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Bonneville Environmental
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Citizens' Utility Board of Oregon
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Columbia Gorge
Community College
Community Renewable
Energy Association
Cypress Creek Renewables
Davis Wright Tremaine LLP
DNV GL
EDF Renewable Energy
EDP Renewables
Environment Oregon
Environment Washington
Erica Nist-Lund, Attorney
Eurus Energy America
EverPower
Geothermal Resources Council
Green Mountain Energy
HDR Engineering, Inc.
Idaho Conservation League
Invenergy
K&L Gates
Kapla Law PLLC
Latitude45 Associates
MAP
Montana Environmental
Information Center
MontPIRG
National Grid
Natural Resources
Defense Council
NextEra Energy Resources
Northwest Environmental
Business Council
NW Energy Coalition
OneEnergy Renewables
Oregon Solar Energy
Industries Association
OSPIRG
Oregon Tech
Orion Renewable Energy Group
Scout Clean Energy
Semptra Renewables
Solar Oregon
Spark Northwest
Stoel Rives, LLP
Sulus Solar
SunPower Corporation
SWCA Environmental Consultants
Tetra Tech
Vestas Americas
Warm Springs Power &
Water Enterprises
Washington Environmental Council
WashPIRG
Western Resource Advocates



February 12, 2018

TO: Senator Lee Beyer, Chair, Senate Committee on Business and Transportation
Members, Senate Committee on Business and Transportation

FR: Rikki Seguin, Policy Director, Renewable Northwest

RE: Opposition of SB 1519 -1

Dear Chair Beyer:

Renewable Northwest is a regional, non-profit renewable energy advocacy organization based in Oregon, dedicated to the responsible development of renewable energy resources throughout the Pacific Northwest. Our members are a combination of renewable energy businesses and environmental and consumer groups. **Renewable Northwest opposes SB 1519 -1.**

Our organization shares a positive and productive relationship with the Oregon Department of Energy (the Department) with the goal of ensuring that the benefits renewable resources bring to Oregon are fully realized. Renewable Northwest, together with energy stakeholders across the state, collaborates with the Department in both the policy and regulatory arenas. The Department provides an important independent voice in state venues with its energy expertise. It fills a crucial role in the study, design, and implementation of energy policies in Oregon, and is uniquely qualified and positioned to help the state achieve its energy policy goals. We want to ensure that the Department is able to maintain its role in contributing to the implementation of the state's goals as it transitions in the future.

Renewable Northwest appreciates the sponsors' work to think creatively about ways to support the Oregon Department of Energy. As we consider legislation modifying the scope and vision of the Department, Renewable Northwest is committed to policies that are forward-looking and recognize the agency today rather than the agency of the past.

The electricity sector is undergoing changes, including changes in available technologies and suppliers, customer preferences for being supplied with different resources or combinations of resources, and the ability of different resources to interact together on the grid. Customers in Oregon and elsewhere are increasingly looking to support investments in clean, renewable energy and complementary technologies, like energy storage. Now more than ever, we need a Department of Energy focused on the future and able to be flexible and nimble as change occurs.

While we appreciate the previous processes the Committee has undertaken to hear from stakeholders, we do not see this bill as appropriately balancing the suggestions made or solving the previously acknowledged problems of the agency. Renewable Northwest appreciates the ongoing conversations about an advisory body that can help the Department modernize and meet state goals.

Any new advisory body must be comprised of parties with expertise on the subject areas of the Department and committed to looking forward. This advisory body should be visionary and should recognize the progress the Department has made over recent years. The proposed six-member Oregon Energy Commission does not reflect Oregon's full energy landscape and lacks representatives from resource types that will certainly be an increasing part of our energy mix such as renewable energy or energy efficiency sectors to balance the customer representatives. The non-voting make-up of the Commission is industry-heavy, including representatives from investor-owned, consumer-owned, and natural gas utilities. Interestingly, while all three of these entities pay the energy resource supplier assessment (ESA), other energy service suppliers

assessed the ESA are excluded from the Commission. The proposed Oregon Energy Commission would have rulemaking authority in place of the Department. Renewable Northwest believes that this role should continue to be played by the Department of Energy.

The Oregon Energy Commission would also shape the statewide strategic energy plan. This energy plan impacts agencies and work beyond that of the Oregon Department of Energy alone. The development of the plan should include stakeholder input rather than Commissioners alone. Renewable Northwest believes that any such plan should also examine the link between energy and climate change, a connection which is currently unacknowledged in SB 1519 -1.

Any new legislation should also recognize the budget requirements of an agency with such a scope during this changing time of energy policy and regulation. Legislation should allow and not constrain the Department's ability to do good work in a measured and meaningful way. Funding should be responsibly developed with stakeholder input and robust enough to meet the above-mentioned objectives. Unfortunately SB 1519 -1 fails to provide this budget requirement. The cap on the ESA could decrease the Department's ability to run critical programs for Oregonians and/or participate in policy or regulatory development.

While we urge a no vote on SB 1519 -1, we look forward to additional conversations about ways to support the Department and its important work.

Sincerely,

A handwritten signature in black ink that reads "Rikki Seguin". The signature is written in a cursive, flowing style.

Rikki Seguin
Policy Director
Renewable Northwest