



April 2, 2019

Representative Ken Helm
Chair, House Energy & Environment Committee
Oregon State Legislature

Re: HB 3141

Dear Chair Helm, Vice Chairs Schouten and Reschke, and Members of the Committee:

Forth is a nonprofit trade association that advocates for the advancement of electric, hydrogen, shared, smart, connected, and autonomous mobility. Forth supports these initiatives through demonstration pilot projects, public outreach and education, industry networking and legislative and regulatory advocacy across the nation.

Forth has over 160 members representing auto manufacturers, electric vehicle charging suppliers, industry partners, utilities, local governments, non-profits, environmental organizations and many additional stakeholders within the transportation electrification “ecosystem”.

Forth is a 501c6 and is closely affiliated with the Forth Mobility Fund, which is a 501c3. The Forth Mobility Fund is the contract entity for the Clean Fuels Program Backstop Aggregator for 2018. This letter of testimony is on behalf of both organizations.

Forth appreciates the Governor, the State legislature, the Oregon Department of Energy, the Oregon Department of Transportation, and the Oregon Department of Environmental Quality’s (DEQ) efforts to move transportation electrification forward in Oregon. Electrifying our transportation sector is a crucial component in preparing Oregon’s transportation future and meeting our state’s climate goals.

Regarding Section 1 of HB 3141: Forth supports creating standards for Oregon building codes with respect to multi-family, commercial and public buildings to support electric vehicle charging. Forth believes the minimum standard required should be 240 volt and 40 amp. In addition, we recommend the deadline for the building code upgrade should be December 31, 2019 and not December 2022 to assist in the state’s climate goals.

Regarding Section 4 of HB 3141 (Section 3 in the -4 amendments): Forth supports the Northwest Energy Coalition (NWECC) recommendation that the “payment method” should be redefined to ensure all options can and will be considered when making charging stations widely available and accessible to members of the public without limitations or restrictions.

Greater accessibility for moderate-to-low income individuals will help ensure Oregon does not end up with a “transportation electrification divide”.

Regarding Section 14 (Section 11 in the -4 amendments): Forth believes this language is unnecessary and should be removed completely. DEQ has adopted rules that govern use of the credits. The rules and the DEQ contract require participants to file an annual workplan and an annual report, both of which are made public and available on the DEQ website.

We welcome the Legislature’s review of these public documents, but respectfully object to additional different reporting requirements or timelines. Generating such additional reports would use a significant amount of any credit revenue received that would otherwise go towards transportation electrification.

Utilities negatively impacted by the additional reporting requirements would include: Central Lincoln PUD, City of Cascade Locks, Clatskanie PUD, Columbia River PUD, Emerald PUD, EWEB, Hermiston Energy Services, Lane Electric, N. Wasco Co PUD, PacifiCorp, PGE, Springfield Utility Board, Tillamook PUD, Umatilla Electric Coop and those that Forth Mobility Fund serves as the Backstop Aggregator for: Blachly-Lane Electric Coop, Canby Utility Board, Central Electric Coop, City of Ashland, City of Bandon, City of Monmouth, Columbia Basin Electric Coop, Columbia Power Coop, Consumers Power, Coos-Curry Electric Coop, Douglas Electric Coop, City of Forest Grove, Harney Electric Coop, Hood River Electric Coop, Idaho Power, McMinnville Power & Light, Midstate Electric Coop, Milton-Freewater Light & Power, Oregon Trail Electric Coop, Salem Electric, Surprise Valley Electric Coop, Wasco Electric Coop, and West Oregon Electric Coop.

Thank you for the opportunity to provide comments regarding HB 3141. We are always happy to answer questions or testify before the Legislature regarding our work as the Backstop Aggregator.



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[The Roadmap 12 program is now live - view it here!](#)