



April 4, 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 intention of HB 3141 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. However, Forth has some questions and requests regarding the legislative reporting requirements included in some versions of the bill.

Both the -1 and -4 amendments to HB 3141 include a requirement that the Backstop Aggregator reports annually to the Legislature with an accounting of monetized and nonmonetized credits and how the funds were used. The Forth Mobility Fund’s contract with DEQ to serve as the Backstop Aggregator already requires an annual workplan and an annual report to DEQ that includes this information. On March 31 of 2019, Forth submitted its first annual report for the last 3 months of 2018. Both the workplan and annual report are public documents available on the DEQ website (although the annual report was submitted so recently that DEQ may not have posted it yet).

Forth welcomes and invites the Legislature’s review of these public documents, but respectfully

requests that any legislative reporting requirements do not necessitate the creation of another, separate report in addition to the report already provided annually to DEQ. Requiring a separate legislative report would result in credit revenue being used for administrative expenses instead of going towards transportation electrification. Additionally, we would like to point out that while the -1 and -4 amendments to HB 3141 require investor-owned utilities and the backstop aggregator to report to the legislature on how they are spending funds from clean fuels credits, the bill does not require the same legislative reporting from any of the private entities that also participate in the clean fuels program and monetize clean fuels credits.

Thank you for the opportunity to provide comments regarding HB 3141. I am sorry that I am unavailable to testify in person at the hearing today, but I am always be happy to answer questions regarding our work as the Backstop Aggregator.

Sincerely,

Jeanette Shaw

**FORTH** Empowering Mobility

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