Exhibit X
Facility Retirement

Umatilla-Morrow County Connect Project

750 West Elm Avenue
PO Box 1148
Hermiston, OR 97838

Cole Bode
Vice President of Engineering
541-567-6414
UMCCproject@umatillaelectric.com

Application for Site Certificate

May 2025

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TABLES

ACRONYMS AND ABBREVIATIONS

EFU	Exclusive Farm Use
OAR	Oregon Administrative Rule
Project	Umatilla-Morrow County Connect Project
Project Order	First Amended Project Order, *In the Matter of the Application for Site Certificate for the Umatilla-Morrow County Connect Project* (April 04, 2024)
UEC	Umatilla Electric Cooperative

1.0 INTRODUCTION

Exhibit X provides information regarding site restoration, as required to meet the submittal requirements of Oregon Administrative Rule (OAR) 345-021-0010(1)(x).

1.1 Applicable Rules and Project Order Provisions

> OAR 345-021-0010(1)(x). Exhibit X. Information about site restoration, providing evidence to support a finding by the Council as required by OAR 345-022-0050(1). The applicant must include information that the site can be restored adequately to a useful, non-hazardous condition following permanent cessation of construction or operation of the facility.

2.0 ANALYSIS

> OAR 345-021-0010(1)(x)(A) and (B). (A) The estimated useful life of the proposed facility; (B) Specific actions and tasks to restore the site to a useful, non-hazardous condition;

2.1 Estimated Useful Life of the Project

In general, transmission lines such as the Umatilla-Morrow County Connect Project (Project), are designed and maintained to remain in service (with necessary upgrades) in perpetuity. In addition, given the demand for transmission services, the limited number of transmission facilities, the high cost of building new transmission lines and the intrinsic value of existing transmission rights-of-way, older transmission facilities have historically been repaired or upgraded rather than retired. Over time, transmission line components and related facilities may be rebuilt, reconfigured, and modified repeatedly and may use new materials and hardware. While retirement of the Project facilities is in theory possible, the need for electricity and supporting facilities is expected to increase into the foreseeable future. Therefore, based on currently operating transmission lines in Oregon and in consideration of when they began operation, Umatilla Electric Cooperative (UEC) does not anticipate retirement of the Project and estimates that the useful life of the Project will continue on in perpetuity.

2.2 Actions to Restore the Site

2.2.1 Specific Actions and Tasks to Restore the Site to a Useful, Non-Hazardous Condition

In the event the Project is ever retired, the site can be restored to a useful, non-hazardous condition. The proposed facility will not have any underground storage tanks or on-site bulk storage of hazardous materials. Insignificant quantities of lubricants, vehicle fuel, and herbicides might be transported over and across the site during operation. This could result in minor leaks or spills, which can be avoided through proper handling. Given the small amounts of such

materials used on the site, soil contamination is highly unlikely. Therefore, it is not expected that the site would become hazardous, necessitating any remediation measures.

As discussed above, retirement of the facility is not anticipated. If UEC is required to retire the Project—that is, to permanently remove from service the transmission line and relinquish the rights to the transmission line corridor—it will do so in accordance with an Energy Facility Siting Council-approved retirement plan, as required by OAR 345-027-0020(9), or according to whatever applicable requirements exist at that time. Currently, OAR 345-027-0110(5) dictates the contents of a retirement plan.

> OAR 345-027-0110(5). In the proposed final retirement plan, the certificate holder must include:
>
> (a) A plan for retirement that provides for completion of retirement without significant delay and that protects public health, safety and the environment.
>
> (b) A description of actions the certificate holder proposes to take to restore the site to a useful, non-hazardous condition, including information on how impacts to fish, wildlife and the environment would be minimized during the retirement process.
>
> (c) A current detailed cost estimate and a plan for ensuring the availability of adequate funds for completion of retirement.
>
> (d) An updated list of the owners of property located within or adjacent to the site of the facility, as described in OAR 345-021-0010(1)(f).

Specific actions to be taken to restore the site, provided in the retirement plan, will include, among others:

- Removal of all facilities: For the transmission line, these facilities include all support structures, conductors, and overhead shield wires.
- Removal of foundations: UEC does not typically fully remove foundations. General practice is instead to remove the foundation material two to four feet below grade, depending on ground slope. Any foundations in Exclusive Farm Use (EFU)-zoned lands will be removed to a depth of four feet below grade. For all foundation areas, the area will then be restored to meet the requirements specified in individual landowner easements.
- Site Restoration: Restoration of all line structure locations and access roads to a useful condition consistent with site zoning, including EFU zoning. This restoration will include restoring the site to a condition suitable for uses comparable with the surrounding land uses, intended land use, and then-current technologies.
- Revegetation: Vegetation will be restored to the maximum extent practicable, and all areas disturbed by removal of the facilities will be reseeded in a manner compatible with the surroundings and proposed use.

2.3 Total Costs, Estimating Methods, and Assumptions

OAR 345-021-0010(1)(x)(C) and (D). (C) An estimate, in current dollars, of the total and unit costs of restoring the site to a useful, non-hazardous condition; (D) A discussion and justification of the methods and assumptions used in preparing the estimate, the estimate should include sufficient detail to identify costs associated with individual tasks and units.

2.3.1 Restoration Costs and Methods

UEC estimates that the total cost of restoring the site to a useful, non-hazardous condition after facilities are removed is approximately $650,000 per mile in current dollars. This cost includes labor costs, equipment and machinery to aid in the removal process, disposal and recycling, and site restoration, which will total nearly $9,500,000 for the length of the Project. Please note, however, that due to the very long predicted useful life of the facilities, it is extremely difficult to predict with any certainty the actual costs that might be incurred if the facilities are ever retired. This is due to factors such as changes in construction costs, technology, and inflation rates over such a long timescale.

Given the long, potentially indefinite useful life of the Project facilities, decommissioning cost estimates at this time may be of limited relevance. In the very unlikely event, and at such time, that the Project's facilities have to be removed from service, UEC will provide a detailed retirement and restoration cost estimate.

The estimated costs are based on the application of Energy Facility Siting Council guidelines for transmission facility retirement and include labor, equipment and machinery for line removal, disposal fees, and site restoration.

2.4 Monitoring Plan

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

2.4.1 Monitoring Plan Discussion

In the event that UEC elects to retire the transmission line, the site could be restored to a useful condition consistent with site zoning, including EFU zoning. The existing facilities could be removed without significant risk of contamination by hazardous materials. The Project is not expected to cause site contamination with hazardous materials, and no contamination monitoring plan is proposed.

3.0 COMPLIANCE CROSS-REFERENCES

Table X-1 identifies the location within the Application for Site Certificate (ASC) of the information submittal requirements OAR 345-021-0010(1), the Facility Retirement Standard at OAR 345-022-0050, and the relevant Project Order provisions.

TABLE X-1. COMPLIANCE REQUIREMENTS AND RELEVANT CROSS-REFERENCES

REQUIREMENT	LOCATION
OAR 345-021-0010(1)(x)	
(A) The estimated useful life of the proposed facility;	Exhibit X, Section 2.1
(B) Specific actions and tasks to restore the site to a useful, non-hazardous condition;	Exhibit X, Section 2.1
(C) An estimate, in current dollars, of the total and unit costs of restoring the site to a useful, non-hazardous condition;	Exhibit X, Section 2.3
(D) A discussion and justification of the methods and assumptions used to estimate site restoration costs; and	Exhibit X, Section 2.3
(E) For facilities that might produce site contamination by hazardous materials, a proposed monitoring plan, such as periodic environmental site assessment and reporting, or an explanation why a monitoring plan is unnecessary.	Exhibit X, Section 2.4
First Amended Project Order Section IV(u)	
Exhibit X must provide information about site restoration, providing evidence to support a finding that the site can be restored adequately to a useful, non-hazardous condition following permanent cessation of construction or operation of the facility.	Exhibit X
Under OAR 345-021-0010(1)(x)(A) and (B), this information must include the estimated useful life of the proposed facility and a description of the specific actions and tasks to restore the site to a useful, non-hazardous condition.	Exhibit X, Section 2.1
Under OAR 345-021-0010(1)(x)(C) and (D), Exhibit X must also include an estimate, in current dollars, of the total and unit costs of restoring the site to a useful, non-hazardous condition and a discussion and justification of the methods and assumptions used in preparing the estimate. The estimate should include sufficient detail to identify costs associated with individual tasks and units.	Exhibit X, Section 2.3
Under 345-021-0010(1)(x)(E), Exhibit X must include a proposed monitoring plan, if applicable, for any potential site contamination by hazardous materials, including oils or fuels used or stored on site, such as periodic environmental site assessment and reporting. If the applicant believes no monitoring of soil contamination is necessary, Exhibit X must provide evidence to support this position.	Exhibit X, Section 2.4