

Exhibit D

Applicant's Organizational Expertise

**Nolin Hills Wind Power Project
January 2022**



d/b/a Nolin Hills Wind, LLC

Prepared by



Tetra Tech, Inc.

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Acronyms and Abbreviations

Applicant	Nolin Hills Wind, LLC
Capital Power	Capital Power Corporation
CTUIR	Confederated Tribes of the Umatilla Indian Reservation
GW	gigawatt
HSE	health, safety, and environment
ISO	International Organization for Standardization
MW	megawatt
NWC	Northwest Wildlife Consultants
OAR	Oregon Administrative Rule
Project	Nolin Hills Wind Power Project
TRIF	Total Recordable Injury Frequency
U.S.	United States

1.0 Introduction

Exhibit D describes the sources and organizational, managerial, and technical expertise extent of Nolin Hills Wind, LLC (the Applicant), as required to meet the submittal requirements of Oregon Administrative Rule (OAR) 345-021-0010 (1)(d), paragraphs (A) through (G). This exhibit also provides the qualifications of known contractors assisting in design and construction of the Nolin Hills Wind Power Project (Project). This exhibit shows that the Project complies with OAR 345-022-0010:

345-022-0010 Organizational Expertise

(1) To issue a site certificate, the Council must find that the applicant has the organizational expertise to construct, operate and retire the proposed facility in compliance with Council standards and conditions of the site certificate. To conclude that the applicant has this expertise, the Council must find that the applicant has demonstrated the ability to design, construct and operate the proposed facility in compliance with site certificate conditions and in a manner that protects public health and safety and has demonstrated the ability to restore the site to a useful, non-hazardous condition. The Council may consider the applicant's experience, the applicant's access to technical expertise and the applicant's past performance in constructing, operating and retiring other facilities, including, but not limited to, the number and severity of regulatory citations issued to the applicant.

(2) The Council may base its findings under section (1) on a rebuttable presumption that an applicant has organizational, managerial and technical expertise, if the applicant has an ISO 9000 or ISO 14000 certified program and proposes to design, construct and operate the facility according to that program.

(3) If the applicant does not itself obtain a state or local government permit or approval for which the Council would ordinarily determine compliance but instead relies on a permit or approval issued to a third party, the Council, to issue a site certificate, must find that the third party has, or has a reasonable likelihood of obtaining, the necessary permit or approval, and that the applicant has, or has a reasonable likelihood of entering into, a contractual or other arrangement with the third party for access to the resource or service secured by that permit or approval.

(4) If the applicant relies on a permit or approval issued to a third party and the third party does not have the necessary permit or approval at the time the Council issues the site certificate, the Council may issue the site certificate subject to the condition that the certificate holder shall not commence construction or operation as appropriate until the third party has obtained the necessary permit or approval and the applicant has a contract or other arrangement for access to the resource or service secured by that permit or approval.

2.0 Applicant's Previous Experience – OAR 345-021-0010(1)(d)(A)

OAR 345-021-0010(1)(d) Information about the organizational expertise of the applicant to construct and operate the proposed facility, providing evidence to support a finding by the Council as required by OAR 345-022-0010, including:

OAR 345-021-0010(1)(d)(A) The applicant's previous experience, if any, in constructing and operating similar facilities.

The Applicant and its parent company, Capital Power Corporation (Capital Power), can demonstrate previous experience in constructing and operating renewable generation facilities. Capital Power is a growth-oriented North American power producer headquartered in Edmonton, Alberta, with its United States (U.S.) office based in Boston. The company develops, acquires, owns, and operates power generation facilities using a variety of energy sources. Capital Power owns over 6,100 megawatts (MW) of power generation capacity at 25 facilities across North America.

Capital Power's current portfolio of renewable energy facilities, operating or planned for construction, includes those shown in Table D-1.

Table D-1. Capital Power's Renewable Energy Facilities in Operation or Planned for Construction

Name / Location	Size (MW)	Ownership Structure	Operation Date
Hornet Solar / North Carolina	75	Own	2022
Hunter's Cove Solar / North Carolina	50	Own	2022
Bear Branch Solar / North Carolina	35	Own	2022
Whitla Wind 3 / Alberta	54	Own	December 2021
Whitla Wind 2 / Alberta	97	Own	December 2021
Cardinal Point Wind / Illinois	150	Own	March 2020
Whitla Wind 1 / Alberta	201.6	Own	December 2019
New Frontier Wind / North Dakota	99	Own	December 2018
Bloom Wind / Kansas	178	Own	June 2017
Macho Springs Wind / New Mexico	50	Own	Acquired in Dec. 2014
Beaufort Solar / North Carolina	15	Own	December 2015
Port Dover and Nanticoke Wind / Ontario	105	Own	November 2013
Halkirk Wind / Alberta	150	Own	December 2012
Quality Wind / British Columbia	142	Own	November 2012
Kingsbridge 1 Wind / Ontario	40	Own	2001

Capital Power's ability to develop, construct, and operate the Project is aided by its commitment to a workplace culture dedicated to health, safety, environmental management, and meaningful engagement of facility neighbors and the surrounding community.

Capital Power maintains the highest workplace standards for its employees and contractors. Our safety campaign, "Zero Means Everything," is a core value of our culture and operations. Contractors whose work and/or workplace activities are not under the direction of Capital Power are covered through our "Contractor Management Standard" that includes robust pre-qualification and selection criteria for qualified contractors. We use ISNetworld to assist with assessing contractor health and safety management systems, worker qualifications, injury statistics, insurance requirements, and compliance with jurisdictional regulations.

Capital Power's employees actively work to reduce the company's impact to the environment, improve our performance, and cultivate a future for low-carbon power generation. We engage respected subject matter experts to methodically prepare environmental assessments on our projects. Our employees are continually building a culture that strives for zero environmental incidents. Capital Power's strong health and safety culture means that employees are continually monitoring risks and seeking ways to further reduce the potential for impacts to health and safety.

Engaging with local communities is a vital component of Capital Power's work to develop, construct, and run power generation facilities that are successful in their operational, environmental, and financial performance. Capital Power's stakeholder engagement practice encompasses a broad range of contact with external stakeholders, including direct public consultation and community relations activities. Engagement activities typically begin when a project is in its development phase; however, this process generally continues through regulatory permitting and construction, and into operations. Overall, the process takes into account regulatory requirements related to stakeholder engagement, specifically public consultation and notification requirements for the project; stakeholder values and perspectives; and potential project impacts in relation to stakeholders. In the case of the present Project, Capital Power's project team is committed to Native American consultation, which has involved considerable engagement with the Confederated Tribes of the Umatilla Indian Reservation (CTUIR).

Capital Power works with community members to preserve and strengthen community character, ecology, and heritage. Through the company's established community investment program, we strive to contribute to programs and initiatives that promote and strengthen the quality of life for community members. In 2019, we contributed over \$1 million to organizations in the communities in which we operate. By supporting meaningful, grassroots initiatives and programs, we help create healthy and sustainable communities.

3.0 Qualifications of Applicant's Personnel – OAR 345-021-0010(1)(d)(B)

OAR 345-021-0010(1)(d)(B) The qualifications of the applicant's personnel who will be responsible for constructing and operating the facility, to the extent that the identities of such personnel are known when the application is submitted.

3.1 Management

Brian Vaasjo is Capital Power's President and Chief Executive Officer. Brian has guided the company in its growth and expansion across Canada and the United States. Assuming leadership of Capital Power at its inception in 2009 following a spin-off from parent company EPCOR Utilities Inc., Brian has led the company during a period of tremendous growth, nearly doubling the generation capacity to over 6,000 MW. Capital Power has been named one of the "Best 50 Corporate Citizens in Canada" for nine consecutive years (2011–2019) and has received numerous recognitions for its commitment to workplace health and safety and operational reliability.

Bryan DeNeve is Senior Vice President, Business Development and Commercial Services for Capital Power. Serving in this role since May 2015, Bryan is responsible for Capital Power's financing and capital market initiatives. He has raised over \$2 billion in the combined debt and equity capital markets to support Capital Power's growth initiatives. Prior to his current role, Bryan served as Senior Vice President, Corporate Development and Commercial Services, and Vice President, Business Development, at Capital Power. During this time, Bryan oversaw asset growth within the company both through greenfield development and acquisition. Bryan has a Master of Business Administration from the University of Alberta and is a graduate of the Harvard Business School Advanced Management Program.

Kelly S. Laill is Vice President, Business Development for Capital Power Corporation. He is responsible for business development and growth through greenfield developments and acquisitions and divestitures across North America. Kelly's experience spans directing system operations, resource and energy planning, power (hydroelectric and natural gas) and natural gas pipeline projects development, asset acquisitions and divestitures, mergers and acquisitions, and financing and negotiation of Joint Ventures. Kelly led deal structuring and negotiations of Capital Power's interest in a variety projects and mergers and acquisitions (gas-fired, wind, and solar assets and portfolios). This includes the \$1.6 billion, 800 MW Shepard project, the \$500 million acquisition of the Veresen thermal portfolio, and the \$1.97 billion acquisition of the 875-MW Gorway facility and the divestiture of Capital Power Income LP and Capital Power's two hydroelectric assets. He regularly presents to the Board of Directors; made formal appearances before regulatory agencies; held meetings with municipal councils and officials, industry and aboriginal groups; and participated in meetings with the Provincial Treasury Board, Cabinet and the B.C. Legislature and the Canadian Senate. Prior to joining Capital Power/EPCOR in 2006, Kelly was with BC Hydro for 14 years and with TransAlta for 6 years. While at BC Hydro, Kelly served as

the head of Resource Management, Business Development and Energy Plans, and Investments divisions.

3.2 Wind and Solar Energy and Business Development

Paul Wendelgass is the Managing Director of Business Development for Capital Power. Paul is responsible for leading Capital Power's U.S. development team in pursuing renewable energy opportunities across the United States. With more than 30 years of experience in the power generation sector, Paul has managed development of over 2,000 operating MW of both conventional and renewable energy in North America. He personally led the team that completed the intensive regulatory process for the 270-MW K2 Wind facility in Ontario, one of Canada's largest wind energy facilities. Paul has a Bachelor of Arts from the University of Chicago and a Master of Science from the University of Massachusetts Amherst.

Matt Martin is a Senior Manager of Business Development for Capital Power, responsible for renewable energy projects across the United States. With 13 years of experience in the power generation sector, Matt has managed development of more than 1,400 MW of operating conventional and renewable assets in the U.S. Matt led the development of three of Capital Power's renewables assets including the 150 MW Cardinal Point Wind project in Illinois, the 178 MW Bloom Wind project in Kansas, and the 15 MW Beaufort Solar facility in North Carolina. Matt has a Bachelor of Science from the University of Pennsylvania's Wharton School of Business.

Kimberly Cupicha is a Manager of Business Development (U.S.) for Capital Power. Kimberly is responsible for all aspects of renewable energy project development, including acquisition and financing, across the United States. Her priorities include ensuring such projects are developed in an environmentally sound and economically sustainable manner. Kimberly is the lead developer for the Nolin Hills Solar and Storage and directly manages the Project team, which includes specialists in engineering, environment, wind resource assessment, regulatory matters, cultural resources, and Native American engagement. Kimberly has over 10 years' experience in project management and development of projects in the United States and Europe. She has developed over 75 solar energy projects. Kimberly holds a Bachelor of Science from Syracuse University and a Master of Business Administration (MBA) from Rensselaer Polytechnic Institute.

Bob Evans is currently a Business Development Specialist for Capital Power. Bob is a part of the business development team responsible for the development of wind energy projects within the United States, including the New Frontier Wind Project (North Dakota) and Cardinal Point Wind Project (Illinois). Bob is currently the lead developer of the Garrison Butte Wind Project in North Dakota. With more than 15 years of experience in the environmental permitting and the power generation sectors, Bob has assisted with the development of over 400 planned and operating MW of renewable energy in North America. He is currently leading the solar development green-fielding efforts for Capital Power in in the United States. Bob has a Bachelor of Science in Environmental Design from Auburn University, and a Master of Landscape Architecture and a Master of Community Planning, both from Auburn University.

3.3 Construction and Engineering

Darcy Trufyn is the Senior Vice President of Operations, Engineering, and Construction. Joining Capital Power in 2009, Darcy is now responsible for Operations, Construction, Engineering, Health, Safety and Environment, and Supply Chain. Darcy oversees the safe operation of power generation (natural gas, solar, coal, biomass, and wind) across North America and is responsible for Capital Power's Reliability program, which is helping to provide industry-leading plant availability. Darcy is also responsible for ensuring that Capital Power maintains its competitive advantage constructing our new developments safely, on time, and on budget. Darcy has extensive experience in the engineering and construction fields, including senior roles in a number of large projects in Alberta and the Maritimes. Prior to joining Capital Power, Darcy was the Senior Vice President Construction with WorleyParsons in Calgary, where he was responsible for all Canadian construction activities and was the Director responsible for global construction. Previously, Darcy was the President of the construction firm Lockerbie & Hole, based in Edmonton. Darcy serves as the Board Chair for the Art Gallery of Alberta. Darcy, a professional engineer, is a graduate of the University of Alberta, Faculty of Engineering.

Steve Owens is the Vice President of Construction for Capital Power and is responsible for leading a multi-disciplinary team that executes all of Capital Power's construction projects throughout North America. Steve has over 30 years of construction experience, 15 of which were in the field and all in the power generation sector. Steve has overseen the construction of more than 1,000 MW of wind development over the past 9 years. He has a Bachelor of Engineering from Carleton University. He currently sits on the Board of Directors of the Construction Owner's Association of Alberta and the Executive Board of the University of Alberta's Construction Innovation Centre.

Sandy Fleming is Senior Project Manager for Capital Power. Sandy is responsible for leading all aspects of the construction process for major power projects at Capital Power. With 20 years of experience in the construction field, Sandy has directly managed engineering and/or construction of over 500 MW of wind power projects in North America. He is most recently the construction manager of the 150 MW Cardinal Wind Project in Illinois, anticipated for commissioning in spring 2020. Sandy has a Bachelor of Science in Civil Engineering from the University of Alberta.

Matthew Crane is a Site Construction Manager for Capital Power. Matt is responsible for on-site management of the Capital Power's engineering, procurement, and construction contractors and wind turbine vendors for the company's renewable energy construction projects. With more than 15 years of experience (10 of which are on site), Matt has worked as the Construction Manager/Site Engineer, from greenfield to commercial operation, for over 1,200 operating MW of renewable energy (wind and solar) in North America. Matt has a Bachelor of Science in Mechanical Engineering and Master of Science in Thermodynamics and Fluid Dynamics from the University of Saskatchewan.

Sandeep Sharma is the Senior Manager of Renewables, United States for Capital Power. Sandeep is accountable for the safe, commercial, and technical operations of Capital Power's renewables fleet across the U.S., including Capital Power's existing operations in Kansas, North Dakota, New Mexico,

and North Carolina. His work includes monitoring and developing methods to improve asset performance; implementing planning and control processes for operational integrity; and ensuring compliance with company policy and all applicable regulations. Sandeep previously held significant roles in supporting the engineering and construction of several power generating assets including a supercritical 516 MW coal-fired facility, a 243 MW natural gas-fired facility, and a 150 MW wind energy facility. Sandeep has a Bachelor of Science in Mechanical Engineering from the University of Alberta.

3.4 Permitting

Kent Brandt is the Senior Manager, Environment for Capital Power. Kent is responsible for leading a team of environmental professionals supporting compliance during development, construction, and operational phases of approximately 25 power generation facilities across North America. Kent has over 20 years of environmental experience in the power generation sector, holds a Bachelor of Science, and has an Environmental Professional designation.

Jennifer Schroeder is a Senior Specialist in the Health, Safety and Environment group within Capital Power. Jennifer supports the company's renewable and gas infrastructure efforts and is responsible for assisting in environmental due diligence for acquisitions while also assisting in the siting and permitting activities for energy projects across the United States and Canada. Her related duties include supporting the company's environmental compliance at operating facilities; interpreting regulatory requirements; interfacing with federal, state, and regional agencies; and directing environmental and wildlife monitoring programs. Jennifer has supported the permitting and development of both conventional and renewable energy projects for over 20 years. She is currently supporting Capital Power's 150 MW Cardinal Point Wind project in Illinois, and the Whitla Wind 1 project in Alberta, Canada. Jennifer has an undergraduate degree in political science from the University of Manitoba and a Master of Environmental Science from the University of Calgary.

3.5 Regulatory and Government Relations

Jon Sohn is the U.S. Director of Government Relations for Capital Power. Previously, Jon has worked on investment in clean energy, climate change mitigation, and environmental and social risk management with Dentons Law Firm, Climate Change Capital LLC, the World Resources Institute, and the United States Overseas Private Investment Corporation. Jon has a Bachelor's degree from the University of Michigan and J.D. from Lewis & Clark, Northwestern School of Law, where he also received a Certificate of Specialization in Environmental & Natural Resources Law from the #1 ranked program in the United States for this area of study.

Jason Muller is the Manager of Government Affairs and Policy for Capital Power where he engages in various state and federal policy forums on behalf of the company. Prior to joining Capital Power, Jason spent over a decade working in government affairs and compliance for regulated utilities NiSource and CMS Energy. Jason has a Bachelor of Science in Political Science from Grand Valley

State University and a Master of Science in Environmental Science & Policy from Johns Hopkins University.

3.6 Energy Trading

Josh Campbell is the Vice President of Commodity Portfolio Management and Corporate Strategy at Capital Power. Josh and his team are responsible for management of all commodity exposures at Capital Power, including leadership of Trading, Marketing, and Environmental portfolios with coverage across the United States and Canada and including commodities products. In addition, his team leads the development and rollout of the Corporate Strategy, which articulates corporate direction, focus, and rationale, as well as long- and intermediate-term direction. Josh has 16 years of commodity management experience and a track record in leadership, portfolio development, commercial arrangements, Energy, Trade and Risk Management systems, and risk management. Josh has a Bachelor of Arts in Economics from the University of Calgary.

Laurence Smith is the Director of Strategic Portfolio Management and Corporate Strategy at Capital Power. Laurence and his team are responsible for analytics related to managing the company's commodity exposures across North America. Additionally, the Corporate Strategy team leads the development and rollout of the Capital Power's strategy, which conveys the focus and direction of the company. Laurence has 8 years of commodity management and business development experience, and he holds a Ph.D. and Master in Electrical and Computer Engineering from Carleton University as well as a Bachelor in Applied Science from the University of British Columbia.

Matt Palardy is a Marketing Specialist with Capital Power's Commodity Portfolio Management group. He is responsible for market analytics and portfolio optimization across Capital Power's existing assets. Matt also supports the Business Development teams in assessing market risks, opportunities, and origination initiatives on new renewable projects. He has experience in both operations and trading, as well as in management of assets in the AESO, IESO, and Mid-Columbia and Desert Southwest markets. Matt holds a Bachelor of Engineering from McGill University.

3.7 Origination

James Renouf is the Director of U.S. Environmental Products and Origination for Capital Power. James works with customers to sell the power, capacity, and environment attributes our assets generate. He has more than 15 years' experience in various commercial roles including power and gas trading, portfolio management, and corporate strategy. James holds an MBA from Queens University, is a CFA charter holder, and holds the Energy Risk Professional designation.

3.8 Commercial Management

Lorne Whittles is the Director of Commercial Management for Capital Power's fleet of renewable assets. Lorne is responsible for leading Capital Power's Commercial Renewables team in managing existing wind and utility-scale solar assets in both Canada and the United States. With 18 years of power sector experience, Lorne has held leadership roles in many aspects of generation

development and operation, including negotiating power purchase agreements, energy marketing and structured products, and commercial asset management. Lorne has been principally responsible for a wide array of thermal and renewable assets, including commercial responsibility over time for nearly 3 gigawatts (GW) of thermal capacity and nearly 1.2 GW of wind capacity. Lorne has a Bachelor of Science from the University of Lethbridge and a Master of Business Administration from the University of Calgary.

3.9 Finance

Sandra Haskins is Senior Vice President Finance and Chief Financial Officer of Capital Power. Serving in the role since July 2020, Sandra leads all Capital Power's financial functions including Treasury, Financial Reporting, Financial Planning and Analysis, Tax and Investor Relations. She is also responsible for our Enterprise Risk Management processes. Prior to her current role, Sandra served for over 2 years as the Vice President, Finance and Treasury during which time she raised \$1.2 billion in debt and equity financing. In her previous role, Sandra was Vice President, Forecasting and Analytics responsible for Capital Power's Budget & Forecasts, Corporate Financial Projections, Valuations, and Market Assessment and Forecasting functions. Sandra has been with Capital Power since the IPO in 2009 at which time she served as the Controller.

Brenda Lessard is the Senior Manager of U.S. Tax for Capital Power. Brenda is responsible for all U.S. tax matters relating to all entities under the Capital Power umbrella. She has over 30 years of tax and accounting experience in a variety of industries, both public and private. Brenda received her Bachelor of Science in Business Administration from Merrimack College in North Andover, Massachusetts and is a Certified Public Accountant licensed in Virginia.

Scott Manson is the Director of Treasury for Capital Power and is responsible for Treasury operations, Corporate Finance, and Credit activities. Scott has 9 years' experience in the power sector. Scott is a Canadian Chartered Professional Accountant and holds a designation as a Canadian Chartered Business Valuator and Canadian Chartered Accountant. Scott holds a Bachelor of Commerce degree from the University of Alberta.

3.10 Community and Native American Relations

Jay Shukin is a Manager of Indigenous and Stakeholder Engagement at Capital Power. Jay is responsible for developing public engagement programs to support new projects, license renewals, and other regulatory processes. Jay also provides guidance to Capital Power's business teams on working effectively with Indigenous (Native American) communities in both Canada and the United States. He has worked extensively with native communities in British Columbia, Ontario, and Alberta, developing long-term partnerships that support both cultural interests and economic goals. Jay has a Bachelor of Arts from the University of Calgary.

4.0 Qualifications of Known Contractors – OAR 345-021-0010(1)(d)(C)

OAR 345-021-0010(1)(d)(C) The qualifications of any architect, engineer, major component vendor, or prime contractor upon whom the applicant will rely in constructing and operating the facility, to the extent that the identities of such persons are known when the application is submitted.

The Applicant has previously worked with contractors experienced with the construction, operation, and maintenance of wind energy facilities. Selection criteria will center on qualified engineers, manufacturers, and contractors who are experienced in these industries.

5.0 Applicant's Past Performance – OAR 345-021-0010(1)(d)(D)

OAR 345-021-0010(1)(d)(D) The past performance of the applicant, including but not limited to the number and severity of any regulatory citations in constructing or operating a facility, type of equipment, or process similar to the proposed facility.

Capital Power works to comply with all legal and regulatory requirements applicable to the electricity sector in our various Canadian and U.S. jurisdictions. Prior to work starting on construction projects, we perform pre-job Risk Assessments to identify Health, Safety and Environmental jurisdictional requirements. We maintain an active compliance monitoring program to identify potential non-compliance and develop training and awareness on various risk areas and changes to applicable laws and regulations. Should non-compliance events occur, we take immediate action to identify and address the root cause to prevent future incidents.

5.1 Construction and Operation

All employees, contracted employees, and contractors must comply with all health and safety policies and procedures. Contractors must manage their health, safety, and environment (HSE) risks in a manner consistent with our HSE Policy.

In 2018, the company (employees only) had zero fatalities, zero high-consequence work-related injuries, six recordable work-related injuries with a Total Recordable Injury Frequency (TRIF) of 0.78, five medical treatments, one lost-time injury, and 1,544,010 exposure hours. In 2018, workers who are not employees but whose work and/or workplace is controlled by the organization had zero fatalities, three recordable work-related injuries with a TRIF of 0.68, two medical treatments, one modified work injury, and 886,554 exposure hours.

Since 2017, Capital Power has developed four wind farms in North America. There have been no jurisdictional citations issued to any of our contractors during these construction projects.

5.2 Regulatory Compliance

To date, Capital Power has not received any citations at its U.S.-based wind energy facilities related to regulatory compliance during operations.

In 2016, Capital Power received a violation ticket for \$230.00 from the British Columbia Department of Forests, Lands and Natural Resources related to a stream diversion that was constructed near an abandoned wind turbine pad. Capital Power paid the ticket and corrected the matter that prompted the fine.

6.0 Warranty to Secure Necessary Expertise – OAR 345-021-0010(1)(d)(E)

OAR 345-021-0010(1)(d)(E) If the applicant has no previous experience in constructing or operating similar facilities and has not identified a prime contractor for construction or operation of the proposed facility, other evidence that the applicant can successfully construct and operate the proposed facility. The applicant may include, as evidence, a warranty that it will, through contracts, secure the necessary expertise.

Not applicable because, as demonstrated above, the Applicant has experience constructing and operating similar facilities.

7.0 ISO Certified Program – OAR 345-021-0010(1)(d)(F)

OAR 345-021-0010(1)(d)(F) If the applicant has an ISO 9000 or ISO 14000 certified program and proposes to design, construct and operate the facility according to that program, a description of the program.

The Applicant does not propose to design, construct, or operate the Project facilities according to an International Organization for Standardization (ISO) 9000 or ISO 14000 certified program.

8.0 Mitigation – OAR 345-021-0010(1)(d)(G)

OAR 345-021-0010(1)(d)(G) If the applicant relies on mitigation to demonstrate compliance with any standards of Division 22 or 24 of this chapter, evidence that the applicant can successfully complete such proposed mitigation, including past experience with other projects and the qualifications and experience of personnel upon whom the applicant will rely, to the extent that the identities of such persons are known at the date of submittal.

Mitigation for the Project may be required for potential impacts to wildlife habitat, cultural resources, and other resources. The mitigation measures proposed by the Applicant for compliance with OAR Divisions 22 or 24 are described in the specific exhibit in which impacts are described.

The parent company of Nolin Hills Wind LLC, Capital Power, has extensive experience over multiple jurisdictions in implementing mitigation and monitoring programs. In North Dakota, the company implements a curtailment protocol related to whooping cranes, pausing turbines' operation if these birds are spotted flying within 2 miles of our operating wind facility. In addition, both of Capital Power's recently constructed facilities in the United States follow the guidelines established by the Avian Power Line Interaction Committee. The company has also conducted multi-year bird and bat monitoring programs at its facilities in Kansas, Alberta, Ontario, and British Columbia. The company has also participated in ongoing research efforts related to bat impacts from wind turbines through the Canadian Wind Energy Association. It has applied some of the early findings of this research by implementing a curtailment program for several Canadian sites during peak migration season for bats.

In terms of resourcing, Capital Power has staff and resources that actively manage environmental commitments and compliance that flow from regulatory approvals. The company's environmental management team members are based in the United States and Canada and draw on contracted expertise as necessary. Capital Power has extensive experience as detailed in Exhibit D with constructing large energy facilities. This experience includes hiring and overseeing specialty contractors with area-specific expertise in required local areas, and in complying with all required permit conditions both during and after construction of the facilities. As described in Exhibit D Section 5.0, Capital Power has not received any jurisdictional citations during construction of four wind farms in North America since 2017, and has received only one minor citation for operations at a North American energy facility. This demonstrates Capital Power's ability to manage compliance with conditions of permit approval during construction and operation of large projects, including conditions related to implementation of mitigation projects.

Capital Power will retain and rely on the expertise of experienced contractors such as Tetra Tech and Northwest Wildlife Consultants (NWC) to implement mitigation projects such as habitat mitigation plans and revegetation plans. Tetra Tech has experience conducting post-construction monitoring measures, including monitoring of revegetation success and weed control, on numerous facilities in Oregon. Three relevant examples in Oregon are:

- Restoration and enhancement of the Fox Creek Floodplain near Fox, Oregon. This project includes design and implementation of stream and floodplain restoration totaling more than 4 miles of Fox Creek and associated floodplains and uplands.
- Ochoco Preserve Restoration for the Deschutes Land Trust near Prineville, Oregon, addressing restoration of stream, riparian, wetland, and uplands habitat for 184 acres.
- Construction and revegetation monitoring for the Wheatridge Renewable Energy Facility in Morrow County, Oregon.

NWC is a specialty firm with extensive experience focused on Columbia Basin and Great Basin wildlife and botanical surveys, monitoring, and habitat mitigation for numerous facilities across Oregon.

Capital Power has been actively discussing the Project with the CTUIR. The company has extensive experience in working with Indigenous communities in Canada, including developing consultation programs that involve these communities in the regulatory process for wind projects and which provide the means for meaningful engagement in the process. Capital Power has developed agreements with a number of Canadian Indigenous communities that address the cultural and economic interests of these groups relative to projects that developed in the traditional territory of these communities.

9.0 Conclusion

Based on the evidence provided in this exhibit, the Energy Facility Siting Council can conclude that Nolin Hills Wind, LLC, through its parent corporation, Capital Power Corporation, complies with the organizational expertise standard under OAR 345-022-0010.

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