



Washington State Energy Facility Site Evaluation Council

POTENTIAL ACTION ITEM

AGENDA

MONTHLY MEETING
Wednesday June 21, 2023
1:30 PM

VIRTUAL MEETING ONLY
[Click here to join the meeting](#)

Conference number: (253) 372-2181 ID: 56502492#

- 1. Call to Order Kathleen Drew, EFSEC Chair
- 2. Roll Call Andrea Grantham, EFSEC Staff
- 3. Proposed Agenda Kathleen Drew, EFSEC Chair
- 4. Minutes
 - Meeting Minutes Kathleen Drew, EFSEC Chair
 - May 16, 2023 Carriger Solar Land Use Hearing Minutes
 - May 17, 2023 Monthly Meeting Minutes
- 5. Projects
 - a. Kittitas Valley Wind Project
 - Operational Updates Eric Melbardis, EDP Renewables
 - b. Wild Horse Wind Power Project
 - Operational Updates Jennifer Galbraith, Puget Sound Energy
 - c. Chehalis Generation Facility
 - Operational Updates Michael Adams, Chehalis Generation
 - d. Grays Harbor Energy Center
 - Operational Updates Chris Sherin, Grays Harbor Energy
 - e. Columbia Solar
 - Operational Updates Thomas Cushing, Greenbacker Capital
 - f. Columbia Generating Station
 - Operational Updates Felicia Najera-Paxton, Energy Northwest
 - g. WNP – 1/4
 - Non-Operational Updates Felicia Najera-Paxton, Energy Northwest
 - h. Goose Prairie Solar
 - Project Updates Cody Burttschell, Brookfield Renewable
 - i. High Top & Ostrea
 - Project Updates Sara Randolph, EFSEC Staff
 - j. Whistling Ridge
 - Extension and Transfer SCA Amendment Requests Lance Caputo, EFSEC Staff
 - k. Desert Claim
 - SCA Amendment Update Amy Moon, EFSEC Staff
 - l. Horse Heaven Wind Farm
 - Project Updates Amy Moon, EFSEC Staff
 - ASC Extension Request Amy Moon, EFSEC Staff

EFSEC staff and the applicant will provide information and the Council may take FINAL ACTION on granting the extension request.
 - m. Badger Mountain
 - Project Updates Joanne Snarski, EFSEC Staff
 - n. Wautoma Solar
 - Project Updates Lance Caputo, EFSEC Staff
 - o. Hop Hill Solar
 - Project Updates John Barnes, EFSEC Staff
 - p. Carriger Solar
 - Project Updates Joanne Snarski, EFSEC Staff
 - Land Use Consistency Update Joanne Snarski, EFSEC Staff

The Council may consider and take FINAL ACTION on Land Use Consistency Update for the Carriger Solar Project.
- 6. Adjourn Kathleen Drew, EFSEC Chair

Note: "FINAL ACTION" means a collective positive or negative decision, or an actual vote by a majority of the members of a governing body when sitting as a body or entity, upon a motion, proposal, resolution, order, or ordinance. RCW 42.30.020

EFSEC Monthly Council Meeting – Facility Update Format

Facility Name: Kittitas Valley Wind Power Project
Operator: EDP Renewables
Report Date: June 5, 2022
Reporting Period: May 2023
Site Contact: Eric Melbardis, Sr Operations Manager
Facility SCA Status: Operational

Operations & Maintenance (only applicable for operating facilities)

- Power generated: 28,546 MWh
 - Wind speed: 6.36 m/s
 - Capacity Factor: 38%
-

Environmental Compliance

- No incidents

Safety Compliance

- Nothing to report

Current or Upcoming Projects

- Nothing to report

Other

- No sound complaints
- No shadow flicker complaints

EFSEC Monthly Council Meeting – Facility Update

Facility Name: Wild Horse Wind Facility
Operator: Puget Sound Energy
Report Date: June 8, 2023
Report Period: May 2023
Site Contact: Jennifer Galbraith
SCA Status: Operational

Operations & Maintenance

May generation totaled 33,484 MWh for an average 16.51%.

Environmental Compliance

Nothing to report.

Safety Compliance

Nothing to report.

Current or Upcoming Projects

Nothing to report.

Other

Nothing to report.

EFSEC Monthly Council Meeting – Facility Update

Facility Name: Chehalis Generation Facility
Operator: PacifiCorp
Report Date: June 8, 2023
Reporting Period: May 2023
Site Contact: Mike Adams, Plant Manager
Facility SCA Status: Operational

Operations & Maintenance

-Relevant energy generation information, such as wind speed, number of windy or sunny days, gas line supply updates, etc.

- 140,385 net MW-hrs. generated in the reporting period for a capacity factor of 39.05%.

The following information must be reported to the Council if applicable to the facility:

Environmental Compliance

-Monthly Water Usage: 2,193,136 gallons

-Monthly Wastewater Returned: 984,651 gallons

-Permit status if any changes.

- No changes.

-Update on progress or completion of any mitigation measures identified.

- Nothing to report

-Any EFSEC-related inspections that occurred.

- Nothing to report

-Any EFSEC-related complaints or violations that occurred.

- Nothing to report

-Brief list of reports submitted to EFSEC during the monthly reporting period.

- Nothing to report

Safety Compliance

-Safety training or improvements that relate to SCA conditions.

- Zero injuries this reporting period for a total of 2861 days without a Lost Time Accident.



Current or Upcoming Projects

- Planned site improvements.
 - No planned changes.
- Upcoming permit renewals.
 - Nothing to report.
- Additional mitigation improvements or milestones.
 - Nothing to report.

Other

- Current events of note (e.g., Covid response updates, seasonal concerns due to inclement weather, etc.).
 - Certification testing for new CEMS system has been successfully completed.
- Personnel changes as they may relate to EFSEC facility contacts (e.g., introducing a new staff member who may provide facility updates to the Council).
 - Stacy LaClair has resigned as the Environmental Analyst at Chehalis. Jeremy Smith will be the interim contact.
- Public outreach of interest (e.g., schools, public, facility outreach).
 - Nothing to report.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Adams".

Mike Adams
Plant Manager
Chehalis Generation Facility

EFSEC Monthly Council Meeting – Facility Update

Facility Name: Grays Harbor Energy Center

Operator: Grays Harbor Energy LLC

Report Date: June 21, 2023

Reporting Period: May 2023

Site Contact: Chris Sherin

Facility SCA Status: Operational

Operations & Maintenance

-GHEC generated 8060MWh during the month and 1,333,687MWh YTD.

-GHEC was offline 20days in May to perform our Annual Maintenance Outage.

The following information must be reported to the Council if applicable to the facility:

Environmental Compliance

-There were no emissions, outfall, or storm water deviations, during the month.

-Routine monthly, quarterly, and annual reporting to EFSEC Staff.

- Monthly Outfall Discharge Monitor Report (DMR).

Safety Compliance

- None.

Current or Upcoming Projects

-- Application for a Modification to the Air Operating Permit submitted to EFSEC in April 2022.

GHEC is currently authorized to operate under PSD Permit EFSEC/2001-01, Amendment 5 and Federal Operating Permit EFSEC/94-1 AOP Initial.

Other

-None.

EFSEC Monthly Council Meeting Facility Update

Facility Name: Columbia Solar Projects (Penstemon, Camas and Urtica)

Operator: Tuusso Energy, LLC

Report Date: June 9, 2023

Reporting Period: 30 days ending June 7, 2023

Site Contact: Thomas Cushing

Facility SCA Status: Construction

Construction Status

- Penstemon
 - Currently operational
 - Total Generation during the month of April was 1.454 Gigawatt hours

 - Camas
 - Currently operational
 - Total Generation during the month of April was 1.435 Gigawatt hours

 - Urtica
 - Currently operational
 - Total Generation during the month of April was 1.625 Gigawatt hours
-

EFSEC Monthly Council Meeting

Facility Name: **Columbia Generating Station and Washington Nuclear Project 1 and 4 (WNP-1/4)**

Operator: **Energy Northwest**

Report Date: **June 8, 2023**

Reporting Period: **May 2023**

Site Contact: **Felicia Najera-Paxton**

Facility SCA Status: **Operational**

CGS Net Electrical Generation May 2023: **93,606 Mega Watt-Hours.**

The following information must be reported to the Council if applicable to the facility:

Environmental Compliance:

No non-routine items to report.

Safety Compliance

No update.

Current or Upcoming Projects

No update.

Other

No update.



Scott A. Vance
Vice President, Corporate Governance and General Counsel
P.O. Box 968, MD PE13
Richland, WA 99352-0968
Ph. 509.377-4650 | F. 509.372.5330
savance@energy-northwest.com

June 16, 2023
GO2-23-077
DIC 409.8

Amy Moon
Siting and Compliance Lead
Energy Facility Site Evaluation Council
PO Box 43172
Olympia, WA 98504-3172

ELECTRONIC SUBMITTAL ONLY

**Subject: JUNE 2023 COLUMBIA GENERATING STATION NPDES 5-DAY
DISCHARGE NONCOMPLIANCE REPORT**

Reference: NPDES Permit No. WA002515-1, Conditions S3.E.b.1 & c.

Dear Ms. Moon:

In accordance with the referenced permit conditions, Energy Northwest is providing a National Pollutant Discharge Elimination System (NPDES) 5-day noncompliance report for the discharge of Mobil DTE 732 turbine oil into Plant Service Water (TSW) and subsequently the Circulating Water (CW) Basin and potentially the Columbia River via Columbia Generating Station Outfall 001.

Energy Northwest completed a report within 24 hours pursuant to NPDES permit condition S3.E.b.1, which involved notification via telephone to the Energy Facility Site Evaluation Council (EFSEC) with the phone number in the NPDES permit. Additionally, Energy Northwest also notified the United States Coast Guard (USCG) National Response Center (NRC) and Washington Emergency Management Division pursuant to Revised Code of Washington (RCW) 90.56.280. This notification occurred at 6:42 pm on June 13th. Energy Northwest followed up by phone call with EFSEC the morning of June 14th to ensure the notification was received.

Please contact Marshall Schmitt at (509) 372-5334 or maschmitt@energy-northwest.com with any questions.

Respectfully,

DocuSigned by:

D58EB9055F2F498
Final Approver

Scott A. Vance
Vice President, Corporate Governance and General Counsel

I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

cc: Ami Hafkemeyer, EFSEC
Dave Walker, EFSEC
Cynthia Smith, EFSEC

Attachment: NPDES Report Within Five Days - Oil Release to Circulating Water

INTERNAL DISTRIBUTION:		FILE COPY	
Vance/lb		Columbia Files	964Y
		Docket File	PE20

GO2-23-077 - Attachment 1

NPDES Report Within Five Days – Oil Release to Circulating Water

1. A description of the noncompliance and its cause

On June 13th, 2023 during Refueling and Maintenance Outage 26 (R26), maintenance activities on the Reactor Feedwater (RFW) Drive Turbine (DT) system resulted in the loss of approximately 300 gallons of Mobil DTE 732 turbine lubricating oil to the plant service water system (TSW). The oil entered TSW through an acute leak in a heat exchanger (TO-HX-2A) designed to cool the oil during operation. Mobil DTE 732 is not a hazardous substance according to the Safety Data Sheet (SDS).

TSW provides continuous recirculating cooling for non-radioactive components in the plant. It is drawn from and discharged to the circulating water basin. Therefore, the release of oil to TSW means oil has also been released to circulating water and has a theoretical pathway to the Columbia River by way of the blowdown pipe, which discharges circulating water to the Columbia River for chemistry control in the circulating water system.

The RFW oil pumps were started at 9:34 am and ran until 10:30 am, when abnormal oil usage was noted by Operations. At approximately 12:30 pm, an oil sheen was noticed by Operators on the circulating water basin and blowdown to the Columbia River was isolated at 12:35 pm. Environmental and Regulatory Programs (E&RP) was notified of the oil release at approximately 1:00 pm on June 13th. Operators were dispatched to the Columbia River shore near the outfall to look for a sheen on the river, but no sheen was observed. Subsequent walkdowns of the cooling water towers and basin revealed visible sheens of oil in various locations, including the top decks and lower basins of the cooling towers and the cooling water basin. Sheens were most visible in areas of low water turbulence – in areas of rougher water, no sheen could be perceived.

In the early evening of June 13th, Washington State Department of Ecology (Ecology) visited the Columbia River in the vicinity of the Columbia Generating Station (CGS) Outfall 001 and verbally confirmed no visible oil sheen was observed.

2. The period of noncompliance, including exact dates and times

Oil would have entered the heat exchanger when the RFW pumps were turned on at 9:34 am on June 13th and would have recirculated through the system, including the heat exchanger, continuously until 10:30 am. It is unknown if the heat exchanger had failed prior to the system start or if it failed during the run. Once the RFW pumps were switched off, the oil would no longer be at a higher pressure and the release to TSW would have terminated. Blowdown was established while the maintenance was taking place and was not isolated until 12:35 pm. Therefore, there was potential for an

GO2-23-077 - Attachment 1

oil/water mixture to discharge to the river from 9:34 am to 12:35 pm, or about 3 hours and 1 minute at a maximum.

3. The estimated time the permittee expects the noncompliance to continue if not yet corrected

The potential noncompliance was terminated when blowdown was isolated at 12:35 pm on June 13th. However, the circulating water system still shows signs of oil contamination as evidenced by sheens on the surface of the water. GrayMar Environmental Services assessed the circulating water system the morning of June 14th to assist in developing a cleanup strategy. GrayMar began work to remove the oil and eliminate the sheen from the circulating water system the morning on June 15th and estimated approximately 5 days to clean up the water that is circulating within the system. The timeline may be adjusted as work progresses.

Energy Northwest continues to work with GrayMar and Ecology spill personnel as the cleanup of the circulating water system continues. Ecology and EFSEC will be engaged prior to restoring blowdown to the Columbia River.

4. Steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance

An evaluation of recent heat exchanger issues is being driven by the station Corrective Action Program (CAP) utilizing the Condition Report (CR) process and is assigned CR number 447333. This evaluation includes the failure of TO-HX-2A, which is the only heat exchanger in the evaluation to have discharged oil to a plant water system. The action will be with the Energy Northwest Systems Engineering group to determine causes and corrective actions.

More immediately, TO-HX-2A has been drained and inspected for damage. A damaged tube was discovered and plugged. The heat exchanger will be tested prior to being put back into service.

5. If the noncompliance involves an overflow prior to the treatment works, an estimate of the quantity (in gallons) of untreated overflow

This noncompliance does not involve an overflow prior to the treatment works.

EFSEC Monthly Council Meeting – Facility Update Format

Facility Name: Goose Prairie Solar

Operator: Brookfield Renewable US

Report Date: 6/9/23

Reporting Period:

Site Contact: Cody Burttschell

Facility SCA Status: (Pre-construction/**Construction**/Operational/Decommission)

Construction Status (only applicable for projects under construction)

-On schedule or not. If not, provide additional information/explanation.

Project is on schedule.

-Phase/Brief update on status/month in review.

Mobilization currently scheduled for 6/15 with onsite work beginning 6/19. Work will consist of preparing site entrance and lay down areas and prepping site for construction.

-Other?

Operations & Maintenance (only applicable for operating facilities)

-Energy generated for the reporting period.

-Relevant energy generation information, such as wind speed, number of windy or sunny days, gas line supply updates, etc.

The following information must be reported to the Council if applicable to the facility:

Environmental Compliance

-Permit status if any changes.

-Update on progress or completion of any mitigation measures identified.

-Any EFSEC-related inspections that occurred.

-Any EFSEC-related complaints or violations that occurred.

-Brief list of reports submitted to EFSEC during the monthly reporting period.

Safety Compliance

-Safety training or improvements that relate to SCA conditions.

Current or Upcoming Projects

-Planned site improvements.

-Upcoming permit renewals.

-Additional mitigation improvements or milestones.

Other

-Current events of note (e.g., Covid response updates, seasonal concerns due to inclement weather, etc.).

-Personnel changes as they may relate to EFSEC facility contacts (e.g., introducing a new staff member who may provide facility updates to the Council).

-Public outreach of interest (e.g., schools, public, facility outreach).

High Top and Ostrea Solar Project

June 2023 project update

[Place holder]

Whistling Ridge Energy Project

June 2023 project update

[Place holder]



1301 Fifth Avenue Suite 2700
Seattle, WA 98101
(206) 224-5800 • greendiamond.com

RECEIVED

MAR 24 2022

ENERGY FACILITY SITE
EVALUATION COUNCIL

RECEIVED
MAR 22 2022

WASH. UT. & TR. COMM.

March 16, 2022

Ms. Sonia Bumpus
Siting Manager
Washington Energy Facility Site Evaluation Council
621 Woodland Square Loop SE
PO Box 43172
Olympia, WA 98504-3172

Dear Ms. Bumpus:

Green Diamond Management Company is the manager and authorized representative for Twin Creeks Timber, LLC (TCT), the new owner of Whistling Ridge Energy LLC (Whistling Ridge). TCT acquired Whistling Ridge as part of a larger acquisition in November of 2021.

As you know, on March 2, 2022, Whistling Ridge filed with the Energy Facility Site Evaluation Council (Council) a request to extend the Whistling Ridge Energy Project (Project) Site Certificate Agreement (SCA) for a period of three years.

This is the first of two filings. The second will be a request to amend the SCA to account for the change in ownership of Whistling Ridge from the prior owner to TCT. We anticipate filing a request for transfer in the next several weeks, and we anticipate seeking the Council's review of both the SCA extension request and the transfer request in a single process. We will work with Council staff on the most convenient date to initiate these processes. We ask that the Council not take action on either request until we are prepared to move forward on both.

Very truly yours,

DocuSigned by:
Greg Corbin
149EEAD3B9F34C4...

Greg Corbin
Senior Special Counsel

BEFORE THE STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL

In the Matter of the Application No. 2009-01:
WHISTLING RIDGE ENERGY LLC:
WHISTLING RIDGE ENERGY PROJECT

WHISTLING RIDGE ENERGY LLC'S
REQUEST TO EXTEND TERM OF SITE
CERTIFICATE AGREEMENT
PURSUANT TO WAC 463-68-080

A. Introduction

The Applicant, Whistling Ridge Energy, LLC (Whistling Ridge or Applicant), requests that the Washington Energy Facility Site Evaluation Council (EFSEC or "Council") grant a three-year extension to the term of the Site Certification Agreement (effective November 18, 2013)¹ to November 2025. This request is based on the Council's discretionary authority to grant an extension pursuant to WAC 463-68-080(3).

If the Council grants this request, the Applicant will first fully review the financial and environmental feasibility of constructing the facility prior to commencing any studies. Only then would the Applicant move forward with studies, some of which are specific to certain times of the year.

As discussed below, EFSEC's rules and the terms of Site Certificate Agreement (SCA) approved by EFSEC set permissive timeframes for the commencement of construction. Whistling Ridge believes that the intent behind the permissive "shelf life" of SCAs acknowledges that EFSEC jurisdictional projects which typically fulfill important statewide policy objectives often face multi-year litigation aimed at delaying applications and undermining the commercial viability of projects through costs and delays. As is the case here, once a Site Certification Application has undergone often multi-year evaluation and scrutiny, including extensive review through Washington's State Environmental Policy Act (SEPA, RCW 43.21C), such appeals are rarely successful, but they exact a significant cost for the Applicant. Here, litigation filed by project opponents commenced with a failed appeal before the Washington Supreme Court, followed by failed litigation and appeals before the Ninth Circuit Court of appeals. The appeals were concluded in July 2018.

¹ WAC 463-64-040(3) provides that the certification agreement "shall be binding upon execution by the governor and the applicant." [Emphasis added].

B. Whistling Ridge Project History and Timeline

- 3/10/09 Application for Site Certification filed; history of adjudication can be found on EFSEC’s Project web page.
- 1/5/12 EFSEC’s Site Certificate Agreement and Recommendation submitted to Governor Gregoire.
- 3/5/12 Governor Gregoire approves the Final Order and signs the Site Certificate Agreement.
- 8/20/13 After appeal by project opponents, the Washington Supreme Court issues a unanimous decision denying appeal.
- 11/18/13 Jason Spadaro, Whistling Ridge Energy, signs the Site Certificate Agreement (“Effective Date” of Site Certificate Agreement)
- 2013-15 During this period, BPA worked on the FEIS and its Supplement to the FEIS, addressing further comments submitted post-FEIS by project opponents.
- 9/9/15 Project opponents file an appeal with the US 9th Circuit Court of Appeals, challenging BPA’s NEPA FEIS, supporting BPA’s decision to grant the Whistling Ridge Energy Project an interconnection to the Federal Columbia River Transmission System.
- 3/27/18 The 9th Circuit Court of Appeals issues a Memorandum Decision denying the appeal.
- 7/11/18 Following a petition by project opponents for a rehearing (*en banc*), the full US 9th Circuit Court of Appeals denied rehearing. This denial concluded all opposition litigation.
- 10/25/18 Whistling Ridge files and presents its “Five Year Report” to EFSEC (WAC 463-68-060), confirming the following:
- Section 1: At this time, the Project is not proposing any changes as described in Section 1 of the statute.*
- Section 2: There is no new information or changed conditions known at this time that might indicate the existence of any probable significant adverse environmental impacts not previously addressed in the EFSEC FEIS.*
- Section 3: Finally, at this time, Whistling Ridge is not proposing any changes, modifications or amendments to the Site Certificate Agreement of any regulatory permits. It is possible that such changes will be proposed in the future.*
- 2018 – 2021 SDS Lumber Co. (parent company to Whistling Ridge Energy LLC) undergoes protracted internal discussions among the owners, ultimately resulting in the

decision to sell SDS Lumber Co. and related entities. A sale process was begun in 2021 and in November of 2021 all company assets were sold to multiple buyers. COVID complicates efforts to proceed with Whistling Ridge Energy construction.

2021 - 2022 Twin Creeks Timber, LLC (TCT) acquired a substantial portion of the SDS timberland assets, including Whistling Ridge Energy LLC and the property on which the project would be built, in November of 2021. The assets of TCT are managed by Green Diamond Management Company, a Washington corporation and subsidiary of Green Diamond Resource Company, a fifth-generation timberland owner in the State of Washington.

C. Effective Date of Site Certificate

Whistling Ridge executed the SCA only after completion of the Supreme Court appeal, where the Court issued a unanimous decision denying the appeal. Whistling Ridge believed that it would be unjust for the Project to lose any time established in the SCA on account of what proved to be a failed appeal filed to stop the project. *Friends of Columbia Gorge, Inc. v. State Energy Facility Site Evaluation Council*, 178 Wn.2d 320, 310 P.3d 780 (2013). RCW 80.50.100 confirms that the SCA is binding upon execution of *both* the Governor and the Applicant:

RCW 80.50.100 Recommendations to governor—Expedited processing—Approval or rejection of certification—Reconsideration.

* * *

(3)(a) Within sixty days of receipt of the council's report the governor shall take one of the following actions:

- (i) Approve the application and execute the draft certification agreement;
- or
- (ii) Reject the application; or
- (iii) Direct the council to reconsider certain aspects of the draft certification agreement.

(b) The council shall reconsider such aspects of the draft certification agreement by reviewing the existing record of the application or, as necessary, by reopening the adjudicative proceeding for the purposes of receiving additional evidence. Such reconsideration shall be conducted expeditiously. The council shall resubmit the draft certification to the governor incorporating any amendments deemed necessary upon reconsideration. Within sixty days of receipt of such draft certification agreement, the governor shall either approve the application and execute the certification agreement or reject the application. The certification agreement shall be binding upon execution by the governor and the applicant. * * *

Whistling Ridge chose to defer executing the Site Certificate Agreement until the Supreme Court appeal was resolved. The “effective date” of the Site Certification Agreement occurred at the time the two parties (the Governor and the Applicant) had executed the Site

Certificate Agreement. The “term” for start of construction commences within ten years of the “effective date” of the Site Certificate Agreement:

WAC 463-68-030 Term for start of construction. Subject to conditions in the site certification agreement and this chapter, construction may start any time within ten years of the effective date of the site certification agreement.

Furthermore, the Site Certificate Agreement allows construction deadlines to be extended to such time as when “all final state and federal permits necessary to construct an operate the Project are obtained and associated appeals have been exhausted:

Site Certification Agreement, Article I.B: “This Site Certification agreement authorizes the Certificate Holder to construct the Project such that Substantial Completion is achieved no later than ten (10) years from the date that all final state and federal permits necessary to construct and operation the Project are obtained and associated appeals have been exhausted.” (Page 8 of 42).

As noted in the Project History summary above, opposition appeals to the Bonneville Power Administration interconnection and related NEPA process were not concluded until July 2018. In summary, it was not until 2018 that appeals of all state and federal permits were “exhausted.”

The essential reason for this latitude for construction is that *no project facing fierce, multi-year litigation can secure financing or otherwise proceed if pending appeals jeopardize construction.* No prudent developer proceeds with construction and operation of an energy facility during litigation, where there is a risk of an appeal outcome that would require the dismantling of an operating facility and cause monumental contract breaches and power disruptions. In fact, it is unlikely that any utility or private purchaser of energy resources would even consider commitments to purchase a facility or power from an energy facility facing staunch appeal risks. It is that fundamental risk that stops projects during appeals, including appeals that have little or no merit.

D. Request to Extend Term of Site Certificate Agreement; Authority and Process

Whistling Ridge requests that the Council extend the term of the Site Certificate for a reasonable period (three years) to undertake due diligence work for the facility, and to update essential natural resource and other studies. WAC 463-68-080 confers discretion for the Council to grant this request. Whistling Ridge understands that the Council would need to conduct review of this request as an amendment to the Site Certificate Agreement, including one or more “public hearing sessions.” In seeking this request, the Applicant will utilize this time to consider commercial viability and to update environmental information and engage with stakeholders. The extension and amendment process are subject to the following Council Rules:

WAC 463-68-080 Site certification agreement expiration.

(1) If the certificate holder does not start or restart construction within ten years of the effective date of the site certification agreement, or has canceled the project, the site certification agreement shall expire.

(2) If commercial operations have not commenced within ten years of the effective date of the site certification agreement, the site certification agreement expires unless the certificate holder requests, and the council approves, an extension of the term of the site certification agreement.

(3) Upon a request to extend the term of the site certification agreement, the council may conduct a review consistent with the requirements of WAC 463-68-060 and 463-68-070, and other applicable legal requirements.

WAC 463-66-030 Request for amendment.

A request for amendment of a site certification agreement shall be made in writing by a certificate holder to the council. The council will consider the request and determine a schedule for action at the next feasible council meeting. The council may, if appropriate and required for full understanding and review of the proposal, secure the assistance of a consultant or take other action at the expense of the certificate holder. The council shall hold one or more public hearing sessions upon the request for amendment at times and places determined by the council.

WAC 463-66-040 Amendment review.

In reviewing any proposed amendment, the council shall consider whether the proposal is consistent with:

- (1) The intention of the original SCA;
- (2) Applicable laws and rules;
- (3) The public health, safety, and welfare; and
- (4) The provisions of chapter 463-72 WAC. [Concerns site restoration]

E. Matters to be Addressed in the Amendment to the ASC

The extension will allow Whistling Ridge Energy, through its new owner TCT, to review and if feasible to propose the installation of fewer but taller wind turbine generators and associated facilities within the designated and approved micrositing corridors. Additionally, **Attachment A** outlines what the Applicant considers to be related and necessary actions, including studies and reports needed to complete the amendment request. The Applicant would confer with EFSEC staff to ensure that all necessary information is developed. Most importantly, Whistling Ridge proposes to update natural resource studies including season-specific data (*e.g.* avian nesting surveys) and new visual simulations from key viewing areas (KVAs) within the Columbia River Gorge Scenic Area. Commencing these studies, including consultation with WDFW, local Tribes, and other agencies concerning sufficiency of information needed for updated wildlife and other surveys, will be essential.

DATED: March 2, 2022.

STOEL RIVES LLP

A handwritten signature in blue ink, appearing to read 'T. McMahan', with a long horizontal line extending to the right.

By: Timothy L. McMahan, WSBA #16377
tim.mcmahan@stoel.com

Attachment A

Likely (Tentative) Permitting Tasks and Actions Anticipated to Amend WREP Site Certificate

Action	Likely Timing (<i>tbd</i>)
Contact wildlife consultants; develop scopes of work; identify seasonally imperative work and schedule same: <ul style="list-style-type: none"> • Avian baseline updates (including passerines and bats) • Bald and Golden Eagle and other raptor nest surveys • Northern Spotted Owl survey update for confirmation • Sensitive plants. 	
Visual simulation updates; develop scope of work for modified WTGs and locations.	
Updated noise analysis.	
Develop schedule to complete all study work needed for Site Certificate Amendment Application and SEPA action.	
Agency meetings: <ul style="list-style-type: none"> • ODFW -- Confirm wildlife update work • EFSEC staff -- Discuss timing, cost, needs, process; outline amendment process, including SEPA process. Discuss and confirm mitigation parcel or alternative mitigation approaches. • USFWS -- BGEPA; NSO • DNR – Consultation as needed. • Consult with Tribal governments and representatives. 	
BPA contacts and confirmations.	
Complete all studies.	
Draft ASC Amendment; filing timing discussion with EFSEC, including evaluation of expected hearing proceedings.	
File amendment (public process begins).	
Complete all work on mitigation parcel, including agency (WDFW) concurrence; identify and address any other mitigation plans.	

PRELIMINARY AGENCY REVIEW DRAFT
04/27/23

**Application to Transfer Site Certification Agreement for the
Whistling Ridge Energy Project to Twin Creeks Timber, LLC, as the new
Parent of Whistling Ridge Energy, LLC**

WAC 463-66-100

April __, 2023

Whistling Ridge Energy, LLC (“Applicant”) submits this application for transfer (“Transfer Application”) of a controlling interest in Applicant and the Site Certification Agreement effective as of November 19, 2013 (“SCA”) for the Whistling Ridge Energy Project (“Project”). Twin Creeks Timber, LLC (“TCT”) acquired ownership of Applicant from SDS Lumber Co. (“SDS”) in November 2021.

WAC 463-66-100 Transfer of a site certification agreement.

No site certification agreement, any portion of a site certification agreement, nor any legal or equitable interest in such an agreement issued under this chapter shall be transferred, assigned, or in any manner disposed of (including abandonment), either voluntarily or involuntarily, directly or indirectly, through transfer of control of the certification agreement or the site certification agreement owner or project sponsor without express council approval of such action. In the event a site certification agreement is to be acquired via a merger, leveraged buy-out, or other change in corporate or partnership ownership, the successor in interest must file a formal petition under the terms of this section to continue operation or other activities at the certificated site.

(1) A certification holder seeking to transfer or otherwise dispose of a site certification agreement must file a formal application with the council including information about the new owner required by WAC 463-60-015 and 463-60-075 that demonstrate the transferee's organizational, financial, managerial, and technical capability to comply with the terms and conditions of the original site certification agreement including council approved plans for termination of the plant and site restoration. The council may place conditions on the transfer of the certification agreement including provisions that reserve liability for the site in the original certification holder.

RESPONSE: This request for transfer details how the Applicant, under new ownership, continues to have the financial, managerial, and technical capability to comply with the terms and conditions of the SCA and construct, operate, and retire the Project.

Summary of Application for Transfer.

On March 10, 2009, Applicant applied to EFSEC for a site certification agreement to construct and operate the Whistling Ridge Energy Project. On March 5, 2012 Governor Gregoire approved the Final Order for and signed the Site Certificate Agreement for the Project. The Applicant signed the SCA on November 18, 2013 after resolution of litigation before the Washington Supreme Court. Subsequently Project opponents initiated federal litigation related to the Project that ultimately was resolved in the Applicants favor on July 11, 2018. A more complete timeline of the Project's approval history is contained in Whistling Ridge Energy LLC's Request to Extend Term of Site Certificate Agreement Pursuant to WAC 463-68-080, filed on March 2, 2022.

In November of 2021, SDS, the sole member of Applicant, sold a substantial portion of its timberlands and 100% of its membership interest in Applicant to TCT. Accordingly, the analysis below provides the information necessary for the Council to determine that Applicant, with TCT instead of SDS as sole member, will continue to meet the requirements of WAC 463-66-100.

On March 2, 2022, TCT filed with EFSEC a request to extend the expiration of the Site Certificate ("Extension Request"). As noted in that request, with the extended SCA deadline, TCT has engaged the renewable energy development experts discussed below to evaluate the opportunities to develop the Project, including updating studies and evaluation under Washington's State Environmental Policy Act, RCW 43.21C.

Information About the New Owner.

TCT acquired Applicant from SDS in November 2021. TCT is a large, well-capitalized timberland investment fund that currently owns and operates over 600,000 acres in the Pacific Northwest and U.S. South. The fund is a long-term investment vehicle that holds core timberland in the major U.S. timber markets. In addition to producing timber, TCT has developed carbon offset projects and worked with major energy companies to develop renewable energy projects in the U.S. South. TCT is managed by Silver Creek Advisory Partners LLC ("Silver Creek") based in Seattle, Washington. Silver Creek is an investment advisor registered with the U.S. Securities and Exchange Commission with institutional scale, deep investment expertise, and strong investor alignment. As of June 30, 2022, Silver Creek had \$8.6 billion in assets under management across several alternative and real asset investment strategies. Silver Creek has a history of originating and managing more than 50 funds over 28 years, including nearly \$2.5 billion in real assets. Silver Creek's senior team and team members bring decades of experience in hands-on real asset and financial management with prior experience at several of the largest managers in the industry.

Information About TCT's Development Consulting Contractor.

TCT has engaged Navitas Development, a renewable energy development services company. Navitas will assist in directing and managing the work described below. Mr. Sean Bell, owner and principal of Navitas, has over 26 years of commercial-scale infrastructure development experience including 14 years of renewable energy development experience. He has a proven history of leadership and management of internal and external team resources including land acquisition, permitting, resource evaluation, interconnection processes, power purchase

agreements (PPAs) and asset purchase agreement negotiations and related diligence activities. He has comprehensive knowledge of all aspects and disciplines of renewable energy development with stakeholders at every level. Mr. Bell led responses to numerous requests for proposal (RFP) solicitations for project development, asset acquisition and offtake for major utilities in the WECC region including, but not limited to, SDG&E, PG&E, Portland General Electric, Southern Cal Edison, PacifiCorp, Sacramento Municipal Utility District and Puget Sound Energy. Mr. Bell has been involved of the development of over 3.0 GW of renewable energy development throughout the United States. More detailed information about Mr. Bell is attached as **Appendix A**.

Information About TCT’s Development Partner, Steelhead Americas.

In addition to Navitas, the Applicant has partnered with Steelhead Americas to update and complete the development of the Project. Steelhead Americas (Steelhead) is the North America development arm of Vestas, the world’s largest wind turbine manufacturer and leading service provider. Steelhead leverages Vestas’ industry expertise and turbine technology to advance in existing markets and unlock new geographic markets to expand renewable energy across North America. Formed in 2016, Steelhead develops new wind and solar assets and brings the benefits of renewable energy to local communities and industry partners. More detailed information about Steelhead Development is attached as **Appendix B**.

Transferee’s operational, financial, managerial, and technical capability to comply with the terms and conditions of the SCA, including plans for termination and restoration.

Applicant and its prior owner, SDS, met EFSEC’s siting standards as codified in EFSEC’s administrative code, Ch. 463-62 WAC, in part through engagement of outside consultants and renewable energy development experts, including Navitas Development. Applicant is developing a memorandum of understanding with Steelhead to provide development services and potentially take a leading or controlling interest in the Project and its further development. As noted above, Applicant has contracted with Navitas Development and Steelhead after approval of this Transfer Application and the Extension Request.

Financial capability.

TCT was launched in 2016 and is a long-term investor in timberland and associated non-timber assets included but not limited to renewable energy projects. TCT is capitalized by well-known institutional investors including some of the largest and most respected public pension plans in the United States. TCT’s strong balance sheet is evident by its lack of any long-term debt and is solely financed with equity. TCT’s asset base and capitalization is also significantly larger than that of the previous owner of Whistling Ridge Energy, LLC (SDS Lumber).

Investors in TCT include a small group of sophisticated institutional investors and an operating company, Green Diamond Resource Company (“Green Diamond”). While Silver Creek is the fiduciary and manager of TCT, Green Diamond is a significant co-investor in TCT and, through its affiliate Green Diamond Management Company, is responsible for all of the day-to-day operations of TCT, including Applicant’s development of the Project.

Green Diamond is a fifth generation, family-owned forest products company that manages forests for their own account and TCT across nine states; all certified in compliance with the Sustainable Forestry Initiative. Green Diamond is one of the largest timberland owners in the United States with 2.2 million acres owned and/or managed. Green Diamond has a strong operating track record with a focus on relationships with customers and regulators. Green Diamond has deep experience developing conservation easements, carbon offset projects, and developing renewable energy projects, including multiple solar and wind energy projects in the Pacific Northwest and U.S. South.

For SDS Lumber, in EFSEC proceedings, SDS Lumber was able to provide sufficient assurances of financial capability. As noted, TCT has the financial capability to permit, construct and operate the Whistling Ridge Facility.

Management of construction and operation of projects.

See Appendix A, qualifications of Navitas Development and Appendix B, Steelhead Americas.

(2) If the certification holder is seeking an alternative disposition of a certificated site, the certification holder must petition the council for an amendment to its site certification agreement pursuant to the provisions of this chapter and gain council approval of its alternative disposition plan. In submitting a request for an alternative disposition of a certificated site, the certification holder must describe the operational and environmental effects of the alternative use of the site on the certified facility. If the proposed alternative use of the site is inconsistent with the terms and conditions of the original site certification agreement the council may reject the application for alternative use of the site.

RESPONSE: Not applicable. Neither TCT nor Whistling Ridge Energy, LLC propose an alternative disposition of the certificated site.

(3) The council shall require any person who submits an application to acquire a site certification agreement under provisions of this section to file a written consent from the current certification holder, or a certified copy of an order or judgment of a court of competent jurisdiction, attesting to the person's right, subject to the provisions of chapter 80.50 RCW et seq. and the rules of this chapter, to possession of the energy facility involved.

RESPONSE: Not applicable. TCT is making this request together with Whistling Ridge Energy, LLC.

(4) After mailing a notice of the pending application for transfer of the site certification agreement to all persons on its mailing list, the council shall hold an informational hearing on the application. Following the hearing the council may approve an application for transfer of the site certification agreement if the council determines that:

(a) The applicant satisfies the provisions of WAC 463-60-015 and 463-60-075;

(b) The applicant is entitled to possession of the energy facility described in the certification agreement; and

(c) The applicant agrees to abide by all of the terms and conditions of the site certification agreement to be transferred and has demonstrated it has the organizational, financial, managerial, and technical capability and is willing and able to comply with the terms and conditions of the certification agreement being transferred.

(5) The council shall issue a formal order either approving or denying the application for transfer of the site certification agreement. If the council denies the request, it shall state the reasons for its denial.

RESPONSE: Following the hearing, TCT anticipates that the Council will find that TCT complies with the requirements applicable to this transfer request. TCT agrees to abide by all of the terms and conditions of the SCA.

Appendix A

Information and Qualifications for Sean Bell, Navitas Development

SEAN C. BELL

PROFESSIONAL EXPERIENCE

Navitas Development – *Principal (2019-Present)*

Providing strategic renewable energy development services from project inception through commercial operations throughout the US

RES Americas Developments Inc – *Sr. Development Manager (2008-2019)*

Primary responsibilities included, but were not limited to, the development of commercial scale wind energy projects; prospecting, resource evaluation, land acquisition, permitting, interconnection application filing, interconnection study management, competition analysis, budget management, forecasting, consultant management, power purchase negotiations and financial modeling. In addition to Lead Development responsibilities in Oregon, Washington and Montana, I have provided lead development support for other RES regions in a variety of roles including managing ROW acquisition, permit and jurisdictional compliance, property owner interface, local, state and federal agency interface and RES Construction representation. At the corporate level, I developed asset divestiture strategies, prepared successful responses to energy generation RFPs, and performed due diligence on potential asset acquisitions.

Development Experience Highlights:

- **Skookumchuck Wind Energy Project** – 138.6 MW - Lewis County & Thurston Counties, Washington
Lead Developer – Managed all development phases; Real Property, Wind Resource, Interconnection, Land Use / Permitting and Off-take. Project entered into a 20-year PPA with Puget Sound Energy as a resource for the PSE's Green Direct Program. The Project closed and was sold to Southern Power Company October 2019.
- **Lower Snake River Wind Energy Project** – 1432 MW - Garfield and Columbia County, Washington *Developer / Permitting Co-Lead* – DEIS/EIS drafting, jurisdictional interface, participation in asset sale negotiation, PSE/RES joint venture team reporting and budgeting. Project COD January 2012.
- **Rock Creek Wind Energy Project** – 200 MW - Gilliam County, Oregon
Lead Developer – Managing all development phases; Real Property, Wind Resource, Land Use / Permitting, Environmental, Interconnection, off-take. Responsible for local, state and federal agency and governmental interface (Gilliam County, ODOE, ODFW, USFWS, DOD, WINAS), utility interface (BPA & PGE) and community outreach. Led asset sale discussions between Portland General Electric and RES.
- **Bear Creek Wind Energy Project** – 400 MW - Umatilla County, Oregon

Lead Developer - Managed all development phases; Real Property, Wind Resource, Land Use / Permitting, Environmental, Interconnection, Off-take. Responsible for local, state and federal agency interface and governmental interface (Umatilla County, ODFW, ODOE, ODFW, USFWS, DOD, WINAS), utility interface (BPA, PGE, IPC) and community outreach.

- **Origin Wind Energy Project** – 122 MW - Carter and Murray Counties, Oklahoma
Developer / Real Property Manager - Managed procurement of 17 miles of transmission ROW and Title Curative Matters through sale and closing of project to ENEL, November 2013.
- **Montana Alberta Tie Line (MATL)** – 214 mile, 230kV, 300MW capacity transmission line - Central Montana
Developer / RES Construction Liaison - Development, Permitting and Real Property - Coordinated ROW access, responsible for field interaction with the investor, represented RES-C to the local community, assisted land acquisition team in resolution of development issues including permit compliance. Project completed November 2013.
- **Pheasant Run Wind Energy Project** – 220 MW - Huron County, Michigan
Developer / Real Property Manager – Managed resolution of Title Curative Matters thru sale to Next Era (Florida Power and Light), March 2013.
- **Keechi Creek Wind Energy Project** -144 MW - Jack County, Texas
Developer / Real Property Manager – Managed procurement of 6 miles of transmission ROW, Title Curative Matters, and acquisition of Crossing Agreements through sale and closing to Enbridge, December 2013.
- **Pleasant Valley Wind Energy Project** – 140 MW - Dodge and Mower Counties, Minnesota
Developer / Real Property Manager –Managed resolution of Title Curative Matters, Utility and Jurisdictional Crossing Agreements thru sale and close to Xcel Energy, July 2014
- **Tucannon River Wind Farm (Lower Snake River II)** – 266 MW - Columbia County, Washington
Lead Developer through bid process and subsequent sale to Portland General Electric. Land Use and Permitting lead. Construction Liaison for Development and Permitting activities. Project COD June 2015.

Additionally, I have been active in Renewable Northwest membership and closely engaged with the larger renewable energy community on such policy issues as BPA rate case, PGE IRP, DOD Radar and Airspace, BPA Environmental Re-Dispatch (VERBS), Oregon Health Authority Wind Energy Health Impact Assessment, CPP 111(d).

Appendix B

Information and Qualifications for Steelhead Americas

Steelhead Americas (Steelhead) is the North America development arm of Vestas, the world's largest wind turbine manufacturer and leading service provider. Steelhead leverages Vestas' industry expertise and turbine technology to advance in existing markets and unlock new geographic markets to expand renewable energy across North America.

Formed in 2016, Steelhead develops new wind and solar assets and brings the benefits of renewable energy to local communities and industry partners. The Steelhead team consists of over 40 subject matter experts skilled at bringing projects from origination to construction and specialize in all stages of the development process.

Steelhead North American Footprint

- 1.4 GW of wind delivered to date
- 4 GW of projects in the pipeline spanning over 15 projects and 5 independent service operators (ISO's) territories.
-

Steelhead Projects sold and/or operational

- Maverick Creek, TX: 415 MW
- Wild Horse Mountain, OK: 100 MW
- Glass Sands, OK: 118 MW
- Rio Bravo, TX: 238 MW
- 25 Mile Creek, OK: 250 MW
- Boyer Solar, MS: 99 MW
- Delta Wind, MS: 185MW

Additional information can be found at: www.steelheadrenewables.com

Appendix C – Studies to be Completed & Updated SEPA Process

Action	Likely Timing
<p>Contact wildlife consultants; develop scopes of work; identify seasonally imperative work and schedule same:</p> <ul style="list-style-type: none"> • Avian baseline updates (including passerines and bats) • Bald and Golden Eagle and other raptor nest surveys • Northern Spotted Owl survey update for confirmation • Sensitive plants. 	<p>Within 30 days of Transfer Approval and 12 to 18 months after date of Transfer Approval. Refreshing previously completed studies will be guided by respective agency interaction with the Transferee. Depending upon the timing of Transfer Approval and agency consultation, studies may begin immediately, as in the case of avian use and cultural resource studies or may not commence until specific times of the year, as in the case of raptor nest and spotted owl surveys. Nesting, habitat and certain ESA studies will commence in the springtime and run thru mid to late summer. Initial study results and follow-up agency consultation will determine the timing of final studies.</p>
<p>Visual simulation updates; develop scope of work for modified WTGs and locations.</p>	<p>18 months after Transfer Approval. Visual simulations are based upon final turbine selection. Turbine selection is determined upon preliminary site layout, completion of interconnection studies, preliminary civil design, transportation studies and other relevant reports. It is anticipated that the Transferee will commence relevant work within 30 days of Transfer Approval.</p>
<p>Updated noise analysis.</p>	<p>18 months after Transfer Approval. Noise analysis is based upon final turbine selection. Turbine selection is determined upon preliminary site layout, completion of interconnection studies, preliminary civil design, transportation studies and other relevant reports. It is anticipated that the Transferee will commence relevant work within 30 days of Transfer Approval.</p>
<p>Develop schedule to complete all study work needed for Site Certificate Amendment Application and SEPA action.</p>	<p>Within 30 days of Transfer Approval</p>
<p>Agency meetings:</p>	<p>Ongoing for 24 months after date of Transfer Approval. It is anticipated that the Transferee will</p>

<ul style="list-style-type: none"> • WDFW -- Confirm wildlife update work • EFSEC staff -- Discuss timing, cost, needs, process; outline amendment process, including SEPA process. Discuss and confirm mitigation parcel or alternative mitigation approaches. • USFWS -- BGEPA; Northern Spotted Owl • DNR – Consultation as needed. • Consult with Tribal governments and representatives. 	<p>commence agency consultation within 30 days of Transfer Approval.</p>
<p>BPA contacts and confirmations.</p>	<p>Within 30 days of date of Transfer Approval.</p>
<p>Complete all studies.</p>	<p>18 – 24 months from of date of Transfer Approval</p>
<p>Draft ASC Amendment; filing timing discussion with EFSEC, including evaluation of expected hearing proceedings.</p>	<p>24 - 36 months from date of Transfer Approval</p>
<p>File amendment (public process begins).</p>	<p>24 - 36 months from date of Transfer Approval</p>
<p>Assess mitigation requirements and obtain agency (WDFW) concurrence.</p>	<p>24 - 36 months from date of Transfer</p>

Desert Claim Wind Power Project

June 2023 project update

[Place holder]

Horse Heaven Wind Project

June 2023 project update

[Place holder]

June 12, 2023

Sonia Bumpus
EFSEC Manager
PO Box 43172
Olympia WA, 98504-3172

Subject: Horse Heaven Wind Farm, LLC Updated Third Extension Request (Agency Docket #EF-210011)

Dear Ms. Bumpus,

This letter requests the Energy Facility Site Evaluation Council's agreement that the processing time of the Horse Heaven Wind Farm, LLC Application be extended with an expectation of completing the adjudication followed by the remaining process to complete EFSEC's recommendation to the Governor by January 31, 2024.

The Horse Heaven Wind Farm, LLC Application for Site Certification was filed with EFSEC on February 8, 2021. RCW 80.50.100 requires that: *"The council shall report to the governor its recommendations as to the approval or rejection of an application for certification within twelve months of receipt by the council of such an application, or such later time as is mutually agreed by the council and the applicant."*

We value the level of effort and analysis involved in the progress to date, including preparation of the draft Environmental Impact Statement (EIS), released on December 16, 2022, subsequent comment period held December 19, 2022 through February 1, 2023, followed by a public comment meeting held February 1, 2023.

The Order Commencing Agency Adjudication was published by EFSEC on December 15, 2022. Adjudication pre-hearing conference orders were published on March 20th and May 2nd, 2023 which established the venue and schedule for the conduct of the adjudication hearings.

We encourage EFSEC to make a recommendation to the Governor in a timely manner as continued delays make it challenging for the Applicant to keep pace with regional utility clean energy supply procurement in the Pacific Northwest being driven by Washington and neighboring states' aggressive goals for significant reduction in greenhouse gas production.



Scout Clean Energy LLC
5775 Flatiron Parkway, Suite 120
Boulder, CO 80301
(303) 284-7566

Sincerely,

Michael Rucker

Michael Rucker

President and CEO

Scout Clean Energy

Signature: *Michael Rucker*

Email: michael@scoutcleanenergy.com

Badger Mountain Solar Energy Project

June 2023 project update

[Place holder]

Wautoma Solar

June 2023 project update

[Place holder]

Hop Hill Solar Project

June 2023 project update

[Place holder]

Carriger Solar

June 2023 project update

[Place holder]