Exhibit H Non-Generating Facility

OAR 345-020-0011(1)(h)

If the proposed facility is a non-generating energy facility for which the applicant must demonstrate need under OAR 345-023-005, identification of the rule in Division 23 of this chapter under which the applicant intends to demonstrate need and a summary statement of the need and justification for the proposed facility;

PGE has included the Project in its Integrated Resource Plan (IRP), which outlines several investments PGE has proposed to meet our customers' growing energy needs, ensure continued reliability, and meet the requirements of the State of Oregon's Renewable Energy Standard. Cascade Crossing is essential to PGE meeting all of those requirements.

The IRP has been submitted to the OPUC for its acknowledgement. OPUC Order No. 89-507 requires the adoption of least-cost planning for all energy utilities in Oregon. PGE filed its final IRP on November 5, 2009, to meet the requirements of the OPUC order. The OPUC will seek public input in the coming months, prior to a Commission decision, which is anticipated in summer of 2010.

PGE intends to demonstrate need for the proposed non-generating facility principally under the Least-Cost Plan Rule, OAR 345-023-0020, and also in part under the System Reliability Rule for Electric Transmission Lines, OAR 345-023-0030.

Least-Cost Plan Rule

"The Council shall find that the applicant has demonstrated need for the facility if the capacity of the proposed facility or a facility substantially similar to the proposed facility, as defined by OAR 345-001-0010, is identified for acquisition in the short-term plan of action of an energy resource plan or combination of plans adopted, approved or acknowledged by …a governmental body that makes or implements energy policy (OAR 345-023-0020)". PGE's IRP, submitted in final form for the acknowledgement of the OPUC on November 5, 2009, meets the requirements of such a plan. In this most recent IRP filing, PGE has included Cascade Crossing in its Recommended Action Plans.

Chapter 13, Section 13.3, Transmission Actions, of PGE's 2009 IRP states:

"We propose moving forward with the Cascade Crossing Transmission Project in this Action Plan. When the Commission issued Order 04-375 acknowledging PGE's 2002 IRP, it recognized that the development of new transmission capacity was critical to making new resources, particularly renewable resources on the eastern side of the Cascade Mountains, available to customers. The Commission directed PGE to work with others to develop such transmission capacity." The Project PGE proposed in this Action Plan results from this effort. The Project proposed in this NOI is PGE's response to the OPUC directive.

Cascade Crossing Project. "We seek acknowledgment, subject to achieving certain milestones and participation described in Chapter 8, to construct a 500-kV transmission line connecting the southern portion of our service territory near Salem, Oregon, to our Boardman and Coyote Springs generating plants near Boardman, Oregon. Most of the high-voltage transmission line will be constructed adjacent to or within existing ROWs and will enable us to access significant existing and new generation resources east of the Cascade Mountains. We anticipate that the line will be in service by 2015. If we achieve the milestones and participation described in Chapter 8, we will design, site and construct the facility as a double-circuit 500-kV facility. Otherwise, we will construct it as a single-circuit 500-kV facility. We provide a detailed description of the Project, including a discussion of the need for the Project and a timeline, in Chapter 8."[11]

PGE is proposing to construct a new 200-mile, high-voltage transmission facility across the Oregon Cascades to address expected future constraints on the Cross-Cascades South transmission path and the need for PGE to access significant amounts of new generation resources, including renewable resources located in the renewable-resource-rich area of eastern Oregon.

The Cascade Crossing Project was conceived to meet a number of objectives, including:

- Integrate up to 700 MW of additional renewable wind generation to meet 2020 RPS.
- Integrate new benchmark energy resource additions planned for 2015.
- Integrate existing PGE generation resources (i.e., Boardman and Coyote Springs) that currently rely on third-party transmission.
- Meet all NERC/WECC reliability criteria when accessing new generation resources east of the Cascades.
- Increase the Cross-Cascades South path transmission capacity and connect this directly to PGE's service territory through a new delivery point.
- Utilize existing ROW and transmission corridors to the maximum extent possible.

PGE's IRP meets the remaining requirements of the Least-Cost Plan Rule, as shown in Table H-1.

[11] Portland General Electric. 2009. Integrated Resource Plan 2009. P. 326. November 5.

Table H-1. Least-Cost Plan Rule Requirements and PGE's IRP Compliance

Requirement (OAR 345-023-0020)	PGE IRP Section	Description
Includes a range of firm energy and capacity demands and committed firm energy and capacity resources.	3.1	Provides more detail on demand and projected loads.
	3.3	Discusses Load-Resource Balance and displays a projected shortfall in resources versus demand.
	2	Provides detailed discussion of resources.
Considers and evaluates a reasonable range of practicable demand and supply resource alternatives.	11	Describes the alternatives and modeling analysis used to develop the Action Plan.
Uses Financial Assumptions that are consistent and comparable between resources.	7 and 8.3	Describes financial assumptions used.
Considers alternatives that include:		
Implementation of cost-effective conservation, peak load management, and voluntary customer interruption	4.1 and 4.2	Demand forecasts discuss assumptions regarding conservation and peak load management.
Construction and operation of electric generating facilities	9.1, 9.2, 9.3 and 9.4	Discusses electric generating facilities.
Direct use of natural gas, solar or geothermal resources	7.1and 7.2	Discusses direct use of these resources.
Adding standard sized smaller or larger transmission line capacity	8.6	Discusses alternative transmission line capacity.

System Reliability Rule for Electric Transmission Lines

In addition to the Least-Cost Plan Rule compliance shown above, PGE may also evaluate need under the System Reliability Rule in its ASC.

Exhibit I Land Use Standard

OAR 345-020-0011(1)(i)

A statement indicating whether the applicant intends to satisfy the Council's land use standard, OAE 345-022-0030, by obtaining local land use approval under ORS 469.504(1)(a) or by seeking a Council determination under ORS 469.504 (1)(b.

PGE intends to satisfy the Council's land use standard by seeking a Council determination of compliance with the Council's land use standard under ORS 469.504(1) (b) for either the proposed or alternative certified corridors.

Exhibit J Environmental Impact Summary

OAR 345-020-0011(1)(j)

Identification of significant potential environmental impacts of construction and operation of the proposed facility on the study areas, including those impacts affecting air quality, surface and ground water quality and availability, wildlife and wildlife habitat, threatened and endangered plant and animal species, historic, cultural and archaeological resources, scenic and aesthetic areas, recreation and land use;

The following statements apply to both proposed and alternative corridors.

Air Quality

During Project construction, gasoline and diesel fuel engines will be used and could result in minor air quality impacts in the vicinity of the Project. Dust can be created from the activities involved in construction, such as vegetation removal, grading, and vehicles and equipment moving on unsurfaced roads. Impacts from vehicle operation and dust will be controlled by applying the appropriate control measures (*e.g.*, watering unpaved roads, covering piles, etc). The Project will not emit pollutants during operation and does not require a permit from the DEQ.

Surface and Groundwater Quality

Construction storm water will be managed as required by NPDES 1200-C permit issued by the DEQ. Transmission lines and associated substations will not discharge pollutants to surface water or groundwater during operation. A restroom will be required at the proposed Grassland, Cedar Spring, and Juniper Flat substations. Depending on location, a septic system may be installed to appropriately manage waste. If needed, the septic system design will be included in the request for a building permit from Morrow, Gilliam and Wasco Counties for the proposed new substations.

Surface and Groundwater Availability

During operation, the Project will not require any new use of surface or groundwater, except in the case of the restroom at the proposed new Grassland, Cedar Spring, and Juniper Flat substations. Limited quantities of water will be required during construction for road watering, dust abatement, and other construction purposes. Water will be obtained from a municipal supplier if available; if no municipal water is available, a Limited License will be obtained from the WRD for each basin where water will be used or discharged. Water will be disposed of according to the NPDES 1200-C permit issued by DEQ.

Wildlife and Wildlife Habitat

Potential effects to wildlife and wildlife habitat will be analyzed as part of the NEPA and EFSC processes. PGE will attempt to avoid and minimize impacts through routing, construction techniques, and the use of BMPs, and will plan further mitigation in coordination with the land and wildlife agencies.

The primary impacts to wildlife and wildlife habitat will occur during Project construction and could include habitat modification or loss, direct injury and/or mortality for less mobile species, increased disturbance, introduction of invasive species, creation of habitats suitable for invasive species, and exposure to contaminants. Impacts from operation could include injury and/or mortality through collisions, electrocution and exposure to electromagnetic fields, disturbance, exposure to herbicides and other contaminants, increased human access, and increased fire possibility. In aquatic areas, potential impacts could include deposition of sediment in waterbodies, changes in water quality or temperature, introduction of contaminants, removal of riparian vegetation, and increased human access. Specific mitigation measures will be developed to avoid or minimize potential impacts to wildlife species from the proposed Project. For example, in accordance with PGE's Avian Protection Plan, avian-safe design will be implemented as practical and feasible to reduce risk of bird collision and electrocution in high avian risk areas.

Habitat associations will be used to assess impacts to wildlife. In addition to the general wildlife, a number of sensitive species including the northern goshawk, great gray owl, golden eagle, bald eagle, ferruginous hawk, peregrine falcon, Washington ground squirrel, sage sparrow, loggerhead shrike, and burrowing owl could be affected by the Project. Sensitive and special-status wildlife species are listed in Table J-1. ODA special status plants and USFS and BLM special status plant species are listed in Table J-2. Surveys for these species, if needed, will be determined based on consultation with the federal and state wildlife agencies.

Threatened, Endangered, and Other Special Status Plant and Animal Species

Federally threatened, endangered, and candidate species, and ODFW threatened and endangered species of animals and plants, are summarized in Table J-1 and Table J-2, respectively. Potential habitat and the location of threatened and endangered, species will be identified through site-specific field surveys. PGE will avoid or reduce impacts to special status species through routing, construction techniques, and BMPs, and will work with the agencies to mitigate significant impacts.

Two listed species—the northern spotted owl (federally and Oregon threatened) and Washington ground squirrel (Oregon endangered)—could be affected by the proposed Project based on available information from the Oregon Natural Heritage Information Center (ORNHIC) database, ODFW, and the USFS. Spotted owls may occur in private or public lands in the Cascades and are found in old-growth forests. The Washington ground squirrel is limited to private lands and may occur in native rangeland between the Coyote Springs Generating Plant and the John Day River. Available data for these species including those from existing and proposed wind power projects are currently being evaluated. Additional surveys will be conducted as needed, based on consultation with the federal and state wildlife agencies.

Table J-1. Special Status Animal Species with the Potential to Occur in or near the Study Area

Species	USFWS[1/]	Oregon[2/]	USFS[3/]	BLM[4/]
Mammals				
Pallid bat (*Antrozous pallidus*)	SOC	SV	WIL - S	PV - D, SA - S
(Oregon) Red tree vole (*Arborimus longicaudus*)	SOC	-		SA - D
Pygmy rabbit (*Brachylagus idahoensis*; outside Columbia Basin DPS)	SOC	SV		PV - D, VA - D
Townsend's big-eared bat (*Corynorhinus townsendii*)	SOC	SC	MTH - D, WIL - D	PV - D, SA - D, VA - D
California wolverine (*Gulo gulo luteus*)	SOC	T	MTH - S, WIL - S	PV - S
Silver-haired bat (*Lasionycteris noctivagans*)	SOC	SV		
Hoary bat (*Lasiurus cinereus*)	-	SV		
White-tailed jackrabbit (*Lepus townsendii*)	-	SV		
California myotis (*Myotis californicus*)	-	SV		
Small-footed myotis bat (*Myotis ciliolabrum*)	SOC	-		
Long-eared myotis bat (*Myotis evotis*)	SOC	-		
Fringed myotis bat (*Myotis thysanodes*)	SOC	SV	MTH - D, WIL - D	PV - D, SA - S, VA - D
Long-legged myotis bat (*Myotis volans*)	SOC	SV		
Yuma myotis bat (*Myotis yumanensis)*	SOC	-		
Western gray squirrel (*Sciurus griseus*)	-	SV		
Washington ground squirrel (*Spermophilus washingtoni*)	C	E		PV - D, VA - S
Camas pocket gopher (*Thomomys bulbivorus*)	SOC	-		
Birds				
Northern goshawk (*Accipiter gentilis*)	SOC	SV		
Tricolored blackbird (*Agelaius tricolor*)	SOC	-	-	PV - D
Grasshopper sparrow (*Ammodramus savannarum*)	-	SV		PV - S, VA - D
Sage sparrow (*Amphispiza belli*)	-	SC		
Burrowing owl (*Athene cunicularia*)	-	SC		
Western burrowing owl (*Athene cunicularia hypugaea*)	SOC	-		
Bufflehead (*Bucephala albeola*)	-	-	MTH - D, WIL - D	PV - D
Ferruginous hawk (*Buteo regalis*)	SOC	SV		
Swainson's hawk (*Buteo swainsoni*)	-	SV		
Common nighthawk (*Chordeiles minor*)	-	SC		
Olive-sided flycatcher (*Contopus cooperi*)	SOC	SV		
Pileated woodpecker (*Dryocopus pileatus*)	-	SV		
Willow flycatcher (*Empidonax traillii adastus*)	SOC	SV		
Streaked horned lark (*Eremophila alpestris strigata*)	C	SC		
American peregrine falcon (*Falco peregrinus anatum*)	-	SV	MTH - D, WIL - D	PV - D, SA - D, VA - D
Arctic peregrine falcon (*Falco peregrinus tundrius*)	-	SV		
Bald eagle (*Haliaeetus leucocephalus*)	-	T	MTH - D, WIL - D	PV - D, SA - D, VA - D
Harlequin duck (*Histrionicus histrionicus*)	SOC	-	MTH - D, WIL - D	SA - D
Yellow-breasted chat (*Icteria virens*)	SOC	SC		
Loggerhead shrike (*Lanius ludovicianus*)	-	SV		
Lewis' woodpecker (*Melanerpes lewis*)	SOC	SC	MTH - D, WIL - S	PV - D, SA - D, VA - D
Long-billed curlew (*Numenius americanus*)	-	SV		
Mountain quail (*Oreortyx pictus*)	SOC	-		
Flammulated owl (*Otus flammeolus*)	-	SV		

Table J-1. Special status animal species with the potential to occur in or near the Study Area (continued)

Species	USFWS[1]	Oregon[2]	USFS[3]	BLM[4]
Band-tailed pigeon (*Patagioenas fasciata*)	SOC	-		
White-headed woodpecker (*Picoides albolarvatus*)	SOC	SC	MTH - D, WIL - D	PV - D, VA - S
Black-backed woodpecker (*Picoides arcticus*)	-	SV		
American three-toed woodpecker (*Picoides dorsalis*)	-	SV		
Oregon vesper sparrow (*Pooecetes gramineus affinis*)	SOC	SC		SA - S
Purple martin (*Progne subis*)	SOC	SC	WIL - S	SA - D
Western bluebird (*Sialia mexicana*)	-	SV		
White-breasted nuthatch, Slender-billed nuthatch (*Sitta carolinensis aculeata*)	-	SV		
Great gray owl (*Strix nebulosa*)	-	SV		
Northern spotted owl (*Strix occidentalis caurina)*	T	T	MTH - D, WIL - D	SA - D
Western meadowlark (*Sturnella neglecta*)	-	SC		
Columbian sharp-tailed grouse (*Tympanuchus phasianellus columbianus*)	SOC	SC		VA - S
Reptiles and Amphibians				
Northern Pacific/Northwestern pond turtle (*Actinemys marmorata marmorata*)	SOC	SC	WIL - D	SA - S
Western toad (*Anaxyrus boreas*)	-	SV		
Clouded salamander (*Aneides ferreus*)	-	SV		
Coastal tailed frog (*Ascaphus truei*)	SOC	SV		
Oregon slender salamander (*Batrachoseps wrighti*)	SOC	SV	MTH - D, WIL - D	SA - D
Painted turtle (*Chrysemys picta*)	-	SC	-	SA - S, VA - D
Western rattlesnake (*Crotalus oreganus*)	-	SC		
Northern red-legged frog (*Rana aurora aurora*)	SOC	SV		
Foothill yellow-legged frog (*Rana boylii*)	SOC	SC	WIL - D	SA - S
Cascades frog (*Rana cascadae*)	SOC	SV		
Oregon spotted frog (*Rana pretiosa*)	C	SC	MTH - D, WIL - D	PV - D
Cascade torrent salamander *(Rhyacotriton cascadae*)	-	SV		
Northern sagebrush lizard (*Sceloporus graciosus graciosus*)	SOC	SV		
Fish				
Margined sculpin (*Cottus marginatus*)	SOC	-		
Coastal cutthroat trout (*Oncorhynchus clarki clarki*; Southwestern Washington/Columbia River ESU)	SOC	SV		SA - D
Coho salmon (*Oncorhynchus kisutch*; Coastal coho salmon SMU/Oregon Coast ESU)	-	SV		
Coho salmon (*Oncorhynchus kisutch*; Lower Columbia River ESU)	-	E	MTH - D	-
Steelhead (*Oncorhynchus mykiss*; Lower Columbia River ESU)	-	SC	MTH - D	SA - D
Steelhead (*Oncorhynchus mykiss*; Middle Columbia River ESU)	-	SC	MTH - D	PV - D
Steelhead (*Oncorhynchus mykiss*; Upper Willamette River ESU)	-	SV	WIL - D	SA - D
Inland redband trout (*Oncorhynchus mykiss*; all stocks)	-	SC	MTH - D	PV - D, VA - D
Chinook salmon (*Oncorhynchus tshawytscha*; Upper Willamette River ESU)	-	SC	MTH - D, WIL - D	SA - D

Table J-1. Special status animal species with the potential to occur in or near the Study Area (continued)

Species	USFWS[1]	Oregon[2]	USFS[3]	BLM[4]
Chinook salmon (*Oncorhynchus tshawytscha*; Lower Columbia River Chinook ESU)	-	SC	MTH - D	SA - D
Chinook salmon (*Oncorhynchus tshawytscha*; Mid-Columbia River ESU)	-	SV		
Oregon chub (*Oregonichthys crameri*)	E	SC	WIL - D	-
Western brook lamprey (*Lampetra richardsoni*)	-	SV		
Bull trout (*Salvelinus confluentus*)	T	SC	WIL - D, MTH – D	PV - D, VA - D
Invertebrates				
Beller's ground beetle (*Agonum belleri*)	SOC	-		
Scott's apatanian caddisfly (*Allomyia scotti*)	SOC	-	MTH - D	
Cascades apatanian caddisfly (*Apatania tavala*)	SOC	-		
Columbia duskysnail (*Colligyrus sp.)*	-	-	MTH - D	SA - D
Puget Oregonian (*Cryptomastix devia*)	-	-	MTH - S	SA - D
Columbia Gorge Oregonian (*Cryptomastix hendersoni*)	-	-	MTH - D	
Mount Hood primitive brachycentrid caddisfly (*Eobrachycentrus gelidae*)	SOC	-		
Mount Hood farulan caddisfly (*Farula jewetti*)	SOC	-		
Columbia pebblesnail [*Fluminicola fuscus* (= *columbianus*)]	SOC	-		
Salamander slug (*Gliabates oregonius*)	-	-	-	SA - D
Lynn's clubtail dragonfly (*Gomphus lynnae*)	SOC	-		
Dalles juga (*Juga hemphilli dallesensis*)	-	-	-	PV - D
Barren juga (*Juga hemphilli hemphilli*)	-	-	MTH - D	PV - S
Purple-lipped juga (*Juga hemphilli maupinensis*)	-	-	MTH - S	PV - D
Oregon giant earthworm (*Megascolides macelfreshi*)	SOC	-		
Minor Pacific/Dalles sideband snail (*Monadenia fidelis minor*)	SOC	-	MTH - D	
Deschutes sideband (*Monadenia fidelis ssp.*)	-	-	-	PV - D
Dalles mountainsnail (*Oreohelix variabilis sp.*)	-	-	-	PV - D
Pristine springsnail (*Pristinicola hemphilli*)	-	-	MTH - S, WIL - D	

[1/] Federally Listed Species: E = Endangered, T = Threatened, SOC = Species of Concern
[2/] Wildlife: Oregon Department of Fish and Wildlife: E = Endangered, T = Threatened, SC = Critical Sensitive Species, SV = Vulnerable Sensitive Species
[3/] United States Forest Service Region 6 Sensitive Species: WIL = Willamette National Forest, MTH = Mount Hood National Forest; D = Documented occurrence, S = Suspected occurrence
[4/] Bureau of Land Management Sensitive Species: SA = Salem District, PV = Prineville District, VA = Vale District in Oregon; D = Documented occurrence, S = Suspected occurrence

Sources:
1. Oregon Department of Fish and Wildlife (ODFW). 2008. Sensitive Species List. Accessed November 2009 at http://www.dfw.state.or.us/wildlife/diversity/species/docs/SSL_by_category.pdf.
2. ODFW. 2008. Threatened, Endangered, and Candidate Fish and Wildlife Species in Oregon. Accessed November 2009 at http://www.dfw.state.or.us/wildlife/diversity/species/threatened_endangered_candidate_list.asp.
3. United States Fish and Wildlife Service. 2009. Federally listed, proposed, candidate, delisted species and species of concern by Oregon County. Oregon Fish and Wildlife Office. Accessed November 2009 at http://www.fws.gov/oregonfwo/Species/Lists/.
4. United States Forest Service. 2008. Federally Threatened, Endangered, and Proposed Species and Sensitive Species List, Region 6. Accessed November 2009 at http://www.fs.fed.us/r6/sfpnw/issssp/agency-policy/.
5. Bureau of Land Management. 2008. Federally Threatened, Endangered, and Proposed Species and Sensitive Species List, OR/WA . Accessed November 2009 at http://www.fs.fed.us/r6/sfpnw/issssp/agency-policy/.

Table J-2. Special Status Plant Species with the Potential to Occur in or near the Study Area

Species	USFWS[1/]	Oregon[2/]	USFS[3/]	BLM[4/]
Vascular Plants				
Tall agoseris (*Agoseris elata*)	-	-	MTH - D, WIL - S	-
Sickle-pod rockcress (*Arabis sparsiflora var. atrorubens*)	-	-	MTH - D	PV - S
Tygh valley milk-vetch (*Astragalus tyghensis*)	-	T	MTH - D	PV - D
Gray moonwort (*Botrychium minganense*)	-	-	MTH - D, WIL - D	PV - S, VA - D
Mountain grape fern (*Botrychium montanum*)	SOC	-	MTH - D, WIL - D	PV - S, VA - S
Brewer's reedgrass (*Calamagrostis breweri*)	-	-	MTH - D, WIL - D	SA - S
Pale sedge (*Carex livida*)	-	-	MTH - D, WIL - D	SA - S
Cliff paintbrush (*Castilleja rupicola*)	SOC	-	-	-
Thompson's paintbrush (C*astilleja thompsonii*)	-	-	MTH - D	PV - S
Tall bugbane (*Cimicifuga elata var. elata*)	-	C	MTH - D, WIL - D	SA - D
Three-leaf goldthread (*Coptis trifolia*)	-	-	MTH - D, WIL - S	SA - S
Cold-water corydalis (*Corydalis aquae-gelidae*)	SOC	C	MTH - D, WIL - D	SA - D
Pale larkspur (*Delphinium leucophaeum*)	SOC	E	-	SA - S
Nutall's larkspur (*Delphinium nuttallii*)	-	-	MTH - D	PV - S, SA - S
Willamette Valley larkspur (*Delphinium oreganum*)	SOC	C	-	-
Peacock larkspur (*Delphinium pavonaceum*)	SOC	E	-	SA - S
Willamette daisy (*Erigeron decumbens var. decumbens*)	E	E	-	SA - S
Howell's daisy (*Erigeron howellii*)	SOC	C	MTH - D	SA - S
Gorman's aster (*Eucephalus gormanii*)	-	-	MTH - D, WIL - D	SA - D
Salt heliotrope (*Heliotropium curassavicum*)	-	-	-	PV - S, VA - D
Thin leaved peavine (*Lathyrus holochlorus*)	SOC	-	WIL - D	SA - D
Bradshaw's lomatium (*Lomatium bradshawii*)	E	E	-	SA - S
Suksdorf's desert parsley (*Lomatium suksdorfii*)	SOC	C	-	PV - D
Watson's desert parsley (*Lomatium watsonii*)	-	-	MTH - D	PV - D
Kincaid's lupine (*Lupinus sulphureus ssp. kincaidii*)	T	T	-	SA - S
Bog club-moss (*Lycopodiella inundata*)	-	-	MTH - D, WIL - D	SA - D
Ground cedar (*Lycopodium complanatum*)	-	-	MTH - D, WIL - D	SA - S, VA - S
White meconella (*Meconella oregana*)	SOC	C	-	-
Disappearing monkeyflower (*Mimulus evanescens*)	SOC	C	-	PV - S, VA - D
Jungermann's monkeyflower, hepatic monkeyflower (*Mimulus jungermannioides*)	-	C	-	-
Howell's montia (*Montia howellii*)	-	C	-	-
Adder's-tongue (O*phioglossum pusillum*)	-	-	MTH - D, WIL - D	SA - S, VA - S
Barrett's penstemon (*Penstemon barrettiae*)	SOC	C	-	-
Variable hot-rock penstemon (*Penstemon deustus var. variabilis*)	-	-	-	PV - D, VA - D
Dalles Mount buttercup (*Ranunculus triternatus, Ranunculus reconditus*)	SOC	E	MTH - S	PV – D

Table J-2. Special Status Plant Species with the Potential to Occur in or near the Study Area (continued)

Species	USFWS[1/]	Oregon[2/]	USFS[3/]	BLM[4/]
Thompson's mistmaiden (*Romanzoffia thompsonii*)	-	-	MTH - S, WIL - D	SA – S
Scheuchzeria (*Scheuchzeria palustris var. americana*)	-	-	MTH - D, WIL - D	-
Whitetop aster (*Sericocarpus rigidus, Aster curtus*)	SOC	T	-	SA – S
Meadow sidalcea, meadow checkermallow (*Sidalcea campestris*)	-	C	-	-
Nelson's checker-mallow (*Sidalcea nelsoniana*)	T	T	-	SA – D
Pale blue-eyed grass (*Sisyrinchium sarmentosum*)	SOC	C	MTH - D, WIL - S	SA – S
Kruhsea (*Streptopus streptopoides*)	-	-	MTH - D	SA – S
Violet suksdorfia (*Suksdorfia violacea*)	-	-	MTH - D	VA – S
Oregon sullivantia (*Sullivantia oregana*)	SOC	C	MTH - S	SA – S
Spinescent fameflower (*Talinum spinescens*)	-	-	-	PV – D
Lesser bladderwort *(Utricularia minor)*	-	-	MTH - D, WIL - D	PV - S, SA - S, VA – S
Northern bladderwort *(Utricularia ochroleuca)*	-	-	MTH - D, WIL - D	SA – S
Columbia water-meal *(Wolffia columbiana)*	-	-	MTH - D, WIL - S	SA – D
Non-Vascular Plants				
Brachydontium olympicum	-	-	MTH - D, WIL - S	-
Bryoria subcana	-	-	WIL - D	SA – D
Calypogeia sphagnicola	-	-	MTH - D, WIL - D	SA – S
Nephroma occultum	-	-	MTH - D, WIL - D	-
Peltigera pacifica	-	-	MTH - D, WIL - D	-
Pseudocyphellaria rainierensis	-	-	MTH - D, WIL - D	-
Rhizomnium nudum	-	-	MTH - D, WIL - D	SA - S, VA - S
Schistostega pennata	-	-	MTH - D, WIL - D	SA – D
Scouleria marginata	-	-	MTH - S, WIL - S	SA – S
Tetraphis geniculata	-	-	MTH - D, WIL - S	SA – D
Tetraplodon mnioides	-	-	MTH - S, WIL - D	SA – D
Texosporium sancti-jacobi	-	-	-	PV - D, VA - S
Tholurna dissimilis	-	-	MTH - D, WIL - D	SA – S
Usnea longissima	-	-	MTH - D, WIL - D	-
Fungi				
Alpova alexsmithii	-	-	MTH - D, WIL - D	PV – S

Table J-2. Special Status Plant Species with the Potential to Occur in or near the Study Area (continued)

Species	USFWS[1]	Oregon[2]	USFS[3]	BLM[4]
Bridgeoporus nobilissimus	-	-	MTH - D, WIL - D	PV – D
Cortinarius barlowensis	-	-	MTH - D, WIL - D	PV – S
Cudonia monticola	-	-	MTH - S, WIL - D	PV – D
Leucogaster citrinus	-	-	MTH - D, WIL - D	PV – D
Mythicomyces corneipes	-	-	MTH - D, WIL - D	PV – S
Octaviania macrospora	-	-	MTH - D, WIL - S	PV – S
Phaeocollybia attenuata	-	-	MTH - D, WIL - D	-
Phaeocollybia olivacea	-	-	MTH - D	PV – D
Phaeocollybia oregonensis	-	-	MTH - D	PV – D
Phaeocollybia piceae	-	-	MTH - S	-
Phaeocollybia pseudofestiva	-	-	MTH - D, WIL - D	PV – D
Phaeocollybia scatesiae	-	-	MTH - D	PV – D
Pseudorhizina californica	-	-	MTH - D, WIL - D	PV – S
Ramaria aurantiisiccescens	-	-	MTH - D, WIL - D	
Ramaria gelatiniaurantia	-	-	MTH - D, WIL - D	PV – D
Sowerbyella rhenana	-	-	MTH - D, WIL - D	PV – D
Stagnicola perplexa	-	-	MTH - D, WIL - S	PV – S

[1/] Federally Listed Species: E = Endangered, T = Threatened, SOC = Species of Concern
[2/] Plants: Oregon Department of Agriculture: E = Endangered, T = Threatened, C = Candidate
[3/] United States Forest Service Region 6 Sensitive Species: WIL = Willamette National Forest, MTH = Mount Hood National Forest; D = Documented occurrence, S = Suspected occurrence
[4/] Bureau of Land Management Sensitive Species: SA = Salem District, PV = Prineville District, VA = Vale District in Oregon; D = Documented occurrence, S = Suspected occurrence

Sources:
1. Oregon Department of Fish and Wildlife (ODFW). 2008. Sensitive Species List. Accessed November 2009 at http://www.dfw.state.or.us/wildlife/diversity/species/docs/SSL_by_category.pdf
2. Oregon Department of Agriculture. 2008. Oregon listed plants. Accessed November 2009 at http://www.oregon.gov/ODA/PLANT/CONSERVATION/statelist.shtml
3. United States Fish and Wildlife Service. 2009. Federally listed, proposed, candidate, delisted species and species of concern by Oregon County. Oregon Fish and Wildlife Office. Accessed November 2009 at http://www.fws.gov/oregonfwo/Species/Lists/
4. United States Forest Service. 2008. Federally Threatened, Endangered, and Proposed Species and Sensitive Species List, Region 6. Accessed November 2009 at http://www.fs.fed.us/r6/sfpnw/issssp/agency-policy/
5. Bureau of Land Management. 2008. Federally Threatened, Endangered, and Proposed Species and Sensitive Species List, OR/WA. Accessed November 2009 at http://www.fs.fed.us/r6/sfpnw/issssp/agency-policy/

Historic, Cultural, and Archaeological Resources

A survey of historic, cultural, and archaeological resources will be conducted prior to submittal of the ASC.

Scenic and Aesthetic Areas

The transmission line has the potential to impact visual resources, although efforts have been made during routing to minimize impact on scenic and aesthetic resources. Potential visual impacts will be described in the ASC.

Recreation

The transmission line routes will avoid protected areas including recreational resources. Potential visual effects on recreational resources have been considered in the identification of corridors and will be described in the ASC.

Land Use

The principal land uses crossed by the proposed and alternative routes are agriculture and forest. Project siting has been conducted to minimize impacts to these land use zones, in large part by attempting, wherever feasible, to locate the proposed Project immediately adjacent to existing transmission line ROWs.

Exhibit K Public Services

OAR 345-020-0011(1)(k)

Information about significant potential adverse impacts of construction and operation of the proposed facility on the ability of communities in the study area to provide the services listed in OAR 345-022-0110.

The following statements apply to both proposed and alternative corridors.

Sewers and Sewage Treatment

Underground utilities will be located prior to excavation to minimize the potential for damage to buried sewer, water, electric, gas, or communication lines. Following construction, the Project will not cause any impacts to sewer systems. Note that there will be a restroom facility required at the proposed new Grassland, Cedar Spring and Juniper Flat substations. Depending on location, either a septic system or connection to an existing sanitary sewer system will be required.

Water

Water for dust control or construction processes such as concrete batching will be purchased from existing sources. Neither use will require significant amounts of water.

Storm Water Drainage

Storm water BMPs will be implemented during construction. Construction will proceed under an approved construction storm water general permit, as required by the DEQ.

Solid Waste Management

Substation and ROW construction will generate a variety of solid wastes including concrete, hardware, and wood debris. The solid wastes generated during construction will be recycled or hauled away for disposal. Excavation along the ROW and at substations will generate solid wastes that could potentially be used as fill; however, some of the excavated material will be removed for disposal. Excavated material that is clean and dry will be spread along the ROW.

The majority of waste associated with substation construction results from spoils created during site grading. Very little of the soil excavated during foundation installation is waste product. Above-grade waste will be packing material such as crates, pallets, and paper wrapping to protect equipment during shipping. We have assumed a 12-yard dumpster will be filled once a week with waste material for the duration of each substation project. All waste will be handled and disposed of in compliance with relevant regulations.

Housing

The proposed Project is not anticipated to have an adverse impact or create a major demand for housing. Many of the workers will come from outside of the Project area and will require temporary housing over a 2-year construction period. Construction workers hired from outside

the area will require motels or other rental units. The proposed and alternative corridors are near small towns, which contain sufficient temporary housing supplies. In addition, construction of the transmission line will proceed in a linear manner with construction dispersed over many miles. The transient workers will benefit the local communities by renting housing for the construction duration.

Traffic Safety

The construction of the transmission line will result in a temporary increase in local traffic, including large trucks and construction equipment. A traffic management plan will be developed to minimize impacts.

Police and Fire Protection

Project plans developed as part of preparing the ASC will provide a framework for construction phase management of personnel, rules of behavior, identification of local police and fire protection resources, and emergency response procedures to be used or followed throughout the five counties crossed.

Health Care

The proposed and alternative corridors are near towns, which contain sufficient health care facilities to support the Project. The size of the construction workforce is not expected to make significant demands on heath care resources. The construction phase of the Project will be covered by a comprehensive health and safety plan.

Schools

The vast majority of construction phase workers typically do not relocate family to the job location. The number of operations-phase personnel will be minimal. Impacts to school systems will be minimal for either phase.

Exhibit L Water Use

OAR 345-020-0011(1)(l)

Information about water requirements the applicant anticipates for construction and operation of the proposed facility, including:

(A) A description of each source of water and the applicant's estimate of the amount of water the facility will need from each source;

(B) If a new water right is required, the approximate location of the points of diversion and estimated quantity of water to be taken at each point;

(C) For operation, the source of cooling water and the estimated consumptive use of cooling water, based on annual average conditions.

Construction of the transmission lines and substations will require water. Major water uses are for preparation and installation of concrete transmission line structure and substation foundations, and dust control during ROW, staging, fly yard, access road, and substation grading and site work. A minor use of water during construction may include substation landscaping, if required. As the preliminary design advances, the total amount of water needed will be identified. The required water will be procured from municipal sources and/or from landowners. No new water rights will be required but if needed, limited licenses will be procured from the Oregon WRD.

In the construction of foundations, water is transported to the batch plant site where it is used to mix wet concrete. From the batch plant the wet concrete is transported to the structure site in concrete trucks for use in foundation installation. Construction of the transmission lines and related facilities will generate a temporary increase in fugitive dust. If the level of fugitive dust is too high in specific Project areas, as determined in cooperation with the landowner or agency, water will be applied to disturbed areas to minimize dust.

Water usage for substation construction is primarily for dust control during site preparation work. During this period, construction equipment will be cutting, moving, and compacting the subgrade surface. As a result, water trucks patrolling the site to control dust will make up to one pass over the station site per hour. Once site preparation work is complete, concrete for the placement of foundations becomes the largest user of water and dust control becomes minimal.

Once site grading is complete, the balance of the substation construction work will be performed on bare subgrade soil or subgrade with a thin layer of rock. Fire risk will be minimal due to the bare ground or rock surface and will be contained within the confines of station fenced area.

Small amounts of water will be required for the restroom facilities at the proposed Grassland, Cedar Spring, and Juniper Flat substations. Depending on location, PGE will obtain water from a municipal supplier or obtain a limited license from the WRD.

Exhibit M Carbon Dioxide Emissions

OAR 345-020-0011(1)(m)

If the proposed facility will emit carbon dioxide, an estimate of the gross rate of carbon dioxide emissions, a table listing all the factors that form the basis for calculating the estimate, and a statement of the means by which the applicant intends to comply with the applicable carbon dioxide emissions standard under OAR 345-024-560, OAR 345-024-600, or OAR 345-024-630.

The Project will not emit carbon dioxide.

Exhibit N Legal Citations

OAR 345-020-0011(1)(n)

Identification, by legal citation, of all state statutes and administrative rules and local government ordinances containing standards or criteria that the proposed facility must meet for the Council to issue a site certificate, other than statutes, rules and ordinances identified in Exhibit E, and identification of the agencies administering those statutes, administrative rules and ordinances. The applicant shall analyze and describe any problems the applicant foresees in satisfying the requirements of any such statute, rule or ordinance.

All state statutes, administrative rules, and local government ordinances containing standards or criteria that the proposed facility within the proposed or alternative corridors must meet are identified in Exhibit E. The agencies administering these statutes, administrative rules, and ordinances are also identified in Exhibit E.

Exhibit O Site Certification Schedule

OAR 345-020-0011(1)(o)

A schedule stating when the applicant expects to submit an application for a site certificate;

PGE expects to submit an ASC in the fourth quarter of 2010.

Exhibit P State Commission on Indian Services

OAR 345-020-0011(1)(p)

Evidence of consultation with the State Commission on Indian Services to identify each appropriate tribe to consult with regarding the proposed facility's possible effects on Indian historic and cultural resources.

PGE contacted Ms. Karen Quigley, Executive Director of the State Commission on Indian Services, on December 1, 2009, to identify each appropriate tribe to consult with regarding the proposed facility's possible effects on Indian historic and cultural resources within the proposed and alternative corridors. Per a letter received from the State Commission on December 15, 2009, tribes identified as being expected to have an interest in the Project proposed or alternative corridors include the following:

Confederated Tribes of Warm Springs Reservation
Ms. Sally Bird, Cultural Resources Coordinator
P.O. Box 1299
Warm Springs, OR 97761

Confederated Tribes of the Umatilla Indian Reservation
Ms. Teara Farrow, Cultural Resources Program Protection Manager
P.O. Box 638
Pendleton, OR 97801

Confederated Tribes of Grand Ronde
Eirik Thorsgard, MAIS
Cultural Protection Coordinator and Interim Tribal Historic Preservation Officer
9615 Grand Ronde Road
Grand Ronde, OR 97347

Confederated Tribes of the Siletz
Mr. Robert Kentta
P.O. Box 549
Siletz, OR 97380

In addition to Oregon EFSC approval, the Project requires a USFS and a BLM ROW grant. Part of the USFS's responsibility includes government-to-government consultation with affected Indian tribes. The USFS may contact additional tribes as part of their consultation process.