



April 4, 2021

**Chair Marsh, Co-Chairs Helm and Brock Smith
Oregon House of Representatives
Committee on Energy and Environment**

Support for HB 3180-3

Madam Chair Marsh, co-chairs Helm and Brock Smith and committee members,

Thank you for granting a hearing for HB 3180. My name is Shannon Souza, I am a licensed engineer in Coos Bay, owner and principle of Sol Coast Companies; committed to supporting strategic growth, responsible development and sustainable living since 2003. In fulfillment of that mission I have, for the last 20 years, been homing in on the economic, ecologic and energy security opportunities of clean energy development for Oregon and its citizens.

I am also the volunteer Executive Director of Oregon Coast Energy Alliance Network (OCEAN). OCEAN's board is comprised of leadership from Labor, Conservation, Economic & Workforce Development, Climate Action, Maritime, Environmental and Resilience and supports a vision of Clean Coastal Energy Security that maximizes the benefits and minimizes the conflicts for Oregon's coastal communities and rate payers. In addition to serving as OCEAN's ED, I represent the Professional Engineers of Oregon (PEO) on the governor's Resilience Mitigation Advisory Council (RMAC) where I advocate the essential role that energy security plays in hardening our communities from the ever-increasing frequency of climate related catastrophes and enabling recovery during and after climate and seismic events. I also serve as the cofounder and chair of Coos Housing Action Team and am painfully aware of the formidable barrier that energy security poses for our businesses, educators and families struggling to find a place and future in a modern coastal economy. In rural and other destitute areas, lack of access to energy has been recognized as a societal determinant of health with direct correlations to mental anxiety, domestic violence and respiratory malfunction.

My volunteer activities in this space are driven by my experience raising my sons, founding and supporting our public schools & the underemployed families they serve and celebrating our fishing communities that reside at the end of the line, where our power outages are more frequent, our economic futures haunted by a past of boom and bust and living on the edge of our lands hit first and hardest by climate change.

Over the past 4 years I've been volunteering hundreds of hours in Oregon's Public Utility Commission rulemaking space learning that the procurement, interconnection and planning tools currently in use by our investor-owned utilities are not 3rd party vetted, transparent or calibrated to our modern technologies and climate realities. Contrary to the frequently repeated statement that investing in energy resilience and Oregon economic development will result in burdens to rate payers – recently published and currently underway modeling and studies that ARE vetted, transparent and calibrated to our modern technologies and



climate realities find that distributed generation, advanced energy management technologies and strategically located utility scale renewables are actually the lowest cost, lowest risk solutions for our clean energy futures. Here is a quote from the national, transparent, vetted analysis published in 2020:

“ Utilities are using traditional models to justify expensive investments in underutilized utility assets. But there’s a better way. A new planning tool that uses more and better data, analyzes the total costs of the energy we put on the grid, and accurately values local solar + storage can help regulators make informed decisions about the right energy mix and save ratepayers a half a trillion dollars.” –
(www.localsolarforall.org/roadmap)

A significant contributor to the frequented fallacy that local generation is not the lowest cost, lowest risk, is that methods currently used by our investor owned utilities do not consider 1) the savings to rate payers of deferring or negating new transmission investments required to import larger quantities of power (referred to as non-wire’s solutions), 2) the loss of electricity through our transmission system (as much as 1/3rd of our electrons are lost in transmission by the time they reach the south coast of our state), 3) the reduced risk of wildfire (direct business and property loss as well as loss of life), and 4) the reduced frequency of service interruption due to transmission failure or preventative safety shut offs (which result in loss of commerce, education and healthcare services).

It is from this collective experience and my understanding of the tremendous opportunity for Oregon to implement policy that supports community level energy independence, statewide economic prosperity and responsible yet rapid decarbonization that I highlight my favorite aspects of this bill.

HB 3180

- ***Promotes resilience and energy reliability through transparent transmission and resource planning mechanisms that fully recognize the rate payer value of strategically located Oregon built clean energy solutions.*** (this is very different than the somewhat biased mechanisms employed today that do not recognize locational values and include inherent financial rewards to IOU stakeholders for investing Oregon’s rate payer funds in investor-owned generation and transmission assets that are not necessarily constructed in Oregon or by underemployed Oregonians)
- ***Minimizes rulemaking delays to implementing clean energy policy by leading with updates to Oregon’s existing RPS.*** This is a direct, efficient framework for immediate progress toward state clean energy goals by cultivating a competitive, robust, transparent clean energy market as soon as possible. This approach opens the door for diversifying Oregon’s wealth while simultaneously making the aggressive decarbonization moves that we need to in the next 5 years. This approach also sends a clear, strong signal for immediate federal and private investments.
- ***Ensures that a minimum 50% built in-state siting requirement*** in order to provide multiple benefits of energy security, economic development, reflection of community values, market competition, wildfire risk reduction, and workforce stability.

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Thank you for providing this bill and this approach the time and attention it deserves. I recognize that this is likely at odds with the pressures you must certainly be feeling from those formidable political forces that do not recognize a vested interest in Oregon's workforce and economic development or energy security.

The decisions that you currently contemplate will impact the opportunities of Oregonians for generations to come. With this in mind, I urge you to request a published analysis which includes underlying assumptions and data, of the financial implications of this bill as verbally reported by Citizen's Utility Board at the April 5th hearing as they do not correlate with either the published analysis provided by EconNW nor that emerging from regional energy modeling activities.

As you continue to craft Oregon's clean energy path forward I urge you to recognize and uphold the Oregon opportunity for energy independence, prosperity, resilience and equitable access to economic diversity such as is afforded by the -3 of this bill.

Respectfully,

Shannon Souza, PE

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