



Department of Energy

Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

FREEDOM OF INFORMATION ACT PROGRAM

March 12, 2015

In reply refer to: FOIA #BPA-2015-00564

Richard Till
Friends of the Columbia Gorge
522 SW Fifth Ave, Suite 720
Portland, OR 97204

Mr. Till:

This is a final response to your request for Bonneville Power Administration (BPA) records under the Freedom of Information Act (FOIA), 5 U.S.C. § 552. Your request was received in our office on January 26, 2015, with an acknowledgement letter sent to you on January 29, 2015.

You requested:

“... all records in the following categories added to BPA’s files during the following time period:
July 2, 2014 through January 23, 2015.”

[...] the following categories of records:

- Any materials submitted by Whistling Ridge Energy LLC (“WRE”) regarding its pending generation interconnection request;
- Any Transmission Service Requests or similar documents submitted to BPA regarding the WREP;
- Any communications between the BPA and the following persons and entities regarding the WREP:
 - Washington Energy Facility Site Evaluation Council (“EFSEC”);
 - state agencies or officials (including elected officials);
 - other federal agencies or officials (including elected officials);
 - Whistling Ridge Energy LLC (“WRE”), including all related entities such as the SDS Lumber Company, Broughton Lumber Company, and Stevenson Land Company, as well as WRE’s attorneys and other representatives; and
 - WRE’s consultants, including but not limited to URS Corp. and West Inc.
- Any meeting notes, agendas, or other related records generated from meetings between BPA, EFSEC, WRE, and consultants.”

Response:

We conducted a search of the paper and electronic records of our Transmission Office. We have located 30 pages of material responsive to your request. We are releasing 23 pages in full and releasing 7 pages with redactions under Exemption 6.

The Freedom of Information Act generally requires the release of all government records upon request. However, FOIA permits withholding certain, limited information that falls under one or more of nine statutory exemptions (5 U.S.C. §§ 552(b)(1-9)).

Exemption 6 protects information in “personnel and medical files and similar files” when the disclosure of such information “would constitute a clearly unwarranted invasion of personal privacy” (5 U.S.C. § 552(b)(6)). Exemption 6 requires balancing the public interest in the information against the individual privacy interest at issue. Here, we assert this exemption to redact personal cell phone numbers and email addresses. We find no public interest in this information and therefore redact it under Exemption 6.

Information that falls under Exemption 6 cannot be discretionarily released; the right of privacy belongs to the individual, not to the agency. Therefore, we did not analyze this information under the discretionary release guidelines in Attorney General Holder’s March 19, 2009, FOIA Memorandum.

Address fees: There are no fees associated with this request.

Appeal:

Pursuant to Department of Energy FOIA regulations at 10 C.F.R. § 1004.8, you may administratively appeal this response in writing within 30 calendar days. If you choose to appeal, please include the following:

- (1) The nature of your appeal - denial of records, partial denial of records, adequacy of search, or denial of fee waiver;
- (2) Any legal authorities relied upon to support the appeal; and
- (3) A copy of the determination letter.

Clearly mark both your letter and envelope with the words “FOIA Appeal,” and direct it to the following address:

Director, Office of Hearings and Appeals
Department of Energy
1000 Independence Avenue SW
Washington DC 20585-1615

Pursuant to 10 C.F.R. Part 1004.7(b)(2), I am the individual responsible for the determination withhold the information described above under Exemption 6. I appreciate the opportunity to assist you. If you have any questions, please contact Colleen Cushnie, FOIA Case Coordinator (BPA Contractor, ACS), at (503) 230-5986 or email at cacushnie@bpa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'C. M. Frost', with a large, sweeping flourish extending to the right.

C. M. Frost
Freedom of Information Act Officer

From: [Peck,Nick \(CONTR\) - TPC-TPP-4](#)
To: [Johnson,Kelly G \(BPA\) - TPC-TPP-4](#)
Cc: [Jusupovic,Jana D \(BPA\) - TPC-TPP-4](#); [Randall,Cherilyn C \(BPA\) - TPCV-TPP-4](#)
Subject: RE: Whistling Ridge/Little Buck Sub Labor Estimate
Date: Thursday, June 19, 2014 3:35:33 PM

This one is not technically on our hit list; developer is working hard to move forward, and Cherilyn, Amy and Angela are all working towards getting this thing finalized and constructed. It has been bedeviled by more issues than anyone (especially Jason Spadaro) deserves; a last obstacle has been overcome when Amy finally agreed to move the substation, and that has engendered a need for some more Prelim Engineering funds – and probably a few more NEPA dollars too.

I didn't realize Cherilyn was not on the original cc list; I have added here here.

N

Nick Peck
Customer Service Engineering
Bonneville Power Administration : TPC/TPP-4
Unisys Corporation
Tel: (360) 619-6419 : Cell: (360) 980-2183
cnpeck@bpa.gov
Strategic | Achiever | Responsibility | Adaptability | Learner

Attitude is everything

From: Johnson,Kelly G (BPA) - TPC-TPP-4
Sent: Thursday, June 19, 2014 2:51 PM
To: Peck,Nick (CONTR) - TPC-TPP-4
Cc: Jusupovic,Jana D (BPA) - TPC-TPP-4
Subject: FW: Whistling Ridge/Little Buck Sub Labor Estimate

Nick,

Is this one of the ones we were asking for more \$ on in our treatment list?

Kelly

From: Burgess,James F (BPA) - TERG-TPP-4
Sent: Thursday, June 19, 2014 11:23 AM
To: Johnson,Kelly G (BPA) - TPC-TPP-4
Subject: FW: Whistling Ridge/Little Buck Sub Labor Estimate

FYI

James F. Burgess, PE, PLS
Supervisor | Geospatial Services - TERG-TPP-4
BONNEVILLE POWER ADMINISTRATION
bpa.gov | P 360-619-6475

From: McCain, Sean [<mailto:Sean.McCain@hdrinc.com>]

Sent: Thursday, June 19, 2014 9:31 AM

To: Burgess,James F (BPA) - TERG-TPP-4; Liebhaber,Dustin F (BPA) - TELP-TPP-3; Esteban,Adrian C (CONTR); Grange,Katey C (BPA) - KEC-4

Cc: Gardner,Amy M (BPA) - TEP-TPP-1; O'Claire,David E (BPA) - TELD-TPP-3; Grappe,Harold H (BPA) - TELP-TPP-3; Struck,Matthew J (CONTR) - TELC-TPP-3; Gentry,Natasha A (BPA) - TELC-TPP-3; Nicholson,Todd S (BPA) - TELF-TPP-3

Subject: FW: Whistling Ridge/Little Buck Sub Labor Estimate

We had originally scheduled a site visit to Whistling Ridge for next Monday (11-5). Amy Gardner has suggested we cancel this site visit for now until we can obtain additional funds from customer and get a new WO. We will keep you informed of any progress. Thank you for your patience as we work through this.

In the meantime, if everyone involved could provide Amy estimated labor hours to support this effort it will facilitate helping BPA in coordinating obtaining additional funds. Thank you.

Sean McCain, MBA

M (b)(6)

hdrinc.com/follow-us

From: McCain, Sean [<mailto:Sean.McCain@hdrinc.com>]

Sent: Wednesday, June 18, 2014 11:36 AM

To: Burgess,James F (BPA) - TERG-TPP-4; Wood,Scott E (CONTR) - TELF-TPP-3; Liebhaber,Dustin F (BPA) - TELP-TPP-3; Esteban,Adrian C (CONTR); Sharp,Carolyn A (CONTR) - KEC-4

Cc: Gardner,Amy M (BPA) - TEP-TPP-1

Subject: Whistling Ridge/Little Buck Sub Labor Estimate

Yesterday we discovered the WO for Whistling Ridge/Little Buck has been closed. In order for further support, BPA will have to request additional funds from the customer to reopen the WO. As a result, Amy Gardner is developing a cost estimate to continue with preliminary design support to move the Little Buck substation north due to environmental and rating issues.

I have attached three PDFs for reference. The APE file shows the original location of substation and other infrastructure, the whisidpp file shows potential substation layout and dimensions, and the Little Buck file shows potential future location.

Could you please provide Amy an estimate of the labor hours your group will need in order to conduct the following:

- Site visit (1 day) to evaluate site conditions for potential new substation, transmission line, and pole/structures.
- GIS support to evaluate what has been done at site and develop new figures and geospatial support, if needed.
- Evaluate civil engineering aspects related to substation, transmission line, and structure relocation. Scott – a few people in your group suggested 3 days labor might be sufficient. If you agree, please let us know.
- Amending environmental compliance surveys and documents for new site locations. Carolyn – I would like to coordinate with you further to determine what we may need and what already has been completed or is ongoing.

If you could provide this to Amy by COB Thursday, it would be appreciated. Thank you.

Sean A. McCain, MBA
Sr. Project Manager

<image001.jpg>
1001 SW 5th Avenue, Suite 1800
Portland, Oregon 97204
M (b)(6)
sean.mccain@hdrinc.com

hdrinc.com/follow-us

 Please consider the environment before printing this email

From: [Jason Spadaro](#)
To: [Caines,Sandra L \(CONTR\) - TSE-TPP-2](#)
Cc: [DeClerck,Angela \(BPA\) - TSE-TPP-2](#); (b)(6)
Subject: Re: Whistling Ridge / Little Buck WO
Date: Monday, June 23, 2014 9:43:24 AM

Hi Sandy
The 27th works for Mike Raschio and I.
Thanks
Jason

On Thursday, June 19, 2014, Caines-Willman,Sandra L (CONTR) - TSES-TPP-2
<slcaines@bpa.gov> wrote:

Hello Jason,

Would you be available for an hour on either Wednesday, June 25 from 8 – 9 a.m. or Friday, June 27 from 2 – 3 p.m. to discuss mitigation for overhead ground wire for the substation please? If so, I will send a meeting invite out with the phone bridge. If not would you please provide a few dates that would work for you?

Thank you!

Sandy Caines / Administrative Services Assistant

DEA, Inc.

 360.619.6018 |  360.619.6940

Bonneville Power Administration

--
Jason Spadaro
SDS Lumber Company
509-493-6103 (office)
(b)(6) (cell)
jasons@sdslumber.com

From: [Jason Spadaro](#)
To: [DeClerck,Angela \(BPA\) - TSE-TPP-2](#)
Subject: Re: Whistling Ridge / Little Buck WO
Date: Monday, June 23, 2014 9:57:09 AM

Thanks. See you Friday

On Monday, June 23, 2014, DeClerck,Angela (BPA) - TSE-TPP-2 <ardeclerck@bpa.gov> wrote:

Jason,

Just to let you know I am certain we have a plan that will work.

Angela

From: Jason Spadaro [mailto:jasons@sds lumber.com]
Sent: Monday, June 23, 2014 9:43 AM
To: Caines-Willman,Sandra L (CONTR) - TSES-TPP-2
Cc: DeClerck,Angela (BPA) - TSE-TPP-2; (b)(6)
Subject: Re: Whistling Ridge / Little Buck WO

Hi Sandy

The 27th works for Mike Raschio and I.

Thanks

Jason

On Thursday, June 19, 2014, Caines-Willman,Sandra L (CONTR) - TSES-TPP-2 <slcaines@bpa.gov> wrote:

Hello Jason,

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Thank you!

Sandy Caines / Administrative Services Assistant

DEA, Inc.

 360.619.6018 |  360.619.6940

Bonneville Power Administration

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Jason Spadaro
SDS Lumber Company
509-493-6103 (office)
(b)(6) (cell)
jasons@sdslumber.com

--

Jason Spadaro
SDS Lumber Company
509-493-6103 (office)
(b)(6) (cell)
jasons@sdslumber.com

From: [Sutherland,Colin J \(CONTR\) - TEPO-3](#)
To: [Randall,Cherilyn C \(BPA\) - TPCV-TPP-4](#); [Cosola,Anna M \(BPA\) - TPCC-TPP-4](#); [Holst,Michele R \(BPA\) - TEPO-TPP-1](#)
Subject: RE: G0108 NEPA WO
Date: Friday, June 27, 2014 4:08:14 PM

Hi Cherilyn -

I show the work order as active in Asset Suite so charges should be able to hit WO 00134099. The last advance payment was received in January 2014 total advance funding equals \$186K. Even with the funding received in January as of today 6/27/14 there is only \$2,931.21 left to spend in direct charges without overheads applied according to the active work order library list. So based on actuals vs. estimate only have \$2,931.21 left to spend in actual dollars without overheads applied.

Thanks,

Colin Sutherland | Project Analyst
ACS Professional Staffing
Bonneville Power Administration | TEPO-TPP-1
Project Mgmt Analysis and Scheduling
Phone: (360) 619-6499

-----Original Message-----

From: Randall,Cherilyn C (BPA) - TPCV-TPP-4
Sent: Friday, June 27, 2014 3:43 PM
To: Cosola,Anna M (BPA) - TPCC-TPP-4; Holst,Michele R (BPA) - TEPO-TPP-1; Sutherland,Colin J (CONTR) - TEPO-TPP-1
Subject: G0108 NEPA WO

The NEPA work order for G0108 is not open for charges (red-flagged I think). The customer recently made a payment. Please get the work order back open. Thanks.

From: [Grange, Katey C \(BPA\) - KEC-4](#)
To: [DeClerck, Angela \(BPA\) - TSE-TPP-2](#)
Cc: [Adams, Hub V \(BPA\) - LN-7](#); [Gardner, Amy M \(BPA\) - TEP-TPP-1](#); [Schmidt, Sunshine R \(BPA\) - KEC-4](#)
Subject: RE: Whistling Ridge- potential northern sub site follow up
Date: Tuesday, July 01, 2014 7:20:22 AM
Attachments: [APE_ProposedBPASubstation.pdf](#)

Understood and I had previously raised the same concern. I was just trying to provide some EFSEC information since that was the subject of your call.

We would not have to reinitiate cultural consultation if the sub isn't moved from the location depicted in the original area of potential effect (red boxes in the attached figure).

Let me know if you have any additional questions.

Katey Grange
Environmental Protection Specialist | KEC-4
BONNEVILLE POWER ADMINISTRATION
kcgrange@bpa.gov | 503.230.4047
Please consider the environment before printing this email.

From: DeClerck, Angela (BPA) - TSE-TPP-2
Sent: Monday, June 30, 2014 4:00 PM
To: Grange, Katey C (BPA) - KEC-4
Cc: Adams, Hub V (BPA) - LN-7; Gardner, Amy M (BPA) - TEP-TPP-1
Subject: RE: Whistling Ridge- potential northern sub site follow up

Overall Jason is concerned that we have to reinitiate the cultural consultation. If we don't move the site do we have to do this. That was Jason's main concern at this point.

Angela

From: Grange, Katey C (BPA) - KEC-4
Sent: Monday, June 30, 2014 3:07 PM
To: DeClerck, Angela (BPA) - TSE-TPP-2
Cc: Adams, Hub V (BPA) - LN-7; Gardner, Amy M (BPA) - TEP-TPP-1
Subject: FW: Whistling Ridge- potential northern sub site follow up

Hi Angela,

Below is the language that I found when I reviewed in the EFSEC certificate. As I previously said, we would need to confirm this understanding with EFSEC- probably best to do that after we have a better proposed location for the substation.

Apologies I didn't have the certificate to pull this language for the discussion on Friday.

-Katey

Katey Grange
Environmental Protection Specialist | KEC-4
BONNEVILLE POWER ADMINISTRATION
kcgrange@bpa.gov | 503.230.4047
Please consider the environment before printing this email.

From: Gardner, Amy M (BPA) - TEP-TPP-1
Sent: Wednesday, May 28, 2014 11:24 AM
To: Grange, Katey C (BPA) - KEC-4
Cc: Adams, Hub V (BPA) - LN-7; McCain, Sean (Sean.McCain@hdrinc.com)
Subject: RE: Whistling Ridge- potential northern sub site follow up

Katey,

That is really good to know. Thanks for following up. It shouldn't take too long to get a new APE.

Thanks,

Amy

From: Grange, Katey C (BPA) - KEC-4
Sent: Wednesday, May 28, 2014 10:49 AM
To: Gardner, Amy M (BPA) - TEP-TPP-1
Cc: Adams, Hub V (BPA) - LN-7; McCain, Sean (Sean.McCain@hdrinc.com)
Subject: Whistling Ridge- potential northern sub site follow up

Hi Amy,

As a follow up to last week's meeting, I checked the Site Certificate and it looks like the micro siting of the project facilities after issuance shouldn't be a problem. The Certificate states the below and I didn't see anything else in the Certificate that would preclude moving the facilities (of course we should double check this understanding with EFSEC and the developer). Here is the relevant text from the Certificate:

"The location of project facilities including, but not limited to, the turbines, roadways, electrical collection and distribution system, operations and maintenance facility, electrical substations, electrical feeder lines, and other related project facilities, is generally described in the Revised Application, as modified within the Site Certificate Agreement. The final location of the TGS and other project facilities within the project area may vary from the locations shown on the conceptual drawings in the Revised Application, but shall be consistent with the conditions of this Agreement, and in accordance with the final construction plans approved by EFSEC..." (Page 9).

Also, Hub and I looked through the language in the EIS to determine if the shifting of sub locations and associated structures north would be within the scope of the EIS' analysis. Shifting the substation to a location that has similar features (topography, vegetation, etc) and within the overall project footprint that was previously analyzed seems to keep the range of effects within those disclosed in the EIS. Therefore, we thought that a supplement analysis would be sufficient review of the new location. That being said we will likely still need to reinitiate cultural consultation (which will likely be the main driver to the SA timeline). At this point, if we could get the location of a northern site pinned down a little better and the location of the structures and associated ROW, I can get the cultural started.

Thanks,

Katey

Katey Grange

Environmental Protection Specialist

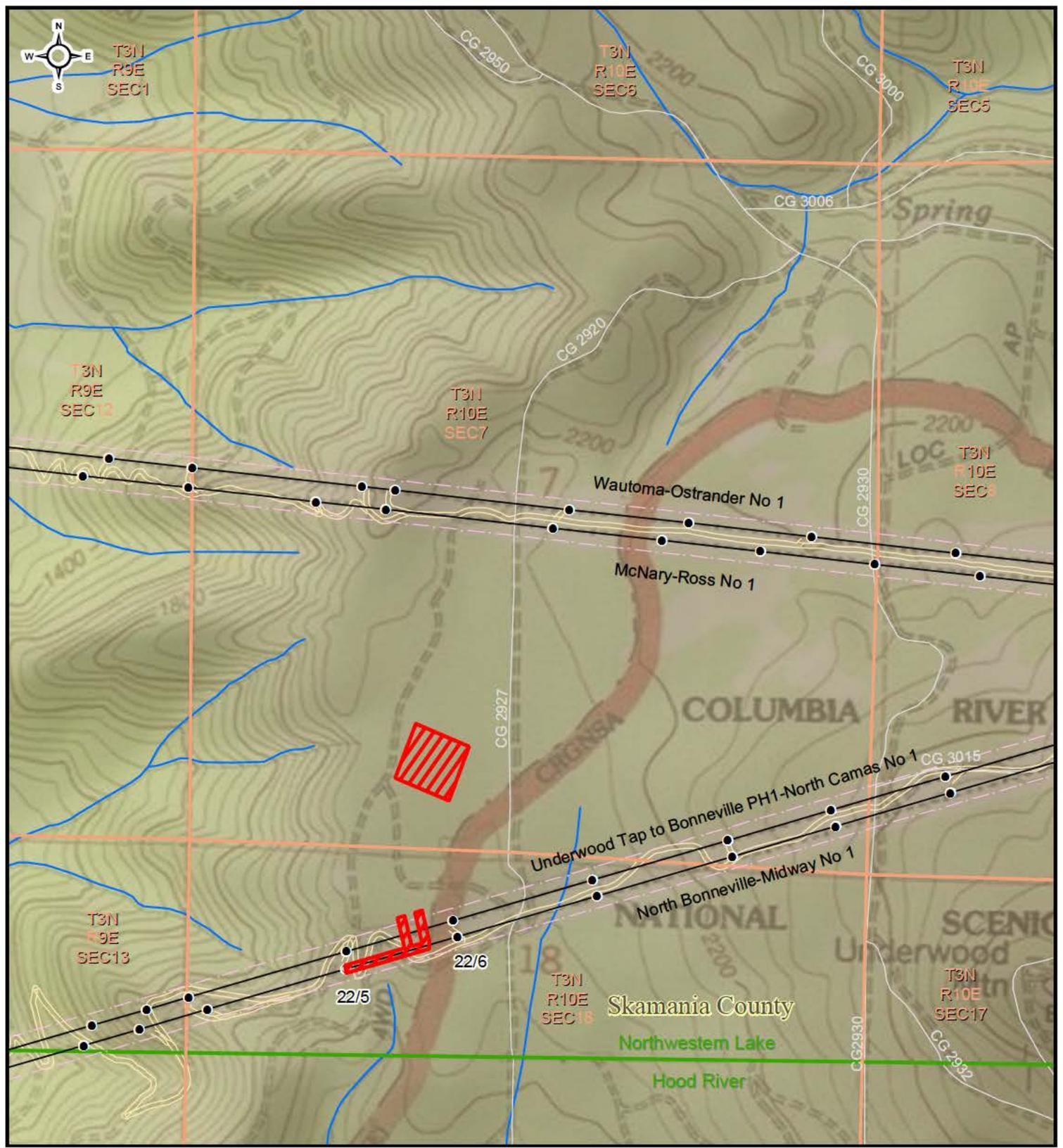
Bonneville Power Administration

PO Box 3621 - KEC-4

Portland, OR 97208-3621

503.230.4047

kcgrange@bpa.gov



Proposed BPA Substation - Whistling Ridge Energy Project
 Area of Potential Effects



- Area of Potential Effect
- Quad Name & Boundary
- Township/Range/Section
- BPA Right-of-Way Corridors
- BPA Towers
- Access Roads
- BPA Transmission Lines



June 28, 2010
 0 500 1,000
 Feet



Department of Energy

Bonneville Power Administration
P.O. Box 61409
Vancouver, Washington 98666-1409

TRANSMISSION SERVICES

July 14, 2014

In reply refer to: TEP-TPP-1

Nathan Baker
Friends of the Columbia Gorge
522 SW Fifth Ave, Suite 720
Portland, OR 97204

Gary Kahn
Reeves, Kahn, Hennessee /, and Elkins
4025 Se 52 Avenue
Portland, OR 97206

J. Richard Aramburu
Aramburu & Eustis, LLP
720 3rd Ave, Suite 2000
Seattle, WA 98104

Dear Mr. Baker, Mr. Kahn, and Mr. Aramburu:

Thank you for the comments dated July 3, 2014, concerning the Whistling Ridge Energy Project that you submitted on behalf of Friends of the Columbia Gorge and Save Our Scenic Area. As we have mentioned in previous e-mail correspondence with you, Bonneville Power Administration (BPA) is currently reviewing relevant data and information that has become available since the issuance of the Final Environmental Impact Statement (EIS) for the Project so that we can complete appropriate NEPA documentation for our proposed actions related to the Project. As we move forward with completing this NEPA documentation, we will consider the comments that you have submitted.

We understand your interest in this wind project and have ensured you will remain included on our mail list for future NEPA documentation for the Project. Please continue to direct any future project-related correspondence to me at the above address.

Sincerely,

A handwritten signature in black ink that reads "Amy M. Gardner". The signature is written in a cursive style.

Amy Gardner
Project Manager

cc:
Jason Spidaro, Whistling Ridge Energy, LLP
Tim Mc Mahan, Stoel Rives LLP
Stephen Posner, WA DFSEC

becc:

E. Mainzer – A-7

L. Klump – DKR-WSGL

R. Swedo – DKR-Spokane

L. Grimm – KEC-4

G. Lynard – KEC-4

C. McClory – KEC-4

H. Adams – LN-7

A. Gardner – TEP-TPP-1

A. DeClerck – TSP-TPP-2

Official File - KEC (EQ-13)

Kgrange:kcg:4047:7/14/14:

http://portal.bpa.gov/orgs/efw/KEC/tsrvcs/Projects/2014_FOG_Response_Letter_11July2014.docx

cx

From: [Gardner, Amy M \(BPA\) - TEP-TPP-1](#)
To: [Goldsworthy, Christine E \(BPA\) - TESM-AMPN-2](#); [DeClerck, Angela \(BPA\) - TSE-TPP-2](#); [Randall, Cheryl C \(BPA\) - TPCV-TPP-4](#); [Grange, Katey C \(BPA\) - KEC-4](#); [Adams, Hub V \(BPA\) - LN-7](#); [Liebhaber, Dustin F \(BPA\) - TELP-TPP-3](#); [Nicholson, Todd S \(BPA\) - TELF-TPP-3](#)
Cc: [Sinha, Amit \(BPA\) - TEP-TPP-1](#)
Subject: RE: OHGW - when can we get an exception? 7-15-14
Date: Tuesday, July 15, 2014 1:45:46 PM

All,

Based on Angela and I's meeting with Christine Goldsworthy today, we do not need to relocate the Little Buck Substation. We are meeting the OHGW policy.

Please, let me know if you have any questions.

Amy

Amy Marie Gardner, EIT, PMP
Bonneville Power Administration
Transmission Project Management
Senior Project Manager
Electrical Engineer
TEP-TPP-1
Office: (360) 619-6154
Dats: 922-71-6154
Cell: (360) 518-1976
Fax: (360) 619-6934
Email: amgardner@bpa.gov

From: Goldsworthy, Christine E (BPA) - TESM-AMPN-2
Sent: Monday, July 14, 2014 11:11 AM
To: DeClerck, Angela (BPA) - TSE-TPP-2; Randall, Cheryl C (BPA) - TPCV-TPP-4
Cc: Van Leuven, Allen L (BPA) - TELC-TPP-3; Gardner, Amy M (BPA) - TEP-TPP-1; Tyson, Ivy L (BPA) - TPS-TPP-1
Subject: RE: OHGW - when can we get an exception?

Per our discussion today at 10:30 it appears that we can get adequate station entrance shielding by adding shield wire from the substation dead-end structures just out to the second set of structures (two lines) just before the tap line passes under the 230 kV N. Bonneville – Midway #1 line. The N. Bonneville – Midway line itself will also provide shielding for the new tap line as the tap line passed under the line. Per the PRD 271980 the new line terminals will have surge arresters as well.

Thank You,

Christine

*Christine Goldsworthy - TESM/AMPN-2
Substation Maintenance & High Voltage Engineering*

*Bonneville Power Administration
5411 N.E. Highway 99
PO Box 491
Vancouver, WA 98666-0491*

 Tel : 360.418.2034
 Fax : 360.418.2958
 Cell: 360.607.8340
 e-mail: cegoldsworthy@bpa.gov

From: DeClerck,Angela (BPA) - TSE-TPP-2
Sent: Wednesday, March 26, 2014 8:04 AM
To: Goldsworthy,Christine E (BPA) - TESM-AMPN-2; Randall,Cherilyn C (BPA) - TPCV-TPP-4
Cc: Van Leuven,Allen L (BPA) - TELC-TPP-3; Gardner,Amy M (BPA) - TEP-TPP-1; Tyson,Ivy L (BPA) - TPS-TPP-1
Subject: RE: OHGW - when can we get an exception?

Thanks Christine. Hopefully this will help out

From: Goldsworthy,Christine E (BPA) - TESM-AMPN-2
Sent: Tuesday, March 25, 2014 11:48 AM
To: DeClerck,Angela (BPA) - TSE-TPP-2; Randall,Cherilyn C (BPA) - TPCV-TPP-4
Cc: Van Leuven,Allen L (BPA) - TELC-TPP-3
Subject: RE: OHGW - when can we get an exception?

Cherilyn, Angela,

The one mile length is not as critical for 230 kV as it is for 500 kV so there is definitely some wiggle room. Since the line loops into the station I would recommend shooting for about ½ mile and at the very least get a shield wire from the dead-end structures in the yard out onto the first tower in each direction on the line. Since this is a looped line, sectionalizing the line puts the remaining section/equipment at greater risk since there is no split in the surge current at the line terminal.

The surge arresters are absolutely critical in this case if there's a reduction in the OHGW length. The surge arresters are also important, as we are finding, in relation to supporting live line and barehand work and the permissible minimum approach distances (MAD's).

Christine

From: DeClerck,Angela (BPA) - TSE-TPP-2
Sent: Monday, March 24, 2014 2:51 PM
To: Randall,Cherilyn C (BPA) - TPCV-TPP-4; Goldsworthy,Christine E (BPA) - TESM-AMPN-2
Subject: RE: OHGW - when can we get an exception?

I would also like to add that we worked with Senior Management and staff to relocate the structures outside the scenic gorge and gave the customer that assurance in order to complete their environmental review. This change would be a really big deal.

See my other email. I will set up a meeting to discuss as needed

Angela

From: Randall,Cherilyn C (BPA) - TPCV-TPP-4
Sent: Monday, March 24, 2014 2:47 PM
To: Goldsworthy,Christine E (BPA) - TESM-AMPN-2
Cc: DeClerck,Angela (BPA) - TSE-TPP-2
Subject: OHGW - when can we get an exception?

Hi Christine,

I am working with SDS Lumber on their Whistling Ridge wind project interconnection. They need a new three-breaker ring bus on the Midway – North Bonneville 230 kV line. Because of some very contentious political and environmental sensitivities, we are trying to stay away from needing to do any work inside the Columbia River Scenic Gorge boundary. We're right on the edge of the boundary for the new substation site. Usually BPA requires one mile of new OHGW in each direction when a new sub goes into an existing line. However, this project is getting hung up on the OHGW requirement. Is it possible to get an exception for the project, and if so, under what criteria? If you're not doing OHGW for the HV group any more, could you forward this email on?

Thanks,
Cherilyn

Cushnie, Colleen A (CONTR) - CGC-B1

Subject: Whistling Ridge Site Visit
Location: Whistling Ridge project area

Start: Thu 8/14/2014 8:30 AM
End: Thu 8/14/2014 5:00 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: McCain, Sean

We would like to have a site visit to the Whistling Ridge project site on 14 August to review the project and to update environmental reviews.

Please note:

All BPA employees will meet at TPP lobby at 830 and we will drive together to SDS Lumber where we will meet with Jason Spadaro at 1000. We will then proceed to the project site.

SDS Lumber
123 Industrial Road
Bingen, WA

Grange,Katey C (BPA) - KEC-4

From: Grange,Katey C (BPA) - KEC-4
Sent: Tuesday, September 30, 2014 8:37 PM
To: 'Posner, Stephen (UTC)'
Subject: RE: Whistling Ridge Project- Voicemail Follow Up

Thanks Stephen. I will give you a call at 3 on the 20th.

Katey Grange
Environmental Protection Specialist
Bonneville Power Administration
503.230.4047

From: Posner, Stephen (UTC) [<mailto:sposner@utc.wa.gov>]
Sent: Tuesday, September 30, 2014 7:38 AM
To: Grange,Katey C (BPA) - KEC-4
Subject: RE: Whistling Ridge Project- Voicemail Follow Up

Katey,

The first Monday I am available is October 20 at 10:30, 1:00 or 3:00. Please let me know if either of those times works for you.

Thanks,

Stephen Posner
Energy Facility Site Evaluation Council
Utilities and Transportation Commission
P.O. Box 43172
Olympia, WA 98504-3172
(360) 664-1903
stephen.posner@utc.wa.gov
www.efsec.wa.gov

From: Grange,Katey C (BPA) - KEC-4 [<mailto:kcgrange@bpa.gov>]
Sent: Monday, September 29, 2014 2:41 PM
To: Posner, Stephen (UTC)
Subject: Whistling Ridge Project- Voicemail Follow Up

Hi Stephen,

As stated in my message, I am the BPA environmental lead for the Whistling Ridge Energy Project. I am hoping that we can connect to discuss the outstanding items that Whistling Ridge needs to complete for your Site Certificate. I am currently only working on Mondays until the week of October 20th. If you have some time available today or next Monday, I would appreciate a couple of mins of your time. Please let me know of a time that would work for you and I will give you a call.

Thanks in advance,
Katey

Katey Grange
Environmental Protection Specialist
Bonneville Power Administration
PO Box 3621 - KEC-4
Portland, OR 97208-3621
503.230.4047
kcgrange@bpa.gov

From: [Grange,Katey C \(BPA\) - KEC-4](#)
To: [DeClerck,Angela \(BPA\) - TSE-TPP-2](#); [Gardner,Amy M \(BPA\) - TEP-TPP-1](#); [Adams,Hub V \(BPA\) - LN-7](#)
Cc: [Randall,Cherilyn C \(BPA\) - TPCV-TPP-4](#)
Subject: RE: Whistling Ridge environmental
Date: Friday, October 31, 2014 2:00:08 PM

Hi Angela and Amy,

Hub and I met today to discuss the SA and ROD. We thought that we would shoot to have the SA and ROD ready for TAC at the end of November/early December with the goal of having the ROD signed by the new year. Will this work for everyone?

Thanks,
Katey

Katey Grange
Environmental Protection Specialist
Bonneville Power Administration
503.230.4047

From: DeClerck,Angela (BPA) - TSE-TPP-2
Sent: Wednesday, October 29, 2014 7:50 AM
To: Gardner,Amy M (BPA) - TEP-TPP-1; Grange,Katey C (BPA) - KEC-4; Adams,Hub V (BPA) - LN-7
Cc: Randall,Cherilyn C (BPA) - TPCV-TPP-4
Subject: RE: Whistling Ridge environmental

Ditto

From: Gardner,Amy M (BPA) - TEP-TPP-1
Sent: Tuesday, October 28, 2014 9:40 AM
To: Grange,Katey C (BPA) - KEC-4; DeClerck,Angela (BPA) - TSE-TPP-2; Adams,Hub V (BPA) - LN-7
Cc: Randall,Cherilyn C (BPA) - TPCV-TPP-4
Subject: RE: Whistling Ridge environmental

Sounds good. Thanks Katey!

Amy Marie Gardner, EIT, PMP
Bonneville Power Administration
Transmission Project Management
Senior Project Manager
Electrical Engineer
TEP-TPP-1
Office: (360) 619-6154
Dats: 922-71-6154
Cell: (360) 518-1976
Fax: (360) 619-6934
Email: amgardner@bpa.gov

From: Grange,Katey C (BPA) - KEC-4

Sent: Tuesday, October 28, 2014 9:21 AM
To: DeClerck,Angela (BPA) - TSE-TPP-2; Adams,Hub V (BPA) - LN-7
Cc: Gardner,Amy M (BPA) - TEP-TPP-1; Randall,Cherilyn C (BPA) - TPCV-TPP-4
Subject: RE: Whistling Ridge environmental

I sent on a draft of the SA to Hub for review, but I know that he is super busy... Hub and I have been trying to connect- when we do, we will discuss timeline and give you an update. Sound good?

Katey Grange
Environmental Protection Specialist | KEC-4
BONNEVILLE POWER ADMINISTRATION
kcgrange@bpa.gov | 503.230.4047
Please consider the environment before printing this email.

From: DeClerck,Angela (BPA) - TSE-TPP-2
Sent: Tuesday, October 28, 2014 9:18 AM
To: Adams,Hub V (BPA) - LN-7
Cc: Grange,Katey C (BPA) - KEC-4; Gardner,Amy M (BPA) - TEP-TPP-1; Randall,Cherilyn C (BPA) - TPCV-TPP-4
Subject: RE: Whistling Ridge environmental

Any news (:

From: Adams,Hub V (BPA) - LN-7
Sent: Tuesday, October 21, 2014 12:56 PM
To: DeClerck,Angela (BPA) - TSE-TPP-2
Cc: Grange,Katey C (BPA) - KEC-4; Gardner,Amy M (BPA) - TEP-TPP-1; Randall,Cherilyn C (BPA) - TPCV-TPP-4
Subject: RE: Whistling Ridge environmental

I've left a couple messages for Katey in the last couple weeks to check in on that but haven't heard back yet. Hopefully I hear from her soon and we can give you an update.

From: DeClerck,Angela (BPA) - TSE-TPP-2
Sent: Tuesday, October 21, 2014 9:51 AM
To: Adams,Hub V (BPA) - LN-7
Cc: Grange,Katey C (BPA) - KEC-4; Gardner,Amy M (BPA) - TEP-TPP-1; Randall,Cherilyn C (BPA) - TPCV-TPP-4
Subject: Whistling Ridge environmental

Hey just wondering the latest of where we are on the environmental review for this project.

From: [Adams, Hub V \(BPA\) - LN-7](#)
To: [Chong, Tim, Marcus H \(BPA\) - LT-7](#)
Cc: [DeClerck, Angela \(BPA\) - TSE-TPP-2](#); [Gardner, Amy M \(BPA\) - TEP-TPP-1](#); [Grange, Katey C \(BPA\) - KEC-4](#)
Subject: LGIP-related comments on WREP
Date: Wednesday, November 26, 2014 11:16:49 AM
Attachments: [FotGSOSAWREPCommentsforMarcus.pdf](#)

Hello Marcus,

As I mentioned to you a little bit ago, we need your help in responding to some comments from Friends of the Gorge on some LGIP-related topics for the Whistling Ridge Wind Project. The attached is an extracted pdf file with just the comments (#2 and #3) needing responses from you. Your responses need not be lengthy, but please make sure they fully hit on all the points made in the comments. If you could send us the responses by the end of next week (Dec 5th), I would appreciate it.

Also, if you'd like a copy of their full letter, please let me know and we can get that to you.

Thanks in advance for your help,
Hub

Similarly, the specific processes that EFSEC will utilize in conducting its review and public involvement will be determined after [WRE] contacts the Council about moving forward with the project.²³

2. The project details for the proposed Whistling Ridge Project are currently unknown, making any generation interconnection approval premature and inappropriate.

As noted above, the application for generation interconnection indicates that the WRE project “would consist of up to approximately 50, 1.2- to 2.5-MW wind turbines up to 426 feet tall.”²⁴ However, this information is now inaccurate for two reasons.

First, Governor Gregoire reduced the maximum number of turbines from 50 to 35.

Second, the Applicant has not disclosed the number, size, locations, capacity or manufacturer of the turbines proposed for the site. Indeed, according to the applicant, 35 turbines with a nameplate capacity of 2.5 MW cannot be located in the turbine corridors approved by the Governor.

By way of background, following EFSEC’s recommendation to the Governor, WRE filed a petition for reconsideration of EFSEC’s decision and recommendation.²⁵ In its petition, WRE stated that two specific turbine corridors containing five turbines (E-1–E-2 and F-1–F-3) “likely are not viable if turbines larger than 2 MW are used.”²⁶ WRE went on to state that “thirty 2.5-MW turbines cannot physically be sited in [the] remaining . . . corridors.”²⁷ WRE did state that thirty smaller (1.5-MW) turbines could be sited in the remaining corridors, but claimed that such a layout would not be economically viable.²⁸

Accordingly, there is no current plan for the Project reflecting the restrictions imposed by the Governor. The Applicant has failed to disclose the number, size, layout, locations, capacities, and manufacturer of the turbines, as well the total nameplate capacity of the Project as a whole. Nor, to our knowledge, has WRE submitted to BPA or EFSEC any additional technical or other information that might describe WRE’s intentions.²⁹

Lacking this information, the proposal fails to supply the “Information Required for Interconnections” in the *Technical Requirements for Interconnection to the BPA Transmission*

²³ *Id.*

²⁴ Ex. A.1 (BPA’s Whistling Ridge website).

²⁵ WRE’s Petition for Reconsideration is attached to these comments as Exhibit B.5.

²⁶ *Id.* at 2.

²⁷ *Id.*

²⁸ *See id.* at 2–3 (citing Whistling Ridge FEIS at 2-21).

²⁹ On March 20, 2014, and again on June 27, 2014, we emailed BPA asking whether it has been provided with any information regarding the size, rated capacity, anticipated output and/or location of the wind turbines proposed for the Project. To date, we have not received an answer to this question. Therefore, we assume BPA does not hold any information responsive to our requests.

Grid STD-N-000001 (November 2013) (“Technical Requirements”).³⁰ These Technical Requirements require an applicant to provide generator data as follows:

4.3.2 Generator Data

If one or more generators are included as part of the connection request, the following is typical data needed. If different types of generators are included, data for each different type of generator and generator step up transformer is needed.

4.3.2.1 Typical Generator data:

- Energy source (e.g., wind, natural gas, hydro, bio-mass, bio-gas, solar, geothermal, etc.)
- Number of rotating generators
- Number of turbines and type: wind, combustion, steam, hydro, engine generator, etc.
- Number and nameplate rating of static conversion devices (e.g. inverters for solar photovoltaic projects)
- Total nameplate rating in MW
- Nameplate power factor
- Station service load for plant auxiliaries, kW and Kvar
- Station service connection plan (specifically, which distribution utility will provide station service to the project when all generation is off line)³¹

As for variable generation facilities, such as wind energy projects, the following additional information is required:

4.3.2.3 Variable Generation

The following data is generally required of each asynchronous variable Large Generation Plant consisting of multiple generation units connected via a network (collector) system proposed or in operation within BPA’s Balancing Area. Similar data may be required for Small Generation consisting of multiple generation units and other asynchronous generation. The information is required to meet the WECC/NERC compliance requirements for Generation Owners / Generation Operators (GO/GOp).

- Proposed Wind Turbine Generator (WTG) or other variable generator manufacturer and data sheet(s), and main transformer(s) size and impedance.
- Collector system single line diagram that includes any proposed reactive equipment.
- Plant equivalent representation as defined by WECC.
- Submit post construction “as built” updates per WECC/NERC requirements to BPA following project commissioning. Include measured net reactive capability as measured at the POI.
- The owner must submit periodic updates of the Wind Generation Plant to BPA as required for WECC compliance with NERC Reliability Standards.³²

³⁰ A copy of the Technical Requirements is attached to these comments as Exhibit A.2.

³¹ Exhibit A.2 at 18.

³² *Id.*

WRE has not, to our knowledge, submitted a plan for the number, nameplate rating, manufacturer or other pertinent information regarding its generation facilities proposed to be connected to the Federal Columbia River Transmission System (“FCRTS”).

Nor has WRE, to our knowledge, provided a dynamic model of generating plant as required by section 5.3.7:

5.3.7 Generator Performance Testing, Monitoring and Validation

Each generator owner is responsible to provide a dynamic model of its generating plant to BPA. The model will characterize plant responses to system disturbances (voltage and frequency deviations at point of interconnection, oscillations) and control signals (power and voltage schedule). The dynamic model will be a part of the power system model used in system studies to determine operating transfer limits and network reinforcements. An incorrect model may result in incorrect transfer limits, which can either put the system at risk of failure or unnecessarily restrict transmission use.³³

Furthermore, given the current lack of information regarding WRE’s intentions, it cannot provide the “Plant Operational Data” required by section 12.2.6.3.1, as follows:

12.2.6.3.1 Plant Operational Data

Each wind generation plant should provide the Number of turbines and total rated capacity installed (MW). For each turbine:

- model/type, nameplate capacity
- turbine identification number (string/collector line if available)
- individual turbine coordinates (Latitude/Longitude)³⁴

WRE, as an interconnection applicant, has failed to supply the basic information necessary for consideration of the Project, *i.e.*, the type, nameplate rating, and locations of the turbines, to even begin the GIR review process. Accordingly, based on the scant information available about the Project, the GIR should be denied.

In the alternative, if BPA *does* have the required information discussed above, it has an obligation to make this information public and to request public comment, and to issue a supplemental EIS, before it makes a decision to approve the interconnection. BPA’s obligations under NEPA to prepare a supplemental EIS are discussed further below.

3. BPA should not act on the interconnection request until the System Impact Study is revised and updated.

As noted above, the Applicant has not provided any detail regarding the Project and therefore does not meet BPA’s Technical Requirements for Interconnection. In addition, there is apparently no current analysis of the impact this Project will have on the FCRTS.

³³ Exhibit A.2 at 28–29.

³⁴ *Id.* at 98.

In 2008, Puget Sound Energy (“PSE”) requested that BPA prepare a “System Impact Study” (“SIS”) for this project, which at the time was called the “Saddleback Project.” A SIS was prepared, dated April 3, 2008.³⁵ However, after the SIS was completed, PSE abandoned its role in the Project.

In an October 28, 2010 email to SOSA, BPA confirmed that the information in the 2008 SIS is “out of date, but there are no updated reports or studies done since the April 3, 2008 report regarding the connection of the Whistling Ridge project.”³⁶ As far as Friends and SOSA are aware, BPA has yet to update the 2008 SIS.

Now that the State of Washington has denied 15 of the proposed 50 wind turbines, the proposal is in an amorphous state, with no designation of turbine locations or sizes and no information concerning anticipated output. Accordingly, there is no available information that could form the basis for evaluating the Project’s impact on BPA’s transmission system.

The April 2008 SIS also identifies constraints to the delivery of power from this Project caused by limitations in transmission capacity from the Project to load centers in western Washington. Though PSE is no longer the transmission customer, the Applicant has consistently advertised this Project as intended to satisfy power needs in the State of Washington. Accordingly, the SIS needs to be updated to determine if the relevant power flow paths are still constrained.

The April 3, 2008 study is also out of date for other reasons. Since that date, significant additional wind capacity has been added to the FCRTS. BPA’s records show that as of the date the SIS was issued (April 3, 2008), there were 1,301 MW of installed wind capacity in BPA’s balancing authority area, and that since then the capacity has more than tripled.³⁷ The SIS was also prepared before BPA began encountering serious issues with overcapacity because of wind projects.

Whistling Ridge is currently a non-project, with no specifications of the number, size, location, and manufacturer of the turbines. Nor is there any indication when this ambiguous proposal might be ready for review. As such, it is not currently possible to assess the potential impacts of the project on the BPA transmission system. If and when the Applicant supplies basic information about the Project and the requested interconnection, BPA should then prepare a new System Impact Study, prior to acting on the Applicant’s request.

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³⁵ A copy of the 2008 SIS is attached to these comments as Exhibit A.3.

³⁶ A copy of BPA’s email to SOSA is attached to these comments as Exhibit A.4.

³⁷ BPA, Wind Generation Nameplate Capacity in the BPA Balancing Authority Area (Apr. 10, 2013) (attached as Exhibit A.5 and available at http://transmission.bpa.gov/Business/Operations/Wind/WIND_InstalledCapacity_DATA.pdf).

From: [Jason Spadaro](#)
To: [DeClerck,Angela \(BPA\) - TSE-TPP-2](#)
Cc: [Adams,Hub V \(BPA\) - LN-7](#)
Subject: Re: FOTG Inquiry about WREP that BPA needs to address in the ROD
Date: Tuesday, December 09, 2014 9:21:21 AM

And thank you

On Tue, Dec 9, 2014 at 9:20 AM, Jason Spadaro <jasons@sdslumber.com> wrote:

Hi Angela,
Will do.
Jason

On Tue, Dec 9, 2014 at 9:15 AM, DeClerck,Angela (BPA) - TSE-TPP-2
<ardeclerck@bpa.gov> wrote:

Hello Jason,

We are putting together responses to a comment letter we received in July from Friends of the Columbia Gorge concerning the Whistling Ridge wind project. There is one comment they raise that we need your help on. It is their comment #4, which says the wind project is not economically viable. Since it seems to me that you as the developer are the most logical person to respond to such a comment, could you please provide me with your response to that comment? I have attached a copy of the comment for your convenience. If you could provide me with your response sometime in the next couple of weeks or so, I would really appreciate it.

Let me know if you have any questions.

Thanks so much,

Angela

--

Jason Spadaro
SDS Lumber Company
[509-493-6103](tel:509-493-6103) (office)
(b)(6) (cell)

jasons@sdslumber.com

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Jason Spadaro
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509-493-6103 (office)
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jasons@sdslumber.com

Grange,Katey C (BPA) - KEC-4

From: Posner, Stephen (UTC) <sposner@utc.wa.gov>
Sent: Wednesday, December 31, 2014 7:32 AM
To: Grange,Katey C (BPA) - KEC-4
Subject: RE: Whistling Ridge Mail List Updates

Happy new year to you.

Stephen Posner
Energy Facility Site Evaluation Council
Utilities and Transportation Commission
P.O. Box 43172
Olympia, WA 98504-3172
(360) 664-1903
stephen.posner@utc.wa.gov
www.efsec.wa.gov

From: Grange,Katey C (BPA) - KEC-4 [<mailto:kcgrange@bpa.gov>]
Sent: Wednesday, December 31, 2014 7:30 AM
To: Posner, Stephen (UTC)
Subject: RE: Whistling Ridge Mail List Updates

Happy New Year. Thanks.

Katey Grange
Environmental Protection Specialist
Bonneville Power Administration
503.230.4047

From: Posner, Stephen (UTC) [<mailto:sposner@utc.wa.gov>]
Sent: Wednesday, December 31, 2014 7:21 AM
To: Grange,Katey C (BPA) - KEC-4
Subject: RE: Whistling Ridge Mail List Updates

No updates. Thanks.

Stephen Posner
Energy Facility Site Evaluation Council
Utilities and Transportation Commission
P.O. Box 43172
Olympia, WA 98504-3172
(360) 664-1903
stephen.posner@utc.wa.gov
www.efsec.wa.gov

From: Grange,Katey C (BPA) - KEC-4 [<mailto:kcgrange@bpa.gov>]
Sent: Tuesday, December 30, 2014 7:40 AM
To: Posner, Stephen (UTC)
Subject: Whistling Ridge Mail List Updates

Hi Stephen,

I'm updating the Whistling Ridge mail list and wanted to check to see if you had any updates/additions you want included. Our folks updated the elected officials (such as Governor, Representatives, etc), so I think we have the elected official changes covered.

Happy New Year.

Katey

Katey Grange

Environmental Protection Specialist | KEC-4

BONNEVILLE POWER ADMINISTRATION

kcgrange@bpa.gov | 503.230.4047

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