



March 10, 2019

Senate Committee on the Environment and Natural Resources
Chair Michael Dembrow
900 Court St. NE
Salem, OR 97301

Dear Chair Dembrow, Vice-Chair Olsen, and members of the committee,

The Oregon Solar Energy Industries Association (OSEIA) is a trade association founded in 1981 to promote clean, renewable, solar technologies. OSEIA members include businesses, non-profit groups, and other solar industry stakeholders. We provide a unified voice of the solar industry and focus exclusively on the solar value chain; from workforce development to permitting, advocacy, policy, and regulation for manufacturing, residential, commercial, community, and utility scale solar projects on the local, state and regional level.

OSEIA urges your opposition of SB 451. Renewable Energy Credits are designed for energy that is naturally renewing, such as solar, wind and biogas, not for municipal waste. In addition, SB 838, the original 2007 authorizing legislation for the Renewable Portfolio Standard (RPS) states: "Whereas the Legislative Assembly finds that it is in the interest of the state to promote research and development of *new* renewable energy sources in Oregon..." Just like hydroelectricity produced by the Bonneville dam is not included in the RPS because it is not new (and new hydroelectric projects are included), Covanta's incinerator should also be excluded since it has been burning waste since 1987.

Furthermore, waste incineration does not provide Oregon with the additional benefits that renewables do. Unlike solar and other renewables eligible under the RPS, burning waste increases carbon pollution, increases air toxics, and does not significantly create jobs.

Most importantly, adding waste incineration as eligible under the RPS seriously undercuts the current market for Renewable Energy Credits (RECs) without providing additional job creation. Even if the Covanta facility plans to hire more workers at their facility, it would not compare to the hundreds of jobs across the state that solar can create. If waste incineration is eligible for RECs, it would flood the REC market and put solar at a disadvantage. The solar industry had a difficult year last year; when the previous state solar incentive disappeared in 2018, there was an eight percent job loss in the industry. At a time when we need both state support and regulatory certainty to stabilize the solar industry, this change moves Oregon's renewables marketplace in the wrong direction.

OSEIA respectfully encourages this committee to oppose SB 451. Solar creates more jobs than waste incineration in Oregon and provides carbon reduction value: the REC market should be preserved for truly renewable resources that provide comprehensive benefits to Oregon, such as solar energy.

Angela Crowley-Koch
Executive Director
Oregon Solar Energy Industries Association (OSEIA)