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To: Energy Facility Siting Council

From: Kathleen Sloan, Senior Siting Analyst

Date: July 10, 2026

Subject: Agenda Item C (Action Item): Buckley Solar Farm Facility – Request to Extend Expiration of the Notice of Intent, for the July 24, 2026 EFSC Meeting

Attachments: Attachment 1: Draft Notice of Intent Extension Order
Attachment 2: Draft Amended Project Order

BACKGROUND

Buckley Solar, LLC, a subsidiary of Clenara, LLC (applicant) is requesting to extend the expiration date of the Notice of Intent (NOI) to file a preliminary pASC from August 16, 2026 to August 17, 2027 for the proposed Buckley Solar Farm Facility.

Under OAR 345-020-0060, the Notice of Intent (NOI) expires two years after its date of submission unless:

- 1. At least 45 days before the expiration date, the applicant submits a petition to extend the expiration date. The timely petition of an extension under this rule stays the expiration of the NOI until the Council makes its decision to grant or deny the extension.; and*
- 2. The petition shows good cause.*

If the Energy Facility Siting Council (EFSC or Council) finds that both of these requirements are met, the Council may extend the expiration date for up to one year.

PROPOSED FACILITY

The Buckley Solar Farm Facility is a proposed solar photovoltaic energy generation facility including battery storage and related and supporting facilities. The proposed facility would have a generating capacity of 1,200 MW with up to 1,200 MW of battery storage with up to 4 hours of discharge capacity. approximately 7,852 acres (12.3 sq. miles) of privately owned land zoned F-1 (Exclusive Farm Use) in Sherman County.

PROCEDURAL HISTORY

- August 16, 2024 – Applicant filed the NOI establishing August 16, 2026 as the deadline to submit a preliminary Application for Site Certificate (pASC)

- October 1, 2024 – The Oregon Department of Energy (Department) held a public informational meeting on the NOI in Grass Valley.
- December 13, 2024 – Department issued a Project Order
- June 10, 2026 – Applicant filed NOI Extension Request.
- June 15, 2026 – Department requested additional information (RAI) to supplement NOI Extension Request
- June 29, 2026 – Applicant responded to RAI.
- July 24, 2026 – Council review of NOI Extension Request.

ANALYSIS

1. 45-Day Requirement – The deadline to timely submit a NOI time extension request was July 2, 2026. The applicant submitted their extension request on June 10, 2026, 67 days prior to the expiration date of the NOI. The Department therefore recommends Council find the 45-day requirement is met.
2. Good Cause Requirement – The applicant has included two reasons to justify good cause:

The first reason is related to the changes in Bonneville Power Administration (BPA) plans and resulting uncertainty surrounding the project schedule and interconnection timeline. These delays are related to the completion of the Buckley Solar interconnection study and large generator interconnection agreement process, as well as delays associated with the required upgrades to BPA's transmission system necessary to inject power into the grid, including the Buckley Substation expansion. BPA has continued to extend both the study and project timelines, with current estimates projecting completion of the Buckley Substation in 2030/2031.

These delays have directly impacted the applicant's ability to shortlist key equipment suppliers, including modules, inverters, and racking systems. Identifying these suppliers is necessary to advance the facility layout and develop the information required for the pASC. In addition, BPA informed the applicant in September 2025 of the proposed location of the new Buckley Substation, which is necessary to determine the location of our facility substation and related interconnection facilities. Now that this information is known, the facility layout is final and pASC development is underway; however, this information was not known sufficiently early to finish the pASC before the current expiration date.

The Department requested additional details and information on, or evidence of BPA coordination, the planning steps required that would justify an extension & need for more time, and a proposed schedule for when this would all occur.

The applicant provided the following responses:

The following timeline documents the sequence of events that gave rise to the permitting delays requiring an NOI extension:

- **November 4, 2024 — Initial Delay Notification**

The Project received email notification from BPA stating that the engineering, procurement, and construction of the Buckley 500 kV Substation upgrades had been delayed. This notification did not specify the revised schedule or the anticipated duration of the delay.

- **April 24, 2025 — High-Level Feedback from BPA**

BPA provided the Project with high-level feedback on the scope of the Buckley Substation upgrades. At this time, BPA informed the Project that it was facing an approximate two-year delay to its interconnection schedule and further noted that the new substation was being relocated “significantly to the west” of its previously anticipated position. This notification confirmed for the first time the magnitude of the schedule impact and that the physical location of the point of interconnection itself had materially changed.

- **August 4, 2025 — Updated Preliminary Plot Plan**

BPA provided the Project with an updated preliminary plot plan identifying the proposed location of the Buckley 500 kV Substation. This was a preliminary document and could not yet serve as the basis for the necessary design adjustments.

- **September 8, 2025 — Updated Project Requirement Documents**

BPA provided the Project with updated Project Requirement Documents (“PRDs”) for both the Buckley Solar interconnection request and the Buckley Substation Rebuild. These PRDs constitute the design inputs the Project requires to assess the full impact to its project design, finalize engineering, and advance permitting activities.

The applicant also documented engagement with BPA on the changes in BPA schedule as the facility design could not be completed until the Buckley Substation planning was known:

- Executing an Engineering and Procurement Agreement with BPA in May 2023 and advancing funding to accelerate the interconnection design process;
- Requesting calls and meetings with BPA personnel to discuss the scope and schedule of the Buckley Substation upgrades;
- Conducting an in-person meeting with BPA on October 20, 2025, to discuss the revised network upgrade scope and identify pathways to compress the Project’s delayed timeline; and
- Remaining engaged with BPA throughout the process and promptly reviewing and acting upon design deliverables once received.

The Department has reviewed the information provided by the applicant to support to the request for extension. The applicant has provided a chronology of BPA coordination as the changes to BPA planning and schedule became known. The facility will rely upon the interconnection provided by the Buckley Substation in order transmit energy to the power grid. The changes in BPA schedule for the substation are part of a larger BPA assessment of interconnection requests into the future and are outside the applicant’s control. The request seems reasonable given the known delays in the BPA planning process that would

impact the construction of the Buckley Substation. The Department therefore recommends Council find that this reason demonstrates good cause.

The second reason relates to project design changes in land control and participation by certain landowners required the Applicant to reevaluate portions of the Facility layout and undertake a significant redesign of the project footprint. The site boundary in the NOI included tax lot 04S 15E 0000 100, a significant parcel of approximately 1,075 acres. This land was removed from the site boundary in Q2 2025, after a preliminary electrical design and facility layout had been completed, which resulted in the need for a significant redesign.

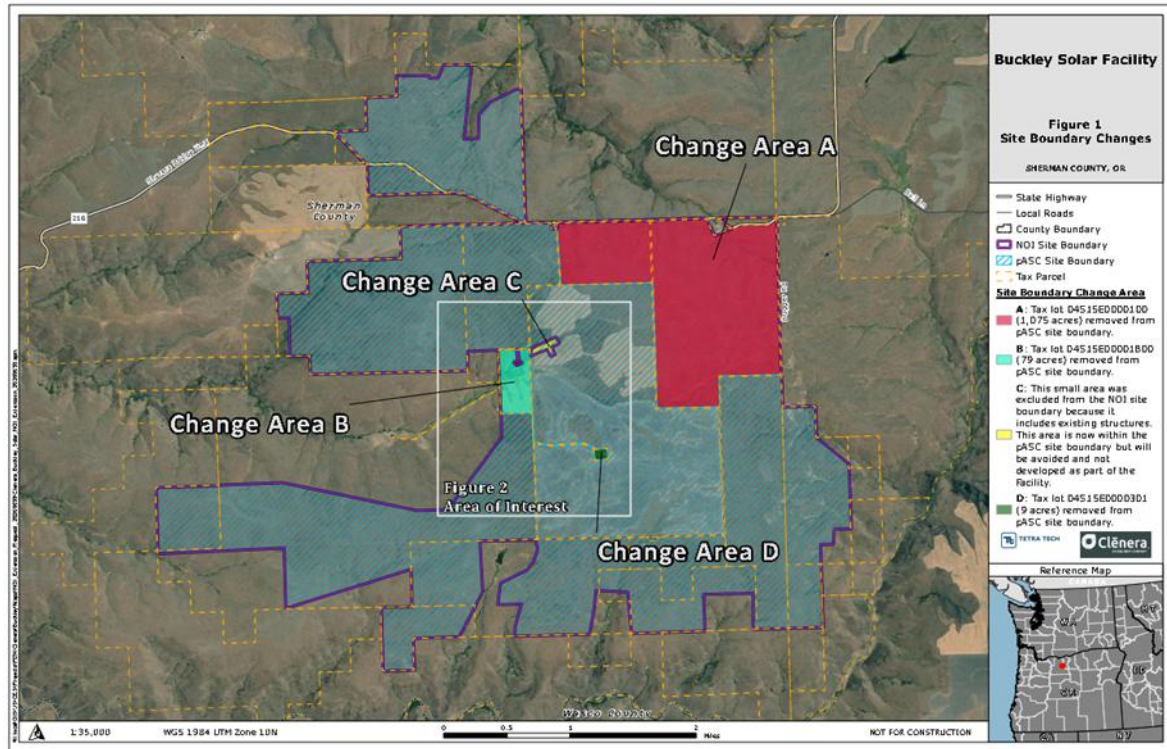
The Department requested additional details and information on the proposed changes in site boundary, proposed schedule for completion of design changes, any changes that may result in additional or different analysis areas, and a revised map reflecting proposed changes to site boundary since the NOI was submitted.

The applicant provided the following responses:

- The most significant change was the removal of tax lot 04S 15E 0000 100 (labeled A in Figure 1). This area is approximately 1,075 acres, the majority of which is buildable land and was planned in the original site design to be fully developed. The parcel was removed from the site boundary in Q2 2025.
- Additionally, a parcel of 79 acres (labeled B) was determined to be high-value farmland because it is predominantly comprised of high-value soils. As part of the Applicant's goal to reduce impacts, this tract was also removed from the site boundary.
- Two additional small changes were made to the site boundary that did not substantially affect Facility design. A small area (labeled C) was initially excluded from the site boundary because it contains a residence. This is now included within the site boundary but is left as an exclusion area that will not be developed. Additionally, the federally owned tract which includes the existing BPA Buckley Substation and road leading to it was removed from the site boundary (labeled D).

The applicant has provided a revised map to illustrate the resulting changes to the site boundary.

Figure 1: Revised Map Showing Changes to Site Boundary



The Department reviewed the information and responses provided by the applicant. The changes in the proposed site boundary do not change the analysis areas because they are either reductions from the NOI proposed boundary or they are included within the existing external site boundary so that analysis areas remain the same or are reduced as a result of the change. The addition of new lands requires additional assessment and surveys and agency coordination on findings for the preliminary Application for Site Certificate (pASC). The applicant has requested additional time to complete these studies and anticipates they will be completed within the next year and the pASC will be submitted in 2027 prior to the August 17, 2027 requested extended deadline. The Department therefore recommends Council find that this reason demonstrates good cause.

STAFF RECOMMENDATION

Based on the analysis above, the Department recommends Council issue an Order approving the petition based on meeting both the 45-day requirement and the good cause requirement. A draft Order is included as Attachment 1 of this staff report. A copy of the draft Amended Project Order is included in Attachment 2.