



March 12, 2010

Government

Industry

Columbia Gorge
Community
College

Oregon Energy Facility Siting Council
Oregon Department of Energy

Aubrey
Silvey
Enterprises

Eastern Oregon
Rural Alliance

Council Members,

Coats Ranch

Farmers
Irrigation

The COMMUNITY RENEWABLE ENERGY ASSOCIATION (CREA) is an Oregon based intergovernmental organization whose mission is to support policy and advocacy for Community Based Renewable Energy projects in Oregon. They are defined as projects of 10 MW and less in all technologies – Small Hydro, Geothermal, Biomass, community wind, Wave, Solar, and others.

Columbia
Energy
Partners

Gilliam County

Ecofys US

Harney County

This letter is to provide the Energy Facility Siting Council with input on a proposal being considered in response to an ONDA petition about aggregation of multiple large projects in a given region of the state. This will be a topic of interest to commercial wind projects and I leave that discussion to people better suited to address the issue than CREA is.

Energy
Vision LLC

Hood River
County

Northern
Power
Systems

Lake County
Resources
Initiative

What I would like to do is caution the Council to be careful of unintended consequences.

Orbis Group,
Inc

Middlefork
Irrigation

Morrow County

There has been considerable discussion in the wind community as to when several projects are stand-alone project or become enough critical mass to require an EFSC permit approach. The ODOE 13 point criteria document has helped lend a screening method to assist in decision making.

Oregon
Community
Energy

MCCOG

Oregon
Power
Solutions

Oregon
Department of
Energy

Oregon
Rural Action

Sherman County

The ONDA proposal requests a different approach to the screening method used to determine multiple project requirements for either several local conditional use permits or a combined EFSC process.

Oregon Trail
Wind Farm

Union County

Oregon
Wind Farms

Wallowa County

Wasco County

Unfortunately, the ONDA proposal does not recognize the differences in size and impact between multiple large commercial wind projects and the much smaller size and impact of Community Based Renewable Energy Projects.

Proctor's
Transport

Wheeler County

The COMMUNITY RENEWABLE ENERGY ASSOCIATION would like EFSC to exclude smaller Community Renewable Energy projects from EFSC's consideration of the ONDA request for joint aggregation of projects.

Richardson
and O'Leary

Western
Community
Energy

A number of Community Wind projects in a region would very unlikely trigger an EFSC siting requirement because their aggregate total would still be less than the 104 MW standard established as a threshold for EFSC jurisdiction. Several closely sited Community Projects in aggregate still is less than the siting requirements of EFSC. Their foot print is much smaller than the 104 MW EFSC limit and does not traditionally fall into EFSC jurisdiction.

Western
Wind Power

Likewise, it is unlikely for an aggregated set of biomass projects, Geotech projects, small hydro, or wave energy projects to approach the threshold of EFSC siting.

The State's Renewable Energy Standard of 2007 specifically requires state agencies to put in place policies in support of Community Renewables. ONDA's proposal as presented would do just the opposite. With no screening criteria of project size, their proposal could trigger unintended aggregation of projects the sum of which does not require EFSC consideration.

For example, several small 10 MW projects owned by different farmers, counties, or communities may elect to use a joint substation interconnection to control transmission interconnection costs. They may also elect to buy common turbines and do other combined activities as appropriate for projects of their size. Their aggregated size is unlikely to approach the 104 MW EFSC size and should not be under EFSC jurisdiction unless the sum of these projects exceeds the 35 MW average generating capacity threshold.

Likewise, an irrigation district may build several 2-3 MW hydro power stations along a several mile-long pen stock pressurized piping system. The aggregate size is well below the EFSC criteria and should not trigger EFSC jurisdiction.

Solar facilities routinely aggregate a number of small kW systems that rarely exceed 1 MW in size and do not trigger EFSC siting requirements.

CONCLUSION

We request that EFSC exempt from EFSC siting consideration a group of aggregated Community Sized projects unless the sum of the combined projects exceeds EFSC's size criteria.

Thank you for your consideration.

A handwritten signature in black ink that reads "Paul R. Woodin". The signature is written in a cursive, flowing style.

Paul R Woodin
Executive Director
Community Renewable Energy Association
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