



Oregon

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To: Energy Facility Siting Council

From: Jennifer Casler, Senior Client Leader with Haley and Aldrich and Sarah Esterson, Senior Policy Advisor

Date: June 12, 2026

Subject: Agenda Item E (Information Item):
Oregon Trail Solar Facility Construction Update for the June 26, 2026 EFSC Meeting

BACKGROUND

Oregon Trail Solar Facility is a 41 megawatt (MW) solar photovoltaic power generation facility currently under construction in Gilliam County, which will use or occupy 400 acres.

Oregon Trail Solar, LLC (certificate holder), a subsidiary of Avangrid Power, LLC (parent company) commenced construction of related or supporting facilities (battery energy storage system) on August 30, 2025. Construction of solar power generation components commenced in Spring 2026. To date, the certificate holder and its contractor, Cupertino Electric, have completed installation of perimeter fencing, site grading, and road construction. Pile installation, which serves as the foundation for the solar panel racking and tracking systems, is approximately 99 percent complete.

Over the next several months, construction activities will focus on installation of the torque tubes that support the tracking system, and installation of the solar panels (Photos 1 and 2). Construction is expected to continue through Fall 2026, with facility startup anticipated on or around November 9, 2026.

CONSTRUCTION MONITORING ACTIVITIES

The certificate holder provides weekly email updates to the Oregon Department of Energy (Department) documenting construction progress, installation activities, and any reportable incidents or conditions requiring corrective action. The Department's consultant, Haley & Aldrich, facilitates bi-weekly construction update meetings on behalf of the Department, attended by Department and certificate holder personnel.

During these meetings, the certificate holder provides updates on construction progress, discusses corrective actions implemented in response to observations made during Haley & Aldrich's monthly site inspections, and reports on any incidents identified through the weekly

reporting process. The meetings also include planning and coordination for upcoming site inspections.

CONDITION MANAGEMENT AND CORRECTIVE ACTIONS

Site inspections are conducted using Survey123 software configured with project-specific compliance conditions. Haley & Aldrich staff document inspection findings within the platform and upload supporting photographs collected during site visits.

Attention is given to conditions requiring ongoing management and oversight to maintain compliance, including weed control, track-in/track-out controls, spill response, and, most recently, fire prevention and preparedness planning.

Condition 43 – Noxious Weed Plan (Weed Control)

The certificate holder's construction contractor, Cupertino Electric, continues to work closely with Vegetation Solutions to manage weed growth during construction activities. Most recently, Vegetation Solutions conducted mowing activities during the week of June 8, 2026, to reduce vegetation prior to seed production. Herbicide treatment is anticipated to occur within the coming weeks. Photo 3 shows weeds just prior to mowing.

The certificate holder intends to continue providing weekly updates regarding weed management activities, and weed control remains a focus of monthly compliance inspections. Cupertino Electric's project management team coordinates weed management efforts directly with Vegetation Solutions.

Vegetation Solutions recently established a facility in Arlington, Oregon, approximately 10 minutes north of the project site. As a result, Vegetation Solutions personnel can regularly visit the Oregon Trail Solar Facility and other utility-scale solar facilities in the region to assess site conditions and implement weed control measures as needed.

Conditions 73 and 74 – Traffic Impact Mitigation (Track-In/Track-Out Controls)

Minor challenges were identified with the implementation of Cupertino Electric's track-in/track-out system, which is designed to minimize the transfer of gravel, soil, and potential weed seed from the construction site onto adjacent county roads (Photo 4).

The certificate holder reported that some drivers were bypassing the rumble mat system intended to remove accumulated dirt and gravel from vehicle tires prior to exiting the site. To address the issue, certificate holder installed a rope barrier to direct all outbound traffic over the rumble mats. The corrective action appears to have resolved the issue, and certificate holder and Cupertino Electric continue to monitor the effectiveness of the control measure and report on its performance.

Condition 56 – Spill Notification (Petroleum-Affected Soil Disposal)

In April 2026, certificate holder reported a hydraulic oil release from construction equipment that resulted in the discharge of approximately 30 gallons of hydraulic oil. Impacted soil was excavated and placed in a roll-off container pending characterization and approval for off-site disposal.

As of June 11, 2026, certificate holder received approval for off-site disposal of the petroleum-impacted soil and is proceeding with disposal activities in accordance with applicable requirements.

NEXT INSPECTION

The next site inspection is scheduled for June 18, 2026, and will be conducted by Michael Oakes in coordination with Avangrid. The inspection will include evaluation of fire prevention and preparedness measures, including applicable requirements and preventive actions identified in Appendix BB of the Health and Safety Plan (HASP).

Photo 1. Solar panel foundation installation.



Photo 2. Solar panels are installed on foundations and trackers.



Photo 3. View of Yellow Mustard and Russian Thistle growth. Mowing Week of June 8th followed by herbicide application and continued monitoring.



Photo 4. View of entrance/exit track out of the solar array area before corrective action.

