Proposed Action: South-of-Allston Flow Congestion Relief Pilot Program: Energy Purchase from Avangrid Renewables

Project Manager: Deb Malin, Customer Account Executive – PTL-5

Location: Klamath County, Oregon

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B4.4 – Power marketing services and activities

Description of the Proposed Action: As part of a two-year pilot program, BPA proposes to purchase energy from Avangrid Renewables for temporary summer-peak congestion relief along BPA’s South-of-Allston (SOA) transmission path. During the pilot program, BPA plans to pair this energy with third-party thermal generation decreases north of the SOA path to reduce congestion. BPA would provide notice for Avangrid Renewables to provide 155 MW of energy for a maximum of 40 hours during July, August, and September peak-load periods during a two-year term that ends on September 30, 2018.

Avangrid Renewables would deliver energy from the Klamath Cogeneration Project that consists of two natural-gas-fueled combustion turbines and one steam turbine. In response to BPA’s notices, Avangrid Renewables would either increase generation to send it north to the BPA network or direct its existing generation output to the north that otherwise would have been sold into California, creating power flows that relieve SOA path congestion. As such, BPA does not expect the facility to substantially increase generation because it has historically operated close to its full generating output during summer peak-load conditions. In addition, the facility would operate within normal operating limits while participating in the pilot program.

Findings: In accordance with Section 1021.410(b) of the Department of Energy’s (DOE) National Environmental Policy Act (NEPA) Regulations (57 FR 15144, Apr. 24, 1992, as amended at 61 FR 36221-36243, July 9, 1996; 61 FR 64608, Dec. 6, 1996, 76 FR 63764, Nov. 14, 2011), BPA has determined that the proposed action:
(1) fits within a class of actions listed in Appendix B of 10 CFR 1021, Subpart D (see attached Environmental Checklist);
(2) does not present any extraordinary circumstances that may affect the significance of the environmental effects of the proposal; and
(3) has not been segmented to meet the definition of a categorical exclusion.
Based on these determinations, BPA finds that the proposed action is categorically excluded from further NEPA review.

/s/ Jeffrey J. Maslow  
Jeffrey J. Maslow  
Environmental Protection Specialist

Concur:

/s/ Stacy L. Mason  
Stacy L. Mason  
NEPA Compliance Officer  
Date: August 1, 2016

Attachment(s): Environmental Checklist
Categorical Exclusion Environmental Checklist

This checklist documents environmental considerations for the proposed project and explains why the project would not have the potential to cause significant impacts on environmentally sensitive resources and would meet other integral elements of the applied categorical exclusion.

**Proposed Action:** South-of-Allston Flow Congestion Relief Pilot Program: Energy Purchase from Avangrid

**Project Site Description**

The Klamath Cogeneration Project is located approximately 25 miles south of Klamath Falls on the west side of Highway 97.

**Evaluation of Potential Impacts to Environmental Resources**

<table>
<thead>
<tr>
<th>Environmental Resource Impacts</th>
<th>No Potential for Significance</th>
<th>No Potential for Significance, with Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Historic and Cultural Resources</td>
<td>✔</td>
<td></td>
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</tbody>
</table>

**Explanation:**

Because the undertaking does not involve a type of activity with the potential to cause effects on historic properties, there would be no effect on historic and cultural resources.

| 2. Geology and Soils | ✔ | | |

**Explanation:**

Because the energy purchase from an existing facility would not involve an activity with the potential to affect geology and soils, there would be no effect on geology and soils.

| 3. Plants (including federal/state special-status species) | ✔ | | |

**Explanation:**

Because the energy purchase from an existing facility would not involve an activity with the potential to affect plants, there would be no effect on plants.

| 4. Wildlife (including federal/state special-status species and habitats) | ✔ | | |

**Explanation:**

Because the energy purchase from an existing facility would not involve an activity with the potential to affect wildlife, there would be no effect on wildlife.

| 5. Water Bodies, Floodplains, and Fish (including federal/state special-status species and ESUs) | ✔ | | |

**Explanation:**

Because the energy purchase from an existing facility would not involve an activity with the potential to affect...
water-dependent resources, there would be no effect on waterbodies, floodplains, and fish.

6. **Wetlands**
   - **Explanation:**
     Because the energy purchase from an existing facility would not involve an activity with the potential to affect water-dependent resources, there would be no effect on wetlands.

7. **Groundwater and Aquifers**
   - **Explanation:**
     Because the energy purchase from an existing facility would not involve an activity with the potential to affect water-dependent resources, there would be no effect on groundwater and aquifers.

8. **Land Use and Specially Designated Areas**
   - **Explanation:**
     Because the energy purchase from an existing facility would not involve an activity with the potential to affect land use and specially designated areas, there would be no effect on land use and specially designated areas.

9. **Visual Quality**
   - **Explanation:**
     Because the energy purchase from an existing facility would not involve an activity with the potential to affect visual quality, there would be no effect on visual quality.

10. **Air Quality**
    - **Explanation:**
      The Klamath Cogeneration Project will operate within the limits established under its current air quality operating permit issued by the Oregon Department of Environmental Quality (Permit No. 18-0003-TV-01). Thus, there would be no change in effect on air quality from the energy purchase.

11. **Noise**
    - **Explanation:**
      Because the energy purchase from an existing facility would not increase noise levels from the facility, there would be no change in effect on noise levels.

12. **Human Health and Safety**
    - **Explanation:**
      Because the energy purchase from an existing facility would not involve an activity with the potential to affect human health and safety, there would be no effect on human health and safety.

### Evaluation of Other Integral Elements

The proposed project would also meet conditions that are integral elements of the categorical exclusion. The project would not:

- Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or Executive Orders.
Explanation, if necessary:

- Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators) that are not otherwise categorically excluded.

Explanation, if necessary:

- Disturb hazardous substances, pollutants, contaminants, or CERCLA excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases.

Explanation, if necessary:

- Involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species, unless the proposed activity would be contained or confined in a manner designed and operated to prevent unauthorized release into the environment and conducted in accordance with applicable requirements, such as those of the Department of Agriculture, the Environmental Protection Agency, and the National Institutes of Health.

Explanation, if necessary:

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**Landowner Notification, Involvement, or Coordination**

No landowner notification, involvement, or coordination will be conducted because the pilot project would occur at an existing facility that will operate within the normal operating limits established under its air-quality permit issued by the Oregon Department of Environmental Quality.

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Based on the foregoing, this proposed project does not have the potential to cause significant impacts on any environmentally sensitive resources.

Signed: /s/ Jeffrey J. Maslow  
Date: August 1, 2016