



Portland General Electric Company
121 SW Salmon Street, Portland, Oregon 97204
PortlandGeneral.com

November 7, 2008

PW2-001-2008

Via Email and Courier

Mr. Tom Stoops
Siting Director
Oregon Department of Energy
625 Marion Street, NE
Salem, OR 97301-3737

Re: Request for Amendment No. 6 to the Site Certificate for the Port Westward
Generating Project

Dear Mr. Stoops,
Enclosed please find an original and 10 copies of Portland General Electric Company's Request for Amendment No. 6 to the Site Certificate for the Port Westward Generating Project. As we have discussed, the purpose of this Amendment Request is to extend the deadline to complete construction of the project from May 8, 2009 to May 8, 2011.

Please let me know if you have any questions with respect to this submittal.

Sincerely,

A handwritten signature in blue ink that reads 'Rick Tetzloff'.

Rick Tetzloff

Enclosure

cc: Richard Allan

CERTIFICATE HOLDER'S REQUEST FOR SIXTH AMENDMENT TO THE SITE CERTIFICATE FOR THE PORT WESTWARD GENERATING PROJECT

Pursuant to OAR 345-027-0050, Portland General Electric Company ("PGE"), the holder of the Fifth Amended Site Certificate for the Port Westward Generating Project dated September 26, 2006 (the "Site Certificate"), requests to amend the Site Certificate to extend by 24 months the deadline for completing construction of the facility. Pursuant to Section F.1(6) of the Site Certificate, the Certificate Holder is required to complete construction of the facility by May 8, 2009. PGE requests the extension of that deadline to May 8, 2011. This Amendment Request is timely under OAR 345-027-0030(1) because it is being submitted more than six months before the applicable deadline.

OAR 345-027-0030(1) requires that a request for an amendment to extend the construction completion deadline must conform to the requirements of OAR 345-027-0060, which sets forth the required contents of a request to amend a site certificate. The discussion below provides the information required by OAR 345-027-0060.

SECTION 1 INFORMATION REQUIRED PURSUANT TO OAR 345-027-0060(1)

1.1 Certificate Holder Information

Name and mailing address of the Certificate Holder:

Portland General Electric Company
121 S.W. Salmon Street
Portland, OR 97204

Name, mailing address and telephone number of individual responsible for submitting the request:

Rick Tetzloff
Portland General Electric Company
121 S.W. Salmon Street
3WTC-BR03
Portland, OR 97204
503-464-8508

1.2 Description of the Facility

The facility, referred to as the Port Westward Generating Project, is described in Exhibits B and C of the Application for Site Certificate (ASC) and Section C of the Site Certificate. The Site Certificate authorizes the Certificate Holder to construct the facility in two phases. PGE began construction of Phase 1 of the facility prior to the deadline of November 8, 2006, set forth in Condition F.1(5) of the Site Certificate. Phase 1/Unit 1 is complete and is in commercial operation.

Unit 2 of the PWGP was originally intended to be a baseload natural gas-fired combustion turbine combined cycle unit. Over the last several years, however, the Northwest has experienced tremendous growth in renewable energy supplies, mostly in the form of wind energy, such as PGE's Biglow Canyon Wind Farm. When wind energy is added to a utility system, its natural variability and uncertainty is combined with the natural variability and uncertainty of loads. As a result, there is an increase in the need for system flexibility required to maintain utility system balance and reliability.

Port Westward Generating Plant Unit 2 (PWGP2) will be a state-of-the-art, highly efficient and environmentally responsible power plant consisting of multiple dual fuel reciprocating engine-generator sets or aeroderivative combustion turbine generators and associated equipment with a combined nominal generating capacity of up to 200 megawatts (MW). Unit 2 will operate primarily on natural gas and will be capable of running on ultra-low sulfur distillate fuel oil so it can ensure reliability during instances of natural gas curtailment in the region.

Development of Unit 2 will require a number of changes to the Site Certificate. In order to preserve PGE's ability to develop Unit 2 and to allow time to submit a request to amend the Site Certificate to authorize construction of Unit 2 as described above, PGE is requesting to extend the deadline for completing construction of the facility.

1.3 Description and Analysis of the Proposed Change

OAR 345-027-0060(1)(c) requires that an amendment request include "a detailed description of the proposed change and the certificate holder's analysis of the proposed change under the criteria of OAR 345-027-0050(1)." The Certificate Holder is proposing only to extend by 24 months the deadline to complete construction of the Port Westward Generating Project.

Under OAR 345-027-0050, a site certificate amendment request is required if a site certificate holder proposes "to design, construct, or operate a facility in a manner different from the description in the site certificate" and the proposed change meets one of three criteria, discussed below. PGE's proposed change triggers a site certificate amendment pursuant to the third and fourth criteria.

1.3.1 *"Could result in a significant adverse impact that the Council has not addressed in an earlier order and the impact affects a resource protected by Council standards."*

Response: A change in the deadline for completing construction does not affect any resource protected by Council standards. As discussed below, approval of the amendment to extend the construction completion date would require an amendment to the Site Certificate conditions in Section D.15 of the Site Certificate regarding compliance with the Council's carbon dioxide standard.

1.3.2 *"Could impair the certificate holder's ability to comply with a site certificate condition; or"*

Response: A 24-month extension of the deadline for completing construction of the Port Westward Generating Project would not impair the Certificate Holder's ability to comply with any site certificate condition.

1.3.3 *“Could require a new condition or change to a condition in the site certificate.”*

Response: The Certificate Holder is requesting a change to Condition F.1(6) of the Site Certificate to extend the deadline for completing construction from May 8, 2009 to May 8, 2011.

Pursuant to OAR 345-027-0030(5), the Council cannot grant an amendment to extend the deadline for completing construction unless the certificate holder demonstrates compliance with the carbon dioxide standard in effect at the time of the Council's order on the amendment. Compliance with the carbon dioxide standard is addressed below in Section 1.6.5.

1.4 Proposed Changes to Site Certificate

OAR 345-027-0060(d) requires that a request to amend a site certificate must include “the specific language of the site certificate, including affected conditions, that the certificate holder proposes to change, add or delete by an amendment.” Attachment 1 to this amendment request is a “redline” version of the Site Certificate, showing the proposed changes. The substantive changes to the Site Certificate are found on pages 31, 35, 36, 37 and 42 of the redline.

1.5 Relevant standards

OAR 345-027-0060(1)(e) requires that this Amendment Request include “a list of the Council standards relevant to the proposed change.” As discussed above, the Certificate Holder is requesting only to extend by 24 months the deadline for completing construction of the Port Westward Generating Project. Relevant standards are identified and addressed in Section 1.6. Pursuant to OAR 345-027-0030(5), the Council's current carbon dioxide standards, set forth at OAR 345-024-0500 through 345-024-0720 must be applied to the Port Westward Generating Project at the time an amendment to extend the construction deadlines is granted by the Council. Compliance with the current carbon dioxide standard is addressed in Section 1.6.5.

1.6 Analysis of compliance with ORS 469, Council rules and applicable state and local laws, rules and ordinances

OAR 345-027-0060 requires that this request include:

“an analysis of whether the facility, with the proposed change, would comply with the requirements of ORS Chapter 469, applicable Council rules, and applicable state and local laws, rules and ordinances if the Council amends the site certificate as requested. For the purpose of this rule, a law, rule or ordinance is

‘applicable’ if the Council would apply or consider the law, rule or ordinance under OAR 345-027-0070(9).”

1.6.1 *Applicable substantive criteria.*

OAR 345-027-0070(10) provides:

“In making a decision to grant or deny issuance of an amended site certificate, the Council shall apply the applicable substantive criteria, as described in OAR 345-022-0030, in effect on the date the certificate holder submitted the request for amendment and all other state statutes, administrative rules, and local government ordinances in effect on the date the Council makes its decision.”

OAR 345-022-0030 sets forth the Council’s land use standard. The Certificate Holder is not proposing to alter the nature, location, or impacts of the energy facility or any of its related or supporting facilities as part of the requested Site Certificate amendment. Similarly, the amendment does not implicate other state statutes, administrative rules and local government ordinances.

1.6.2 *Considerations for extending construction deadlines.*

OAR 345-027-0070(10)(b) identifies three factors the Council must consider when considering an amendment that extends the deadlines for beginning or completing construction. Each factor is considered below.

“(A) Whether the Council has previously granted an extension of the deadline.”

Response: The Council has granted one extension of the deadline for completing construction. The Council’s Final Order of September 24, 2004 approved Amendment No. Two to the Site Certificate. Amendment No. Two extended the deadline for beginning construction from November 8, 2004 to November 8, 2006. It also extended the deadline for completing construction from May 8, 2007 to May 8, 2009.

Subsequent to the Council’s approval of the new deadlines, the Certificate Holder timely began and completed construction of Phase 1 of the PWGP. Unit 1 is currently in commercial operation. As discussed in the Site Certificate, the Phase 1 construction included portions of the facility that also would serve Phase 2. As described in Section 1.2 of this Amendment Request, the Certificate Holder intends to seek a further amendment of the Site Certificate to alter the nature of the Phase 2 generating units. The extension of the deadline for completing construction will allow time for such an amendment, and will preserve the Certificate Holder’s ability to more fully utilize the energy facility site and the facility components constructed in Phase 1.

“(B) Whether there has been any change of circumstances that affects a previous Council finding that was required for issuance of a site certificate or amended site certificate.”

Response: The Certificate Holder is not aware of any change of circumstances that affects a previous Council finding required for issuance of the Site Certificate or any of the subsequent amendments to the Site Certificate.

“(C) Whether the facility complies with all Council standards . . .”

Response: The Council approved the Site Certificate for the Port Westward Generating Project on November 8, 2002. The Council subsequently has approved five amendments to the Site Certificate, including Amendment No. 2 which extended the deadlines to begin and complete construction. The Council’s Final Order approving Amendment No. 2, dated September 24, 2004, includes an analysis of the project’s compliance with applicable Council standards as of that date. As discussed below in Section 1.6.5, the facility will continue to comply with current Council standards, with the proposed revisions to the requirements for carbon dioxide offsets in Condition D.15 of the Site Certificate.

1.6.3 Division 22 Standards

(a) OAR 345-022-0010 Organizational Expertise

The proposed extension of the deadline to complete construction does not affect any of the Council’s prior findings with respect to PGE’s qualifications or capabilities, or its ability to rely on third-party permits.

(b) OAR 345-022-0020, Structural Standard

OAR 345-022-0020 requires the Council to find that the applicant, through appropriate site-specific study, has adequately characterized the seismic, geologic and soils hazards of the site and its vicinity and that the applicant can design, engineer and construct the facility to avoid dangers to human safety presented by such hazards.

The proposed extension of the deadline to complete construction does not affect any of the Council’s prior findings with respect to compliance with the structural standard.

(c) OAR 345-022-0022, Soil Protection

OAR 345-022-0022 requires the Council to find that the design, construction, and operation of the facility, taking mitigation measures into account, is not likely to result in a significant adverse impact to soils including, but not limited to, erosion and chemical factors such as salt deposition from cooling towers, land application of liquid effluent, and chemical spills.

The proposed extension of the deadline to complete construction does not affect any of the Council’s prior findings with respect to compliance with the soil protection standard.

(d) OAR 345-022-0030, Land Use

The Council’s Final Order dated September 24, 2004, approving PGE’s Request for Amendment No. 2, addressed changes in applicable land use standards since the issuance of

the Site Certificate. To the Certificate Holder's knowledge, the applicable substantive land use criteria and other state statutes, administrative rules and local government ordinances have not changed materially from the standards applied by the Council in prior Final Orders. As discussed below, both Columbia County and the City of Rainier have amended some of their land use provisions; however, the amendments do not affect any of the Council's findings with respect to the Port Westward Generating Project.

Columbia County

The Columbia County Zoning Ordinance §1100 Flood Hazard Overlay was amended in July 2008 with an effective date of July 9, 2008. The amendments include the following:

§1102.3 – Definition of "Development" revised to include storage of equipment or materials;

§1105.1 – Exceptions to the permit requirement for storage of equipment and materials in any area of special flood hazard;

§1109.1 – Requires the lowest floor, including the basement of residential construction in areas of special flood hazard be elevated to one foot above the base flood elevation;

§1109.2 – Requires the lowest floor, including the basement of commercial construction in areas of special flood hazard be elevated to one foot above the base flood elevation; and

§1109.3 – Amends specific standards for manufactured homes in any area of special flood hazard

Although these amendments apply to development in flood hazard areas, they do not apply to the facility as the definition of "Area of Special Flood Overlay" was not changed and the Council has already determined that the facility is not subject to the Flood Hazard Overlay Zone. (Final Order, dated November 8, 2002, Attachment D, page 27.)

There have been no other amendments to the Columbia County Zoning Ordinance since December of 2003.

The Columbia County Comprehensive Plan was amended in May 2004 to account for an expansion of Columbia City's UGB and again in January of 2006 to allow for an exception to Goal 4 for Megan Erickson. These amendments do not apply to the energy facility.

City of Rainier

The City of Rainier Zoning Code was amended in June of 2005 to do the following:

- Add a Waterfront Mixed Use Overlay Zone;

- Change requirements for accessory dwelling units and off-street parking;
- Add a definition for “Flag Lot”; and
- Amend procedures for application extensions, public notice areas, land use fees and final plat notice and review.

The zoning code was amended again in April of 2007 to change zoning designations for the Light Industrial Zone and the Heavy Industrial Zone and to increase the time allowed for discontinuance of a nonconforming use from six months to eighteen months. These amendments do not apply to the Port Westward Generating Project.

Finally, the City of Rainier Comprehensive Plan was last amended on January 21, 2003.

(e) OAR 345-022-0040, Protected Areas

OAR 345-022-0040 requires the Council to find that, taking into account mitigation, the design, construction, and operation of the facility are not likely to result in significant adverse impact to areas protected by state or federal statute.

The applicant provided information on compliance with the standard for Protected Areas in Exhibit L of the ASC. In Section D.7 of the Final Order November 8, 2002, the Council found that the energy facility would meet the protected areas standard, and no conditions of approval were attached to the Site Certificate for this standard (*see* Site Certificate, Section D.7). In its Final Order of September 24, 2004, approving Amendment No. Two, the Council determined that its prior findings were still valid, though OAR 345-022-0040 as in effect at that time extended to protected areas designated as of August 28, 2003.

OAR 345-022-0040 currently extends “protected area” status to the areas designated under federal or state statutes or regulations in effect as of May 11, 2007. The Certificate Holder is not aware of any additional protected areas in the vicinity of the Port Westward Generating Project. The extension of the deadline to complete construction does not affect the Council’s findings in prior Final Order that the project, without conditions, complies with the Council’s protected areas standard.

(f) OAR 345-022-0050, Retirement and Financial Assurance

OAR 345-022-0050 requires the Council to find that the applicant has a reasonable likelihood of obtaining a bond or comparable security, satisfactory to the Council, in an amount adequate to restore the site to a useful, nonhazardous condition if the certificate holder either begins but does not complete construction of the facility or permanently closes the facility before establishing the financial mechanism or instrument described in OAR 345-027-0020(9).

The proposed extension of the deadline to complete construction does not require an amendment to conditions regarding Retirement and Financial Assurance and does not affect the Council’s prior findings that the Certificate Holder can comply with the retirement and financial assurance standard.

(g) OAR 345-022-0060, Fish and Wildlife Habitat

OAR 345-022-0060 requires the Council to find that the design, construction and operation of the facility, taking into account mitigation, are consistent with the fish and wildlife habitat mitigation goals and standards of OAR 635-415-0025 in effect as of September 1, 2000.

The proposed extension of the deadline to complete construction does not affect the Council's prior findings that the facility, with conditions in the Site Certificate, complies with ODFW's habitat mitigation goals and standards.

(h) OAR 345-022-0070, Threatened and Endangered Species

OAR 345-022-0070 requires the Council, after consultation with appropriate state agencies, to find that the design, construction and operation of the energy facility are consistent with any protection and conservation programs adopted by the Oregon Department of Agriculture for plant species listed as threatened or endangered under ORS 564.105(2), or if the Department of Agriculture has not adopted a protection and conservation program, that the facility is not likely to cause a significant reduction in the likelihood of survival or recovery of the species. With respect to wildlife species, the Council must find that the design, construction and operation of the facility, taking into account mitigation, are not likely to cause a significant reduction in the likelihood of survival or recovery of species listed as threatened or endangered by Oregon Fish and Wildlife Commission under ORS 496.172(2).

The proposed extension of the deadline to complete construction does not affect the Council's prior findings that the facility, with conditions in the Site Certificate, complies with the threatened and endangered species standard.

(i) OAR 345-022-0080, Scenic and Aesthetic Values

OAR 345-022-0080 requires the Council to find that the design, construction and operation of the facility, taking into account mitigation, are not likely to result in significant adverse impact to scenic and aesthetic values identified as significant or important in applicable federal land management plans or in local land use plans in the analysis area. The impact of the energy facility on scenic and aesthetic values was addressed in Exhibit R of the ASC. In Section D.10 of the Final Order of November 8, 2002, the Council concluded that, with the imposition of the seven conditions set forth in Section D.10 of the Site Certificate, the energy facility would meet the Scenic and Aesthetic Values Standard.

Federal land management plans: There are no applicable federal land management plans pertaining to the areas of the proposed facility modifications.

Local land use plans: As discussed in the Final Order of November 8, 2002, the Columbia County Comprehensive Plan identifies one scenic resource within the analysis area that could be affected by the proposed energy facility, i.e., U.S. Highway 30 between Deer Island and Rainier, Oregon. No new scenic resources have been added to the Columbia County Comprehensive Plan, and the extension of the deadline for completing construction does not affect the Council's prior findings with respect to impacts on scenic resources identified in local land use plans.

Key observation points: The ASC used key observation points (“KOPs”) as an approach to analyzing visual impacts of the energy facility and its related or supporting facilities. The extension of the deadline for completing construction would not affect the Council’s prior findings that the facility would not have a significant adverse impact on KOPs or other scenic resources.

(j) OAR 345-022-0090, Historic, Cultural, and Archaeological Resources

OAR 345-022-0090 requires the Council to find that the construction, operation and retirement of the facility, taking into account mitigation, are not likely to result in significant adverse impacts to historic, cultural or archaeological resources that have been listed on, or would likely be listed on the National Register of Historic Places, and/or archaeological objects, as defined in ORS 358.905(1)(a), or archaeological sites, as defined in ORS 358.905(1)(c).

The extension of the deadline to complete construction does not affect the Council’s prior findings that the project, subject to the conditions in Section D.11 of the Site Certificate, is consistent with the Historic, Cultural, and Archaeological Resources standard.

(k) OAR 345-022-0100, Recreation

OAR 345-022-0100 requires the Council to find that the design, construction and operation of a facility, taking into account mitigation, are not likely to result in a significant adverse impact to important recreational opportunities in the analysis area.

Recreational facilities and opportunities were described in Exhibit T of the ASC. The extension of the deadline for completing construction does not affect the Council’s prior findings of compliance with the recreation standard.

(l) OAR 345-022-0110, Public Services

OAR 345-022-0110 requires the Council to find that the construction and operation of the facility, taking into account mitigation, are not likely to result in significant adverse impact to the ability of public and private providers within the analysis area to provide sewers and sewage treatment, water, storm water drainage, solid waste management, housing, traffic safety, police and fire protection, health care and schools.

In Section D.13 of the Final Order of November 8, 2002, the Council found that, with the imposition of the ten conditions of approval set forth in Section D.13 of the Site Certificate, the facility would not adversely affect the listed public services. The extension of the deadline to complete construction does not affect the Council’s findings that these conditions are adequate to ensure that the construction and operation of the facility will be consistent with the Public Services Standard.

(m) OAR 345-022-0120, Waste Minimization

OAR 345-022-0120 requires the Council to find that, to the extent reasonably practicable, the applicant's solid waste and wastewater plans are likely to minimize generation of

solid waste and wastewater in the construction, operation, and retirement of the facility, and when solid waste or wastewater is generated, to result in recycling and re-use of such wastes; and the applicant's plans to manage the accumulation, storage, disposal and transportation of waste generated by the construction and operation of the facility are likely to result in minimal adverse impacts on surrounding and adjacent areas.

The waste minimization standard was addressed in Exhibit V of the ASC and in Section D.14 of the Final Order of November 8, 2002. The Council imposed five conditions in Section D.14 of the Site Certificate to ensure compliance with the waste minimization standard. The extension of the deadline to complete construction does not affect the Council's findings that these conditions are adequate to ensure that the construction and operation of the facility will be consistent with the Waste Minimization Standard.

1.6.4 Division 23 Standards

The Division 23 standards apply only to non-generating facilities and are inapplicable to the Port Westward Generating Project.

1.6.5 Division 24 Standards

Pursuant to OAR 345-027-0030(5), the Council cannot grant an amendment to extend the deadline for completing construction unless the certificate holder demonstrates compliance with the carbon dioxide standard in effect at the time of the Council's order on the amendment. Condition D.15(1) of the Fifth Amended Site Certificate incorporates an offset fund rate for the monetary path payment of \$0.85 per ton of carbon dioxide emissions (in 2002 dollars). Pursuant to OAR 345-024-0580, the current applicable offset fund rate for the monetary path payment is \$1.27 per ton of carbon dioxide emissions. That rate would apply to any excess carbon dioxide emissions from Phase 2. Therefore, Condition D.15 must be amended to reflect the offset fund rate of \$1.27 per ton for Phase 2.

Condition D.15(3)(a) of the First Amended Site Certificate incorporates a net carbon dioxide emissions rate for the base load gas plant of 0.675 pounds of carbon dioxide per kilowatt hour of net electric power output, which matches the current applicable standard under OAR 345-024-0550. Condition D.15(3)(b) of the First Amended Site Certificate incorporates a net carbon dioxide emissions rate for incremental emissions for the facility operating with power augmentation technologies of not more than 0.675 pounds of carbon dioxide per kilowatt hour of net electric power output, with carbon dioxide emissions and net electric power output measured on a new and clean basis. Again, that matches the current standard under OAR 345-024-0590. No amendment is necessary to the applicable standards for carbon dioxide emission rate.

The Certificate Holder anticipates more extensive amendment to Condition D.15 when it seeks an amendment to authorize the construction of Phase 2 with multiple dual fuel reciprocating engine-generator sets or aeroderivative combustion turbine generators, as described in Section 1.2 of this Amendment Request. At this time, however, the Certificate Holder requests that the language regarding base load and power augmentation be retained, and that Condition D.15 be amended to reflect the different applicable offset payment rates for Phase 1 and Phase 2.

1.6.6 Other State Statutes, Administrative Rules and Local Government Ordinances

Pursuant to ORS 469.503(1)(b), the Council must determine that the proposed facility complies with all other Oregon statutes and administrative rules identified in the Project Order, as amended, as applicable to the issuance of a site certificate. The statutes and administrative rules addressed under this standard in the Site Certificate are DEQ's noise control regulations and WPCF permit requirements, the Department of State Lands' ("DSL") Removal/Fill Permit regulations for disturbance to wetlands, and the Council's statutory authority to consider protection of the public health and safety.

(a) Water Pollution Control Facilities Permit

The proposed extension of the deadline to complete construction will have no impact on issuance of or compliance with the required WPCF permit.

(b) Public Health and Safety

In Section E.1.c of the Final Order of November 8, 2002, the Council found that the energy facility, if designed per the proposed conditions, will protect public health and safety. The extension of the deadline to complete construction does not affect the Council's prior findings that these nine conditions are adequate to ensure that the construction and operation of the facility will be consistent with the Public Health and Safety Standard.

(c) DEQ Noise Regulations

DEQ noise regulations for industrial and commercial noise sources apply to the energy facility. In Section E.1.a of the Final Order of November 8, 2002, the Council found that the energy facility, with five condition, would meet the DEQ noise standards applicable to the facility, OAR 340-035-0035(1)(b)(B)(i). The applicable DEQ standards are unchanged. The extension of the deadline to complete construction does not affect the Council's findings that these conditions are adequate to ensure that the operation of the facility will comply with the applicable DEQ noise standard.

(d) DSL Removal/Fill Permit

Pursuant to OAR 345-021-0010(1)(j), PGE submitted information regarding the energy facility's "significant potential impacts" on wetlands within state jurisdiction under ORS Chapter 196. PGE's original wetlands analysis is set forth in Exhibit J of the ASC. In Section E.1.b of the Final Order of November 8, 2002, the Council found that the energy facility would comply with applicable state wetlands statutes and rules in effect at that time, subject to issuance of a Removal/Fill Permit substantially in the form of Attachment C to the Final Order prior to commencement of construction of the facility. In conjunction with PGE's Request for Amendment No. 2, PGE submitted a revised analysis of compliance with the standards for issuance of a removal-fill permit, demonstrating compliance with standards adopted by the Department of State Lands after the initial approval of the Site Certificate on November 8, 2002. PGE also submitted a revised Appendix J-2, which conformed to DSL's new rules regarding wetland assessment.

The extension of the deadline to complete construction does not affect the Council's prior findings regarding impacts on state jurisdictional wetlands.

1.7 Updated list of property owners

OAR 345-027-0060(1)(g) requires, for an amendment to change the site boundary or to extend the deadlines for beginning or completing construction of the facility, "an updated list of the owners of property located within or adjacent to the site of the facility, as described in OAR 345-021-0010(1)(f)." Because PGE proposes to extend the deadline to complete construction, an updated property owner list is required. The list is provided in attached Exhibit F.

SECTION 2 INFORMATION CONSISTENT WITH SITE CERTIFICATE APPLICATION REQUIREMENTS

OAR 345-027-0060(2) requires:

"In a request to amend a site certificate, the certificate holder shall provide the information described in applicable subsections of OAR 345-021-0010(1) in effect as of the date of the request. The certificate holder may incorporate by reference relevant information that was previously submitted to the Office of Energy in the site certificate application or that is otherwise included in the Office of Energy's administrative record on the facility."

All exhibits of the ASC and prior amendment requests referenced above are incorporated herein by reference.

Attachments

Attachment 1: Redline – Proposed Sixth Amended Site Certificate

Exhibit F: Updated List of Property Owners