



To: Chair Marsh & Members of the House Energy & Environment Committee

From: J.L. Wilson, Alliance of Western Energy Consumers (AWEC)

Date: February 1, 2021

Re: Testimony for HB 2475, Support of -2 Amendment

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AWEC is a trade organization that represents Oregon's largest energy users, as well as some of the state's largest employers. These companies spend many millions of dollars each month on energy to manufacture products that are sent all over the world, to feed the region, and to perform and produce many other basic needs and products.

Although AWEC is supportive of the goals of HB 2475, it will result in a cost shift to certain residential payers as well as commercial and industrial customers, resulting in higher costs for these customers.

AWEC believes the bill can be improved for ratepaying customers with the inclusion of the -2 amendment.

The first half of the amendment adds a specific requirement for advocacy on economic regulation. This would have the effect of recognizing in the new law that the PUC is solely an economic regulator. And while the PUC could include this specificity in a new intervenor funding agreement with the new organizations authorized by HB 2475, this agreement would not be required to include it without that same specificity in the statute.

The second half of the amendment adds a provision that intervenor funding is limited to one organization that represents substantially the same customer interests as another organization.

Currently, only AWEC and CUB are "pre-certified" to receive intervenor funds. HB 2475 will authorize others to also be eligible for funding. The -2 amendment is necessary to ensure that there are not multiple organizations receiving intervenor funding that represent substantially the same constituency.

AWEC believes this is important for two reasons. First, intervenor funds are recoverable from ratepayers. Second, the preparation and review of intervenor funding requests is a labor-intensive process. OPUC shouldn't be overwhelmed with the administrative burden of processing multiple additional intervenor funding requests from substantially similar organizations.

Please support the -2 amendment to add reasonable parameters to ensure the integrity of HB 2475.