

Large Generator Interconnection
Facilities Study Report

FINAL

Completed for
(“Interconnection Customer”)
C1-37

Proposed Point of Interconnection
Pomona-Vantage 230 kV transmission line

June 24, 2022

TABLE OF CONTENTS

1.0	DESCRIPTION OF THE PROJECT	1
2.0	STUDY SCOPE AND OBJECTIVES.....	1
3.0	STUDY ASSUMPTIONS	1
4.0	TYPE OF INTERCONNECTION SERVICE	2
5.0	PROPOSED POINT OF INTERCONNECTION	2
6.0	SCOPE OF WORK	3
6.1	Generating Facility Requirements.....	3
6.1.1	INTERCONNECTION CUSTOMER TO BE RESPONSIBLE FOR.....	3
6.1.2	TRANSMISSION PROVIDER TO BE RESPONSIBLE FOR	7
6.2	Point of Interconnection	8
6.2.1	INTERCONNECTION CUSTOMER TO BE RESPONSIBLE FOR.....	8
6.2.2	TRANSMISSION PROVIDER TO BE RESPONSIBLE FOR	8
6.3	Other.....	10
6.3.1	INTERCONNECTION CUSTOMER TO BE RESPONSIBLE FOR.....	10
6.3.2	TRANSMISSION PROVIDER TO BE RESPONSIBLE FOR	10
7.0	COST ESTIMATE (+/- 20%)	10
8.0	SCHEDULE.....	12
9.0	PARTICIPATION BY AFFECTED SYSTEMS	13
10.0	APPENDICES.....	13
10.1	APPENDIX 1: HIGHER PRIORITY REQUESTS	14
10.2	Appendix 2: Contingent Facilities.....	15
10.3	APPENDIX 2: PROPERTY REQUIREMENTS.....	16

1.0 DESCRIPTION OF THE PROJECT

The Interconnection Customer has proposed to interconnect 199 megawatts (“MW”) of new solar and battery storage generation to PacifiCorp’s (“Transmission Provider”) Pomona-Vantage 230 kV transmission line located in Kittitas County, Washington. The Interconnection Request is proposed to consist of two hundred fifty-five (55) TMEIC PVUL08800GR 4,000 kVA solar inverters for a total output of 199 MW at the POI. In addition, the Interconnection Request includes twenty-nine (29) 3,825 kVA TMEIC BSU-L0840GR battery storage inverters to be DC coupled. The requested commercial operation date is December 31, 2024.

Interconnection Customer will NOT operate this generator as a Qualified Facility as defined by the Public Utility Regulatory Policies Act of 1978 (PURPA).

The Transmission Provider has assigned the Project “C1-37.”

2.0 STUDY SCOPE AND OBJECTIVES

The objective of the facilities study is to:

- complete a facilities analysis, which shall specify and estimate the cost of equipment, engineering, procurement, and construction required to address issues as outlined in the system impact study, and
- provide a scope of work and an estimated cost and schedule for completing the scope of work.

The information contained in this study report is based on preliminary information and not to be used for construction.

3.0 STUDY ASSUMPTIONS

- All active higher priority transmission service and/or generator interconnection requests will be considered in this study and are listed in Appendix 1. If any of these requests are withdrawn, the Transmission Provider reserves the right to restudy this request, as the results and conclusions contained within this study could significantly change.
- For study purposes there are two separate queues:
 - Transmission Service Queue: to the extent practical, all network upgrades that are required to accommodate active transmission service requests will be modeled in this study.
 - Generation Interconnection Queue: Interconnection Facilities associated with higher queue interconnection requests will be modeled in this study.
- The Interconnection Customer’s request for energy or network resource interconnection service in and of itself does not convey transmission service. Only a Network Customer may make a request to designate a generating resource as a Network Resource. Because the queue of higher priority transmission service requests may be different when a Network Customer requests network resource designation for this Generating Facility, the available capacity or transmission modifications, if any, necessary to provide network resource interconnection service may be

- significantly different. Therefore, the Interconnection Customer should regard the results of this study as informational rather than final.
- This study assumes the Project will be integrated into Transmission Provider's system at the agreed upon and/or proposed point of interconnection.
 - The Interconnection Customer will construct and own any facilities required between the Point of Interconnection and the Project.
 - Line reconductor or fiber underbuild required on existing poles will be assumed to follow the most direct path on the Transmission Provider's system. If during detailed design the path must be modified it may result in additional cost and timing delays for the Interconnection Customer's Project.
 - Generator tripping may be required for certain outages.
 - All facilities will meet or exceed the minimum Western Electricity Coordinating Council ("WECC"), North American Electric Reliability Corporation ("NERC"), and Transmission Provider performance and design standards.
 - Bonneville Power Administration ("BPA") has notified the Transmission Provider that it requires an Affected System study for this Interconnection Request. This study report does not contain any required upgrades or associated estimated costs from BPA. The milestone schedule is based on assumptions regarding BPA's typical schedule and may need to be revised further once any necessary agreements have been executed with BPA.
 - This report is based on information available at the time of the study. It is the Interconnection Customer's responsibility to check the Transmission Provider's web site regularly for Transmission system updates at (<https://www.oasis.oati.com/ppw>)

4.0 TYPE OF INTERCONNECTION SERVICE

The Interconnection Customer has selected Network Resource (NR) Interconnection Service.

5.0 PROPOSED POINT OF INTERCONNECTION

The Interconnection Customer's proposed Generating Facility is to be interconnected to the Transmission Provider's Pomona-Vantage 230 kV transmission line via a new Point of Interconnection substation. The new Point of Interconnection substation is proposed to be constructed adjacent to the transmission line approximately 14 miles northeast from the Pomona Heights substation at latitude 46.8295, longitude -120.3686. Figure 1 below, is a one-line diagram that illustrates the interconnection of the proposed Generating Facility to the Transmission Provider's system.

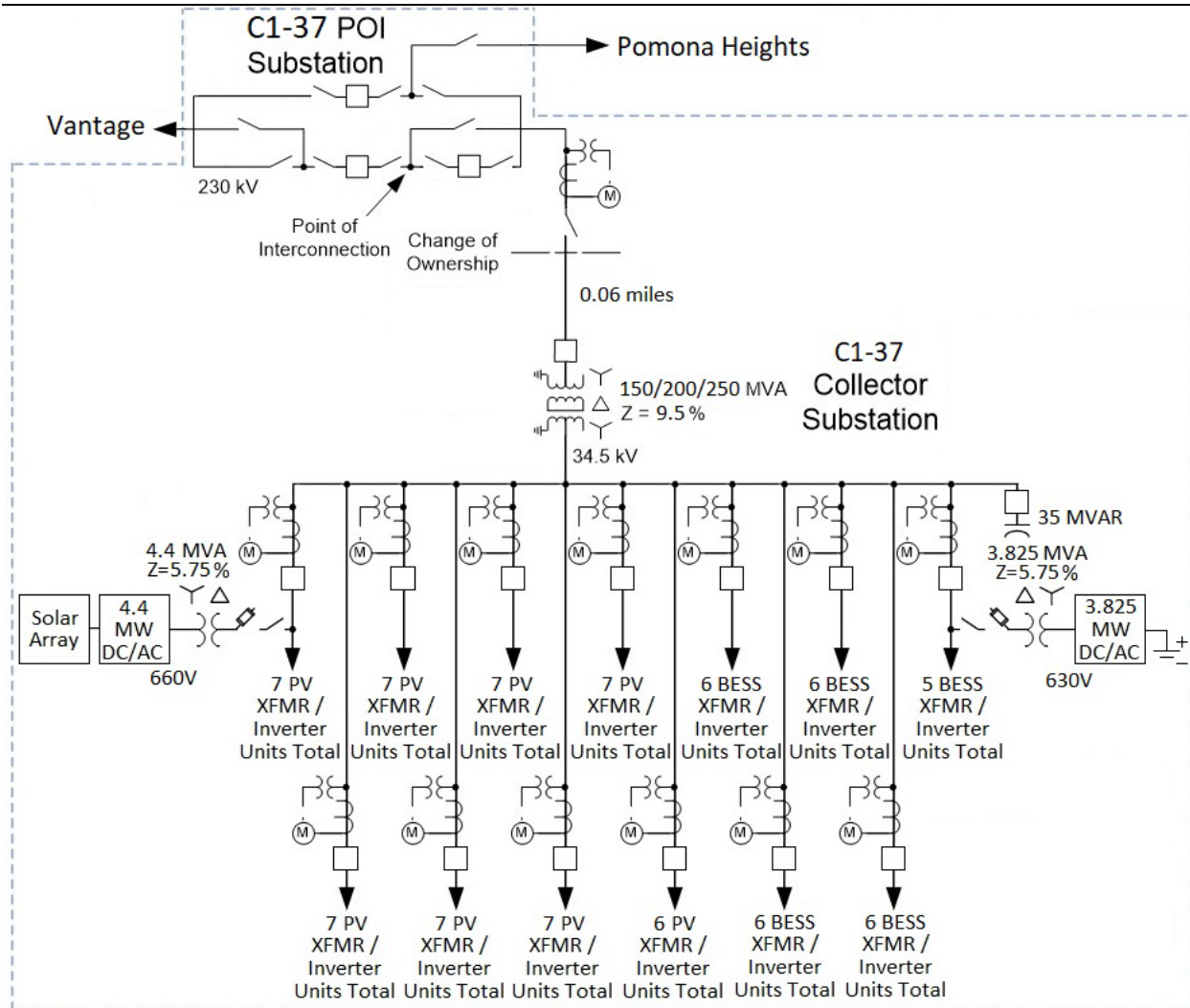


Figure 1: System One Line Diagram

6.0 SCOPE OF WORK

6.1 Generating Facility Requirements

The following outlines the design, procurement, construction, installation, and ownership of equipment at the Interconnection Customer's Generation Facility.

6.1.1 INTERCONNECTION CUSTOMER TO BE RESPONSIBLE FOR

- Procure all necessary permits, lands, rights of way and easements required for the construction and continued maintenance of the Interconnection Customer's Generating Facility and collector substation.
- Design, procure, construct, own and maintain the Interconnection Customer's Generating Facility and associated collector substation.
- Design the Generating Facility with reactive power capabilities necessary to operate within the full power factor range of 0.95 leading

to 0.95 lagging as measured at the high side of the Interconnection Customer's GSU transformer. This power factor range shall be dynamic and can be met using a combination of the inherent dynamic reactive power capability of the generator or inverter, dynamic reactive power devices and static reactive power devices to make up for losses.

- Design the generating facility such that it can provide positive reactive support (i.e., supply reactive power to the system) immediately following the removal of a fault or other transient low voltage perturbations or install dynamic voltage support equipment. These additional dynamic reactive devices shall have correct protection settings such that the devices will remain on line and active during and immediately following a fault event.
- Operate the Generating Facility to the voltage set point to be provided by the Transmission Provider.
- Equip the Generating Facility with automatic voltage-control equipment and operate with the voltage regulation control mode enabled unless explicitly authorized to operate another control mode by the Transmission Provider.
- Install, maintain and operate a functioning governor or equivalent controls to ensure primary frequency capability as required under FERC Order 842.
- Install a Phasor Measurement Unit to collect data from the Project. The data must be collected, held for a minimum of 90 days and be able to stream to the Planning Coordinator for each of the Generator Facility's step-up transformers measured on the low side of the GSU at a sample rate of at least 60 samples per second and synchronized within +/- 2 milliseconds of the Coordinated Universal Time (UTC). Initially, the following data must be collected:
 - Three phase voltage and voltage angle (analog)
 - Three phase current (analog)

Data requirements are subject to change as deemed necessary to comply with local and federal regulations.

- Operate the Generating Facility so as to maintain the voltage at the Point of Interconnection, or other designated point as deemed appropriate by Transmission Provider, at a voltage schedule to be provided by the Transmission Provider following testing. Voltage will typically be required to operate between 1.00 and 1.04 per unit.
- Operate the Generating Facility with a voltage droop.
- Have any Transmission Provider required studies, such as a voltage coordination study, performed and provide results to Transmission Provider. Any additional requirements identified in these studies will be the responsibility of the Interconnection Customer.
- Meet the Federal Energy Regulatory Commission (FERC) and WECC low voltage ride-through requirements as specified in the interconnection agreement.

- Provide test results to the Transmission Provider verifying that the inverters for this Project have been programmed to meet all PRC-024 requirements rather than manufacturer IEEE distribution standards.
- Provide the Transmission Provider the manufacturer Electromagnetic Transient Modeling (“EMT”) model a minimum of 180 days prior to Commercial Operation.
- Provide the Transmission Provider a standard model from the WECC Approved Dynamic Model Library.
- Design the Generating Facility control system such that it can receive an analog output from the Transmission Provider for setpoint control and provide an analog input back to the Transmission Provider on the status of the setpoint.
- Design and construct the collector substation such that the ground grid can be connected to the POI substation ground grid to support the installation of a Transmission Provider owned and maintained bus differential scheme. The Interconnection Customer is responsible to ensure the ground grid design supports safe step and touch potentials.
- Design, provide and install conduits between the Interconnection Customer collector substation and the marshalling cabinet to be installed just inside the fence of the POI substation to support copper circuits installed between the facilities.
- Provide and install two sets of current transformers to be fed into the bus differential relays with a maximum current transformer ratio matching the maximum CT ratio of the breakers at the POI substation. Provide and install conduit and cabling to the POI substation marshalling cabinet with these outputs.
- Provide a separate graded, grounded and fenced area along the perimeter of the Interconnection Customer’s collector substation for the Transmission Provider to install a control building. The site will share a fence and ground grid with the Interconnection Customer collector substation and have separate, unencumbered access for the Transmission Provider. Fencing, gates and road access shall meet Transmission Provider standards. The Interconnection Customer shall provide a Transmission Provider approved easement for its control building.
- Perform a CDEGS grounding analysis for both the collector substation site and the Transmission Provider control building and provide the results to the Transmission Provider.
- Provide permanent AC power to the Transmission Provider’s control building.
- Design, procure and install conduit and control cabling and hard wire the Interconnection Customer’s source devices to Transmission Provider’s marshalling cabinet. Replicated values are not acceptable.
- Provide the following points which are based on the Interconnection Customer’s most recent design information. Please note that this list of

points could change if the Interconnection Customer's final design changes:

From each of the generator/battery invertors at the collector station:

Analog:

- Voltage
- Amps
- Real Power MW
- Energy Register KWH

From the collector station:

Analog:

- Real power flowing through the 230 – 34.5 kV transformer
- Reactive power flowing through the 230 – 34.5 kV transformer
- Global Horizontal Irradiance (GHI)
- Average Plant Atmospheric Pressure (Bar)
- Average Plant Temperature (Celsius)
- BESS current energy capacity (MWh)
- BESS current energy capacity (%)
- BESS cycles or health (cycle count or % health)
- Max Generator Limit MW (one set point control and feedback)
- Potential Power MW

Status:

- 230 kV Transformer circuit breaker
- 34.5 kV Circuit breaker
- Provide and install conductor, shield wire and line hardware in sufficient quantities to allow the Transmission Provider to terminate the segment running from the collector substation deadend structure into the POI substation deadend structure. The last segment will be owned by the Transmission Provider.
- Procure and install Transmission Provider approved H-Frame structures for the Transmission Provider's instrument transformers. The installation locations shall be coordinated with the Transmission Provider.
- Install complete conduit and control cable provided by the Transmission Provider from each of the Transmission Provider's instrument transformers to the Transmission Provider's collector substation control building. Leave sufficient quantities of control cable to allow the Transmission Provider to terminate the cable inside its control building.
- Install the Transmission Provider provided instrument transformers.
- Procure and install disconnect switches on each side of each of the instrument transformers.
- Provide Transmission Provider unfettered and maintained access to the Transmission Provider's instrument transformers.
- Install Transmission Provider approved fiber optic cable in conduit from the Transmission Provider's collector substation control building to the POI substation fence line. Leave sufficient amounts of cable for

the Transmission Provider to terminate the fiber in both its collector substation control building and POI substation control building.

- Provide Transmission Provider approved easements for all Transmission Provider Interconnection Facilities to be installed in the Interconnection Customer's collector substation.
- Arrange for and provide permanent retail service for power that will flow from the Transmission Provider's system when the Project is not generating with the utility holding service territory rights at this location. The arrangement must be in place prior to backfeed.
- Coordinate with the retail service provider to procure the transmission service rights from the Transmission Provider to wheel the retail service across the Transmission Provider's system.
- Provide any construction or backup retail service necessary for the Project.
- Provide a professional engineer ("PE") stamped maintenance plan package for all Interconnection Customer protective equipment prior to energization.

6.1.2 TRANSMISSION PROVIDER TO BE RESPONSIBLE FOR

- Provide the Interconnection Customer the designated point at which the voltage is to be maintained and the associated voltage schedule.
- Identify any necessary studies that the Interconnection Customer must have performed.
- Provide the Interconnection Customer the necessary specifications to allow the ground grid of the Interconnection Customer's collector substation and the POI substation to be tied together.
- Provide the Interconnection Customer the necessary specifications for the bus between the Interconnection Customer's collector substation and the new POI substation to be connected.
- Coordinate with Interconnection Customer on the location, size, and types of conduits and control cables between the POI substation and the collector substation.
- Install a control building on the property prepared by the Interconnection Customer.
- Procure and install a backup DC battery system for the Transmission Provider control building.
- Procure and install a communications racks and associated communications equipment in the Transmission Provider's control building.
- Coordinate with the Interconnection Customer on the location of the Transmission Provider's instrument transformers.
- Provide the Interconnection Customer the specifications for the instrument transmission installation structures.

- Procure and provide to the Interconnection Customer thirteen sets of 34.5 kV instrument transformers to be on installed on the AC side of each of the Interconnection Customer's inverters.
- Design, procure and install thirteen sets of 34.5 kV revenue metering equipment including metering panels, primary and secondary revenue quality meters, test switches, junction boxes and secondary metering wire.
- Provide the control cable to be installed by the Interconnection Customer from the instrument transformers to the Transmission Provider's control building and coordinate on the location of the cable.
- Terminate the fiber optic cable provided by the Interconnection Customer in the control building communications panel.
- Establish an Ethernet connection for retail sales and generation accounting via the MV-90 translation system.

6.2 Point of Interconnection

The following outlines the design, procurement, construction, installation, and ownership of equipment at the Point of Interconnection.

6.2.1 INTERCONNECTION CUSTOMER TO BE RESPONSIBLE FOR

- Coordinate with the Transmission Provider on the procurement of the property rights for the location of the new POI substation if the Interconnection Customer has a desired location for the substation and is able to provide the Transmission Provider ownership of the property.
- Coordinate with the Transmission Provider on the location and design of the final span between the Interconnection Customer's collector substation and the POI substation. The Interconnection Customer's deadend structure shall meet Transmission Provider's standards. Leave sufficient quantiles of conductor for the Transmission Provider's terminate onto the POI substation deadend structure. The Transmission Provider will own the final span into the POI substation.
- Coordinate with the Transmission Provider on the commissioning of the communications coming from the Interconnection Customer's collector substation.

6.2.2 TRANSMISSION PROVIDER TO BE RESPONSIBLE FOR

- Procure the necessary permits and/or property rights to allow for the construction and ownership of the new POI substation. If the Interconnection Customer is able to provide required property, coordinate to transfer ownership.
- Design, procure and construct, own and maintain a new 230 kV three breaker ring bus substation which will include the following major pieces of equipment:
 - (3) – 242 KV Circuit Breaker

- (6) – 230 KV CCVT
- (3) – 230 KV CTVT
- (11) – 230 KV Group-operated Switch
- (3) – 125 VDC Motor Operator
- (1) – 242 KV SSVT
- (1) – 28'x40' Control House
- (1) – Marshalling Cabinet
- Perform a CDEGS grounding analysis of the POI substation location.
- Terminate the last bus/line segment running from the Interconnection Customer's collector substation deadend structure into the POI substation deadend structure using Interconnection Customer provided and installed conductor, shield wire and line hardware.
- Terminate the transmission lines running from Pomona Heights and Vantage substations.
- Design, procure and install a marshalling cabinet near the Interconnection Customer's collector substation shared fence line.
- Provide and install conduit and control cabling between the marshalling cabinet and the control building bus differential cabinet.
- Design, procure and install a bus differential relay system for the connection to the Interconnection Customer's collector substation.
- Procure and install a relay for under/over voltage and over/under frequency protection of the system.
- Procure and install a line current differential relays for the lines to Pomona Heights and Vantage substations.
- Include the following data points from the new POI substation into the new substation RTU:

Analog:

- Net Generation MW
- Net Generator MVar
- Energy Register kWh
- Terminate the fiber optic cable to be looped into the POI substation installed on the Pomona-Vantage transmission line.
- Procure and install the necessary communications equipment for protection and data provision to the Transmission Provider's existing communications network.
- Design, procure and install 230 kV revenue metering equipment for the Project including two (2) revenue quality meters, test switch, instrument transformers, metering panels, junction box and secondary metering wire.
- Design, procure and install 230 kV revenue metering equipment for the monitoring the line capacity to Vantage substation.
- Provide and install an Ethernet connection for retail sales and generation accounting via the MV-90 translation system.

6.3 Other

The following outlines the design, procurement, construction, installation, and ownership of equipment past the Point of Interconnection.

6.3.1 INTERCONNECTION CUSTOMER TO BE RESPONSIBLE FOR

- Bonneville Power Administration Requirements
 - If deemed necessary by Bonneville Power Administration (“BPA”) and the Transmission Provider, execute an agreement with BPA for any BPA required work.

6.3.2 TRANSMISSION PROVIDER TO BE RESPONSIBLE FOR

- Bonneville Power Administration Requirements
 - Coordinate with BPA on the work required in Vantage substation as well as any Affected System requirements.
- Pomona-Vantage Transmission Line
 - Loop the transmission line in/out of the new POI substation which will require the installation of a minimum of four transmission structures.
 - Loop the fiber optic cable installed on the transmission line in/out of the new POI substation.
- Pomona Heights Substation
 - Replace the line relays with versions compatible with relays to be installed in the new POI substation and install a new panel.
 - Remove the existing check metering for monitoring the line to Vantage substation.
- BPA Vantage Substation
 - Replace the line relays with versions compatible with relays to be installed in the new POI substation and install a new panel.
- System Operations Center
 - Update databases to include the Interconnection Customer’s Generating Facility along with Interconnection Facilities and Network Upgrades.

7.0 COST ESTIMATE (+/- 20%)

The following estimate represents only scopes of work that will be performed by the Transmission Provider. Costs for any work being performed by the Interconnection Customer are not included.

Direct Assigned**C1-37 POI substation****\$750,000***Project metering and line termination*

C1-37 Collector Substation \$1,810,000
Control building, metering and communications equipment

Total Direct Assigned \$2,560,000

Network Upgrades
Station Equipment

Q0906 POI substation \$8,000,000
Construct 230 kV three breaker ring bus substation

Shared Network Upgrades

The following estimated costs are the Interconnection Customer's proportional share of the overall estimated costs for these upgrades for the entire cluster area in which this Interconnection Request resides.

Wine Country Substation \$98,000
Install relaying and communications equipment

Pomona Heights Substation \$324,000
Install relaying and communications equipment

Vantage Substation \$96,000
Install relaying equipment

Pomona Heights – Vantage Transmission Line \$798,000
Loop line in/out of C1-37 POI substation, install 23 miles of fiber

Total Network Upgrade \$9,316,000
Total \$11,876,000

*Any distribution line modifications identified in this report will require a field visit analysis in order to obtain a more thorough understanding of the specific requirements. The estimate provided above for this work could change substantially based on the results of this analysis. Until this field analysis is performed the Transmission Provider must develop the Project schedule using conservative assumptions. The Interconnection Customer may request that the Transmission Provider perform this field analysis, at the Interconnection Customer's expense, prior to the execution of an Interconnection Agreement in order to obtain more cost and schedule certainty.

This estimate is as accurate as possibly given the level of detailed study that has been completed to date and approximates the costs incurred by Transmission Provider to interconnect this Generator Facility to Transmission Provider's electrical distribution or transmission system. The Interconnection Customer will be responsible for all actual costs, regardless of the estimated costs communicated to or approved by the Interconnection Customer.

8.0 SCHEDULE

Execute Interconnection Agreement	July 1, 2022
Provision of Financial Security	July 8, 2022
Interconnection Customer Approval for Transmission Provider to Commence Engineering and Procurement Activities	July 8, 2022
*Interconnection Customer Initial Design Package Provided	August 5, 2022
Transmission Provider Engineering & Procurement Commences	August 15, 2022
Affected System Construction Agreement Executed	August 15, 2022
Interconnection Customer Energy Imbalance Market Submittal	October 7, 2022
Interconnection Customer Property/Permits/ROW Procured	May 5, 2023
Transmission Provider Property/Permits/ROW Procured	August 4, 2023
*Interconnection Customer Final Design Package Provided	October 6, 2023
Transmission Provider and Affected System Engineering Design Complete	August 16, 2024
Interconnection Customer Commences Voltage Coordination Study	August 26, 2024
Interconnection Customer Approval for Transmission Provider to Commence Construction Activities	August 30, 2024
Transmission Provider and Affected System Construction Begins	October 7, 2024
Interconnection Customer Submits Request for Voltage Schedule	January 6, 2025
Interconnection Customer Maintenance and Commissioning Plans Provided	March 7, 2025
Interconnection Customer, Transmission Provider and Affected System Construction Complete	August 1, 2025
Transmission Provider Commissioning Activities Complete	September 12, 2025
Transmission Provider Commissioning Document Review Complete	September 22, 2025

Interconnection Customer's Facilities Receive Backfeed Power	September 24, 2025
Initial Synchronization/Generation Testing	September 29, 2025
Commercial Operation	November 7, 2025

*Interconnection Customer initial design package shall include final generating facility location, inverter/turbine selection, basic protection package, tie line route and collector system locations and data as applicable. Interconnection Customer final design package shall include PE stamped issued for construction ("IFC") drawings for generating facility, collector substation, tie line as well as an updated PSS/e model and updated WECC approved model, electromagnetic transient ("EMT") model and a detailed short circuit model of its generation system using the ASPEN OneLine short circuit simulation program as applicable. The WECC model parameters must be adjusted to reflect the plant's actual anticipated performance. The plant controller must be included in the model. If there is to be coordination between facilities or a master VAR controller, this must be included in the detailed WECC dynamic model, as well as in the PSS/e user-written model.

Please note, the time required to perform the scope of work identified in this report does not support the Interconnection Customer's requested Commercial Operation date of December 31, 2024.

9.0 PARTICIPATION BY AFFECTED SYSTEMS

Transmission Provider has identified the following affected systems: Bonneville Power Administration

A copy of this report will be shared with each Affected System.

10.0 APPENDICES

Appendix 1: Higher Priority Requests

Appendix 2: Contingent Facilities

Appendix 3: Property Requirements

10.1 APPENDIX 1: HIGHER PRIORITY REQUESTS

All active higher priority Transmission Provider projects, and transmission service and/or generator interconnection requests will be considered in this study and are identified below. If any of these requests are withdrawn, the Transmission Provider reserves the right to restudy this request, as the results and conclusions contained within this study could significantly change.

Transmission/Generation Interconnection Queue Requests considered:

- Serial Queues
Q953 (80MW)
Q1008(80MW)
- Transition Cluster
TCS-12(3MW)
TCS-13(5MW)
TCS-14(2.99MW)
TCS-15(2MW)
- Bonneville Power Administration Requests Queues
G0596(80MW)
G0578(80MW)
G0634(80MW)
G0672(200MW)
G0656(500MW)
G0629(100MW)
G0626(90MW)
G0602(170MW)

10.2 Appendix 2: Contingent Facilities

The following Interconnection Facilities and/or upgrades to the Transmission Provider's system are Contingent Facilities for the Interconnection Customer's Interconnection Request and must be in service prior to the commencement of generation activities: None

10.3 APPENDIX 2: PROPERTY REQUIREMENTS**Property Requirements for Point of Interconnection Substation****Requirements for rights of way easements**

Rights of way easements will be acquired by the Interconnection Customer in the Transmission Provider's name for the construction, reconstruction, operation, maintenance, repair, replacement and removal of Transmission Provider's Interconnection Facilities that will be owned and operated by PacifiCorp. Interconnection Customer will acquire all necessary permits for the Project and will obtain rights of way easements for the Project on Transmission Provider's easement form.

Real Property Requirements for Point of Interconnection Substation

Real property for a point of interconnection substation will be acquired by an Interconnection Customer to accommodate the Interconnection Customer's Project. The real property must be acceptable to Transmission Provider. Interconnection Customer will acquire fee ownership for interconnection substation unless Transmission Provider determines that other than fee ownership is acceptable; however, the form and instrument of such rights will be at Transmission Provider's sole discretion. Any land rights that Interconnection Customer is planning to retain as part of a fee property conveyance will be identified in advance to Transmission Provider and are subject to the Transmission Provider's approval.

The Interconnection Customer must obtain all permits required by all relevant jurisdictions for the planned use including but not limited to conditional use permits, Certificates of Public Convenience and Necessity, California Environmental Quality Act, as well as all construction permits for the Project.

Interconnection Customer will not be reimbursed through network upgrades for more than the market value of the property.

As a minimum, real property must be environmentally, physically, and operationally acceptable to Transmission Provider. The real property shall be a permitted or able to be permitted use in all zoning districts. The Interconnection Customer shall provide Transmission Provider with a title report and shall transfer property without any material defects of title or other encumbrances that are not acceptable to Transmission Provider. Property lines shall be surveyed and show all encumbrances, encroachments, and roads.

Examples of potentially unacceptable environmental, physical, or operational conditions could include but are not limited to:

1. Environmental: known contamination of site; evidence of environmental contamination by any dangerous, hazardous or toxic materials as defined by any governmental agency; violation of building, health, safety, environmental, fire, land use, zoning or other such regulation; violation of ordinances or statutes of any governmental entities having jurisdiction over the property; underground or above ground storage tanks in area; known remediation sites on property; ongoing mitigation activities or monitoring activities; asbestos; lead-based paint, etc. A

phase I environmental study is required for land being acquired in fee by the Transmission Provider unless waived by Transmission Provider.

2. Physical: inadequate site drainage; proximity to flood zone; erosion issues; wetland overlays; threatened and endangered species; archeological or culturally sensitive areas; inadequate sub-surface elements, etc. Transmission Provider may require Interconnection Customer to procure various studies and surveys as determined necessary by Transmission Provider.

Operational: inadequate access for Transmission Provider's equipment and vehicles; existing structures on land that require removal prior to building of substation; ongoing maintenance for landscaping or extensive landscape requirements; ongoing homeowner's or other requirements or restrictions (e.g., Covenants, Codes and Restrictions, deed restrictions, etc.) on property which are not acceptable to the Transmission Provider.