The Community Renewable Energy Association, an Intergovernmental organization representing local governments and renewable energy developers since 2007 has the following comments with regard to HB 3081-3:

> We believe that increasing the current Renewable Portfolio Standards now is the most expedient method for accelerating the decarbonization of the grid. We recognize that an emissions based approach is a more comprehensive strategy but that system will take time to implement. (Section2)

> We support providing the OPUC with greater leverage to direct utilities to meet those requirements. (Section 7)

> The evidence presented in the ECONorthWest study indicate that the 50% in state/resiliency enhancement criteria will provide significant additional benefit to Oregon’s economy, particularly in the more rural areas of the state where projects are likely to be located. (Section 9)

> Adding more community/small scale renewables to the portfolio adds strength to the energy system and benefits to local economies and community resilience through distributed generation. (Section 16)
We support the additional planning requirements and alternative solutions to ensure that investments can be done strategically and match the capacity to deliver the energy to where it is needed. (Section 16)

We support legislation that requires labor standards designed to build a trained labor force to be available to work in the renewable energy sector and policies leading to greater apprenticeship training and supply of labor for rural Oregon. We are concerned about enacting labor standards for the renewable sector more stringent than for other industry sectors where public money may be involved. (Section 28)

We appreciate the requirement for the OPUC to strengthen the terms for projects qualifying under the Public Utility Regulatory Policy Act and setting the length of term for projects using avoided cost rates and standard contracts for at least 25 years. (Sections 24 & 25)

It is important to clarify the jurisdiction of the OPUC in matters in dispute over contractual issues regarding qualifying facilities and that those issues should be resolved by the courts. (Section 27)

Submitted by:

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