12E 0 6200	Walters	Eugene				81213 Old Wapinitia Rd	Maupin	Oregon	97037
5S 12E 0 6300					Juniper Flat Rural Fire Protection	53333 Reservation Rd	Maupin	Oregon	97037
5S 12E 0 6400					Snodgrass Mickey L et al	13051 SW Foran Hills Ct	Tigard	Oregon	97224
5S 12E 0 6501	Campbell	Gregory D	Campbell	Laura C		81025 E Wapinitia Rd	Maupin	Oregon	97037
5S 12E 0 6600					Snodgrass Mickey L et al	13051 SW Foran Hills Ct	Tigard	Oregon	97224
5S 12E 0 6700	Silvey	Brian D	Silvey	Lisa M		52802 Reservation Rd	Maupin	Oregon	97037
5S 12E 0 6800	White	Earl E	White	Sharon V		290 NE Ninth St	Irrigon	Oregon	97844
5S 12E 0 6900	Beebe	Malcolm J	Beebe	Debra K		52590 Reservation Rd	Maupin	Oregon	97037
5S 12E 0 7000					Snodgrass Mickey L et al	13051 SW Foran Hills Ct	Tigard	Oregon	97224
5S 12E 0 7100	Hein	Kenneth W				PO Box 29	Maupin	Oregon	97037
5S 12E 0 7200	Skogrand	Richard	Lamirande	Pamela Lt		3107 SE Knapp St	Portland	Oregon	97202
5S 12E 0 7300	Tolentino	John A	Tolentino	Virginia		PO Box 94	Maupin	Oregon	97037
5S 12E 0 7400	Wentzel	Duane	Wentzel	Dorothy		79205 Back Walters Rd	Maupin	Oregon	97037
5S 12E 0 7401					SMI Group LLC	1255 NW 9Th Ave Apt 115	Portland	Oregon	97209
5S 12E 0 7500	Soskin	Steven				1435 Windy Knoll Lane	Deland	Florida	32724
5S 12E 0 7600	Soskin	Steven L				1435 Windy Knoll Lane	Deland	Florida	32724
5S 12E 0 7700	Wassenmiller	Gary L	Wassenmiller	Luann M		PO Box 237	Maupin	Oregon	97037
5S 12E 0 7800	Dodge	Richard T				78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 7900	Dodge	Richard T				78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 7901	Dodge	Richard T				78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 7902	Dodge	Richard T				78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 8000					Sterling Trust	1435 Windy Knoll Lane	Deland	Florida	32724
5S 12E 0 8100					Sterling Trust	1435 Windy Knoll Lane	Deland	Florida	32724
5S 12E 0 8200					Sterling Trust	1435 Windy Knoll Lane	Deland	Florida	32724
5S 12E 0 8300	Lewis	Andrew M	Lewis	Joyce K		78451 Walters Rd	Maupin	Oregon	97037
5S 12E 0 8301	Lam	Stanley				2525 Coconut Dr	San Jose	California	95148
5S 12E 0 8400	Hill Jr	Leland W	Hill	Betty J		14991 S Macksburg Rd	Molalla	Oregon	97038
5S 12E 0 8500	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 8600					Parman Trust RLT	PO Box 324	Maupin	Oregon	97037
5S 12E 0 8700	Kruger	Donald	Kruger	Sandra		12508 NW Mtn View Rd	Portland	Oregon	97231
5S 12E 0 8800	Johnson	Dale F	Johnson	Sharon F		79116 Back Walters Rd	Maupin	Oregon	97037
5S 12E 0 8900	Watson	Henry A				79118 Back Walters Rd	Maupin	Oregon	97037
5S 12E 0 9000	Dodge	Chad E				74125 Johns Ln	Pendleton	Oregon	97801
5S 12E 0 9100	Treanor	Paul E				1040 Yorkshire Ct SE	Salem	Oregon	97317
5S 12E 0 9200	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 9300	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
5S 12E 0 9400	Wisenbaker	Jamie D	Wisenbaker	Shellee		822 Alder Rd	Washougal	Washington	98671
5S 12E 23 DD 100					Snodgrass Mickey L et al	13051 SW Foran Hills Ct	Tigard	Oregon	97224
5S 12E 23 DD 1000	Cole	David R				4186 SE Filbert	Milwaukie	Oregon	97222
5S 12E 23 DD 1100					Snodgrass Mickey L et al	13051 SW Foran Hills Ct	Tigard	Oregon	97224
5S 12E 23 DD 200					Snodgrass Mickey L et al	13051 SW Foran Hills Ct	Tigard	Oregon	97224
5S 12E 23 DD 300	Woodside	Carlotta I				13051 SW Foran Hills Ct	Tigard	Oregon	97224
5S 12E 23 DD 400					Snodgrass Mickey L et al	13051 SW Foran Hills Ct	Tigard	Oregon	97224
5S 12E 23 DD 500					Snodgrass Mickey L et al	13051 SW Foran Hills Ct	Tigard	Oregon	97224
5S 12E 23 DD 600	Wall	Salina				4745 Lockwood St	The Dalles	Oregon	97058
5S 12E 23 DD 700	Blackford	Ray				8839 NW Springville Rd	Portland	Oregon	97231
5S 12E 23 DD 800	Mc Coy	Donna J				PO Box 133	Maupin	Oregon	97037
5S 12E 23 DD 900	Blackford	William				6410 SE Needham St	Portland	Oregon	97222
5S 12E 25 B 100	Bryce	Paul A				2520 SEven Mile Hi Rd	The Dalles	Oregon	97058
5S 12E 25 B 200	Woodside	Carlotta I				13051 SW Foran Hills Ct	Tigard	Oregon	97224
5S 12E 30 100	Miller	Lawrence C	Miller	Gloria		77891 Hwy 216	Maupin	Oregon	97037
5S 12E 30 B 100					State Highway Commission	4040 Fairview Industrial Dr SE	Salem	Oregon	97302-1142

Map Tax Lot ID	Last Name 1	First & Middle Names 1	Last Name 2	First & Middle Names 2	Company/Organization	Mailing Address	City	State	Zip Code
5S 12E 30 B 1000	Ertel	Keith				5414 SE Roethe St	Milwaukie	Oregon	97267
5S 12E 30 B 1100	Ayers	Jack	Ayers	Patricia		77925 Hwy 216	Maupin	Oregon	97037
5S 12E 30 B 200	Johnson	Stephanie				10511 NE 215Th Ct	Vancouver	Washington	98682
5S 12E 30 B 300	Beebe	John E				77982 Hwy 216	Maupin	Oregon	97037
5S 12E 30 B 400	Penson	Alan R			RLT	8930 NW Cornell Rd	Portland	Oregon	97229
5S 12E 30 B 500	Udey	Rosalee	Udey	James C		77898 Hwy 216	Maupin	Oregon	97037
5S 12E 30 B 700	Miller	Lawrence C	Miller	Gloria		77891 Hwy 216	Maupin	Oregon	97037
5S 12E 30 B 800	Ayers	Jonathan E				12621 SE Holgate Blvd	Portland	Oregon	97236
5S 12E 30 B 900	Campbell	Gregory D				81025 E Wapinitia Rd	Maupin	Oregon	97037
5S 12E 31 100	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
5S 12E 31 200					Malay George W et al	78264 Walters Rd	Maupin	Oregon	97037
5S 12E 31 300	Wolfe	Vernon L	Wolfe	Mary Jo		78190 Walters Rd	Maupin	Oregon	97037
5S 12E 31 400	Miller	Richard L	Miller	Kristie L		69332 Camp Polk Rd	Sisters	Oregon	97759
5S 12E 31 500	Skellenger	Scott J				78060 Walters Rd	Maupin	Oregon	97037
5S 12E 31 800					USA in Trust for	PO Box 1329	Warm Springs	Oregon	97761-1329
5S 13E 0 3000					Dulings Natural Pasture LLC	54909 Natural Pasture Rd	Maupin	Oregon	97037
5S 13E 0 4502	Campbell	Gregory D	Campbell	Laura C		81025 E Wapinitia Rd	Maupin	Oregon	97037
5S 13E 0 6200					Snodgrass Mickey L et al	13051 SW Foran Hills Ct	Tigard	Oregon	97224
5S 13E 0 6300	Gabel	Henry E				3300 Main St #101	Forest Grove	Oregon	97116
5S 13E 0 6400					Hang Belly Ranch LLC	6134 NE Alameda St	Portland	Oregon	97213
5S 13E 0 6500					Snodgrass Mickey L et al	13051 SW Foran Hills Ct	Tigard	Oregon	97224
5S 13E 0 6600					Nelson Dan L Trust	30737 SE Waybill Rd	Boring	Oregon	97009
5S 13E 0 6700					Snodgrass Mickey L et al	13051 SW Foran Hills Ct	Tigard	Oregon	97224
5S 13E 0 6800	Wisenbaker	Jamie D	Wisenbaker	Shellee		822 Alder Rd	Washougal	Washington	98671
6S 12E 0 100	Wisenbaker	Jamie D	Wisenbaker	Shellee		822 Alder Rd	Washougal	Washington	98671
6S 12E 0 1000					Oregon Department of Transportation	355 Capitol Street NE	Salem	Oregon	97301
6S 12E 0 1100					USA in Trust for	PO Box 1329	Warm Springs	Oregon	97761-1329
6S 12E 0 1200	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
6S 12E 0 1300	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
6S 12E 0 1400					Parman Trust Rlt	78902 Walters Rd	Maupin	Oregon	97037
6S 12E 0 1500	Dodge	Richard E	Dodge	Janie P		78888 Walters Rd	Maupin	Oregon	97037
6S 12E 0 1600	Dodge	Richard	Dodge	Janie		78888 Walters Rd	Maupin	Oregon	97037
6S 12E 0 1700					USA in Trust for	PO Box 1329	Warm Springs	Oregon	97761-1329
6S 12E 0 1900					USA in Trust for	PO Box 1329	Warm Springs	Oregon	97761-1329
6S 12E 0 200	Wisenbaker	Jamie D	Wisenbaker	Shellee		822 Alder Rd	Washougal	Washington	98671
6S 12E 0 2100					Indian Allotment	1233 Veterans Street PO Box C	Warm Springs	Oregon	97761
6S 12E 0 2200					Indian Allotment	1233 Veterans Street PO Box C	Warm Springs	Oregon	97761
6S 12E 0 300	Glass	David C				PO Box 777	Banks	Oregon	97106
6S 12E 0 600	Hein	Kenneth W				PO Box 29	Maupin	Oregon	97037
6S 12E 0 601	Yanez	Isaac A				52237 Reservation Rd	Maupin	Oregon	97037
6S 12E 0 700					State Highway Commission	4040 Fairview Industrial Dr SE	Salem	Oregon	97302-1142
6S 12E 0 900	Campbell	Lori				PO Box 391	Maupin	Oregon	97037

Attachment E

OPERATIONAL ELECTRICAL COMPONENT AND VEGETATION INSPECTION AND MAINTENANCE SCHEDULE AND RESULTS TABLES

Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results

Facility Component(s)	Inspection Procedure	Inspection Frequency	Standard[1]	Maintenance Schedule	Date and Personnel Completing Inspection(s); Inspection Results	Date and Personnel Completing Maintenance; Maintenance Results
System Protection	Protection Relays • Verify calibration and check functionality. Breaker Trip Testing • Verify the ability to trip breakers via coil.	Annually at a minimum. More frequently if specified by manufacturer.	Manufacturer's maintenance recommendations	Repair or replace once every 5 years	Date: Personnel: Results: Notes:	Date: Personnel: Results: Notes:
System Protection	System Protection Potential Transducers ("PTs") and Current Transducers ("CTs") • Verify calibration and check functionality.	Annually at a minimum. More frequently if specified by manufacturer.	Manufacturer's maintenance recommendations	Repair or replace once every 11 years	Date: Personnel: Results: Notes:	Date: Personnel: Results: Notes:
Solar Inverter	• Visual inspection of inverter and surrounding area. • Verify torque specifications. • For alternating current (AC)/direct current (DC), perform inspection of communication and control power terminations. • Cycle AC/DC disconnects, inspect AC/DC contactors and cooling fans. • Perform infrared scan. Inverter Testing and Preventative Parts Replacement • Preventative maintenance replacement of inverter parts (e.g.: cooling system and power supplies that are operating effectively but scheduled for replacement per manufacturer's recommendations).	Annually at a minimum. More frequently if specified by manufacturer.	Spill Prevention, Control, and Countermeasures (SPCC) Plan[3] Manufacturer's maintenance recommendations	• Monthly SPCC Plan • Bi-annual Preventative Maintenance • Per manufacturer's recommendations	Date: Personnel: Results: Notes:	Date: Personnel: Results: Notes:
	Vegetation: Visual inspection during component inspections and visual inspections during vegetation surveys twice a year.	Vegetation: Twice a year during vegetation surveys and additional visual inspections during routine inspections of components.	Vegetation: Herbicide application on gravel pad around inverter to prevent vegetation growth. IEEE 80 NEC 70	Vegetation: Yearly, depending on vegetation condition. Or more frequent based on vegetation survey results or upon visual inspections listed above.	Date: Personnel: Results: Notes:	Date: Personnel: Results: Notes:
Tracker System	• Perform visual inspection of tracking components; sync data with the Applicant's Operations Center. • Perform visual inspection of module clamps and rail fasteners for integrity. • Perform visual inspection of gear drives and shaft assemblies for alignment. • Grease gear boxes and/or drive shaft. • Verify wind stow functionality and lubricate slew ring.	Annually at a minimum. More frequently if specified by manufacturer.	Manufacturer's maintenance recommendations	• Per manufacturer's recommendations	Date: Personnel: Results: Notes:	Date: Personnel: Results: Notes:
Solar Array Structures	• Perform visual inspection of mounting structures,	Annually at a minimum.	Manufacturer's	Repair or replace annually	Date:	Date:

Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results

Facility Component(s)	Inspection Procedure	Inspection Frequency	Standard[1]	Maintenance Schedule	Date and Personnel Completing Inspection(s); Inspection Results	Date and Personnel Completing Maintenance; Maintenance Results
	grounding, and cabling.	More frequently if specified by manufacturer.	maintenance recommendations		Personnel: Results: Notes:	Personnel: Results: Notes:
Solar Array Panels, Harnesses, and Combiner Boxes	At Applicant's sole discretion, to perform one of the following options: • Infra-red ("IR") Flyover a. IR scan of Site providing DC health of the Facility down to string level reporting; or • Physical DC Health Inspection a. Perform visual inspection of whips and wires connectors for damage or exposed conductors in gutters of harness combiner boxes. b. Measure and record current of each whip using clamp- on meter and identify low performing whips.	Annually at a minimum. More frequently if specified by manufacturer.	Applicant's discretion Manufacturer's maintenance recommendations	Repair or replace annually	Date: Personnel: Results: Notes:	Date: Personnel: Results: Notes:
	Vegetation: Visual inspection during component inspections and visual inspections during vegetation surveys twice a year.	Vegetation: Twice a year during vegetation surveys and additional visual inspections during routine inspections of components	Vegetation: Vegetation under solar arrays will be maintained to a height of 10-12 inches, with a minimum clearance of 12 inches from electrical equipment. Methods include manual removal, mowing, or as designate din this Plan.	Vegetation: Twice a year, or more often, as designate din this Plan.	Date: Personnel: Results: Notes:	Date: Personnel: Results: Notes:
Collector Substation	• Perform visual inspection of the grounding system. • Perform thermographic and visual inspection. • Perform uninterrupted power supply (UPS) inspection and maintenance.	Annually at a minimum. More frequently if specified by manufacturer.	Manufacturer's maintenance recommendations North American Electric Reliability Corporation (NERC)	Repair or replace annually	Date: Personnel: Results: Notes:	Date: Personnel: Results: Notes:
	Vegetation: Visual inspection during component inspections and visual inspections during vegetation surveys twice a year.	Vegetation: Twice a year during vegetation surveys and additional visual inspections during routine inspections of components.	Vegetation: Herbicide application on substation gravel pad. IEEE 80 NEC 70	Vegetation: Yearly, depending on vegetation condition. Or more frequently based on vegetation survey results or upon routine visual inspections.	Results: Notes:	Results: Notes:

Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results

Facility Component(s)	Inspection Procedure	Inspection Frequency	Standard[1]	Maintenance Schedule	Date and Personnel Completing Inspection(s); Inspection Results	Date and Personnel Completing Maintenance; Maintenance Results
BESS	• Set battery maintenance (system check, cell balancing). • Battery cable, appearance, grounding, dust removal. • Inspect battery management system alarms. • Visual inspection of electrical terminations using thermal imager.	Annually at a minimum. More frequently if specified by manufacturer.	Manufacturer's maintenance recommendations	Repair or replace annually	Date: Personnel:	Date: Personnel:
	Vegetation: Visual inspection during component inspections and visual inspections during vegetation surveys twice a year.	Vegetation: Twice a year during vegetation surveys and additional visual inspections during routine inspections of components.	Vegetation: Herbicide application on substation gravel pad. IEEE 80 NEC 70	Vegetation: Yearly, depending on vegetation condition. Or more frequently based on vegetation survey results or upon routine visual inspections.	Results: Notes:	Results: Notes:
Unit Control Enclosure Battery	• Check for correct operations of battery monitoring system and battery charging system. • Perform visual inspection of the battery room, mounting rack, batteries, and connections.	Annually at a minimum. More frequently if specified by manufacturer.	Manufacturer's maintenance recommendations	Repair or replace monthly	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
Unit Control Enclosure Battery	• Perform individual cell float charge and specific gravity checks.	Annually at a minimum. More frequently if specified by manufacturer.	Manufacturer's maintenance recommendations	Repair or replace quarterly	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
Unit Control Enclosure Battery	• Measure float cell voltage, pilot cell voltage, and electrolyte temperature of pilot cell.	Annually at a minimum. More frequently if specified by manufacturer.	Manufacturer's maintenance recommendations	Repair or replace annually	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
Supervisory, Control and Data Acquisition (SCADA) & Network Equipment	• Plant equipment will be evaluated every 5 years to determine state of health and provide recommendations to Certificate Holder.	Annually at a minimum. More frequently if specified by manufacturer.	Manufacturer's maintenance recommendations	Upgrade, repair, or replace every 5 years	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
BESS Junction Box/ Auxiliary System/Miscellaneous	• Auxiliary equipment maintenance and inspection. • Enclosure dust removal. • Inspect cable entry, grounding, sealing, dust removal.	Annually at a minimum. More frequently if specified by manufacturer.	Manufacturer's maintenance recommendations	Repair or replace annually	Date: Personnel:	Date: Personnel:

Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results

Facility Component(s)	Inspection Procedure	Inspection Frequency	Standard[1]	Maintenance Schedule	Date and Personnel Completing Inspection(s); Inspection Results	Date and Personnel Completing Maintenance; Maintenance Results
	• Critical sensor calibration check. • Maintenance report.				Results: Notes:	Results: Notes:
BESS Fire Safety System	• Fire alarm and detection system inspection. • Fire alarm and detection system maintenance. • Fire suppression System Inspection.	Inspections to be done in accordance with NFPA 72.	NFPA 72 Manufacturer's maintenance recommendations	Repair or replace annually	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
BESS Thermal Management System	• Thermal management system inspection. • Thermal management system maintenance. • Motor Lubrication. • Clean Filters by rinsing with water. • Electric Heater - Dust accumulation on the coil, signs of overheating on the heater frame, traces of water or rust on the electric heater control box.	Annually at a minimum. More frequently if specified by manufacturer.	Manufacturer's maintenance recommendations	Repair or replace semi-annually	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
BESS Thermal Management System	• Coolant tester visual inspection.	Annually at a minimum. More frequently if specified by manufacturer.	Manufacturer's maintenance recommendations	Repair or replace annually	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
BESS General	• System configuration check.	Annually at a minimum. More frequently if specified by manufacturer.	Manufacturer's maintenance recommendations	Repair or replace annually	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
Medium Voltage (MV) and High Voltage (HV) Breaker	• Clean out dirt and debris. • Perform a manual operation test. • Perform an electrical test. • Perform a gas leakage test.	Annually at a minimum. More frequently if specified by manufacturer.	Manufacturer's maintenance recommendations NERC	Repair or replace per manufacturer's recommendations	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
Generator Step-Up (GSU) Transformer	• Perform a visual inspection and check for proper operation of fan motor, oil pump motor, and breather. • Inspect and maintain substation transformer bushings	Annually at a minimum. More frequently if specified by manufacturer.	SPCC Plan[3]	Repair, overhaul, refurbish, or replace per manufacturer's recommendations	Date: Personnel:	Date: Personnel:

Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results

Facility Component(s)	Inspection Procedure	Inspection Frequency	Standard[1]	Maintenance Schedule	Date and Personnel Completing Inspection(s); Inspection Results	Date and Personnel Completing Maintenance; Maintenance Results
	and control panel. • Perform visual inspection of bushings for indications of local heating, oil leaks, proper oil level and indication of contaminants.		Manufacturer's maintenance recommendations		Results: Notes:	Results: Notes:
Inverter Step-up Transformer	• Perform infrared scans on low side of transformer when power is >80%. • Verify temperature and pressure sync with the contractor's Operations Center. • Perform visual inspection of the physical integrity of the enclosure and check for oil leakage. • Perform visual inspection for damage or discoloration of bushings. • Perform oil sample analysis on MV transformer(s). • Collect MV transformer oil sample(s) for 3rd party analysis. • Perform electrical test of transformer. • Verify integrity of surge arresters and check for proper tap position.	Annually at a minimum. More frequently if specified by manufacturer.	SPCC Plan[3] Manufacturer's maintenance recommendations	Replace or repair per manufacturer's recommendation	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
	Vegetation: Visual inspection during component inspections and visual inspections during vegetation surveys twice a year.	Vegetation: Twice a year during vegetation surveys and additional visual inspections during routine inspections of components.	Vegetation: Herbicide application on gravel pad around inverter to prevent vegetation growth. IEEE 80 NEC 70	Vegetation: Yearly, depending on vegetation condition. Or more frequent based on vegetation survey results or upon visual inspections listed above.	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
Overhead electrical lines	Visual inspection of components, grounding and APLIC measures.	Annually at a minimum. More frequently if specified by Utility.	APLIC		Date: Personnel:	Date: Personnel:
	Vegetation: Visual inspection of vertical clearance distance between conductor and vegetation.	Vegetation: Twice a year during vegetation surveys and additional visual inspections during routine inspections of components.	Vegetation: National Energy Reliability Corporation (NERC) - Vegetation maintenance standard FAC-003-0. Mow vegetation to achieve clearance requirements between conductor and ground.	Vegetation: Yearly, depending on vegetation condition.	Results: Notes:	Results: Notes:
1. The Operational SPCC Plan for the Facility will require these components to be inspected monthly for spills. During these inspections, Operational Staff will also visually inspect the component and surrounding area.						

Attachment F

MANUFACTURER INSPECTION AND MAINTENANCE RECOMMENDATIONS