

BEFORE THE STATE OF WASHINGTON
ENERGY FACILITY SITING EVALUATION COUNCIL

In the Matter of the Application of:

Scout Clean Energy, LLC, for Horse Heaven
Wind Farm, LLC,

Applicant.

DOCKET NO. EF-210011

REPLY TESTIMONY OF LESLIE
MCCLAIN ON BEHALF OF SCOUT
CLEAN ENERGY, LLC

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ON BEHALF OF

SCOUT CLEAN ENERGY, LLC

EXH-1040_R

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JULY 12, 2023

1 **Q.** Please state your name, occupation, and where you live.

2 **A.** My name is Leslie McClain. I reside in White Salmon, Washington.

3 **Q.** Where are you employed?

4 **A.** I am employed at Tetra Tech, an environmental consulting, engineering, and
5 permitting firm, which, among other things, serves the energy industry. I have
6 described my professional experience in prior testimony.

7 **Q.** Please describe the purpose of your testimony.

8 **A.** I am providing clarifying testimony regarding the ability of Scout Clean Energy to
9 safely operate the Horse Heaven Energy Facility (“Project”) without measurable fire
10 safety risk. I am testifying in response to the pre-filed direct testimony of Greg Wendt
11 and Michelle Cooke, both of whom work for the Benton County Planning
12 Department, as well as rebuttal testimony from Ms. Linda Lehman, expressing
13 concerns regarding safety for aircraft during fire suppression work. My testimony
14 speaks to the ability of the Project to be constructed and to operate subject to typical
15 practices, conditions, and requirements imposed as conditions at operating wind
16 energy projects in Oregon and Washington.

17 **Q.** Are you able to answer questions under cross examination regarding your testimony?

18 **A.** Yes.

19 **Q.** Do you have specific expertise regarding fire prevention and control?

20 **A.** No. However, in my experience in permitting Northwest energy facilities, I am
21 familiar with typical conditions imposed on wind and solar energy facilities in order
22 to minimize the risk of fire associated with these facilities. Wind turbine fires in the
23 Northwest are a remote risk; I am aware of only one incident since the advent of
24 Northwest wind energy facilities where a fire was attributed to a malfunctioning wind
25 turbine generator.

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1 Q. Are you familiar with fire conditions at other wind energy facilities imposed by
2 permitting entities?

3 A. Yes, I am.

4 Q. Is it common practice in energy facility permitting for the permitting agency to
5 impose conditions to minimize and avoid fire safety risks?

6 A. Yes. To my knowledge, in every major wind and solar energy facility pending or
7 approved by either Washington EFSEC or Oregon Energy Facility Siting Council
8 (“EFSC”). EFSC, the permitting agency, has imposed conditions to address fire
9 safety risks. The same is true for most wind farms permitted at the county level in
10 Oregon and Washington.

11 Q. Are you familiar with these conditions, and able to explain them?

12 A. Yes, I am. In my testimony below, I include conditions from other permitted and
13 operational wind and solar energy facilities that were imposed by Washington EFSEC
14 or Oregon EFSC to minimize and avoid risks associated with the extremely rare event
15 of a fire associated with wind and solar energy facilities. These example conditions
16 from other facilities show that on similar landscapes as this Project, decisionmakers
17 have crafted well understood requirements to ensure public safety.

18 **Washington EFSEC**

19 The following table lists some of the wind and solar facilities that have
20 received Site Certificate Agreements (“SCA”) from Washington EFSEC. All of the
21 below listed facilities were required to prepare a Fire Control Plan and have this plan
22 approved by EFSEC prior to commencement of the construction and operation
23 phases. The Fire Control Plan is typically developed in consultation with the County
24 Fire District and other appropriate agencies. The plan would detail measure for on-
25 site fire suppression and prevention, offsite fire suppression support, and safety plan
26 in the event of a fire.

1 EFSEC coordinates with the relevant agencies regarding review and approval
 2 of this plan. The Project anticipates that EFSEC would require a similar condition for
 3 a Fire Control Plan as with these other facilities.

4 In addition to a Fire Control Plan, all of the example wind facilities listed
 5 below have conditions that required execution of a fire protection service agreement
 6 with the local fire service providers. As noted in the Whistling Ridge Energy Project
 7 SCA condition, the cost of fire protection was to be borne by the certificate holder.
 8 Special training to the fire district personnel on how to respond to fires related to
 9 wind turbines, solar arrays, or battery energy storage facilities can be provided by the
 10 certificate holder to fire district personnel. Furthermore, the facilities are typically
 11 required to provide detailed maps to fire service providers detailing the location of
 12 infrastructure and access roads and provide keys to the master lock system that would
 13 enable emergency personnel to unlock gates that would otherwise limit access to the
 14 project. Before beginning construction, the certificate holder would submit a Notice
 15 of Proposed Construction or Alteration to the Federal Aviation Administration
 16 (“FAA”) identifying the proposed final locations of turbine towers and
 17 meteorological towers.

18 The Project anticipates that EFSEC will include a similar condition as it has
 19 done with other facilities, requiring an approved Fire Control Plan prior to project
 20 commencement, and requiring a fire protection service agreement with the local fire
 21 service providers.

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WA EFSEC Facility	Fire Control Plan Condition of ASC?	Fire Protection Services Agreement Condition of ASC?
Desert Claim Wind Power Project	Yes, for both construction and operations. See SCA conditions below. <i>SCA condition:</i>	Yes, see SCA conditions below. <i>SCA condition:</i> Prior to commencing Site Preparation, the Certificate Holder shall verify continuing protection

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WA EFSEC Facility	Fire Control Plan Condition of ASC?	Fire Protection Services Agreement Condition of ASC?
Desert Claim Wind Power Project (cont.)	<p>The Certificate Holder shall develop and implement a Fire Control Plan in coordination with state and local agencies to minimize risk of accidental fire during construction and to ensure effective response to any fire that does occur on the Project Site at any time. The Certificate Holder shall submit the Fire Control Plan to EFSEC for review and approval at least sixty (60) days prior to Site Preparation and provide a copy to WDFW, DNR and Ecology for comment. The Certificate Holder shall not begin Site Preparation prior to obtaining Council approval of the Fire Control Plan.</p> <p>SCA condition: The Certificate Holder shall develop an operations phase Fire Control Plan in consultation with WDFW and WDNR and in coordination with other state and local agencies to minimize risk of accidental fire during operation and ensure effective response to any fire that does occur. No later than sixty (60) days prior to the beginning of Commercial Operation, the Certificate Holder shall submit the Plan to EFSEC for review and approval.</p>	<p>through DNR for Desert Claim facilities on land leased from that agency and shall execute a fire protection services agreement with a fire services provider such as Kittitas Valley Fire and Rescue for the Project site to ensure that adequate fire protection services are in place during the construction and operations of the Project.</p> <p>SCA condition: The Certificate Holder shall maintain fire protection services agreement(s) ... for the entire Project, for the life of the Project or until and to the extent that the Project site is annexed into a Fire District or other municipal entity that provides fire protection services.</p>
Kittitas Valley Wind Power Project	<p>Yes, for both construction and operations. See SCA conditions below.</p> <p>SCA conditions:</p>	<p>Yes, see SCA conditions below.</p> <p>SCA conditions: The fire protection services agreement that the Certificate Holder</p>

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WA EFSEC Facility	Fire Control Plan Condition of ASC?	Fire Protection Services Agreement Condition of ASC?
Kittitas Valley Wind Power Project (cont.)	<p>The Certificate Holder shall develop and implement a Fire Control Plan in coordination with state and local agencies to minimize risk of accidental fire during construction and to ensure effective response to any fire that does occur on the Project Site. The Certificate Holder shall submit the Fire Control Plan for review and approval at least sixty (60) days prior to Site Preparation. The Certificate Holder shall not begin Site Preparation prior to obtaining Council approval of the Fire Control Plan.</p> <p>SCA conditions: The Certificate Holder shall develop and implement an operations phase Fire Control Plan in coordination with state and local agencies to minimize risk of accidental fire during operation and ensure effective response to any fire that does occur. No later than sixty (60) days prior to the beginning of Commercial Operation the Certificate Holder shall submit the Plan to EFSEC for review and approval.</p>	<p>has executed with Kittitas County Fire District #1 for the Project assures that suitable fire protection services are in place during the construction and ongoing operations of the Project. A fire protection services agreement shall be maintained for the life of the Project, or until the Project site is annexed into a Fire District or other municipal entity that provides fire protection services.</p>
Whistling Ridge Energy Project	<p>Yes, for both construction and operations. See SCA conditions below.</p> <p>SCA conditions: The Certificate Holder shall develop and implement a Fire Control Plan in coordination with state and local agencies to</p>	<p>Yes, see SCA conditions below.</p> <p>SCA conditions: Prior to commencing Site Preparation, the Certificate Holder shall verify continuing protection for Whistling Ridge Energy and shall execute a fire protection services agreement with fire services</p>

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WA EFSEC Facility	Fire Control Plan Condition of ASC?	Fire Protection Services Agreement Condition of ASC?
Whistling Ridge Energy Project, Cont.	<p>minimize risk of accidental fire during construction and to ensure effective response to any fire that does occur on the Project Site at any time. The Certificate Holder shall submit the Fire Control Plan to EFSEC for review and approval at least sixty (60) days prior to Site Preparation and provide a copy to WDFW, DNR, Southwest Region and other local and state service providers for comment. The Certificate Holder shall not begin Site Preparation prior to obtaining Council approval of the Fire Control Plan.</p> <p>The Certificate Holder shall develop an operations phase Fire Control Plan in consultation with WDFW, DNR, and Southwest Region and in coordination with other state and local agencies to minimize risk of accidental fire during operation and ensure effective response to any fire that does occur. No later than sixty (60) days prior to the beginning of Commercial Operation, the Certificate Holder shall submit the Plan to EFSEC for review and approval.</p>	<p>providers for the Project site to ensure that adequate fire protection services are in place during the construction and operation of the Project. Cost for fire protection services shall be borne by Whistling Ridge Energy.</p> <p>SCA condition: The Certificate Holder shall maintain fire protection services agreement(s) ... for the entire Project, for the life of the Project or until and to the extent that the Project site is annexed into a Fire District or other municipal entity that provides fire protection services.</p>
Wild Horse Wind Project	<p>Yes, for both construction and operations. See SCA conditions below.</p> <p>SCA condition: The Certificate Holder shall submit the Fire Control Plan to EFSEC and the County for</p>	<p>Yes. See SCA conditions below.</p> <p>SCA condition: The fire protection services agreement that the Certificate Holder has executed with Ellensburg Rural Fire District #2 for the Project, Exhibit G of Attachment 4 to this</p>

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WA EFSEC Facility	Fire Control Plan Condition of ASC?	Fire Protection Services Agreement Condition of ASC?
Wild Horse Wind Project, Cont.	<p>review at least sixty (60) days prior to Site Preparation. The Certificate Holder shall not begin Site Preparation prior to obtaining Council approval of the Fire Control Plan.</p> <p>SCA condition: The Certificate Holder shall develop and implement an operations phase Fire Control Plan in coordination with state and local agencies to minimize risk of accidental fire during operation and ensure effective response to any fire that does occur. No later than sixty (60) days prior to the beginning of Commercial Operation the Certificate Holder shall submit the Plan to the County for review and to EFSEC for review and approval.</p>	<p>Agreement, assures that suitable fire protection services are in place during the construction and ongoing operations of the Project. A fire protection services agreement shall be maintained for the life of the Project, or until the Project site is annexed into a Fire District or other municipal entity which provides fire protection services.</p>
Goose Prairie Solar	<p>Yes, see SCA conditions below.</p> <p>SCA conditions: The Certificate Holder shall develop and implement a Construction Fire Control Plan in coordination with state and local agencies to minimize the risk of accidental fire during construction and to ensure effective response to any fire that does occur on the Facility Area at any time. The Certificate Holder shall submit the Fire Control Plan to EFSEC for review and approval at least ninety (90) days prior to Construction and provide a copy to WDFW, and Yakima County Fire District #4. The</p>	No.

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WA EFSEC Facility	Fire Control Plan Condition of ASC?	Fire Protection Services Agreement Condition of ASC?
Goose Prairie Solar (cont.)	<p>Certificate Holder shall not begin Construction prior to obtaining EFSEC approval of the Fire Control Plan.</p> <p>SCA condition: The Certificate Holder shall develop an Operations Fire Control Plan in coordination with state and local agencies to minimize the risk of accidental fire during operation and ensure effective response to any fire that does occur. The Fire Control Plan must consider and address potential wildfire risk minimization and response.</p>	
High Top Solar Project	<p>Yes, see SCA conditions below.</p> <p>SCA conditions: Construction Fire Control Plan: The Certificate Holder shall develop and implement a Construction Fire Control Plan in coordination with state and local agencies to minimize the risk of accidental fire during construction and to ensure effective response to any fire that does occur on the Project Footprint at any time. The Certificate Holder shall submit the Fire Control Plan to EFSEC for review and approval at least ninety (90) days prior to Construction and provide a copy to Yakima County Fire District #4. The Certificate Holder shall not begin Construction prior to obtaining EFSEC approval of the Fire Control Plan.</p>	No.

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WA EFSEC Facility	Fire Control Plan Condition of ASC?	Fire Protection Services Agreement Condition of ASC?
Goose Prairie Solar (cont.)	<p>SCA Condition: Operations Fire Control Plan: The Certificate Holder shall develop an Operations Fire Control Plan in coordination with state and local agencies to minimize the risk of accidental fire during operation and ensure effective response to any fire that does occur. The Fire Control Plan must consider and address potential wildfire risk minimization and response.</p>	
Ostrea Solar Project	<p>Yes, see SCA conditions below.</p> <p>SCA conditions: Construction Fire Control Plan: The Certificate Holder shall develop and implement a Construction Fire Control Plan in coordination with state and local agencies to minimize the risk of accidental fire during construction and to ensure effective response to any fire that does occur on the Project Footprint at any time. The Certificate Holder shall submit the Fire Control Plan to EFSEC for review and approval at least ninety (90) days prior to Construction and provide a copy to Yakima County Fire District #4. The Certificate Holder shall not begin Construction prior to obtaining EFSEC approval of the Fire Control Plan.</p> <p>SCA Condition: Operations Fire Control Plan: The Certificate Holder shall develop an Operations Fire</p>	No.

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WA EFSEC Facility	Fire Control Plan Condition of ASC?	Fire Protection Services Agreement Condition of ASC?
Ostrea Solar Project (cont.)	Control Plan in coordination with state and local agencies to minimize the risk of accidental fire during operation and ensure effective response to any fire that does occur. The Fire Control Plan must consider and address potential wildfire risk minimization and response.	

Oregon EFSC

The following solar and wind facilities have been permitted through the Oregon Department of Energy and Oregon EFSC. The below list includes site certificate conditions that are relevant to the topic of fire risk/fire safety.

- **Montague Wind Power Facility – Site Certificate Hazardous Materials, Fire Protection & Public Safety Conditions**
 - 58. The certificate holder shall install and maintain self-monitoring devices on each turbine, linked to sensors at the operations and maintenance building, to alert operators to potentially dangerous conditions, and the certificate holder shall immediately remedy any dangerous conditions. The certificate holder shall maintain automatic equipment protection features in each turbine that would shut down the turbine and reduce the chance of a mechanical problem causing a fire.
 - 59. During construction and operation of the facility, the certificate holder shall ensure that the O&M building and all service vehicles are equipped with shovels and portable fire extinguishers of a 4A50BC or equivalent rating.
 - 60. During construction and operation of the facility, the certificate holder shall develop and implement fire safety plans in consultation with the North Gilliam County Rural Fire Protection District to minimize the risk of fire and to respond appropriately to any fires that occur on the facility site. In

1 developing the fire safety plans, the certificate holder shall take into account
2 the dry nature of the region and shall address risks on a seasonal basis. The
3 certificate holder shall meet annually with local fire protection agency
4 personnel to discuss emergency planning and shall invite local fire protection
5 agency personnel to observe any emergency drill or tower rescue training
6 conducted at the facility.

7 ○ 61. Upon the beginning of operation of the facility, the certificate holder shall
8 provide a site plan to the North Gilliam County Rural Fire Protection District.
9 The certificate holder shall indicate on the site plan the identification number
10 assigned to each turbine and the actual location of all facility structures. The
11 certificate holder shall provide an updated site plan if additional turbines or
12 other structures are later added to the facility. During operation, the certificate
13 holder shall ensure that appropriate fire protection agency personnel have an
14 up-to-date list of the names and telephone numbers of facility personnel
15 available to respond on a 24-hour basis in case of an emergency on the facility
16 site.

17 ○ 62. During construction, the certificate holder shall ensure that construction
18 personnel are trained in fire prevention and response, that construction
19 vehicles and equipment are operated on graveled areas to the extent possible
20 and that open flames, such as cutting torches, are kept away from dry grass
21 areas.

22 ○ 63. During operation of the facility, the certificate holder shall ensure that all
23 on-site employees receive annual fire prevention and response training by
24 qualified instructors or members of the local fire districts. The certificate
25 holder shall ensure that all employees are instructed to keep vehicles on roads
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- 1 and off dry grassland, except when off-road operation is required for
2 emergency purposes.
- 3 ○ 64. Before beginning construction, the certificate holder shall submit a Notice
4 of Proposed Construction or Alteration to the Federal Aviation Administration
5 (“FAA”) and the Oregon Department of Aviation identifying the proposed
6 final locations of turbine towers and meteorological towers. The certificate
7 holder shall promptly notify the Department of the response from the FAA
8 and Oregon Department of Aviation.
- 9 • **Nolin Hills Wind and Solar Project - Proposed Order Public Service Conditions**
- 10 ○ Recommended Public Services Condition 6 (“PRO”): Prior to operation, the
11 certificate holder shall contact the Echo Rural Fire Protection District
12 Umatilla County Fire District #1 (“UDFD #1”) to schedule an on-site
13 orientation to review facility layout and safety procedures.
- 14 ○ Recommended Public Services Condition 7 (“PRE”): Prior to construction of
15 the facility, or facility component, the certificate holder shall:
- 16 a. Finalize and submit to the Department a Fire Prevention, Suppression and
17 Emergency Management Plan which shall include at a minimum the
18 provisions included in Attachment U-2 of the Final Order on ASC.
- 19 b. Submit copies of the Final Fire Prevention, Suppression and Emergency
20 Management Plan to the Echo Rural Fire Protection District (“Echo
21 RFPD”) and UDFD #1.
- 22 ○ Recommended Public Services Condition 8 (“OPR”): During operation, the
23 certificate holder shall operate the facility consistent with the provisions in the
24 Final Fire Prevention, Suppression and Emergency Management Plan, as
25 approved in Public Services Condition 7. If substantive updates or changes are
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1 made to the plan, submit copies of the updated plan to the Department and to
2 the Echo RFPD and UDFD #1.

3 **Q.** Based on the conditions you referenced from other wind and solar projects in
4 Washington and Oregon, do you anticipate the Project will present a material safety risk
5 to fire suppression aircraft as referenced in Ms. Lehman’s testimony?

6 **A.** I am not an expert in firefighting or wildland firefighting aviation so I cannot answer
7 that question directly, but based on my expertise in land use, I would say that many of
8 Ms. Lehman’s concerns could be addressed by implementation of appropriate conditions
9 similar to those required at other wind and solar projects in Oregon and Washington and
10 referenced earlier in this testimony. Some example conditions could include the
11 following:

12 ○ Example Condition #1: If available from the selected manufacturer at the time
13 of the wind turbine order, the certificate holder shall install and maintain self-
14 monitoring devices on each turbine, linked to sensors at the operations and
15 maintenance building, to alert operators to potentially dangerous conditions,
16 and the certificate holder shall immediately remedy any dangerous conditions.
17 The certificate holder shall maintain automatic equipment protection features
18 in each turbine that would shut down the turbine and reduce the chance of a
19 mechanical problem causing a fire.

20 ○ Example Condition #2: The Certificate Holder shall develop and implement a
21 Fire Control Plan in coordination with state and local agencies to minimize
22 risk of accidental fire during construction and to ensure effective response to
23 any fire that does occur on the Project site at any time. The Certificate Holder
24 shall submit the Fire Control Plan to EFSEC for review and approval at least
25 sixty (60) days prior to Site Preparation and provide a copy to Benton County
26 Fire Districts #1 and #2, WDFW, DNR, Southwest Region and other local and

1 state service providers for comment. The Certificate Holder shall not begin
2 Site Preparation prior to obtaining Council reasonable efforts to achieve
3 approval of the Fire Control Plan.

- 4 ○ Example Condition #3: The Certificate Holder shall develop and implement
5 an operations phase Fire Control Plan in coordination with state and local
6 agencies to minimize risk of accidental fire during operation and ensure
7 effective response to any fire that does occur. No later than sixty (60) days
8 prior to the beginning of Commercial Operation the Certificate Holder shall
9 submit the Plan to the County for review and to EFSEC for review and
10 approval.
- 11 ○ Example Condition #4: In developing the Fire Control Plans, the certificate
12 holder shall take into account the dry nature of the region and shall address
13 risks on a seasonal basis. The certificate holder shall meet annually with local
14 fire protection agency personnel to discuss emergency planning and shall
15 invite local fire protection agency personnel to observe any emergency drill or
16 tower rescue training conducted at the facility.
- 17 ○ Example Conditions #5: The Fire Control Plan will outline protocols for
18 communication between the during operation, the certificate holder shall
19 ensure that appropriate fire protection agency personnel have an up-to-date list
20 of the names and telephone numbers of facility personnel available to respond
21 on a 24-hour basis in case of an emergency on the facility site. In the event of
22 a wildland fire occurring in the Project area, the Project’s O&M staff will
23 work with Benton County Fire District #1 and other inter-agency fire response
24 personnel to ensure the Project’s turbines can be shut down as needed to
25 ensure the safety of firefighting personnel and equipment.

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- 1 ○ Example Conditions #6: Prior to commencing Site Preparation, the Certificate
2 Holder shall verify fire protection for the Project and shall execute a fire
3 protection services agreement with fire services providers for the Project site
4 to ensure that adequate fire protection services are in place during the
5 construction and operation of the Project. The Certificate Holder shall
6 maintain fire protection services agreement(s) for the entire Project, for the
7 life of the Project, with local fire districts (Benton County Fire Districts #1
8 and #2) that provide fire protection services. Prior to construction, the
9 Certificate Holder will work with EFSEC and the local fire districts to ensure
10 sufficient funding for fire prevention and response.
- 11 ○ Example Conditions #7: Upon the beginning of operation of the facility, the
12 certificate holder shall provide a site plan and final turbine locations and
13 heights to the Benton County Fire District 1. The certificate holder shall
14 indicate on the site plan the identification number assigned to each turbine and
15 the actual location of all facility structures. The certificate holder shall provide
16 an updated site plan if additional turbines or other structures are later added to
17 the facility.
- 18 ○ Example Conditions #8: Before beginning construction, the certificate holder
19 shall submit a Notice of Proposed Construction or Alteration to the FAA
20 identifying the proposed final locations of turbine towers and meteorological
21 towers.
- 22 ○ Example Conditions #9: During construction, the certificate holder shall
23 ensure that construction personnel are trained in fire prevention and response,
24 that construction vehicles and equipment are operated on graveled areas to the
25 extent possible and that open flames, such as cutting torches, are kept away
26 from dry grass areas.

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- Example Conditions #10: During operation of the facility, the certificate holder shall ensure that all on-site employees receive annual fire prevention and response training by qualified instructors or members of the local fire districts. The certificate holder shall ensure that all employees are instructed to keep vehicles on roads and off dry grassland, except when off-road operation is required for emergency purposes.

DATED: July 12, 2023.

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