



Portland General Electric
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September 17, 2026

Mr. Joe Turner
Hearings Officer
City of Sherwood
22560 SW Pine Street
Sherwood, OR 97140

Re: FERC and NERC Regulations Applicable to Meadowlark

Dear Hearings Officer Turner:

This letter is for inclusion in the Meadowlark CUP-SPR, Docket 785-26-000057-PLNG open record following the public hearing held on September 10, 2026.

Portland General Electric Company (PGE) writes to highlight the critical importance that City of Sherwood exercise its authority over the construction of the Meadowlark Energy Storage facility consistent with federal standards applicable to these facilities. In particular, PGE stresses that its security protections are necessary to support the safe, reliable, and resilient operation of the electric system that serves homes, businesses, public institutions, and critical community services both within the City of Sherwood and throughout the region.

The Meadowlark Energy Storage facility will interconnect to the PGE transmission system pursuant to a Large Generator Interconnection Agreement (LGIA) between PGE and Meadowlark. The LGIA is a standard *pro forma* contract developed in accordance with Federal Energy Regulatory Commission (FERC) regulations. The LGIA also incorporates requirements under PGE's FERC-approved Open Access Transmission Tariff, which includes various interconnection service requirements. Among these requirements, both PGE and Meadowlark must comply with all applicable laws and regulations, including applicable reliability standards described below.

PGE operates within a mandatory and enforceable federal reliability and security framework established under the Federal Power Act and administered through FERC and the North American Electric Reliability Corporation ("NERC"). 16 U.S.C. § 824o, 18 C.F.R. Part 39. As part of that framework, PGE is required to assess physical security risks and implement appropriate security measures for facilities (like the Sherwood substation) that are integral to reliable electric service. Noncompliance with these federal standards can result in over \$1M in penalties each day that a violation continues. 16 U.S.C. § 824o(e)(2), 18 C.F.R. § 39.7(e).

Security features at Sherwood substation are consistent with these federally required obligations and with industry best practices for critical infrastructure. They include significant investments in security infrastructure that could be impeded by the current landscaping proposal. Due to these conditions, and the important security features included at the existing substation, we cannot move the access road from the current location. Depending on further details, however, PGE could be amenable to designs incorporating, for example, landscaping additions that would remain outside a necessary 25' security buffer from the fenceline or certain paving options for the access road, depending on material.

PGE reiterates that its security protections are critical to support the safe, reliable, and resilient operation of the electric system. Moreover, without these protections, PGE risks noncompliance with its LGIA and OATT. PGE reserves the right to respond to any additional evidence that is submitted to the record. We appreciate the City of Sherwood's consideration of PGE's position.

Sincerely,

/s/ Meredith Armstrong

Meredith Armstrong
Senior Manager, Local Gov't Affairs
Portland General Electric Company