Exhibit O
Water Use

Umatilla-Morrow County Connect Project

750 West Elm Avenue
PO Box 1148
Hermiston, OR 97838

Cole Bode
Vice President of Engineering
541-567-6414
UMCCproject@umatillaelectric.com

Application for Site Certificate

May 2025

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TABLES

ATTACHMENT

ACRONYMS AND ABBREVIATIONS

ASC	Application for Site Certificate
EFSC	Energy Facility Siting Council
EFU	Exclusive Farm Use
OAR	Oregon Administrative Rule
ORS	Oregon Revised Statute
ODOT	Oregon State Department of Transportation
Project or UMCC	Umatilla-Morrow County Connect Project
Project Order	Administrative Rules, and Other Requirements Applicable to the Proposed Umatilla-Morrow County Connect Project (First Amended Project Order; April 04, 2024)
ROW(s)	right(s)-of-way
site boundary	The perimeter of the site of a proposed energy facility, its related or supporting facilities, all temporary laydown and staging areas, and all corridors and micro-siting corridors proposed by the applicant
UEC	Umatilla Electric Cooperative

1.0 INTRODUCTION

Exhibit O provides information about anticipated water use related to the construction and operation of the Umatilla-Morrow County Connect Project (Project). Exhibit O explains how Umatilla Electric Cooperative (UEC) will procure the needed water from municipal water sources, and how no groundwater permit, surface water permit, or water right transfer will be required. Exhibit O demonstrates water use will be minimal and will not result in adverse impacts to water resources.

2.0 APPLICABLE RULES AND PROJECT ORDER PROVISIONS

2.1 General Standards

OAR 345-022-0000: General Standards of Review
OAR 345-021-0010(1)(o): Exhibit O Water Use

Oregon Administrative Rule (OAR) 345-021-0010(1)(o) provides Exhibit O must include the following information regarding the anticipated water use during construction and operation of the Project:

A. A description of the use of water during construction and operation of the proposed facility.

B. A description of each source of water and the applicant's estimate of the amount of water the facility will need during construction and during operation from each source under annual average and worst-case conditions.

1. A description of each avenue of water loss or output from the facility site for the uses described in (A), the applicant's estimate of the amount of water in each avenue under annual average and worst-case conditions and the final disposition of all wastewater.

C. For thermal power plants, a water balance diagram, including the source of cooling water and the estimated consumptive use of cooling water during operation, based on annual average conditions.

2. If the proposed facility would not need a groundwater permit, a surface water permit or a water right transfer, an explanation of why no such permit or transfer is required for the construction and operation of the proposed facility.

D. If the proposed facility would need a groundwater permit, a surface water permit, or a water right transfer, information to support a determination by the Energy Facility Siting Council (Council) that the Water Resources Department should issue the permit or transfer of a water use, including information in the form required by the Water Resources Department under OAR chapter 690, divisions 310 and 380.

E. A description of proposed actions to mitigate the adverse impacts of water use on affected resources.

2.2 Project Order Provisions

The Project Order states that all paragraphs of OAR 345-021-0010(1)(o) apply to the Project except Subsection D, relating to thermal power plants. Additionally, the Project Order includes the following additional specifications for descriptions of OAR 345-022-0000; OAR 690, Divisions 310 and 3801-0010(1)(o)(A) through (C) and (G); bold text highlights details not already included in the OARs listed in section 2.1.

Under OAR 345-021-0010(1)(o)(A) through (C) and (G), Exhibit O must include a description of how water will be used during construction and operation of the proposed facility and must describe each source of water and the estimated amount of water the facility will need from each source during construction and during operation under annual average and worst-case conditions, and a description of proposed actions to mitigate the adverse impacts of water use on affected resources. These estimates should include water needed for dust abatement during construction and maintenance during operations.

(Proposed Umatilla-Morrow County Connect Project, First Amended Project Order; April 4, 2024)

3.0 ANALYSIS

3.1 Analysis Area

The analysis area for Exhibit O includes all areas within the site boundary, which is defined as "the perimeter of the site of a proposed energy facility, its related or supporting facilities, all temporary laydown and staging areas, and all corridors and micro-siting corridors proposed by the applicant" (OAR 345-001-0010(55)). The Project features are fully described in Exhibit B, and the location of the Project features and the site boundary is outlined in Exhibit C.

3.2 Methods

Estimated quantities of Project water use were provided by UEC's engineering group and UEC's engineering contractor, who have experience that qualifies them to make these estimates, as detailed in Exhibit D. Municipal water providers located within the counties where the Project is proposed will be contacted to verify that they have adequate water available to provide water for the Project without impacting their supplies.

3.3 Water Uses

OAR 345-021-0010(1)(o)(A): A description of the use of water during construction and operation of the proposed facility.

Construction of the Project transmission lines, access roads, communication stations, and the proposed Project will require water. In addition, water would be needed for potable and sanitary purposes. Major water uses are for transmission line structure foundations, access road construction, dust control during right-of-way (ROW) clearing, station grading and site work, and re-seeding restoration work upon Project completion. A minor amount of water will be used to establish station landscaping where required during construction. Drilling and fire prevention also may require minor amounts of water.

In the construction of the transmission line foundations, concrete will be obtained from commercial sources. From the batch plants, the concrete (ready-mix) will be transported to the structure sites in concrete trucks for use in foundation installations. For analysis and certification purposes, it is assumed that all concrete will be purchased from commercial aggregate plants, thereby reducing the amount of water storage and water use at the Project.

Other water uses during foundation construction include water to prepare drilling slurry required to maintain excavations for drilled shaft foundation construction, if required due to soil conditions, and water used by concrete trucks to wash chutes and drums after delivering concrete.

Water usage for access road construction is primarily for moisture conditioning of newly bladed roads necessary to achieve adequate compaction to support heavy equipment travel. New access roads are proposed for this Project.

Construction of the transmission lines and related facilities will generate a temporary increase in fugitive dust. Water will be applied to disturbed areas and unpaved roadways using water trucks as needed to minimize dust.

During construction, a minor amount of water will be needed for potable and sanitary purposes. Construction workers will need to have access to potable water for drinking and hand-washing purposes. Sanitary services will be provided by local, licensed sanitary service providers.

Sanitary service providers will be responsible for legally obtaining any water needed for their services on the Project.

Water usage for restoration will include the water needed to prepare and apply the hydromulch to help stabilize disturbed slopes and to reseed disturbed work areas after construction activities are complete.

Normal operations and maintenance of the transmission line and station may require a small amount of water. No permanent restroom facilities are anticipated as part of the Project.

3.4 Water Sources and Estimated Amounts

OAR 345-021-0010(1)(o)(B): A description of each source of water and the applicant's estimate of the amount of water the facility will need during construction and during operation from each source under annual average and worst-case conditions.

Existing water sources available for this Project include the 730 Switchyard (UEC-owned property). This water supply is an existing well that may be accessed to support water needs.

Additionally, contractors often work with local irrigators with existing water rights to supply water for construction activities.

If needed, the Project will contract with the Port of Morrow, the City of Boardman, and/or the City of Umatilla, most likely under contracts between the water providers and the Project construction contractor. If needed, the contracts could be executed directly between the water providers and UEC.

UEC will mail letters to each water provider requesting documentation that they are willing and able to provide water and confirming that doing so would not adversely impact their ability to provide water for other uses or restrict future growth. These letters are included in Attachment O-1, followed by written responses from water providers, as received.

Water provider contacts may include:

- Miff Devin, Manager of Water Quality, Port of Morrow, MiffD@portofmorrow.com
- Wendy Mejia, Water Utilities, City of Umatilla, 541-922-3226 extension 107
- Toni Connell, City of Boardman, publicworks@cityofboardman.com

During construction, water obtained from these contracted sources will be pumped into tanker trucks at locations indicated by municipal providers and transported to the multi-use areas.

Approximately 2.3 million gallons will be needed during the approximately nine- to 12-month construction period. A breakdown of the anticipated water requirements is included in Table O-1. The amount of water required for the Project is equivalent to approximately 7.1 acre-feet, or the amount of water that 16 typical families use over the same time period (based on the Environmental Protection Agency (2016) estimate of 400 gallons per day per family, applied over the one-year construction schedule). This water use estimate includes all water uses related to the Project, including the water uses at the related and supporting facilities, such as the light-duty fly yards. Table O-1 also provides all water uses related to the Project if the alternative routes are selected. The alternatives and their comparable segments of the Proposed Route would not vary in the total amount of water estimated for use.

The amount of water required for dust control will depend on precipitation, temperature, soil conditions, and frequency of use. Dust control water application may also include eco-safe biodegradable, liquid copolymers to stabilize unpaved road surfaces and manage fugitive dust where extended use is anticipated. Average water use for dust control along the transmission line and related facilities was estimated assuming that one 3,000-gallon water truck will operate within the Project ROW, emptying its tank twice per day during construction. Water for dust control at the Project was estimated based on the specific construction sequence planned at that facility. Worst-case water use for the Project would occur if the weather were exceptionally dry with high temperatures, which would require additional water for dust control. Worst-case estimates were calculated assuming a 50 percent increase in water use for all Project dust control throughout construction. The worst-case estimate of 3.02 million gallons (approximately 9.2 acre-feet) of water for Project construction would be equivalent to irrigating approximately less than one acre of alfalfa for one season. The worst-case water usage would be relatively minor in comparison to existing agricultural use.

Impacts to above-ground (surface water) or below-ground (groundwater) water supplies are not anticipated as a result of Project construction or operation.

During operation, the amount of water required for the Project is minor. No permanent restroom facilities are required.

To ensure the availability of water supplies, UEC proposes that the Council include the following condition in the site certificate:

Water Use Condition 1: During construction, the certificate holder shall ensure the availability of adequate water supplies to meet all construction-related water needs through municipal water suppliers or by contracting with private sources.

TABLE O-1. ESTIMATED WATER USE FOR PROPOSED ROUTE CONSTRUCTION ACTIVITIES BY ROUTE[1,2]

ROUTE	COUNTY	WATER SOURCE	DUST ABATEMENT[3] (GAL)	FOUNDATION CONSTRUCTION[4] (GAL)	ROAD CONSTRUCTION[5] (GAL)	RESTORATION[6] (GAL)	TOTAL WATER 2026-2027 (GAL)	ANNUAL AVERAGE WATER USE (GAL/YR)	TOTAL WORST-CASE WATER USE[7] (GAL)
Route A	Morrow	City of Boardman	2,016,000	195,357	40,400	72,280	2,324,037	2,400,000	3,486,056
	Umatilla	City of Umatilla							
	Umatilla	Port of Morrow							
Route B	Morrow	City of Boardman	1,983,000	182,337	39,600	74,080	2,279,017	2,400,000	3,418,526
	Umatilla	City of Umatilla							
	Umatilla	Port of Morrow							
Route C	Morrow	City of Boardman	2,010,000	191,122	39,200	70,700	2,311,022	2,400,000	3,466,533
	Umatilla	City of Umatilla							
	Umatilla	Port of Morrow							
Route D	Morrow	City of Boardman	1,788,000	147,862	36,000	68,620	2,040,482	2,400,000	3,060,723
	Umatilla	City of Umatilla							
	Umatilla	Port of Morrow							

Notes:

1 Typical operation and maintenance activities will not require water, with the exception of water required for fire protection during extreme fire conditions, which is estimated as 3,000 gallons per year.

2 Drought tolerant plant materials will be used during revegetation of disturbed areas to minimize watering requirements after plant establishment.

3 Average water use for dust control along the transmission line and related facilities was estimated assuming that a single construction crew would require one 3,000-gallon water truck to empty tank three times per day, 224 days per year during construction. It is assumed that one water truck would be utilized during construction, resulting in a total of 9,000 gallons of water per day for dust control purposes during construction.

4 Average water use for construction of concrete structures (e.g., foundations and switching and communication stations) was estimated assuming that mixing of wet concrete (4,000 pounds per square inch mix) would consume 35 gallons per cubic yard of concrete and concrete washout (for chutes and drums) would consume 25 percent of the amount required for concrete mixing, or 8.75 gallons per cubic yard of concrete. For analysis and certification purposes, it is assumed that all concrete will be produced within the same county where it is used for construction and by an existing concrete producer.

5 Access road construction is minimal on this Project as existing access will be used to the extent possible.

6 Average water use for site restoration was estimated assuming that 1,000 gallons would be needed for every acre revegetated.

7 Worst-case estimates were calculated assuming a 50 percent increase in all water uses throughout construction.

3.5 Losses

OAR 345-021-0010(1)(o)(C): A description of each avenue of water loss or output from the facility site for the uses described in (A), the applicant's estimate of the amount of water in each avenue under annual average and worst-case conditions and the final disposition of all wastewater.

Water used during construction for dust control (approximately 2.1 million gallons) and hydromulching restoration will infiltrate into the ground or evaporate into the atmosphere. The amount of water used for dust control will be sufficiently small that runoff will not occur outside of the site boundary. Water used for foundations (approximately 195,357 gallons) will remain in the concrete mix. Management and handling of concrete truck washout areas and disposal of excess or degraded drilling slurry are addressed in Exhibit V. No Project wastewater will be discharged into wetlands, lakes, rivers, or streams. No water use or discharges are anticipated during operations.

3.6 Explanation for No Permits or Transfers

OAR 345-021-0010(1)(o)(E): If the proposed facility would not need a groundwater permit, a surface water permit or a water right transfer, an explanation of why no such permit or transfer is required for the construction and operation of the proposed facility.

The Project's need for water primarily occurs during construction of the Project. Water will be procured from municipal suppliers along the Project, and no groundwater permit, surface water permit, or water right transfer will be required. The municipal water rights will allow use for industrial purposes such as a transmission line project. Because no new water rights will be necessary for the Project, neither a limited license for construction use nor other water right permits will be required.

Attachment O-1 will summarize UEC's communications with the municipal suppliers regarding their indicated willingness and ability to supply water for the Project. Letters from UEC to water suppliers requesting documentation that they are willing and able to provide water and responses from water providers are included in Attachment O-1. The Project's water requirement will be minimal and is not expected to injure any existing water rights or restrict planned future growth near the Project.

3.7 Permit or Transfer Information

OAR 345-021-0010(1)(o)(F): If the proposed facility would need a groundwater permit, a surface water permit or a water right transfer, information to support a determination by the Council that the Water Resources Department should issue the permit or transfer of a water use, including information in the form required by the Water Resources Department under OAR chapter 690, divisions 310 and 380.

As described in the previous section, water will be procured from municipal suppliers along the Project, and no groundwater permit, surface water permit, or water right transfer will be required. As a result, this standard is not applicable.

3.8 Mitigation Measures

OAR 345-021-0010(1)(o)(G): A description of proposed actions to mitigate the adverse impacts of water use on affected resources.

Based on assurances from municipal water providers, which will supply Project construction needs, no adverse impacts are expected to result from water use at the Project during construction and operation. Therefore, no mitigation measures are required to address water use.

4.0 CONCLUSIONS

Exhibit O includes the application information provided for in OAR 345-021-0010(1)(o).

5.0 COMPLIANCE CROSS-REFERENCES

Table O-2 identifies the location within the application for site certificate of the information responsive to the application submittal requirements in OAR 345-021-0010(o) and the relevant Project Order provisions.

TABLE O-2. COMPLIANCE REQUIREMENTS AND RELEVANT CROSS-REFERENCES

REQUIREMENT	LOCATION
OAR 345-021-0010(1)(o)	
(o) Exhibit O. Information about anticipated water use during construction and operation of the proposed facility. The applicant shall include:	
(A) A description of the use of water during construction and operation of the proposed facility.	Exhibit O, Section 3.3
(B) A description of each source of water and the applicant's estimate of the amount of water the facility will need during construction and during operation from each source under annual average and worst-case conditions.	Exhibit O, Section 3.4, Table O-1a and Table O-1b
(C) A description of each avenue of water loss or output from the facility site for the uses described in (A), the applicant's estimate of the amount of water in each avenue under annual average and worst-case conditions and the final disposition of all wastewater.	Exhibit O, Section 3.5
(E) If the proposed facility would not need a groundwater permit, a surface water permit or a water right transfer, an explanation of why no such permit or transfer is required for the construction and operation of the proposed facility.	Exhibit O, Section 3.6
(F) If the proposed facility would need a groundwater permit, a surface water permit or a water right transfer, information to support a determination by the Council that the Water Resources Department should issue the permit or transfer of a water use, including information in the form required by the Water Resources Department under OAR chapter 690, divisions 310 and 380.	Exhibit O, Section 3.7
(G) A description of proposed actions to mitigate the adverse impacts of water use on affected resources.	Exhibit O, Section 3.8

REQUIREMENT	LOCATION
Project Order	
Exhibit O of the application must identify the sources of water to be used during construction and operation of the proposed facility, the quantity of water needed, and the means of disposal of all water discharges from the proposed facility. The application shall provide evidence and analysis to determine whether a new water right or water right transfer is required, and if so, evidence that supports a finding by the Council that the water right should be issued. [See ORS Chapter 537 (Appropriation of Water Generally) or transfer of a water use under ORS Chapter 540 (Transfer or Forfeiture of Water Rights), including a discussion and evaluation of all relevant factors, including those factors listed in ORS 537.153(2) and (3), ORS 537.170(8) and OAR Chapter 690, Divisions 310 (Water Right Application Processing) and 380 (Water Right Transfers).]	Exhibit O, Section 3.4, Section 3.6
Water not obtained from a municipal supplier may require a limited license. Because such licenses cannot authorize use or discharge of water outside a single basin, multiple limited licenses may be required. Limited licenses are under Council jurisdiction.	Exhibit O, Section 3.6
If a new water right, water right transfer, or limited license is required, Exhibit O must include adequate evidence for the Council to evaluate and make findings approving the required permit or license. It is recommended that the applicant consult with the Oregon Water Resources Department (OWRD) to ensure that all information otherwise required by OWRD is included in the site certificate application.	Exhibit O, Section 3.6

6.0 REFERENCES

United States Environmental Protection Agency. 2016. Water Sense. Available online at: http://www.epa.gov/WaterSense/pubs/indoor.html. Accessed June 1, 2024.

ATTACHMENT O-1 RECORD OF COMMUNICATIONS WITH MUNICIPAL WATER PROVIDERS

The following table summarizes preliminary communications with municipal water providers who are willing and have adequate water available to supply the Project. The water volumes in this table represent the sum of the current Project estimates. The current estimates are presented in Table O-1 of this exhibit. All of the listed suppliers have provided UEC with either oral or written assurances that the amounts of water requested by UEC will be available at the time of construction. In addition, UEC mailed letters to municipal water providers requesting documentation that they are willing and able to provide water (based on the updated estimates) and confirming that doing so would not adversely impact the providers' ability to provide water for other uses or restrict future growth. These letters are included following the summary table below, followed by written responses from water providers.

COUNTY	WATER SOURCE	PRELIMINARY ESTIMATES OF WATER QUANTITY NEEDED (GALLONS)	CONTACT PERSON	MUNICIPAL WATER PROVIDER ASSURANCE
Morrow	City of Boardman	3,486,056	Toni Connell Utility Clerk City of Boardman	To be determined
Umatilla	City of Umatilla	3,486,056	Wendy Mejia Utility Clerk City of Umatilla	To be determined
Umatilla	Port of Morrow	3,486,056	Miff Devin Manager Port of Morrow	Letter of Support Received

Letters to Water Providers

UMATILLA ELECTRIC COOPERATIVE

Toni Connell
Utility Clerk
City of Boardman
Public Works Department
200 City Center Circle
Boardman, Oregon 97818

Re: Construction Water Request

Dear Ms. Connell:

Umatilla Electric Cooperative is seeking access to water for the Umatilla-Morrow County Connect Project (Project) in 2026 and 2027. The Project is currently performing due diligence as part of its Oregon Energy Facilities Siting Council Site Application Permit (Project Order February 9, 2024) and is seeking verification of an available water supply from the City of Boardman. The Project may use up to 3,486,056 gallons of water for dust abatement, road construction, and site restoration in a nine-to-12-month period, beginning in 2026. Average monthly water use is expected to vary with the largest application being used for dust abatement. An average rate of application is 200,000 gallons per month. This volume represents the worst-case water use scenario, approximately 50 percent higher than the estimated water use for the actual Project.

Our initial request is to verify whether the City of Boardman would be able to supply the needed water for this Project. The goal is to provide viable options for water sourcing during Project execution to the selected contractors.

Please reach out with any questions you may have. Thank you in advance for your consideration.

Project Email: umccproject@umatillaelectric.com

Kind regards,

Coleman J. Bode
Manager of Engineering
cole.bode@umatillaelectric.com

HERMISTON HEADQUARTERS
750 W. Elm Ave.
P.O. Box 1148
Hermiston, OR 97838

BOARDMAN OPERATIONS CENTER
400 N.E. Eldrige Drive
Boardman, OR 97818

PHONE: (541) 567-6414
FAX: (541) 567-8142
TOLL FREE: (800) 452-2273
www.UmatillaElectric.com

UMATILLA ELECTRIC COOPERATIVE

Wendy Mejia
Utility Clerk
City of Umatilla
Public Works Department
700 Sixth Street
Umatilla, OR 97882

Re: Construction Water Request

Dear Ms. Mejia:

Umatilla Electric Cooperative is seeking access to water for the Umatilla-Morrow County Connect Project (Project) in 2026 and 2027. The Project is currently performing due diligence as part of its Oregon Energy Facilities Siting Council Site Application Permit (Project Order February 9, 2024) and is seeking verification of an available water supply from City of Umatilla. The Project may use up to 3,486,056 gallons of water for dust abatement, road construction, and site restoration in a nine-to-12-month period, beginning in 2026. Average monthly water use is expected to vary with the largest application being used for dust abatement. An average rate of application is 200,000 gallons per month. This volume represents the worst-case water use scenario, approximately 50 percent higher than the estimated water use for the actual Project.

Our initial request is to verify whether the City of Umatilla would be able to supply the needed water for this Project. The goal is to provide viable options for water sourcing during Project execution to the selected contractors.

Please reach out with any questions you may have. Thank you in advance for your consideration.

Project Email: umccproject@umatillaelectric.com

Kind regards,

Coleman J. Bode
Manager of Engineering
cole.bode@umatillaelectric.com

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UMATILLA ELECTRIC COOPERATIVE

Miff Devin
Manager
Port of Morrow
Water Quality Division
P.O. Box 200
Boardman, Oregon 97818

Re: Construction Water Request

Dear Mr. Devin:

Umatilla Electric Cooperative is seeking access to water for the Umatilla-Morrow County Connect Project (Project) in 2026 and 2027. The Project is currently performing due diligence as part of its Oregon Energy Facilities Siting Council Site Application Permit (Project Order February 9, 2024) and is seeking verification of an available water supply from the Port of Morrow. The Project may use up to 3,486,056 gallons of water for dust abatement, road construction, and site restoration in a nine-to-12-month period, beginning in 2026. Average monthly water use is expected to vary with the largest application being used for dust abatement. An average rate of application is 200,000 gallons per month. This volume represents the worst-case water use scenario, approximately 50 percent higher than the estimated water use for the actual Project.

Our initial request is to verify whether the Port of Morrow would be able to supply the needed water for this Project. The goal is to provide viable options for water sourcing during Project execution to the selected contractors.

Please reach out with any questions you may have. Thank you in advance for your consideration.

Project Email: umccproject@umatillaelectric.com

Kind regards,

Coleman J. Bode
Manager of Engineering
cole.bode@umatillaelectric.com

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Letters from Water Providers

PORT OF MORROW

Coleman J. Bode
Manager of Engineering
Umatilla Electric Cooperative
P.O. Box 1148
750 W. Elm Avenue
Hermiston, OR 97838

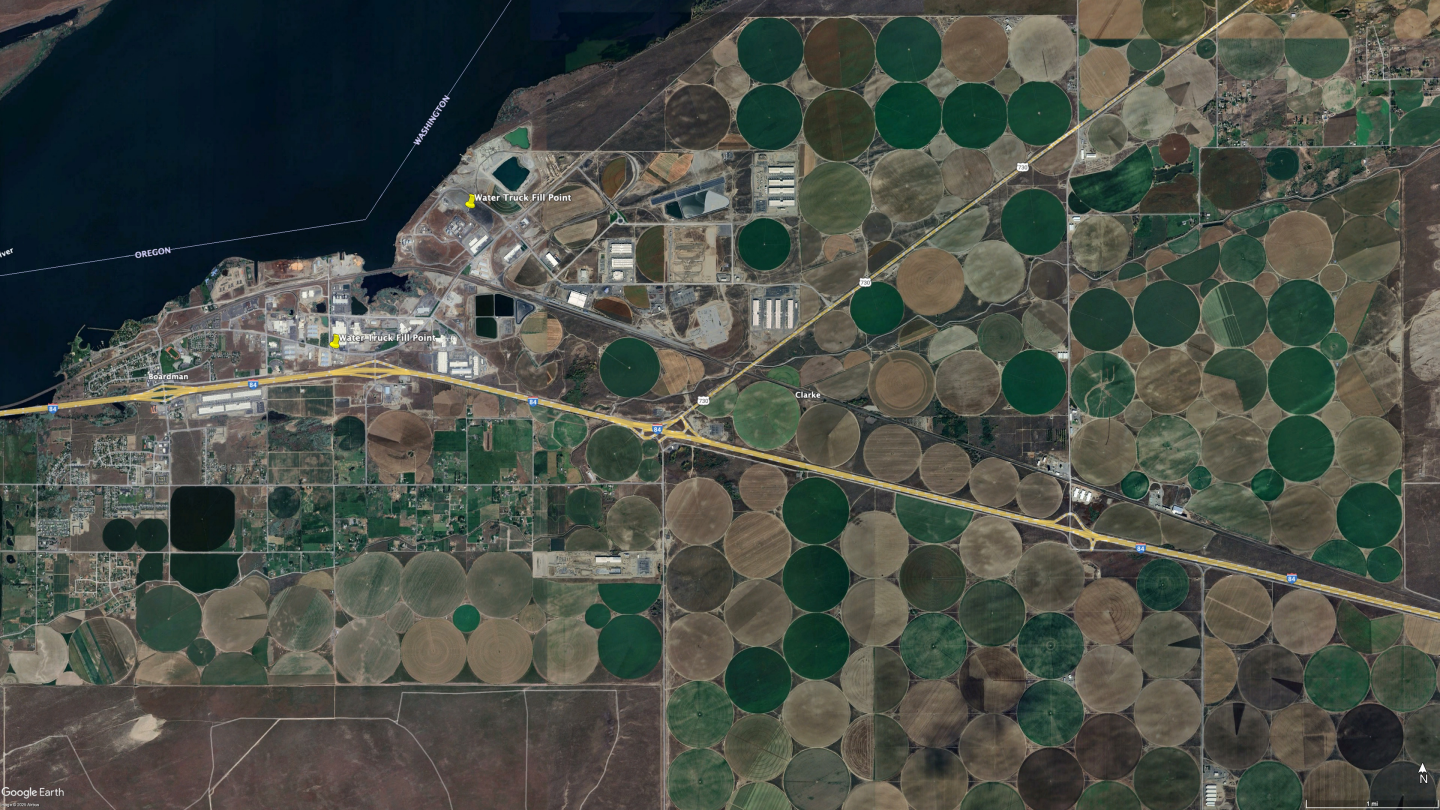
RE: Letter to Provide Construction Water

Dear Mr. Bode:

The Port of Morrow (Port) has reviewed Umatilla Electric Cooperative's (UEC) request for 3,486,056 gallons of construction water for use on UEC's Umatilla-Morrow County Connect Project (Project). The Port would like to indicate its willingness to provide the full amount of water needed for dust abatement, road construction, and site restoration during the Project's construction in 2026 and 2027. Due to the proximity of the Project to the Port's industrial park, I have outlined a semi-truck fill point as well as multiple hydrant fill points for smaller water trucks on the attached map. Filling locations and construction water delivery agreements can be further refined once the Project is ready to start construction.

Kind Regards,

Lisa Mittelsdorf
Executive Director
Port of Morrow
P.O. Box 200
Boardman, OR 97818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