

Preliminary Application for Site Certificate for the Speedway Energy Facility

Exhibit A. Organizational Expertise

**Submitted to
Oregon Energy Facility Siting Council**

Prepared for



BGTF Speedway Project LLC

Prepared by



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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
Applicant	BGTF Speedway Project LLC
ASC	Application for Site Certificate
BPA	Bonneville Power Administration
CAISO	California ISO
CFR	Code of Federal Regulations
COD	Commercial Operation Date
EFSC	Oregon Energy Facility Siting Council
FAA	Federal Aviation Administration
Facility	Speedway Energy Facility
kV	kilovolt
LLC	limited liability company
MW	megawatts
MWh	megawatt-hours
NEPA	National Environmental Policy Act
NPDES	National Pollutant Discharge Elimination System
OAR	Oregon Administrative Rules
ODEQ	Oregon Department of Environmental Quality
ODOT	Oregon Department of Transportation
ORS	Oregon Revised Statutes
PJM	PJM Interconnection LLC
POI	point of interconnection
SCZO	Sherman County Zoning Ordinance
USACE	U.S. Army Corps of Engineers
USC	United States Code
USFWS	U.S. Fish and Wildlife Service
WPCF	Water Pollution Control Facilities

1.0 Introduction

BGTF Speedway Project LLC (Applicant) proposes construction and operation of the Speedway Energy Facility (Facility), a renewable energy facility incorporating wind, solar, and battery energy storage, located on privately owned land in unincorporated Sherman County, Oregon. The Facility's proposed point of interconnection (POI) to the regional electrical grid will be via a new Bonneville Power Administration (BPA) switchyard to be located adjacent to the existing BPA 500-kilovolt (kV) Ashe-Marion Transmission Line, which runs northeast/southwest through the site boundary.

Exhibit A presents information supporting demonstration of compliance with the Organizational Expertise approval standard in Oregon Administrative Rules (OAR) 345-022-0010.

2.0 Applicant Contact Information – OAR 345-022-0010(5)(a)

(5) To assist the Council in determining whether the standard outlined in (1) through (4) has been met, the Applicant must submit:

(a) Information about the applicant and participating persons, including:

2.1 Applicant and Participating Persons – OAR 345-022-0010(5)(a)(A)

(A) The name and address of the applicant including all co-owners of the proposed facility, the name, mailing address, email address and telephone number of the contact person for the application, and if there is a contact person other than the applicant, the name, title, mailing address, email address and telephone number of that person;

The Applicant, BGTF Speedway Project LLC, is co-owned by Brookfield Renewable Corporation (Brookfield Renewable) and Brookfield Global Transition Fund (an investment fund managed by Brookfield Asset Management).

Tables A-1 and A-2 provide contact information for the Applicant and the Applicant's project manager. Table A-3 provides contact information for the owner of the proposed facility.

Table A-1. Name and Address of the Applicant

Entity Name	BGTF Speedway Project LLC
Street Address	200 Liberty St., 14th Floor
City, State, ZIP	New York, NY 10281

Table A-2. Applicant Project Manager Contact Information

Name	Vincent Esposito
Title	Sr. Manager, Asset Development
Company Name	Brookfield Renewable Corporation
Street Address	200 Liberty St., 14th Floor
City, State, ZIP	New York, NY 10281
Email	vincent.esposito@brookfieldrenewable.com
Phone	(646) 992-9316

2.2 Other Participants – OAR 345-022-0010(5)(a)(B)

(B) The contact name, mailing address, email address and telephone number of all participating persons, other than individuals, including but not limited to any parent corporation of the applicant, persons upon whom the applicant will rely for third-party permits or approvals related to the facility, and, if known, other persons upon whom the applicant will rely in meeting any facility standard adopted by the Council;

Tables A-3 and A-4 provide contact information for the Applicant's parent company, the Lead Consultant's project manager, and the Applicant's attorney.

Table A-3. Parent Company

Name	John Soininen
Title	VP, Asset Development
Company Name	Brookfield Global Transition Fund (an investment fund managed by Brookfield Asset Management)
Street Address	c/o BGTF Speedway Project LLC 200 Liberty St, 14th Floor
City, State, ZIP	New York, NY 10281
Email	john.soininen@brookfieldrenewable.com
Phone	(646) 992-2427

Table A-4. Contact Persons Other than the Applicant

Permitting and Environmental Lead Consultant	
Name	Paul Seilo
Title	Senior Project Manager
Company Name	Tetra Tech, Inc.
Street Address	1750 SW Harbor Way, Suite 400
City, State, ZIP	Portland, OR 97213
Email	paul.seilo@tetratech.com
Phone	(503) 200-0005

Applicant's Attorney	
Name	Timothy McMahan
Title	Partner, Energy
Company Name	Stoel Rives LLP
Street Address	760 SW Ninth Avenue, Suite 3000
City, State, ZIP	Portland, OR 97205
Email	tim.mcmahan@stoel.com
Phone	(503) 504-8693

2.3 Corporate Status – OAR 345-022-0010(5)(a)(C)

(C) If the applicant is a corporation:

(i) The full name, official designation, mailing address, email address and telephone number of the officer responsible for submitting the application;

(ii) The date and place of its incorporation;

(iii) A copy of its articles of incorporation and its authorization for submitting the application; and

(iv) In the case of a corporation not incorporated in Oregon, the name and address of the resident attorney-in-fact in this state and proof of registration to do business in Oregon;

The Applicant is not a corporation.

2.4 Ownership – OAR 345-022-0010(5)(a)(D)

(D) If the applicant is a wholly owned subsidiary of a company, corporation or other business entity, in addition to the information required by paragraph (C), the full name and business address of each of the applicant's full or partial owners;

The Applicant, BGTF Speedway Project LLC, is co-owned by Brookfield Renewable and Brookfield Global Transition Fund (an investment fund managed by Brookfield Asset Management). Table A-3 provides contact information for the owner of the proposed facility. A letter from an authorized representative of Brookfield Global Transition Fund is provided as Attachment A-1, which confirms the Applicant's access to its parent company's technical and financial resources sufficient to facilitate the construction, operation, and decommissioning of the Facility.

2.5 Association/Joint-Venture Information – OAR 345-022-0010(5)(a)(E)

(E) If the applicant is an association of citizens, a joint venture or a partnership:

(i) The full name, official designation, mailing address, email address and telephone number of the person responsible for submitting the application;

(ii) The name, business address and telephone number of each person participating in the association, joint venture or partnership and the percentage interest held by each;

(iii) Proof of registration to do business in Oregon;

(iv) A copy of its articles of association, joint venture agreement or partnership agreement and a list of its members and their cities of residence; and

(v) If there are no articles of association, joint venture agreement or partnership agreement, the applicant must state that fact over the signature of each member;

The Applicant is not an association of citizens, a joint venture, or partnership.

2.6 Public/Government Entity Information – OAR 345-022-0010(5)(a)(F)

(F) If the applicant is a public or governmental entity:

(i) The full name, official designation, mailing address, email address and telephone number of the person responsible for submitting the application; and

(ii) Written authorization from the entity's governing body to submit an application;

The Applicant is not a public or governmental entity.

2.7 Individual Applicant – OAR 345-022-0010(5)(a)(G)

(G) If the applicant is an individual, the individual's mailing address, email address and telephone number; and

The Applicant is not an individual.

2.8 Limited Liability Company Information – OAR 345-022-0010(5)(a)(H)

(H) If the applicant is a limited liability company:

(i) The full name, official designation, mailing address, email address and telephone number of the officer responsible for submitting the application;

(ii) The date and place of its formation;

(iii) A copy of its articles of organization and its authorization for submitting the application; and

(iv) In the case of a limited liability company not registered in Oregon, the name and address of the resident attorney-in-fact in this state and proof of registration to do business in Oregon.

The Applicant is a limited liability company. Table A-5 provides the name and information for the officer for BGTF Speedway Project LLC responsible for submitting this Application for Site Certificate (ASC).

Table A-5. Applicant Officer Contact Information

Name	John Soininen
Title	Vice President, Asset Development
Company Name	BGTF Speedway Project LLC
Street Address	200 Liberty St., 14th Floor
City, State, ZIP	New York, NY 10281
Email	john.soininen@brookfieldrenewable.com
Phone	(646) 992-2427

BGTF Speedway Project LLC was formed with the Secretary of State of the State of Delaware on August 1, 2025, and was acknowledged and registered to do business in Oregon by the Oregon Secretary of State on August 20, 2025, in Salem, Oregon. The articles of organization and registration to do business in Oregon are provided in Attachment A-2.

BGTF Speedway Project LLC is registered in Oregon; therefore, information for the resident attorney-in-fact is not required.

3.0 Organizational Expertise – OAR 345-022-0010(5)(b)

(b) Information about the organizational expertise of the applicant to construct and operate the proposed facility, including:

3.1 Applicant's Previous Experience – OAR 345-022-0010(5)(b)(A)

(A) The applicant's previous experience, if any, in constructing and operating similar facilities;

The applicant, BGTF Speedway Project LLC, is a subsidiary of Brookfield Global Transition Fund, which is managed by Brookfield Asset Management, and Brookfield Renewable.

Brookfield Asset Management is a leading global alternative asset manager headquartered in New York, with over \$1 trillion of assets under management. Brookfield Asset Management and its affiliates employ approximately 250,000 people involved in the day-to-day operations of facilities, business, and project development worldwide. Brookfield Asset Management is a global leader in decarbonization, with integrated operating platforms on five continents with operating, development, and power marketing expertise.

Brookfield Renewable operates one of the world's largest platforms for renewable power and sustainable solutions. Its renewable power portfolio consists of hydroelectric, wind, utility-scale solar and storage facilities (including at least two operational projects in Washington and Oregon, see below), and sustainable solutions assets include investment in a leading global nuclear services

business and a portfolio of investments in carbon capture and storage capacity, agricultural renewable natural gas, materials recycling and eFuels manufacturing capacity, among others.

Brookfield Renewable has over 120 years of experience in power generation. With its North American business headquartered in New York, N.Y., Brookfield Renewable's North American platform owns and operates hydropower, wind, solar, and storage facilities across 34 states. The North American platform consists of over 190 utility-scale renewable facilities and over 5,400 distributed generation solar projects, totaling approximately 17,000 megawatts (MW) in nameplate capacity, and the utility-scale portfolio continues to grow with a diversified pipeline of renewable development projects totaling over 70 gigawatts (GW). In recent years, Brookfield Renewable's North American business has expanded its portfolio (shown in Diagram A-1 below) through acquisitions of several renewable platforms, including TerraForm Power, Urban Grid, Scout Clean Energy, X-Elio, Deriva Energy (formerly Duke Energy Renewables), Standard Solar, and Geronimo Power.

Further information about Brookfield Renewable is available at [Renewable Power & Transition | Brookfield](https://www.brookfield.com/about-us/capabilities/energy).¹



Diagram A-1. Brookfield's Global Renewable Platforms

3.2 Qualifications of Applicant's Personnel – OAR 345-022-0010(5)(b)(B)

(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;

¹ <https://www.brookfield.com/about-us/capabilities/energy>

3.2.1 Executive Team

Stephen Gallagher | Chief Executive Officer

Stephen Gallagher is Chief Executive Officer for Brookfield Renewable's North American business. In this role, Mr. Gallagher directs all commercial activities for the North American operations, including trading, origination, business development, asset optimization, regulatory affairs and policy.

Mr. Gallagher joined Brookfield Renewable in 2017, previously serving as Director of Portfolio Management for the European operations and more recently as Vice President of Finance for the North American business. He has more than a decade of experience in the energy industry, having served as Head of Financial Planning and Analysis and Corporate Treasury at Ardmare Shipping Corp. and prior to that, serving nine years as an equity analyst covering the oil & gas and materials sectors at State Street Global Advisors.

Mr. Gallagher holds a bachelor of science (B.S.) in Finance from University College in Cork, Ireland. He is a Chartered Financial Analyst.

Tom Deedy | Chief Operating Officer

Tom Deedy is Chief Operating Officer of Brookfield Renewable's North American business, overseeing operations and construction for the North American platform. In this role, he manages health, safety, security and environmental matters, as well as project construction.

Mr. Deedy's leadership has been critical in implementing Brookfield Renewable's business unit in North America, contributing significantly to its rapid growth. Mr. Deedy joined Brookfield Renewable in 2009, previously serving as Senior Vice President of Operations. He brings more than 25 years of industry experience in generation, transmission, as well as mergers and acquisitions, project development, construction, and marketing.

Mr. Deedy holds a B.S. in Marine Engineering from the Massachusetts Maritime Academy.

Vann Gupta | Chief Development Officer

Vandana "Vann" Gupta is Chief Development Officer for Brookfield Renewable's North American business, leading development activities across an array of renewable energy sectors, including solar, onshore wind, and battery storage.

Ms. Gupta joined Brookfield in early 2021 with over 20 years of energy experience. She has led all aspects of renewable and traditional energy asset management with a background in legal, investment banking, commercial and asset development.

Ms. Gupta holds a J.D. from Columbia Law School and a B.S. from SUNY-Albany.

Michael Tebbutt | Chief Financial Officer

Michael Tebbutt is Chief Financial Officer (CFO) for Brookfield Renewable's North American business, overseeing all finance activities for the North American platform, including accounting, financial reporting, taxation, treasury, capital markets, and risk management.

Mr. Tebbutt joined Brookfield Renewable as CFO in July 2020 following the completion of Brookfield Renewable's merger with TerraForm Power, where he also served as CFO. Prior to TerraForm Power, Mr. Tebbutt has held senior positions including CFO at Brookfield Properties in its North American retail business and CFO of Brookfield Infrastructure Asia Pacific's operations. Prior to joining the company in 2011, Mr. Tebbutt worked at accounting firm PwC in New York and Sydney.

Mr. Tebbutt holds a bachelor's degree in Business from the University of Technology Sydney (UTS) and is a Chartered Accountant.

Brian Krall | Chief Commercial Officer

Brian Krall is the Chief Commercial Officer for Brookfield Renewable's North American business, managing all commercial initiatives including trading, origination, business development, asset optimization, regulatory affairs, and policy.

Mr. Krall joined the company in March 2021, bringing more than 20 years of energy industry experience with expertise in the wholesale and retail energy markets. Prior to Brookfield, he held a variety of leadership roles at Hess Energy Marketing, Direct Energy Business Marketing and East Coast Power & Gas, focused on commercial management and trading roles in the power and gas markets.

Mr. Krall holds a master of business administration and a B.S. in Finance from Rider University.

3.2.2 Development

John Soininen | Vice President, Asset Development - Solar

John Soininen leads utility-scale renewable energy development initiatives across major North American power markets. He brings more than 20 years of experience in renewable energy development.

Mr. Soininen holds a master of science (M.S.) in Real Estate Finance & Economics from the Massachusetts Institute of Technology and a B.S. in Civil Engineering from Lehigh University.

Berk Gursoy | Vice President, Asset Development – Wind & BESS

Berk Gursoy is a senior renewable energy leader with over 20 years of experience in project development, construction, and operations across diverse North American portfolios. Mr. Gursoy has held multiple executive roles overseeing wind, solar, and regional operations.

Mr. Gursoy holds a M.S. and a B.S. in Electrical Engineering from Middle East Technical University.

Vincent Esposito | Senior Manager, Asset Development

Vincent Esposito is Senior Manager of Asset Development at Brookfield Renewable, where he leads asset strategy and development initiatives across renewable energy portfolios. He brings prior experience in offshore wind development, along with a background in power generation and infrastructure, asset management, and power plant operations.

Mr. Esposito holds a B.S. in Marine Engineering from the Massachusetts Maritime Academy.

3.2.3 Construction

John McVaigh | Vice President, Construction

John McVaigh is the Vice President of Construction at Brookfield Renewable and leads renewable energy construction and repowering activities, overseeing large-scale project delivery across a multi-gigawatt pipeline. His prior experience includes senior leadership and operational roles within the company and earlier technical positions in power generation and maintenance across the Navy and private sector.

Mr. McVaigh holds a B.S. in Engineering from Rochester Institute of Technology.

3.3 Qualifications of Known Contractors – OAR 345-022-0010(5)(b)(C)

(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;

The Applicant and Brookfield Renewable have experience working with a multitude of seasoned contractors trusted in the development and construction of renewable energy generation facilities. While the Applicant has not yet selected an architect, engineer, major component vendor, or prime contractor, the Applicant is committed to selecting highly qualified contractors who are experienced in their industries and meet Brookfield Renewable's high quality and safety standards.

3.4 Applicant's Past Performance – OAR 345-022-0010(5)(b)(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;

Brookfield Renewable maintains a strong record of regulatory compliance across its operating fleet. In alignment with institutional governance standards and public disclosures, the organization actively monitors all asset interactions with environmental and energy regulators. For the majority of its operational assets, there have been no material regulatory citations or enforcement actions related to construction, equipment specifications, or operational processes. In limited instances where administrative notices have been issued, those notices have been minor and field-level, and Brookfield Renewable has worked proactively and transparently with the notifying agencies to implement immediate corrective actions, achieving timely resolution with no material adverse enforcement outcomes.

Facilities In Operation

- Goose Prairie Solar, Washington, Western Electricity Coordinating Council (WECC). Utility scale solar, 80 MW. Q4 2024 Commercial Operation Date (COD).
- Shepherds Flat Wind Repower Project, Oregon, BPA. Utility scale wind, 845 MW. Repower 2021.
- Lucky Bluff & Black Springs, Texas, Electric Reliability Council of Texas (ERCOT). Stand-alone BESS: Lucky Bluff: 100 MW /200 megawatt-hours (MWh) / Black Springs: 120 MW /240 MWh. Q4 2025 COD.
- Mesa Wind Repower, California ISO (CAISO). Utility scale wind, 30 MW. Q2 2024 COD.
- Alta Mesa Wind, CAISO. Utility scale wind, 27 MW. Q1 2025 COD.
- Millinocket, Maine, ISO New England (ISONE). Standalone BESS, 20 MW/40 MWh. COD Q4 2020.

Under Construction

- Mulqueeney Wind, CAISO. Utility scale wind, 80 MW. Currently under construction, with COD expected in Q4 2026.
- Pitt Solar, North Carolina, PJM Interconnection LLC (PJM). Utility scale solar. 80 MW. Currently under construction with COD expected May 2026.
- Washington East and West, Pennsylvania, PJM. Utility scale solar, 60 MW in total. In construction, COD expected 2027.
- Cherry Solar, North Carolina, PJM. Utility scale solar, 180 MW. In construction, COD expected Q2 2026.
- Shawboro Solar, North Carolina, PJM. Utility scale solar, 150 MW. In construction, COD expected 2027.

3.5 Warrant to Secure Necessary Expertise – OAR 345-022-0010(5)(b)(E)

(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;

The Applicant and Brookfield Renewable have significant previous experience operating and developing similar facilities and an extensive portfolio of hydroelectric, wind, solar, storage, and distributed energy generation projects, as described in Section 3.1. Therefore, this rule is not applicable.

3.6 ISO Certified Program – OAR 345-022-0010(5)(b)(F)

(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.

3.7 Mitigation – OAR 345-022-0010(5)(b)(G)

(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.

Brookfield Renewable is committed to establishing appropriate mitigation measures for each project it develops. The Applicant has proposed specific mitigation measures in compliance with OAR Divisions 22 and 24 as detailed in the pertinent exhibits within this ASC, and has enlisted a leading consulting and engineering firm, Tetra Tech, Inc. (Tetra Tech), to design and implement the mitigation strategies discussed in the ASC. Tetra Tech has extensive experience on both the national and local stage in regard to conceptual design, environmental mitigation, and post-construction monitoring.

Between the roughly 100 projects currently in operation and in the development pipeline, Brookfield Renewable has established a network of reputable environmental consulting firms across the country to ensure effective mitigation strategies are enacted and tailored to each individual project. Brookfield Renewable values the local knowledge and expertise each group is able to provide in order to create and execute these strategic mitigation plans. Although no two projects are the same, Brookfield Renewable has aimed past mitigation plans at minimizing or avoiding impact to habitats, wildlife, vegetation, waste, and stormwater and erosion. Examples include:

- **Mulqueeney Wind:** An 80-MW wind energy facility in northern California's Altamont Pass Wind Resource Area, permitted through Alameda County as well as California Department of Fish and Wildlife. The project utilizes various mitigation measures including, but not limited to, habitat mitigation, eagle nest refurbishment, pole top retrofits, and artificial burrow and overwintering programs for owls. The project is currently under construction with an anticipated COD in 2026.
- **Goose Prairie Solar:** An operating 80-MWac solar energy facility located in Yakima County, Washington, and connected to BPA's Midway-to-Moxee 115-kilovolt transmission line. The project was permitted through the Washington Energy Facility Site Evaluation Council (EFSEC), started construction in 2023, and achieved commercial operation in December 2024. The EFSEC site certificate requires that the project perform various mitigation measures including habitat mitigation for disturbed land, avian protection for active nests during ground-clearing activities, and noxious weed management to prevent the proliferation of invasive plants in the shrub-steppe habitats.
- **Morgnec Road Solar:** A 45-MW solar energy facility in Kent County, Maryland, connecting to Delmarva Power's Morgnec substation and the broader PJM network. The project was permitted through the Certificate of Public Convenience and Necessity (CPCN) process with the Maryland Public Service Commission and the Kent County Planning Commission. The project utilizes various mitigation measures including avoidance of critical resource conservation areas, a rigorous agricultural and topsoil restoration/decommissioning plan, and pre-construction avian nest monitoring. The project is currently under construction with an anticipated COD in 2026.

4.0 Permits – OAR 345-022-0010(5)(c)

4.1 Identification and Description of Required Permits – OAR 345-022-0010(5)(c)(A)(B)

(c) Information about permits needed for construction and operation of the facility, including:

(A) Identification of all federal, state and local government permits related to the siting of the proposed facility, a legal citation of the statute, rule or ordinance governing each permit, and the name, mailing address, email address and telephone number of the agency or office responsible for each permit;

(B) A description of each permit, the reasons the permit is needed for construction or operation of the facility and the applicant's analysis of whether the permit should or should not be included in and governed by the site certificate;

4.1.1 Federal Permits

Table A-6 identifies and describes the federal permits potentially required for construction and operation of the Facility.

Table A-6. Federal Permits

Permit	Agency Name and Contact	Authority	Description
Clean Water Act, Section 404	U.S. Army Corps of Engineers (USACE), Portland District Attn: Danielle Erb, Sherman County Contact PO Box 2946 Portland, OR 97208-2946 (503) 808-4368 danielle.h.erb@usace.army.mil	Clean Water Act, Section 404 (33 United States Code [USC] § 1344); 33 Code of Federal Regulations (CFR) §§ 320, 323, 325-28, and 330	A Section 404 permit will be required if dredge or fill occurs in waters of the United States. The Facility is not anticipated to permanently impact jurisdictional waters and/or wetlands of the United States. Currently only minor temporary impacts are proposed. The USACE has already issued Nationwide Permits for minor impacts. The USACE would verify the project meets the Nationwide Permit conditions. This federal process is not within the jurisdiction of Oregon Energy Facility Siting Council (EFSC) and therefore should not be included in or governed by the site certificate.
Notice of Proposed Construction or Alteration (Form 7460-1)	Federal Aviation Administration (FAA) Attn: Dan Shoemaker, Airspace Specialist Seattle Obstruction Evaluation Group 1601 Lind Avenue SW Renton, WA 98057 (425) 227-2791 Dan.shoemaker@faa.gov	Federal Aviation Act of 1958 (14 USC § 44718); 14 CFR § 77	The Applicant proposes construction or alterations that may affect navigable airspace pertaining to structures greater than 200 feet above ground surface, potential glare from the Facility's solar arrays, or for construction of structures within specified distances of runways or helipads and may be required to file this notice. No permit is issued by the FAA. This federal process is not within the jurisdiction of EFSC and therefore should not be included in or governed by the site certificate.
Supplemental Notice of Actual Construction or Alteration (Form 7460-2)	FAA Attn: Dan Shoemaker, Airspace Specialist Seattle Obstruction Evaluation Group 1601 Lind Avenue SW Renton, WA 98057 (425) 227-2791 Dan.shoemaker@faa.gov	Federal Aviation Act of 1958 (14 USC § 44718); 14 CFR § 77	If a Notice of Proposed Construction or Alteration with the FAA is required, then submission of the Supplemental Notice of Actual Construction or Alteration form must be filed within 5 days after construction reaches its greatest height as specified in the No Hazard Determination. This federal process is not within the jurisdiction of EFSC and therefore should not be included in or governed by the site certificate.

Preliminary Application for Site Certificate
Exhibit A. Organizational Expertise

Permit	Agency Name and Contact	Authority	Description
Incidental Take Permit or Eagle Take Permit	U.S. Fish and Wildlife Service (USFWS) Attn: Jeffrey A Dillon, Endangered Species Division Manager 2600 SE 98 th Avenue, Suite 100 Portland, OR 970266 (503) 231-6179 Jeffrey.Dillon@fws.gov	Section 7, 9, and 10 Consultation under the Endangered Species Act; Bald and Golden Eagle Protection Act	The Facility is not anticipated to impact federally listed species or protected eagles. However, if impacts to federally listed species or eagles are determined not to be avoidable based on the results of field surveys and ongoing coordination with USFWS, the Applicant will pursue an Incidental Take Permit or Eagle Take Permit with the USFWS as applicable. This federal process is not within the jurisdiction of EFSC and therefore should not be included in or governed by the site certificate.
Record of Decision/ National Environmental Policy Act (NEPA) Compliance	Bonneville Power Administration (BPA) Attn: Laura Green, Manager PO Box 3621 Portland, OR 97208-3621 (360) 418-8633 legreen@bpa.gov	NEPA, Section 102 (42 United States Code [USC] § 4332); 40 CFR § 1500	Interconnection to BPA's transmission system is subject to review under NEPA. BPA will lead this process as a separate action from the Facility site certificate process. This federal process is not within the jurisdiction of the EFSC and therefore should not be included within the site certificate.

4.1.2 State Permits Not Federally Delegated

Table A-7 identifies and describes the state permits not federally delegated that are potentially required for construction and operation of the Facility.

Table A-7. State Permits Not Federally Delegated

Permit	Agency Name and Contact	Authority	Description
Energy Facility Site Certificate	Oregon Department of Energy and EFSC Attn: Todd Cornett, Assistant Director 550 Capitol Street NE Salem, OR 97301 (503) 428-2962 todd.cornett@oregon.gov	Oregon Revised Statutes (ORS) 469.300 et seq.; Oregon Administrative Rules (OAR) Chapter 345, Divisions 1, 21-24	This site certificate is the subject of this Application for Site Certificate.

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Permit	Agency Name and Contact	Authority	Description
Airspace Review	Oregon Department of Aviation Attn: Alex Thomas, Planning, Policy, and Programs Manager 3040 25th Street, SE Salem, OR 97302 (503) 375-2357 Alex.R.THOMAS@odav.oregon.gov	14 CFR § 77; ORS 836.530 and 836.535; OAR Chapter 738, Division 70	The Oregon Department of Aviation provides an airspace review and determination letter following review of Form 7460-1 for structures greater than 200 feet above ground surface or within the distances from airports listed in OAR 738-070-0110. No permit is issued by the Oregon Department of Aviation. The airspace review is useful in understanding the 7460-1 process but is outside EFSC jurisdiction. Therefore, this permit should not be included in and governed by the site certificate.
Removal/Fill Permit (including Individual Permit, General Removal-Fill Permit, and General Authorization)	Oregon Department of State Lands Attn: Richard Fitzgerald, Aquatic Resource Coordinator 951 SW Simpson Avenue, Suite 104 Bend, OR 97702 (503) 910-4565 Richard.W.Fitzgerald@dsl.oregon.gov	Oregon Removal-Fill Law (ORS 196.795 - 196.990) OAR Chapter 141, Divisions 85, 89, 90, 93, 100	A person or utility is required to have a permit if an activity involves filling or removing 50 cubic yards or more of material in a wetland or waterway. For sites within a state designated Essential Indigenous Anadromous Salmonid Habitat (ESH), State Scenic Waterway, or compensatory mitigation site, a permit is required for any amount of removal or fill. The Facility is not anticipated to permanently impact jurisdictional waters and/or wetlands of the state. Currently only minor temporary impacts are proposed. The Removal-Fill Permit/Authorization should be included in and governed by the EFSC site certificate under ORS 469.401(3).
General Water Pollution Control Facilities Permit (WPCF), WPCF-1700-B	Oregon Department of Environmental Quality (ODEQ), Eastern Region Attn: Patty Isaak, Permit Coordinator for Eastern Region 800 SE Emigrant Avenue, Suite 330 Pendleton, OR 97801 (541) 276-4605 Patty.Isaak@deq.oregon.gov	ORS 468B; OAR Chapter 340, Division 45	If solar panel washing is determined to be needed, the Applicant or a third-party contractor who will conduct the solar panel washing activities may seek coverage under the WPCF-1700-B permit from ODEQ following completion of construction and before initiating any washing activities. Therefore, this permit should not be included in or governed by the site certificate.

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Permit	Agency Name and Contact	Authority	Description
General Water Pollution Control Facilities Permit, WPCF-1000, Gravel Mining and Batch Plant	ODEQ, Eastern Region Attn: Patty Isaak, Permit Coordinator for Eastern Region 800 SE Emigrant Avenue, Suite 330 Pendleton, OR 97801 (541) 276-4605 Patty.Isaak@deq.oregon.gov	OAR Chapter 340, Division 45	A WPCF-1000 authorizes the permittee to operate a wastewater collection, treatment, control, and disposal system for sand, gravel, and other nonmetallic mineral quarrying and mining operations, including asphalt-mix batch plants, concrete batch plants, and other related activities. If a temporary batch plant is needed for Facility construction, the Applicant's third-party contractor will obtain a WPCF-1000 permit from the ODEQ, which would therefore not be included in and governed by the site certificate.
Oversize Load Movement Permit/Load Registration	Oregon Department of Transportation (ODOT) Attn: Ben Ebner, Region 4 Manager Region 4 Headquarters 63055 North Highway 97 Bend, OR 97703 (541) 815-6876 benjamin.jebner@odot.oregon.gov	ORS 818.030; OAR Chapter 734, Division 82	Authorization for oversized loads. Movement of construction cranes and other equipment and materials may require this permit. If needed, the Applicant's third-party contractor will obtain this permit and load registration from ODOT and therefore this permit should not be included in or governed by the site certificate.
Access Management Permit	ODOT Attn: Ben Ebner, Region 4 Manager Region 4 Headquarters 63055 North Highway 97 Bend, OR 97703 (541) 815-6876 benjamin.jebner@odot.oregon.gov	OAR Chapter 734, Division 51	Access from Oregon state highways will require an access permit, which may be issued by the local ODOT District Offices. If needed, the Applicant's third-party contractor will obtain this permit directly from ODOT and therefore this permit should not be included in or governed by the site certificate.
Permit to Occupy or Perform Operations Upon a State Highway	ODOT Attn: Ben Ebner, Region 4 Manager Region 4 Headquarters 63055 North Highway 97 Bend, OR 97703 (541) 815-6876 benjamin.jebner@odot.oregon.gov	OAR Chapter 734, Division 55	Utility installations within the right-of-way of a state highway in Oregon require a permit issued by the ODOT. If needed, the Applicant's third-party contractor will obtain this permit directly from ODOT and therefore this permit should not be included in or governed by the site certificate.

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Permit	Agency Name and Contact	Authority	Description
Water Right Permit or Water Use Authorization	Oregon Water Resources Department Water Rights Section, Districts 21 and 3 Attn: Ken Thiemann, District 21 Watermaster (<i>majority of Facility is within District 21</i>) PO Box 427 Condon, OR 97823 (541) 969-8799 kenneth.c.thiemann@water.oregon.gov	ORS 537; OAR 690 Divisions 310, 340, and 410	If water for construction is not available from permitted sources, the Applicant's third-party contractor will obtain the necessary water right permit or use authorization directly from the Oregon Water Resources Department. It is outside the jurisdiction of EFSC and should not be included in or governed by the site certificate.
Archaeological Excavation Permit	Oregon Parks and Recreation Department, State Historic Preservation Office Attn: John Pouley, State Archaeologist 725 Summer Street NE, Suite C Salem, OR 97301 (503) 480-9164 John.Pouley@opr.d.oregon.gov	ORS Chapter 97, 358, and 390; OAR Chapter 736, Division 51	Ground-disturbing activity that may affect a known or unknown archaeological resource on public or private lands requires a permit issued by the Oregon Parks and Recreation Department. If needed, the Applicant will obtain it from the State Historic Preservation Office and therefore this permit should not be included in or governed by the site certificate.
Electrical Permit	State of Oregon Building Codes Pendleton Field Office Attn: Katherine Denight, Permit Technician 800 SE Emigrant Avenue, Suite 360 Pendleton, OR 97801 (541) 276-7814 Building.department@dcbs.oregon.gov	OAR 918, Division 309	A state electrical permit is required prior to the installation of electric, phone, or cable service to any Facility infrastructure. Electrical permits may be obtained in person at the Building Codes Division Pendleton office, or online through the state's e-permitting system (available at: https://aca-oregon.accela.com/oregon/Default.aspx). A state electrical permit will be obtained by the third-party contractor prior to construction of each component for which electrical, phone, or cable service will be required and therefore should not be included in or governed by the site certificate.

Permit	Agency Name and Contact	Authority	Description
State Building Permit	State of Oregon Building Codes Pendleton Field Office Attn: Katherine Denight, Permit Technician 800 SE Emigrant Avenue, Suite 360 Pendleton, OR 97801 (541) 276-7814 Building.department@dcbs.oregon.gov	OAR Chapter 918, Divisions 309 & 780; Oregon Structural Specialty Code	A building permit is required for review and approval prior to commencement of construction of energy facilities. In Sherman County building permits are administered by the State of Oregon Building Codes Pendleton Field Office. A building permit will be obtained by the third-party contractor prior to construction of each component for which a building permit would be required; therefore, this permit should not be included in or governed by the site certificate.

4.1.3 State Permits Federally Delegated

Table A-8 identifies and describes the state permits federally delegated that are required for construction and operation of the Facility.

Table A-8. State Permits Federally Delegated

Permit	Agency Name and Contact	Authority	Description
National Pollutant Discharge Elimination System (NPDES) Stormwater Discharge Permit 1200-C	ODEQ, Eastern Region Attn: Patty Isaak, Permit Coordinator for Eastern Region 800 SE Emigrant Avenue, Suite 330 Pendleton, OR 97801 (541) 276-4605 Patty.Isaak@deq.oregon.gov	Clean Water Act, Section 402 (33 USC § 1342); 40 CFR § 122; ORS 468 and 468B; OAR Chapter 340, Division 45	The NPDES permit is required for construction activities that will disturb one or more acres of land. The Applicant will obtain this permit directly from ODEQ as it is outside the jurisdiction of EFSC and should not be included in or governed by the site certificate.
NPDES Stormwater Discharge Permit 1200-A	ODEQ, Eastern Region Attn: Patty Isaak, Permit Coordinator for Eastern Region 800 SE Emigrant Avenue, Suite 330 Pendleton, OR 97801 (541) 276-4605 Patty.Isaak@deq.oregon.gov	Clean Water Act, Section 402 (33 USC § 1342); 40 CFR § 122; ORS 468 and 468B; OAR Chapter 340, Division 45	The NPDES 1200-A permit is required for concrete and asphalt mix batch plants which discharge stormwater to surface water. If needed, the Applicant will obtain this permit directly from ODEQ as it is outside the jurisdiction of EFSC and should not be included in or governed by the site certificate.

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Permit	Agency Name and Contact	Authority	Description
401 Water Quality Certification	ODEQ Attn: Haley Teach, 401 Program Coordinator 700 NE Multnomah St. Ste 600 Portland, OR 97232 (503) 702-9753 Haley.Teach@deq.oregon.gov	Clean Water Act, Section 401 (33 USC § 1341); OAR Chapter 340, Division 48	Water quality certification is required for projects that are processed under the U.S. Army Corps of Engineers Section 404 Nationwide Permits. The Facility is not anticipated to permanently impact jurisdictional waters and/or wetlands of the United States. Currently, only minor temporary impacts are proposed. If verification from the USACE is required for a Nationwide Permit, water quality certification will be required. The Applicant will obtain this permit, if needed, directly from ODEQ as it is outside the jurisdiction of EFSC and should not be included in or governed by the site certificate.
Air Contaminant Discharge Permit	ODEQ, Eastern Region Attn: Eastern Region Air Quality Permit Coordinator 800 SE Emigrant Avenue, Suite 330 Pendleton, OR 97801 (541) 633-2021 eraqpermits@deq.oregon.gov	OAR Chapter 340, Division 216	Each mobile concrete batch plant used will require an associated Air Contaminant Discharge Permit. Depending on the anticipated volume of concrete to be made by each plant, either a Basic or General Air Contaminant Discharge Permit would be required. If a stationary or portable concrete manufacturing plant is required for Facility construction, the Applicant or its third-party contractor will obtain the appropriate permit from ODEQ for concrete batch plants used during construction. This permit is outside the jurisdiction of EFSC and should not be included in and governed by the site certificate.

4.1.4 Local Permits

Table A-9 identifies and describes the local permits required for construction and operation of the Facility.

Table A-9. Local Permits

Permit	Agency Name and Contact	Authority	Description
Conditional Use Permit (CUP), Goal 3 Exception	Sherman County Planning Department Attn: Amy Phelps, Planning Director P.O. Box 381 Moro, OR 97039 (541) 565-3601 aphelps@shermancountyor.gov	Sherman County Zoning Ordinance (SCZO) Section 3.1, Exclusive Farm Use, F-1 Zone; SCZO Section 5.1, Authority to Grant or Deny Conditional Uses; SCZO Section 5.2, General Criteria; SCZO Section 5.3, General Conditions; SCZO Section 5.4, Application for Conditional Use; SCZO Section 5.8, Standards Governing Specific Conditional Uses; SCZO Section 11.2, Zoning or Other Land Development Permit or Approval; Setbacks established by Sherman County Ordinance No. 39-2007.	The Applicant elects to obtain an EFSC determination under ORS Chapter 469.504(1)(b). Under ORS 469.401(3), following issuance of the site certificate, the County, upon the Applicant's submission or the proper application and fee, shall issue the permits addressed in the site certificate, subject only to the conditions set forth in the site certificate and without hearings or other proceedings. This permit should be included in and governed by the site certificate.
Road Approach Permit	Sherman County Road Department Attn: Mark Coles, Road Master P.O. Box 365 Moro, OR 97039 (541) 565-3271 mcoles@co.sherman.or.us	SCZO Article 5 Conditional Uses	New driveways and increases or changes of use for existing driveways which access a public road shall obtain a Road Approach Permit from Sherman County Road Department or ODOT. This permit will be obtained by the third-party contractor prior to construction. Therefore, this permit should not be included in or governed by the site certificate.

Permit	Agency Name and Contact	Authority	Description
Site Evaluation Application & New Construction Permit (Septic)	North Central Public Health District Attn: Onsite Wastewater Program 419 E 7th Street The Dalles, OR 97058 (541) 506-2600 publichealth@ncphd.org	ORS 454 and 468B; OAR Chapter 340, Division 71 (340-071-0120(1) allows ODEQ to delegate authority to local governmental units)	Facilities with an on-site sewage disposal system must obtain a Site Evaluation & New Construction Permit before construction. The Facility will have a daily sewage flow of fewer than 2,500 gallons and the Applicant's third-party contractor will obtain the permit from North Central Public Health District and Wasco County for the operations and maintenance building. Therefore, this permit should not be included in or governed by the site certificate.

4.2 Permit Applications Not Federally Delegated – OAR 345-022-0010(c)(C)

(C) For any state or local government agency permits, licenses or certificates that are proposed to be included in and governed by the site certificate, evidence to support findings by the Council that construction and operation of the proposed facility will comply with the statutes, rules and standards applicable to the permit. For permits related to wetlands and water rights the applicant may show this evidence in the State and Local Laws and Regulations Exhibit.

The Facility has been intentionally microsited such that no permanent impacts to wetlands and waters of the state are anticipated. Please see Exhibit O1 – Wetlands and Other Waters for additional information regarding a state authorization from the Oregon Department of State Lands. Water for construction and operation, including periodic solar panel washing if needed, will be obtained from an existing exempt well(s) (as allowed under ORS 537.545), municipalities, or another licensed water source with valid water rights and trucked to the site. Please see Exhibit O2 – Water Use for further details.

4.3 Permit Applications Federally Delegated – OAR 345-022-0010(c)(D)

(D) For federally-delegated permit applications, evidence that the responsible agency has received a permit application and the estimated date when the responsible agency will complete its review and issue a permit decision;

The U.S. Environmental Protection Agency has delegated authority to the ODEQ to issue NPDES stormwater discharge permits for construction and operations activities. The Applicant understands that they will obtain an NPDES 1200-C permit prior to the start of construction via the ODEQ's Your DEQ Online platform.² The Erosion and Sediment Control Plan that will be the basis for the ODEQ NPDES 1200-C permit has been provided as Attachment C-1 to Exhibit C – Soil

² <https://ordeq-edms-public.govonlinesaas.com/pub/login?web=1>; note that due to the online system limitations, consultants cannot submit permit applications on behalf of the third party.

Protection. The Applicant anticipates that this permit will be pursued during preconstruction and that confirmation of permit receipt and a permit decision from ODEQ will be received prior to the start of construction.

The U.S. Environmental Protection Agency has delegated authority to the ODEQ to issue the Section 401 Water Quality Certification. The certification is only required if a Section 404 Nationwide permit verification is required from the USACE. The Applicant understands, if required, that they will obtain a 401 Water Quality Certification permit prior to the start of construction via the ODEQ's Your DEQ Online platform.

4.4 Third Party State or Local Permits – OAR 345-022-0010(c)(E)

(E) If the applicant relies on a state or local government permit or approval issued to a third party, identification of any such third-party permit and for each:

- (i) Evidence that the applicant has, or has a reasonable likelihood of entering into, a contract or other agreement with the third party for access to the resource or service to be secured by that permit;*
- (ii) Evidence that the third party has, or has a reasonable likelihood of obtaining, the necessary permit;*
- (iii) An assessment of the impact of the proposed facility on any permits that a third party has obtained and on which the applicant relies to comply with any applicable Council standard;*

As outlined above, the Applicant or its contractors will obtain the permits as needed for construction and operation. The third-party permits listed in Table A-10 are routine and common permits in Oregon and are not dependent on a unique resource or location. During construction and operation, the Applicant will select similarly qualified contractors with experience constructing renewable energy facilities and a reasonable likelihood of securing the required permits.

Table A-10. Potential Third-Party State or Local Permits

Permit Name	Project Phase	Description
ODEQ General WPCF Permit, WPCF-1700-B	Construction and Operation	A WPCF-1700-B permit will be required for solar panel washing activities.
ODEQ General WPCF Permit, WPCF-1000, Gravel Mining and Batch Plant	Construction	If a temporary batch plant is required for Facility construction, a WPCF-1000 permit will be obtained to manage wastewater and stormwater from temporary concrete batch plants.
ODOT Oversized Load Movement Permit/Load Registration	Construction	An oversize load movement permit/load registration will be required for transporting large or overweight equipment to the site over state roads.
ODOT Access Management Permit	Construction	An access permit will be required for access usage of Oregon state highways.

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Permit Name	Project Phase	Description
ODOT Permit to Occupy or Perform Operations Upon a State Highway	Construction	A permit to occupy or perform operations will be required for utility installations within the right-of-way of a state highway.
ODEQ – Oregon Department of Environmental Quality; ODOT – Oregon Department of Transportation; WPCF – Water Pollution Control Facilities		

As indicated above, for each permit listed, the Applicant has worked with contractors familiar with constructing or operating renewable energy facilities, and who are familiar with the requirements for applications and activities under such permits. The Applicant will select the same, or similar, contractors who have the necessary experience to likely obtain the necessary permits.

The Applicant has experience working in various permitting regimes across the United States and has worked with experienced wind and solar contractors for projects such as the Shepherds Flat Wind Repower Project (Oregon), Goose Prairie Solar Project (Washington), and Lucky Bluff & Black Springs stand-alone BESS (Texas). All of these projects reached commercial operation between 2021 and 2025. The contractors utilized had experience constructing renewable energy facilities, including obtaining building permits and sewage disposal permits in relevant jurisdictions. The Applicant would hire a contractor of similar caliber and experience for the Facility.

The Applicant may rely on its third-party contractors to obtain some required permits. Additional permits that may be obtained either by the contractor or other designated third party are indicated in Tables A-7 and A-9.

In order to identify all potentially required permits, the Applicant assumes that the contractor may utilize an onsite temporary concrete batch plant rather than existing nearby concrete suppliers; however, the contractor may utilize nearby suppliers and not use onsite batch plants. If an onsite concrete batch plant is used, such infrastructure may be operated by either the contractor or a third-party contractor. The contractor would be required to obtain all necessary permits.

The Certificate Holder understands that mobile concrete batch plant sites may be covered by the Facility's NPDES 1200-C permit, and that a NPDES 1200-A permit (obtained from ODEQ; both federally delegated state permits to be acquired by the Applicant) would be required for each mobile batch plant if the infrastructure were to discharge stormwater from a point source to surface water or to a conveyance system that discharges to surface water. This would warrant the need for a Stormwater Discharge Permit issued through ODEQ. In addition, a General Water Pollution Control Permit WPCF-1000 would be required for the management of wastewater collection, treatment, control, and disposal for any concrete batch plants. This is a common permit for the construction of renewable energy facilities, which require concrete footings, pads, and other infrastructure. Both the NPDES 1200-A and the WPCF permits would be issued by the ODEQ. Additionally, ODEQ would also issue the WPCF-1700-B permit for solar panel washing activities during construction and operations.

The Certificate Holder understands that an Oversize Load Movement Permit from ODOT will be required for the movement of cranes and construction materials to the Facility, and an Access Management Permit from ODOT if the Facility requires access usage of Oregon state highways; a Permit to Occupy or Perform Operations Upon a State Highway would also be required from ODOT for utility installations within the right-of-way of a state highway. In addition, a septic Site Evaluation and New Construction Permit from North Central Public Health District would be required for facilities with a daily flow of fewer than 2,500 gallons of sewage. The contractors would be responsible for acquiring these permits prior to construction.

Additional permits that may be obtained either by the contractor or other designated third party include Electrical Permits, Building Permits, and Sherman County Road Approach Permits.

4.5 Third Party Federal Permits – OAR 345-022-0010(c)(F)

(F) If the applicant relies on a federally-delegated permit issued to a third party, identification of any such third-party permit and for each:

(i) Evidence that the applicant has, or has a reasonable likelihood of entering into, a contract or other agreement with the third party for access to the resource or service to be secured by that permit;

(ii) Evidence that the responsible agency has received a permit application;

(iii) The estimated the date when the responsible agency will complete its review and issue a permit decision; and

If a stationary or portable concrete manufacturing plant is required for Facility construction, the Applicant may direct its third-party contractor to obtain a Basic Air Contaminant Discharge Permit (Clean Air Act [42 USC Section 7401 et seq.]; 40 CFR Parts 50, 51, and 52; ORS Chapters 468 and 468A; OAR Chapter 340, Division 216) to authorize the temporary establishment of concrete batch plants at the Facility. This permit typically is required for the construction of renewable energy facilities in Oregon to provide a source of concrete in the vicinity of the construction activities. A contractor familiar with constructing renewable energy facilities will have experience obtaining this permit from ODEQ.

4.6 Monitoring – OAR 345-022-0010(c)(G)

(G) The applicant's proposed monitoring program, if any, for compliance with permit conditions.

To the extent that monitoring may be required for any permit conditions, monitoring programs are discussed in the specific exhibit to which the permits pertain. Prior to construction, the Applicant will develop and implement a Compliance Plan to monitor compliance with all site certificate terms and conditions and applicable status and rules, as described by OAR 345-026-0048.

5.0 Approval Standards and Submittal Requirements

Table A-11. Approval Standards and Submittal Requirements

Requirement	Location
OAR 345-022-0010 Organizational Expertise	–
Approval Standards	
(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.	–
(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.	–
(3) If the applicant does not itself obtain a state or local government permit or approval for which the Council would ordinarily determine compliance but instead relies on a permit or approval issued to a third party, the Council, to issue a site certificate, must find that the third party has, or has a reasonable likelihood of obtaining, the necessary permit or approval, and that the applicant has, or has a reasonable likelihood of entering into, a contractual or other arrangement with the third party for access to the resource or service secured by that permit or approval.	–
(4) If the applicant relies on a permit or approval issued to a third party and the third party does not have the necessary permit or approval at the time the Council issues the site certificate, the Council may issue the site certificate subject to the condition that the certificate holder shall not commence construction or operation as appropriate until the third party has obtained the necessary permit or approval and the applicant has a contract or other arrangement for access to the resource or service secured by that permit or approval.	–
Submittal Requirements	
(5) To assist the Council in determining whether the standard outlined in (1) through (4) has been met, the Applicant must submit:	–
(a) Information about the applicant and participating persons, including:	Section 2.0
(A) The name and address of the applicant including all co-owners of the proposed facility, the name, mailing address, email address and telephone number of the contact person for the application, and if there is a contact person other than the applicant, the name, title, mailing address, email address and telephone number of that person;	Section 2.1
(B) The contact name, mailing address, email address and telephone number of all participating persons, other than individuals, including but not limited to any parent corporation of the applicant, persons upon whom the applicant will rely for third-party permits or approvals related to the facility, and, if known, other persons upon whom the applicant will rely in meeting any facility standard adopted by the Council;	Section 2.2

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Requirement	Location
(C) If the applicant is a corporation:	Section 2.3
(i) The full name, official designation, mailing address, email address and telephone number of the officer responsible for submitting the application;	N/A
(ii) The date and place of its incorporation;	N/A
(iii) A copy of its articles of incorporation and its authorization for submitting the application; and	N/A
(iv) In the case of a corporation not incorporated in Oregon, the name and address of the resident attorney-in-fact in this state and proof of registration to do business in Oregon;	N/A
(D) If the applicant is a wholly owned subsidiary of a company, corporation or other business entity, in addition to the information required by paragraph (C), the full name and business address of each of the applicant's full or partial owners;	Section 2.4; Table A-3; Attachment A-1
(E) If the applicant is an association of citizens, a joint venture or a partnership:	Section 2.5
(i) The full name, official designation, mailing address, email address and telephone number of the person responsible for submitting the application;	N/A
(ii) The name, business address and telephone number of each person participating in the association, joint venture or partnership and the percentage interest held by each;	N/A
(iii) Proof of registration to do business in Oregon;	N/A
(iv) A copy of its articles of association, joint venture agreement or partnership agreement and a list of its members and their cities of residence; and	N/A
(v) If there are no articles of association, joint venture agreement or partnership agreement, the applicant must state that fact over the signature of each member;	N/A
(F) If the applicant is a public or governmental entity:	Section 2.6
(i) The full name, official designation, mailing address, email address and telephone number of the person responsible for submitting the application; and	N/A
(ii) Written authorization from the entity's governing body to submit an application;	N/A
(G) If the applicant is an individual, the individual's mailing address, email address and telephone number; and	Section 2.7
(H) If the applicant is a limited liability company:	Section 2.8
(i) The full name, official designation, mailing address, email address and telephone number of the officer responsible for submitting the application;	Section 2.8
(ii) The date and place of its formation;	Section 2.8
(iii) A copy of its articles of organization and its authorization for submitting the application; and	Section 2.8; Attachment A-2
(iv) In the case of a limited liability company not registered in Oregon, the name and address of the resident attorney-in-fact in this state and proof of registration to do business in Oregon.	Section 2.8
(b) Information about the organizational expertise of the applicant to construct and operate the proposed facility, including:	Section 3.0
(A) The applicant's previous experience, if any, in constructing and operating similar facilities;	Section 3.1
(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 3.2

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Requirement	Location
(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 3.3
(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 3.4
(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 3.5
(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 3.6
(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 3.7
(c) Information about permits needed for construction and operation of the facility, including:	Section 4.0
(A) Identification of all federal, state and local government permits related to the siting of the proposed facility, a legal citation of the statute, rule or ordinance governing each permit, and the name, mailing address, email address and telephone number of the agency or office responsible for each permit;	Section 4.1
(B) A description of each permit, the reasons the permit is needed for construction or operation of the facility and the applicant's analysis of whether the permit should or should not be included in and governed by the site certificate;	Section 4.1
(C) For any state or local government agency permits, licenses or certificates that are proposed to be included in and governed by the site certificate, evidence to support findings by the Council that construction and operation of the proposed facility will comply with the statutes, rules and standards applicable to the permit. For permits related to wetlands and water rights the applicant may show this evidence in the State and Local Laws and Regulations Exhibit.	Section 4.2
(D) For federally-delegated permit applications, evidence that the responsible agency has received a permit application and the estimated date when the responsible agency will complete its review and issue a permit decision;	Section 4.3
(E) If the applicant relies on a state or local government permit or approval issued to a third party, identification of any such third-party permit and for each:	Section 4.4
(i) Evidence that the applicant has, or has a reasonable likelihood of entering into, a contract or other agreement with the third party for access to the resource or service to be secured by that permit;	Section 4.4
(ii) Evidence that the third party has, or has a reasonable likelihood of obtaining, the necessary permit;	Section 4.4
(iii) An assessment of the impact of the proposed facility on any permits that a third party has obtained and on which the applicant relies to comply with any applicable Council standard;	Section 4.4

Preliminary Application for Site Certificate
Exhibit A. Organizational Expertise

Requirement	Location
(F) If the applicant relies on a federally-delegated permit issued to a third party, identification of any such third-party permit and for each:	Section 4.5
(i) Evidence that the applicant has, or has a reasonable likelihood of entering into, a contract or other agreement with the third party for access to the resource or service to be secured by that permit;	Section 4.5
(ii) Evidence that the responsible agency has received a permit application;	Section 4.5
(iii) The estimated the date when the responsible agency will complete its review and issue a permit decision; and	Section 4.5
(G) The applicant's proposed monitoring program, if any, for compliance with permit conditions.	Section 4.6
EFSC 2-2025, amend filed 04/02/2025, effective 04/02/2025	

Attachment A-1. Resource Confirmation Letter

July 8, 2026

Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301

Re: BGTF Speedway Project LLC – Resource and Expertise Confirmation

To Whom It May Concern:

Brookfield Global Transition Fund (“Brookfield”), an investment fund managed by Brookfield Asset Management and the indirect parent of BGTF Speedway Project LLC (the “Applicant”), confirms that the Applicant will have access to the technical and financial resources and expertise of Brookfield or its affiliates, in connection with the Speedway Energy Facility and associated facilities, as described in the application for site certificate, located in Sherman County, Oregon (the “Facility”), to facilitate the construction, operation, and decommissioning of the Facility in accordance with the site certificate.

Sincerely,



Adrienne Moore
Managing Director
Brookfield Global Transition Fund

Attachment A-2. Articles of Organization

Delaware

The First State

Page 1

*I, CHARUNI PATIBANDA-SANCHEZ, SECRETARY OF STATE OF THE
STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND
CORRECT COPY OF THE CERTIFICATE OF FORMATION OF "BGTF SPEEDWAY
PROJECT LLC", FILED IN THIS OFFICE ON THE FIRST DAY OF AUGUST,
A.D. 2025, AT 12:50 O`CLOCK P.M.*



C. P. Sanchez

Charuni Patibanda-Sanchez, Secretary of State

10282076 8100
SR# 20253544609

You may verify this certificate online at corp.delaware.gov/authver.shtml

Authentication: 204369272
Date: 08-01-25

STATE OF DELAWARE
CERTIFICATE OF FORMATION
OF LIMITED LIABILITY COMPANY

The undersigned authorized person, desiring to form a limited liability company pursuant to the Limited Liability Company Act of the State of Delaware, hereby certifies as follows:

1. The name of the limited liability company is BGTF Speedway Project LLC

2. The Registered Office of the limited liability company in the State of Delaware is located at 251 Little Falls Drive (street), in the City of Wilmington, Zip Code 19808. The name of the Registered Agent at such address upon whom process against this limited liability company may be served is Corporation Service Company

IN WITNESS WHEREOF, the undersigned has executed this Certificate of Formation this 1st day of August, 2025.

By: Nathalie Godard
Authorized Person

Name: Nathalie Godard
Print or Type

APPLICATION FOR AUTHORITY



Corporation Division
sos.oregon.gov/business

E-FILED
Aug 20, 2025
OREGON SECRETARY OF STATE

REGISTRY NUMBER

245756697

TYPE

FOREIGN LIMITED LIABILITY COMPANY

1. ENTITY NAME

BGTF SPEEDWAY PROJECT LLC

2. MAILING ADDRESS

200 LIBERTY STREET
14TH FLOOR
NEW YORK NY 10281 USA

3. NAME & ADDRESS OF REGISTERED AGENT

15872088 - CORPORATION SERVICE COMPANY

1127 BROADWAY STREET NE SUITE 310
SALEM OR 97301 USA

4. MANAGEMENT

This Limited Liability Company will be manager-managed by one or more managers

5. DATE OF ORGANIZATION

08-01-2025

6. DURATION

PERPETUAL

7. JURISDICTION

DE

8. PRIMARY PHYSICAL LOCATION

200 LIBERTY STREET
14TH FLOOR
NEW YORK NY 10281 USA



I declare, under penalty of perjury, that this document does not fraudulently conceal, fraudulently obscure, fraudulently alter or otherwise misrepresent the identity of the person or any officers, managers, members or agents of the limited liability company on behalf of which the person signs. This filing has been examined by me and is, to the best of my knowledge and belief, true, correct, and complete. Making false statements in this document is against the law and may be penalized by fines, imprisonment, or both.

By typing my name in the electronic signature field, I am agreeing to conduct business electronically with the State of Oregon. I understand that transactions and/or signatures in records may not be denied legal effect solely because they are conducted, executed, or prepared in electronic form and that if a law requires a record or signature to be in writing, an electronic record or signature satisfies that requirement.

ELECTRONIC SIGNATURE

NAME

WILLIAM FYFE

TITLE

MANAGER / SECRETARY

DATE

08-20-2025