

I have two concerns with SB 928.

First: The Division responsibilities as listed in the bill duplicate many activities already being done by the US Department of Energy. This duplication of effort is costly and unnecessary. At a minimum, the agency should be charged with focusing on the State of Oregon rather than a broader scope.

Second: The Oregon Department of Energy Siting Division should not be folded into the Climate Authority until the ongoing problems with the division are addressed. This section of the Energy Department has been problematic for years, and the incorporation into the larger agency will simply allow it to continue practices that have resulted in an increasing amount of litigation and the loss of public trust in the department. The activities of the siting department should be suspended until facilities currently holding site certificates are built, and statutes can be enacted to address the problems identified through the Joint Legislative Committee meetings and the stakeholder group chaired by Senator Olsen. This would not create problems in meeting Oregon's Renewable Energy Portfolio. It would simply save the state money and avoid the request from the department for two additional siting analysts to issue site certificates for more developments with no market for their energy.

Oregon is currently an exporter of renewable energy. According to the US Energy Department, in 2016 Oregon's electricity generation was 56.7% hydro, 12.1% wind, 3.2% coal, 25.8% natural gas, and 2.2% other including solar and other renewables.

In spite of the current over generation of energy in this state, the Oregon Department of Energy Siting Division continues to generate site certificates for additional developments and to extend the construction dates for existing site certificates. The following developers have received site certificates through the Oregon Department of Energy or are in the process of receiving them. They total approximately 3213 Mw of wind and solar which is nearly equal to the number of developments currently operating in the state. The pending developments include: Saddle Butte Wind Development 399 Mw 13,555 acres in siting corridors; Montegue Wind 404 Mw 13,717 acres in siting corridors; Wheatridge Wind Energy 500 Mw 13,097 acres in siting corridors; Summit Ridge 200 Mw 11,000 acres; Golden Hills 400 Mw 29,500 acres; Obsidian Solar Center 400 Mw on 3,921 acres; Boardman Solar Center 75 Mw on 798 acres; Bakeoven Solar 303 Mw on 10,615 acres; Blue Marmot Solar, 60 Mw on 5,170 acres; and Nolan Hills Wind 350 Mw on 44,900 acres.

The total land that will be consumed by these developments as reported by the developers is 146,273 acres. The actual impact is significantly greater.

Some of the developers only show the siting corridors as the acres of land they use rather than the actual acres included in the site. The total land used will actually be approximately 200,000 acres.

Because Oregon does not require a determination that there is a need for developments, Oregon is becoming a favored siting location for energy developers who are looking to market their energy to other states. These developments provide minimal long term employment, but significant long term environmental and wildlife damages to Oregon resources.

Since there are no determinations being made regarding the cumulative damages to wildlife, high value farm lands, historical resources, etc., the accumulation of the developments with the currently existing ones is very significant. The legislature needs to decide whether or not this state should sacrifice our resources and quality of life in order to generate electricity that will be sent to other states, or if the obligation is to meet the needs of this state. Until the legislature has that discussion, the Siting Division of the Oregon Department of Energy should suspend the issuance of additional site certificates until there is a need for additional developments to meet the energy needs of Oregon citizens. The division should not be folded into a larger agency and allowed to continue current practices.

Thank you for considering my comments.

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