



550 NW Franklin Ave., Suite 408  
Bend, OR 97702

September 26, 2025

House Committee on Climate, Energy, and Environment  
Oregon State Capitol  
900 Court Street NE, Room 453, Salem, Oregon 97301

**RE: Impacts of Recent Federal Actions on Energy- and Environment-related Agency  
Operations and Renewable Energy Development in Oregon**

Dear Chair Lively and Members of the Committee:

Thank you for the opportunity to provide comments that shed light on the Impacts of Federal Action on Energy and the Status of Renewable Energy Development in Oregon. Foundationally, changes to federal standards and regulations—in particular, the sunset of the renewable energy investment tax credits (“ITC”) —puts wind and solar clean energy development in peril. Aside from thwarting Oregon’s clean energy goals, this will also raise energy costs to local consumers (even though wind and solar will remain the least expensive new generation resource).<sup>1</sup>

There is still time to advance a meaningful buildout of near-term renewable energy facilities that can obtain ITC and mitigate these impacts, if the State of Oregon takes immediate action to facilitate the start of construction and energization of these facilities in the coming months and years. Obtaining ITC before sunset presents a number of hurdles, most importantly: a permit to commence construction, a buyer to finance construction against, and timely and financially reasonable interconnection.

Facility siting and permitting remains a critical barrier, especially for solar energy. Although the state has taken minor, step-wise actions to address permitting barriers, a broader and more permissive approach is vital to getting projects to the start of construction in the near term.<sup>2</sup> It is also imperative that the State facilitate the competitive and expeditious procurement of such resources by regulated utilities.

We look forward to the opportunity to contribute to solution pathways in response to this unfortunate situation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Max M. Yoklic".

Max M. Yoklic  
*In-House Counsel*  
NEWSUN ENERGY

---

<sup>1</sup> Lazard, *Levelized Cost of Energy* (June 2025) (utility-scale solar and onshore wind remain the most cost-effective forms of new-build energy generation on an unsubsidized basis), <https://www.lazard.com/media/eijnqja3/lazards-lcoepplus-june-2025.pdf>

<sup>2</sup> For example, the Oregon Department of Land Conservation and Development solar rulemaking resulted in a complex regulation that is unproven and costly to comply with, and the Oregon Department of Energy’s 2025 Energy Strategy does not even identify facility permitting as an action item.