

Exhibit D

Applicant's Organizational Expertise

**Yellow Rosebush Energy Center
September 2025**

**Prepared for
Yellow Rosebush Energy Center, LLC**

Prepared by



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Acronyms and Abbreviations

| | |
|-----------|--|
| Applicant | Yellow Rosebush Energy Center, LLC |
| COD | Commercial Operation Date |
| EPC | Engineering Procurement Construction |
| Facility | Yellow Rosebush Energy Center |
| GW | gigawatts |
| M&A | mergers and acquisitions |
| MISO | Midcontinent Independent System Operator |
| MW | megawatts |
| OAR | Oregon Administrative Rules |
| ODFW | Oregon Department of Fish and Wildlife |
| PJM | PJM Interconnection LLC |
| PPA | Power Purchase Agreement |
| RFP | Request for Proposals |
| SPP | Southwest Power Pool |
| SRAMI | Shell Renewable Asset Management International |
| WECC | Western Electricity Coordinating Council |

1.0 Introduction

Yellow Rosebush Energy Center, LLC (Applicant) seeks to develop the Yellow Rosebush Energy Center (Facility), a solar energy generation facility, battery energy storage system, and related or supporting facilities in Wasco and Sherman counties, Oregon. This Exhibit D was prepared to meet the submittal requirements in Oregon Administrative Rules (OAR) 345-021-0010(1)(d).

2.0 Applicant's Previous Experience – OAR 345-021-0010(1)(d)(A)

OAR 345-021-0010(1)(d) Information about the organizational expertise of the applicant to construct and operate the proposed facility, providing evidence to support a finding by the Council as required by OAR 345-022-0010, including:

OAR 345-021-0010(1)(d)(A) The applicant's previous experience, if any, in constructing and operating similar facilities;

The Applicant is a wholly owned subsidiary of Savion, LLC (Savion), which is a part of the Shell Group (see Attachment D-1).

2.1 Savion

Savion, a Shell Group portfolio company, is an industry-leading solar and energy storage organization built on a foundation of specialized experience and mastery in the craft of development. With a growing portfolio of more than 43.3 gigawatts (GW), Savion is currently one of the country's largest and most technologically advanced utility-scale solar and energy storage project development companies. Savion's diverse team provides comprehensive services at each phase of renewable energy project development, from conception through construction. Savion is committed to helping decarbonize the energy grid by replacing electric power generation with renewable sources and delivering cost-competitive electricity to the marketplace. For further information, visit www.savionenergy.com.

2.2 Shell USA

At Shell in the USA, we are delivering more and cleaner energy across America—from producing a secure supply of oil and gas in the U.S. Gulf of Mexico to renewable biofuels to our expanding EV charging network, to electricity generated by solar and wind power. As the energy system continues its transformation, we are working with our customers and across sectors on the journey to net-zero emissions in the United States and globally. We believe we can deliver the energy the world needs today, while building the energy systems of tomorrow—all while creating value for society and our shareholders. To make progress, we believe everybody must experience the economic, social, and environmental benefits of a changing energy system.

3.0 Qualifications of Applicant's Personnel - OAR 345-021-0010(1)(d)(B)

OAR 345-021-0010(1)(d)(B) The qualifications of the applicant's personnel who will be responsible for constructing and operating the facility, to the extent that the identities of such personnel are known when the application is submitted;

3.1 Executive Team

Nick Lincon | President

Nick became the President of Savion in January 2021 after successfully leading the acquisition of the company to Macquarie Capital's Green Investment Group in March 2019, an organization he joined in July 2018 as a Managing Director. Then, in December 2021, Nick led Savion through the sale transaction to Shell New Energies US LLC, a subsidiary of Shell plc. Nick has served on Savion's board since the company's founding in 2019 and also holds a position on Shell's Renewable Generation Leadership Team as Vice President of Onshore Power North America. Prior to Savion and Macquarie, Nick led Enel Green Power North America's Business Development group in the U.S. and Canada from July 2016 to July 2018. He previously held the position of Director and Senior Associate during his tenure beginning in May 2011. Nick has a bachelor's degree in business administration from the University of Connecticut and a Master of Business Administration in Finance from Boston University.

Diana Scholtes | Chief Commercial Officer

As the Chief Commercial Officer managing all aspects of the energy value chain, Diana has dedicated her career to the energy sector. With the successful execution of more than 6 GW of renewables in the U.S. and the European Union, Diana focuses on leveraging her expertise in wholesale markets to refine activities in areas such as structured products, go-to-market strategies, and new product development. Diana leads Savion's commercial transactions team, including the origination of Power Purchase Agreements (PPAs) with utilities and commercial and industrial entities. Additional responsibilities include overseeing market strategy, fundamental analysis, and proposal development. Prior to completing the Women's Leadership Program at the Yale School of Management in 2019, she completed the Executive Management Program at ESADE Business School in Madrid, Spain.

Scott Zeimetz | Chief Development Officer

Scott's diverse background in renewable energy development includes mergers and acquisitions (M&A) experience, including project and portfolio sales and acquisitions; experience in market analysis, portfolio strategy, power marketing, and PPA negotiations; experience in managing site selection, greenfield acquisition, and development of multiple GW-sized portfolios of wind and solar projects. Scott currently oversees development of the solar portfolio at Savion. Scott has a bachelor's degree in environmental biology and chemistry and a master's degree in geographic information science from Saint Mary's University of Minnesota.

Russ Laplante | Chief Investment Officer

Russ leads the company's M&A and project finance function. Russ has more than 16 years of experience in the renewable energy industry and has led and closed on the sale of 2,500 megawatts (MW) of wind and solar projects since joining. Russ brings a broad set of skills and experience, including financial structuring, contract negotiations, origination, M&A, project development, and construction/asset management. Previously a founding member of OwnEnergy, Russ was responsible for helping to grow the business, converting a pure startup to a development platform that was later sold to a strategic investor in 2015. Earlier in his career, Russ was a financial analyst and completed the training program at Goldman Sachs. Russ has a bachelor's degree in economics with a minor in philosophy of religion from Bates College in Maine and is also a chartered financial analyst.

3.2 Development**Mitchell Taylor | Director of Development and M&A**

Mitch leads the Pacific Northwest development team and the uncontracted development asset M&A activities for Savion. He has a background in development, origination, renewable platform management, and M&A, focusing on solar and storage, with an expansion into utility-scale domestic renewable technologies. Mitch is the strategic development lead in forming partnerships, joint ventures and bidding opportunities, and other special development initiatives. He is the internal lead in platform sales, most notably, the sale of Savion to Shell in 2021. Mitch has a bachelor's degree in finance and economics, with a focus in sustainable energy, from Creighton University.

Jeff Watson | Development Manager

Jeff leads project development on Savion's Pacific Northwest solar and storage portfolio. He has extensive multidisciplinary experience in project management, permitting, energy policy reform, and land acquisition across nearly every major Western Energy Coordinating Council (WECC) ISO and utility, with a particular focus on the Bonneville Power Administration. Jeff has a bachelor's in economics from the University of Colorado-Boulder.

3.3 Permitting & Environmental

Chris Powers | Senior Director-Permitting & Environmental

Chris has more than 23 years of experience in the renewable development and environmental consulting fields. He currently leads Permitting and Environmental efforts in the western region, supporting wind, solar, and battery energy storage development in California, Oregon, Washington, Arizona, Nevada, Utah, Colorado, Wyoming, and Montana. Chris's focus in renewable energy development involves environmental review and due diligence for project siting and leading specific permitting processes to obtain project approvals to construct and operate renewable energy projects. He coordinates internal company resources and experts to prepare work plans and permit applications for development stage projects and works directly with federal, state, and local resource agencies and permitting authorities to facilitate environmental reviews and obtain approvals as needed. Prior to Savion, Chris led permitting efforts in the Pacific Northwest and Mountain West for NextEra Energy Resources, and prior to that, he worked as an Environmental Consultant and Project Manager supporting clients in the renewable energy industry.

3.4 Engineering

Benjamin Gaskill | Director of Engineering

Benny leads the Savion engineering department covering project development and project delivery and brings more than 18 years of engineering experience in the renewable energy sector. Prior to Savion, his work at Shell included supporting numerous European and Middle Eastern solar projects in various stages of development, construction, and operations. In addition to his solar project support, he has coordinated technical and commercial issues to resolution, developed a reliability-centered maintenance program, and managed the safety and operational performance of Shell's operational wind project portfolio. Benny has a bachelor's degree in electrical engineering with a specialization in Power and Renewables from the University of Houston.

3.5 EPC

Jared Luebe | Director of Project Delivery

Jared leads pre-construction and construction efforts at Savion as Director of Project Delivery. He has 17 years of project execution experience, ranging from complex power plants to solar and energy storage facilities. Jared has previously held roles as a Structural Engineer of Record, Estimating Manager, and Project Manager for a top-tier EPC Contractor. Jared has a bachelor's degree in civil engineering from the University of Nebraska-Lincoln and maintains licensure as a Professional Engineer and Project Management Professional certification.

Katie Mackin | Director of Procurement

Katie leads Savion's EPC efforts, including developing pricing strategies, preparing requests for proposals, bid evaluations, and negotiating multiple contracts across multiple projects. She has led

procurement teams in both solar and battery storage, including energy projects in the engineering, construction, and completed stages. Katie studied communication studies at the University of Kansas.

3.6 Origination

Apollonia Racca | Originator, West Region

Apollonia is Savion's Origination lead for Western markets. With nearly 10 years of experience in the renewable energy industry, she has expertise in origination, commercial offtake negotiation, project development, site selection, and market strategy, covering solar, wind, and battery energy storage systems. In her previous role as Savion's head of Market Strategy, she oversaw an industry-leading team of analysts while growing the portfolio from 6 GW to 36 GW in four years. Apollonia has a bachelor's degree in environmental science from the University of Kansas.

3.7 Legal

John Larigan | General Counsel

John has more than 20 years of transactional and development legal experience, including six years with the Savion team. He's licensed in Kansas and Missouri.

3.8 Operations

Shell Renewable Asset Management International

Once operational, Shell Renewable Asset Management International (SRAMI) will provide asset management for the Facility. SRAMI will have over 20 years of experience in commercial, technical, and operational oversight of renewable assets in joint venture and wholly owned contexts. SRAMI will maintain operational hubs in Houston and The Hague, with staff in multiple locations within the Americas and EMEA regions. In addition to its dedicated organization, SRAMI can draw upon the expertise and resources of the global Shell Group.

4.0 Qualifications of Known Contractors - OAR 345-021-0010(1)(d)(C)

OAR 345-021-0010(1)(d)(C) The qualifications of any architect, engineer, major component vendor, or prime contractor upon whom the applicant will rely in constructing and operating the facility, to the extent that the identities of such persons are known when the application is submitted;

Savion utilizes a portfolio approach to standardize its procurement efforts across the company. By entering into long-term module supply agreements, Savion can ensure that module pricing, power class, and production slots are secured, allowing greater certainty on the Facility as final technology

can be optimized among a small number of preferred suppliers very quickly. Savion also maintains a close relationship with large EPC providers to inform budget pricing and conducts a competitive Request for Proposals (RFP) process among several pre-qualified contractors to select the optimal contractor for the Facility. This EPC and procurement RFP includes a list of pre-qualified manufacturers for major components such as the tracker, main power transformer, inverters, and power cable to ensure that the contractor meets Savion quality standards.

5.0 Applicant's Past Performance - OAR 345-021-0010(1)(d)(D)

OAR 345-021-0010(1)(d)(D) The past performance of the applicant, including but not limited to the number and severity of any regulatory citations in constructing or operating a facility, type of equipment, or process similar to the proposed facility;

Combined, the Savion team has developed 1,866 MW of operating, in-construction, and contracted solar energy, with a current solar and storage development pipeline of 22,105 MW and 19,251 MW, respectively. Please see the list below for examples of such solar and storage development facilities:

Facilities In Operation

- Madison Fields Solar Project, PJM Interconnection LLC (PJM),¹ Ohio, 180 MW, 12/31/2023 Commercial Operation Date (COD)
- Kiowa Solar Project, 100 MW, Southwest Power Pool (SPP),² Oklahoma, COD 12/31/2024
- Martin Solar Project, 111 MW, PJM, Kentucky, COD 12/31/2024

Under Construction

- Marion Solar Project, 100 MW, PJM, Ohio, COD 12/15/2025
- Elkhart Solar Project, 100 MW, PJM, Indiana, COD 12/31/2025
- Choctaw County Solar Project, 50 MW, SPP, Oklahoma, COD 9/1/2026

Developed/Sold/Operational

- Cass County Solar, 150 MW, Midcontinent Independent System Operator (MISO),³ Illinois, COD 12/31/2024
- Calhoun County, 125 MW, MISO, Michigan, COD 9/30/2024

¹ PJM serves all or parts of 13 mid-Atlantic states. Originally Pennsylvania-New Jersey-Maryland, it now serves states along the eastern seaboard from New Jersey south to North Carolina and extending as far west as Illinois, Ohio, Tennessee, West Virginia, and Kentucky.

² SPP covers Oklahoma, Kansas, and parts of Arkansas, Missouri, Texas, and New Mexico.

³ MISO serves 15 states in the Midwest, extending north to Manitoba, Canada, and south to include much of Arkansas, Mississippi, and Louisiana.

Developed/Sold/Under Construction

- Blacks Creek Energy Center, 400 MW, Western Electricity Coordinating Council (WECC),⁴ Idaho, COD 9/30/2025
- Maricopa Energy Center, 550 MW Solar + 550 MW 4hr Storage, WECC, Arizona, COD 12/31/2026
- Milligan Energy Center, 315 MW, WECC, Arizona, COD 12/31/2026

Savion has not incurred any regulatory citations during construction or operation of a similar facility.

6.0 Warranty to Secure Necessary Expertise - OAR 345-021-0010(1)(d)(E)

OAR 345-021-0010(1)(d)(E) If the applicant has no previous experience in constructing or operating similar facilities and has not identified a prime contractor for construction or operation of the proposed facility, other evidence that the applicant can successfully construct and operate the proposed facility. The applicant may include, as evidence, a warranty that it will, through contracts, secure the necessary expertise;

Savion and Shell Energy have a long track record of working with public and municipal utilities, electric cooperatives, and large-load customers to meet their energy needs. Given our robust business in energy services, we can sell cost-effective and right-sized energy products while assisting our energy customers with their decarbonization goals by delivering clean, reliable, carbon-free electricity. For more information on how Shell Energy is helping businesses navigate through the energy transition with renewable, energy-efficient, and cost-effective solutions, please visit <https://shellenergy.com/business/why-shell/case-studies>.

7.0 ISO Certified Program – OAR 345-021-0010(1)(d)(F)

OAR 345-021-0010(1)(d)(F) If the applicant has an ISO 9000 or ISO 14000 certified program and proposes to design, construct and operate the facility according to that program, a description of the program; and

The Applicant does not propose to design, construct, or operate the Facility in accordance with an ISO 9000 or ISO 14000 certified program, and therefore this rule does not apply.

⁴ WECC oversees the entire Western interconnection system and includes all or part of the 14 westernmost U.S. states as well as Alberta and British Columbia in Canada.

8.0 Mitigation – OAR 345-021-0010(1)(d)(G)

OAR 345-021-0010(1)(d)(G) If the applicant relies on mitigation to demonstrate compliance with any standards of Division 22 or 24 of this chapter, evidence that the applicant can successfully complete such proposed mitigation, including past experience with other projects and the qualifications and experience of personnel upon whom the applicant will rely, to the extent that the identities of such persons are known at the date of submittal.

Savion relies on mitigation to demonstrate compliance with several approval standards, most importantly with the Oregon Department of Fish and Wildlife (ODFW) fish and wildlife habitat goals and standards, addressed in Exhibit P of this Application for Site Certificate. The Applicant is working with Tetra Tech, Inc. to determine impacts and related mitigation requirements. Tetra Tech personnel have extensive experience in determining mitigation needs at numerous energy facilities in Oregon and throughout the country.

As noted in Section 3.0 above, Chris Powers has over 23 years of experience in environmental permitting and compliance, functioning as an environmental consultant supporting numerous renewable energy development clients with project permitting. He has consulted for renewable energy developers across the West, has led permitting efforts for NextEra in the Pacific Northwest and Mountain West, and now leads Savion's permitting portfolio in the Western Region. Savion also has extensive experience with developing and implementing mitigation plans, in coordination with various agencies, to offset impacts from project development. Some of the most recent examples include forested and emergent wetland conservation for its Calhoun County (Michigan) solar project, sand prairie and pollinator habitat restoration for its Cass County (Illinois) solar project, and Texas tortoise management at its Dove Run and Sun Cactus (Texas) solar projects. Savion has engaged directly with key stakeholder groups for this project (ODFW, Tribes, Wasco County, and more) to solicit feedback on its initial design plans. Savion plans to continue to seek feedback from stakeholder groups and implement their feedback wherever possible throughout the development process.

9.0 Submittal Requirements and Approval Standards

9.1 Submittal Requirements

Table D-1. Submittal Requirements Matrix

| Requirement | Location |
|---|-------------|
| OAR 345-021-0010(1)(d) Information about the organizational expertise of the applicant to construct and operate the proposed facility, providing evidence to support a finding by the Council as required by OAR 345-022-0010, including: | – |
| (A) The applicant's previous experience, if any, in constructing and operating similar facilities; | Section 2.0 |

| Requirement | Location |
|--|-----------------|
| (B) The qualifications of the applicant's personnel who will be responsible for constructing and operating the facility, to the extent that the identities of such personnel are known when the application is submitted; | Section 3.0 |
| (C) The qualifications of any architect, engineer, major component vendor, or prime contractor upon whom the applicant will rely in constructing and operating the facility, to the extent that the identities of such persons are known when the application is submitted; | Section 4.0 |
| (D) The past performance of the applicant, including but not limited to the number and severity of any regulatory citations in constructing or operating a facility, type of equipment, or process similar to the proposed facility. | Section 5.0 |
| (E) If the applicant has no previous experience in constructing or operating similar facilities and has not identified a prime contractor for construction or operation of the proposed facility, other evidence that the applicant can successfully construct and operate the proposed facility. The applicant may include, as evidence, a warranty that it will, through contracts, secure the necessary expertise; | Section 6.0 |
| (F) If the applicant has an ISO 9000 or ISO 14000 certified program and proposes to design, construct and operate the facility according to that program, a description of the program; and | Section 7.0 |
| (G) If the applicant relies on mitigation to demonstrate compliance with any standards of Division 22 or 24 of this chapter, evidence that the applicant can successfully complete such proposed mitigation, including past experience with other projects and the qualifications and experience of personnel upon whom the applicant will rely, to the extent that the identities of such persons are known at the date of submittal. | Section 8.0 |

9.2 Approval Standards

Table D-2. Approval Standard

| Requirement | Location |
|---|--------------------------|
| OAR 345-022-0010 Organizational Expertise | – |
| (1) To issue a site certificate, the Council must find that the applicant has the organizational expertise to construct, operate and retire the proposed facility in compliance with Council standards and conditions of the site certificate. To conclude that the applicant has this expertise, the Council must find that the applicant has demonstrated the ability to design, construct and operate the proposed facility in compliance with site certificate conditions and in a manner that protects public health and safety and has demonstrated the ability to restore the site to a useful, non-hazardous condition. The Council may consider the applicant's experience, the applicant's access to technical expertise and the applicant's past performance in constructing, operating and retiring other facilities, including, but not limited to, the number and severity of regulatory citations issued to the applicant. | Sections 2.0 through 8.0 |
| (2) The Council may base its findings under section (1) on a rebuttable presumption that an applicant has organizational, managerial, and technical expertise, if the applicant has an ISO 9000 or ISO 14000 certified program and proposes to design, construct and operate the facility according to that program. | N/A |

Attachment D-1. Yellow Rosebush Energy Center, LLC Parent Letter

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**Yellow Rosebush Energy Center, LLC
422 Admiral Blvd.
Kansas City, MO 64106**

April 4, 2025

Oregon Department of Energy
Energy Siting Division
550 Capital St. NE
Salem, OR 97301

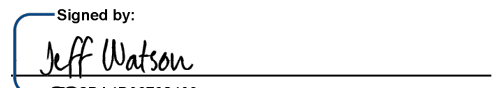
To Whom It May Concern:


As described in the Application for Site Certificate submitted by Yellow Rosebush Energy Center, LLC for the Yellow Rosebush Energy Center ("Facility"), Yellow Rosebush Energy Center, LLC is a wholly-owned subsidiary of Savion, LLC.

With this letter, Yellow Rosebush Energy Center, LLC and Savion, LLC confirm that Yellow Rosebush Energy Center, LLC will have access to sufficient resources and expertise to construct, own, operate, and maintain the Facility which resources and expertise may be obtained as services provided by Savion, LLC or an affiliate thereof on terms and conditions that will ensure the availability of such resources and expertise to Yellow Rosebush Energy Center, LLC as and when needed to ensure safe and reliable operation of the Facility.

Thank you in advance for your consideration of this matter.

Very truly yours,

Signed by:

Jeff Watson
Development Manager
Yellow Rosebush Energy Center, LLC

Signed by:

Christopher Powers
Authorized Person
Savion, LLC

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