



## Eugene Water & Electric Board

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Dear Chair Dembrow, Vice-Chair Olsen, and Members of the Committee:

The Eugene Water & Electric Board (EWEB) appreciates the opportunity to submit testimony on SB 508.

EWEB supports the principle that Oregon energy policy should regulate carbon uniformly and be technology neutral. Basing regulatory application on criteria other than the greenhouse gas (GHG) emissions of energy resources (e.g., technology, size, age of facility, etc.) is inefficient and does not result in least-cost GHG abatement solutions. Consistent treatment and technology-neutrality effectuates a least cost approach to GHG reduction and assures that existing hydropower and renewable resources are not disadvantaged based on non-carbon emissions based criteria.

EWEB utilizes legacy hydropower resources, both from the Federal Columbia River Power System as well as our own hydro resources on the McKenzie River, and we have also procured owned or contracted-for wind, biomass and solar resources for our power portfolio. EWEB recognizes and supports the deployment of existing and additional renewable energy as one of multiple components necessary to accomplish a low carbon energy future for our region.

However, the specific policy mechanisms Oregon utilizes matter greatly as to whether we accomplish that future at the least cost. Technology-neutrality is an essential element of any least-cost policy approach to GHG reduction.

EWEB applauds SB 508 for encouraging a step towards technology-neutrality and spurring examination of unintended or unexpected outcomes of existing energy policy in our region, including such issues as the overbuilding of unneeded energy resources in the region that may often be curtailed or exported rather than resulting in emission reductions in the region, inefficient use of surplus hydropower in our region, and wholesale electricity market conditions that create challenges for reinvestment in existing zero-carbon resources.

We think there are solutions that can be agreed upon to address these issues and harmonize remedies with the original goals of these policies when enacted. However, we acknowledge that solutions would be best formulated through a stakeholder work group process in the interim with adequate time to formulate recommendations to the legislature. EWEB would be happy to participate in any such effort. Thank you for considering our input.

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