

Re: SB 1519 and SB 1537

As you consider these rules relating to the Oregon Department of Energy, I would like to encourage you to consider whether or not the time has come to require a determination regarding whether there is a need for the energy that will be produced by additional wind and solar developments.

COMMENTS REGARDING "NEED"

Page 50, Line 26. Serious consideration should be given to removing section 4 which exempts new generation facilities from having to show a "need". According to the statute, it was believed that competition within the market would limit these developments to those actually needed. Currently, Oregon is a net exporter of electricity. Oregon has over 3547.4 Mw of unbuilt electricity developments sited or in the process of being sited in this state with no market in the state for the electricity they will produce. This results in pressure being placed upon Oregon to require citizens to pay for transmission lines whose primary purpose is to provide a means for electricity generated here to be sold to other states. Oregon is sustaining unnecessary environmental and economic damages due to subsidies and costs developers pass on to customers.

Consider the following: According to PacifiCorp's 2017 Integrated Resource Plan, Pages 2 and 3 of the Executive Summary, they have no plans to add additional Oregon wind energy through 2036 and they only plan to add approximately 230 Mw of Oregon solar between 2028 and 2036.

Portland General Electric already has 40% renewables, and if you include hydro power, that amount is 70%.

There is no market in Oregon for many energy developments already sited, and yet the Oregon Department of Energy continues issuing site certificates and approving amendments to extend the start dates for construction of these sites. It seems reasonable to question why all these developments are being approved when the only possible purchasers of the electricity they would produce are outside Oregon.

Following is a list of wind and solar developments with applications being processed or approved but not yet built.

APPROVED SITE CERTIFICATES FOR DEVELOPMENTS WHICH HAVE NOT BEEN BUILT AND DEVELOPMENTS IN THE PROCESS OF BEING SITED

DEVELOPMENT	CAPACITY	LAND IMPACTED
Golden Hills Wind	400 Mw	27,400 acres
Montague Wind	404 Mw	33,402 acres
Perennial Wind Chaser Natural Gas	415 Mw	
Saddle Butte Wind	399 Mw	Siting Corridors 13,553 acres Actual site approx. 30,000 acres
Summit Ridge Wind	194.4 Mw	Siting Corridors 11,000 acres Actual Site approx. 22,000 acres
Wheatridge Wind	500 Mw	Siting Corridors 13,097 acres Actual site approx. 40,000 acres
Boardman Solar	75 Mw	600 acres
Blue Marmott Solar	60 Mw	5,170 acres
Nolan Hills Wind	350 Mw	45,000 acres

Obsidian Solar	600 Mw	7,000 acres
TOTAL	3,397.4 Mw	210,572 acres

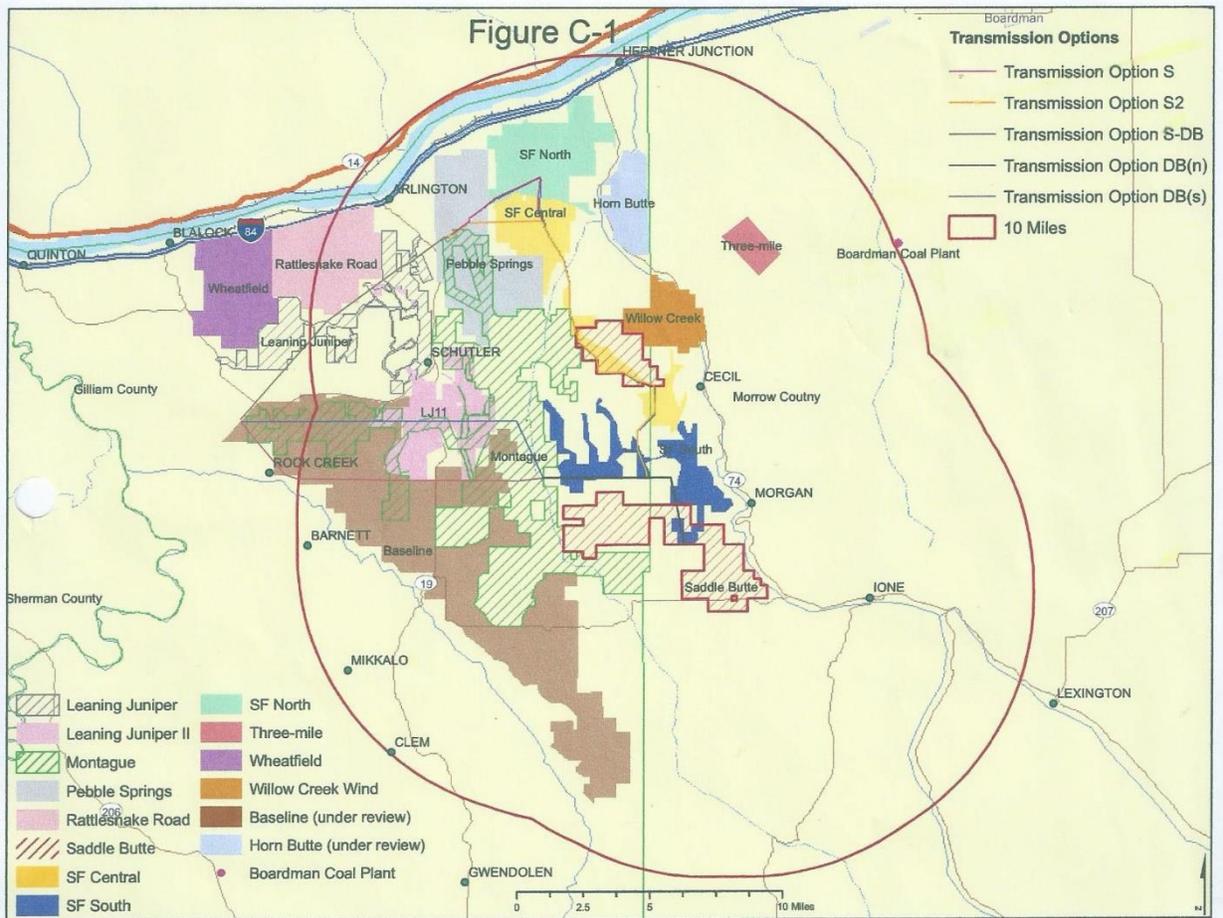
Oregon has approximately 4,352 Mw of existing wind and natural gas plants operating. Why should Oregon citizens be required to sustain the environmental damages and taxpayer costs for these developments and transmission lines to move energy to other states when Oregon has no need of the energy the developments will produce?

Sincerely,

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See attachment: Is this what we want Oregon to look like?

Figure C-1



Saddle Butte Wind Farm

Figure C-1