

Planning Commission  
Wasco County  
2705 East 2<sup>nd</sup> Street  
The Dalles, OR 97058

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### **Comments on Proposed Commercial Energy Ordinance**

Dear Commissioners:

E.ON Climate and Renewables, North America is a leading developer, builder and operator of renewable energy facilities in the United States. We currently operate 11 utility-scale wind farms in the United States with a total nameplate capacity of over 2,000 megawatts, consisting of more than 1,200 wind turbines. All of these facilities were conceived, developed and constructed by E.ON. Globally, E.ON is the largest investor-owned utility company in the world, with some 80,000 employees and operations in 30 countries. While we do not yet operate any wind farms in Oregon, we have been actively pursuing development opportunities in Wasco County since 2009. We have wind development leases in Wasco County dating to November 2009, and have contributed to the County's economic base through land lease payments and property taxes as well as through the purchase of local goods and services. We applaud Wasco County's efforts to produce a comprehensive re-write of the Energy Facility standards, and in general we think the proposed changes are a positive step towards responsible development of the County's energy resources.

Our comments and suggestions all relate to Chapter 19, Section 030 C and D, and for the most part focus on encouraging the County to adopt regulatory standards consistent with those of the Oregon Energy Facility Siting Council. We feel that the regulatory certainty and consistency afforded by the Energy Facility Siting Council's Siting Standards create a positive development environment in Oregon. Further, many wind energy projects cross political boundaries such as county lines, and having a uniform set of development standards to adhere to greatly simplifies facility design. Thank you all for the time and effort you have invested in this process, and for your consideration of the following suggestions:

Section 19.030.C.4 Visual Impact We suggest selecting Option 1 or Option 3 to be consistent with Oregon State EFSC siting standards.

19.030.D.1.a.(3) Lighting RADAR-triggered lighting systems are very new and relatively untested. We suggest striking language requiring lighting to be RADAR-triggered.

19.030.D.1.c.(2) Non-Project Boundaries We suggest using a setback of 1.1 times tower height to be consistent with EFSC siting standards.

19.030.D.1.c.(4) Non-Resource Boundaries We suggest adopting a setback of 3,520 feet in order to remain consistent with EFSC siting standards.

19.030.D.1.c.(5) Downwind Properties The term "downwind" is defined in the proposed language, but the definition is somewhat vague. On any wind site, wind direction changes over time, meaning that every point of the compass is "downwind" from a given turbine from time to time. We suggest using the term "prevailing wind direction" in place of "downwind" or redefining "downwind" to mean "the opposite side from the direction the wind blows the majority of the time."

Regards,



Mike Greczyn  
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E.ON Climate & Renewables