



Chair Kropf, Vice Chairs, and Members of the Committee,

My name is Keith Brooks, and I serve as the General Manager of Douglas Electric Cooperative. Douglas serves 11,000 meters across 2,500 square miles of Douglas, Lane and Coos counties. I am testifying on behalf of the Oregon Rural Electric Cooperative Association and the 18 electric cooperatives represented by ORECA. Electric cooperatives, like DEC, provide power to some of the highest-risk areas for wildfires in Oregon, and I am here in strong support of House Bill 3666, which provides the clarity needed to effectively protect the communities we serve.

As a company, we take wildfire mitigation seriously. In fact, we are spending more on it than any other capital work we do. It has been the driving force behind our last three rate increases. As a manager trying to do the right thing, I constantly wrestle with the question: Are we striking the right balance between safety, affordability and reliability? It's the three-legged stool that we manage by.

We need proactive guidance from the state. Right now, we only find out if we did enough after a fire—when it's too late. That doesn't make sense. If this were about driver safety, no one would say, "No need for speed limits or licenses—just drive, and we'll tell you what you did wrong after a crash." Yet, that's exactly the situation cooperatives face with wildfire mitigation.

As not-for-profit electric cooperatives, we have no shareholders—only members. They pay for everything. That means every dollar spent must drive real wildfire prevention, especially in counties like ours, where many people are struggling. Some members are making choices between paying for power or food. HB 3666 helps cooperatives focus resources where they matter most—ensuring investments deliver meaningful safety improvements while keeping power as reliable and affordable as possible.

No matter what level of investment we make, we can never drive the risk of wildfire ignition to zero. If the expectation is that electric cooperatives can never do enough mitigation work, which is the reality without certification, then I'm telling you, as a utility manager, that will drive prices so high that people will no longer be able to afford to live in the very communities we are trying to protect. That's not wildfire prevention, that's economic displacement.

For example, after receiving a recent bill, a widow wrote to us and shared that she was out of options and could not pay the bill. She said, and I quote, “I use cold water to wash. I am a 71-year-old widow, working for minimum wages when there is work at the job. I don’t know what to do. I have no electric heat or air conditioning. I have cut everything. I can’t afford this.”

Again, the driving pressure behind our recent rate increases are almost entirely linked to our wildfire mitigation investments.

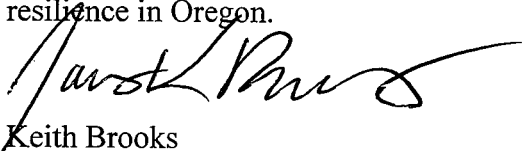
Wildfire prevention isn’t something that happens overnight; it requires steady, long-term investment. HB 3666 provides a consistent framework to follow, allowing us to make smart, proactive investments instead of chasing unproven, ever-changing strategies.

After bringing in an independent contractor, we confirmed what many suspected—95% of our tree-related outages, and likely our biggest fire risks, come from trees outside our rights-of-way. The problem? We don’t have automatic authority to remove them. Since then, we’ve taken out 7,000 high-risk trees, each one requiring separate negotiations, adding time and cost. Over the next five years, this will total \$15 million.

At a recent wildfire conference, a major California utility shared that they’ve stopped trying to predict which outside-the-right-of-way trees will fall—it’s an impossible task. Instead, they’re focusing on clearing vegetation down to bare dirt around poles with equipment, which they believe poses the highest fire risk. We’ve invested millions in our approach and believe in it—but when one of the biggest utilities in California shifts strategy, it raises a tough question: Are we on the right path?

I am here today as someone responsible for making the community I live in safer, and I can tell you—this bill does just that.

Cooperatives appreciate the work that has gone into HB 3666 and fully support its passage. Thank you for your time, and I encourage you to move this bill forward to strengthen wildfire resilience in Oregon.



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