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Sent: Saturday, April 4, 2026 8:58 AM
To: Energy Siting * ODOE
Cc: [CLARK Christopher](#) * [ODOE](#)
Subject: Petition for Rehearing – Biglow Canyon Wind Farm RFA4
(Kevin & Kathryn McCullough)
Attachments: PETITION FOR REHEARING.docx

PETITION FOR REHEARING
Biglow Canyon Wind Farm RFA4
Submitted by: Kevin & Kathryn McCullough
Date: April 6, 2026

Pursuant to OAR 345-015-0085, I petition for rehearing of the Final Order issued March 27, 2026. We participated as commenters and raised the following issues (see Comment Evaluation Table, <https://www.oregon.gov/energy/facilities-safety/facilities/Council%20Meetings/2026-03-19-20-EFSC-Item-G-Staff-Report-Biglow-Canyon-AMD4-Draft-Final-Order-Review-Attachment-2-Comment-Evaluation.pdf>):

- **OE-01 (PGE maintenance/track record)** – p. 9: The Department acknowledged “substantial equipment and maintenance issues” and a “deficiency in the adequacy of the existing site certificate conditions” (Final Order p. 41 explicitly lists blade detachment, oil leaks, transformer failures, and turbine door malfunctions). Only minor new O&M conditions were added.
- **WF-01 through WF-07 and PS-01/PS-02 (wildfire risk, firebreaks, responder capacity)** – pp. 49–50, 52+: Concerns about 50 mph winds, the 2018 fire precedent, isolated site, limited volunteer firefighters, and inadequate water were acknowledged but not strengthened.
- **SP-01/SP-04/SP-05 (vegetation/firebreaks)** – pp. 15–19: The Council added 4–8 inch dry-season limits and a 20-foot buffer (Final Order p. 71), but larger perimeters and on-site water storage were rejected.

The Council abused its discretion and failed to make findings supported by substantial evidence when it:

(1) found the wildfire mitigation plan adequate without stronger firebreaks, water capacity, or independent audits for this high-risk arid site despite the 2018 fire precedent;

(2) accepted the 4–8 inch vegetation limit without requiring permanent operational-plan incorporation or larger water capacity for this isolated site;

(3) relied on PGE’s representations despite the documented maintenance failures at the existing facility.

(Comment Evaluation table, pp. 9–11):

*“As discussed on page 40 of the Proposed Order, the **Department acknowledges that the existing wind facility has experienced substantial equipment and maintenance issues over the past several years.** While the Department does not agree that the maintenance issues demonstrate that the certificate holder... cannot operate or maintain a solar facility in compliance with site certificate conditions, the issues do demonstrate a deficiency in the adequacy of the existing site certificate conditions in ensuring systematic oversight of vendor performance, preventive maintenance, and safe, reliable construction and operation. The Department has recommended the Council adopt additional conditions of approval to improve oversight...”*

It has been eleven years since we noticed equipment and maintenance issues, not just “the past several” that PGE stated above. It has been four years since the blade dropped (February 1, 2022). PGE built the entire phase 1 of Biglow Canyon in 7 months, including transmission lines, substations, and tower erection. <https://projects.oregonlive.com/wind-farms/> The rusty boxes on transformers at Biglow Canyon (photo evidence submitted) are an issue because they set a precedent: The BESS system battery boxes could look the same in ten years’ time.

These deficiencies violate OAR 345-022-0115 (wildfire standard) and ORS 469.403 review standards.

We request rehearing to require:

- (a) Increased water storage and a revised Wildfire Mitigation Plan with 50-foot minimum non-combustible perimeters (Still barely enough room to turn a fire truck around, Chief Bert Norris, South County Fire Department)

(b) Mandatory *independent* annual maintenance audits of Biglow Canyon wind/solar

(c) **Expedite completion, not years, of all Phase 1 turbine tower maintenance — including full installation and verification of the new pitch control system on the original Vestas turbines.** This is needed to demonstrate the certificate holder's commitment to reliable green power generation at the entire Biglow Canyon facility.

Respectfully submitted,
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