

February 6, 2025

Representative John Lively, Chairman  
House Committee on Climate, Energy & Environment  
900 Court St. NE H-481  
Salem, Oregon 97301

RE: House Bills 2064, 2065 and 2066

Chair Lively and members of the committee:

Pacific Power is an investor-owned utility that provides safe and reliable electric service to more than 620,000 customers across Oregon, primarily in rural parts of the state. Pacific Power is part of PacifiCorp, one of the lowest-cost electricity producers in the United States, with 2 million customers in six western states.

Pacific Power has concerns about HB 2064, HB 2065 and HB 2066.

Specifically, HB 2064, Pacific Power believes the unclear delineation between the microgrid and utility transmission/distribution systems under section 2(d) needs further clarity, particularly with the references to operating front-of-meter energy resources independently from the electric grid system. The current wording would allow third party operation and control of utility owned infrastructure which poses a safety risk for line workers and the public.

HB 2065 would allow the option for a developer to hire a third-party contractor to perform a study that would be deemed a final report for interconnection. This process will require utilities to perform additional review to substantiate the third-party analysis and ensure it meets all applicable safety, operations and reliability requirements for interconnection.

Pacific Power's current process already allows a developer's third-party contractor to review Pacific Power's study results, including underlying data and assumptions used in the production of the study results, as well as the opportunity to ask questions, and propose modifications to the data, assumptions and results. We believe this requirement in HB 2065 is costly for customers and duplicative.

Finally, we believe HB 2066 needs work to tighten up definitions to clarify the roles between the public utility and the non-utility microgrid infrastructure, interactions and responsibilities.

Pacific Power looks forward to continued engagement with our partners on these bills to maintain our commitment to the communities we serve.

Please contact: Elizabeth Howe (503) 910-3270 or Shawn Miller (503) 551-7738.