Oregon
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To: Energy Facility Siting Council

From: Kathleen Sloan, Senior Siting Analyst

Date: November 6, 2026

Subject: Agenda Item J (Action Item): Council Review of the Draft Final Order for the Klamath Cogeneration Project Request for Amendment 6 at the November 19-20, 2026 EFSC meeting.

Attachments: Attachment 1: Draft Final Order (in redline/track-changes)

BACKGROUND

Klamath Cogeneration Project (KCP) is an operational facility, a 525 MW combustion turbine power generation facility on an approximately 20-acre site, approximately five miles southwest of the City of Klamath Falls. The certificate holder is Klamath Energy, LLC, a subsidiary of Avangrid Power, LLC.

The Energy Facility Siting Council (Council) issued the Final Order and Site Certificate for the facility in November 1996. The site certificate has been amended five times, most recently in 2013. Request for Amendment 6 (RFA6) seeks Council authorization to amend Condition IV.P(9) (Waste Minimization Condition 9), as presented below, to allow for the disposal of heat recovery steam generator (HRSG) blowdown water through Klamath Falls' wastewater treatment plant consistent with current operation, as authorized under the permit issued by the City of Klamath Falls to the Certificate Holder (See Attachment 1) and in response to the Oregon Department of Energy's (Department) compliance recommendations in its January 22, 2025 Operational Compliance Review Report.

> **Recommended Amended Waste Minimization Condition 9 (OPR):**
> KCP HRSG boiler blowdown shall be ~~used as makeup water to the cooling tower. KCP cooling tower blowdown shall be reduced by automating the chemical treatment and blowdown system to allow the cooling tower to operate at the highest practical number of cycles of concentration~~ discharged to the City of Klamath Falls' Wastewater Treatment Plant as described in the Industrial Wastewater Discharge Permit issued by the City of Klamath Falls to Certificate Holder."
> (ASC, ~~F-3, V-3~~, Final Order on AMD6)

RFA6 PROCEDURAL SUMMARY

The Department issued its Proposed Order on RFA6 on July 27, 2027, initiating a public comment period extending from July 27 through August 28, 2026. The Council conducted a

public hearing on RFA6 and the Proposed Order on RFA6 on August 21, 2026. During the comment period, the Department received written comments from 1 member of the public, which were unrelated to the scope of the amendment.

The Department's evaluation of comments and responses is provided in the draft Final Order, resulting in no changes from the Proposed Order to the draft Final Order. The Department issued the Draft Final Order on October 27, 2026 and issued Public Notice of the Draft Final Order. The Council will review the draft Final Order at the November 20, 2026 EFSC Meeting and will have the opportunity to approve or deny RFA6 and issue a Final Order.

RECOMMENDATION

The Department recommends that the Council find the certificate holder has demonstrated that the preponderance of evidence on the record supports the conclusion that the facility, with the changes proposed in RFA6, complies with the applicable laws and Council standards; and that the changes proposed will not increase the gross carbon dioxide emissions from facility operation.