To: **Chair Lively, Co-Vice Chairs Gamba and Levy, and Members of the House Committee on Climate, Energy, and the Environment**

From: **Chief Brian Stewart**
Clackamas Fire District
Oregon Fire Chiefs Association

Chief Ben Stange
Polk County Fire District No. 1
EMS and Fire Chapter of SDAO

Date: **February 5, 2026**

Re: **HB 4080 Letter in Opposition**

On behalf of the Oregon Fire Chiefs Association (OFCA) and the Special Districts Association of Oregon (SDAO) Fire and EMS Chapter, thank you for the opportunity to submit written testimony regarding House Bill 4080.

OFCA represents fire chiefs and senior fire service leaders from municipal, county, and special district fire agencies across Oregon. The SDAO Fire and EMS Chapter represents special district fire and emergency service providers that deliver essential life safety services to communities throughout the state. Our organizations strongly support renewable energy innovation and the responsible deployment of new technologies. However, we oppose House Bill 4080 as introduced because it attempts to establish technical building and electrical safety policy in statute rather than through Oregon's established building, electrical, and fire code development process. Oregon has a history of following national and state standards on how to adopt codes.

Oregon has a long-standing, nationally respected code development system specifically designed to evaluate new and emerging technologies through a transparent, consensus-based framework. This process brings together fire service professionals, electrical experts, utilities, building officials, manufacturers, and other stakeholders to ensure that technical standards are safe, enforceable, and adaptable as technology evolves. When the Legislature prescribes technical installation and use requirements in statute, it bypasses this system and limits the state's ability to refine standards based on field experience, new research, and changing conditions.

House Bill 4080 authorizes the installation and use of portable solar photovoltaic energy devices designed to connect to a building's electrical system through a standard 120-volt outlet and receptacle, provided the device is listed and incorporates anti-islanding functionality. While these features are important, they represent only a small portion of the safety considerations normally addressed through the code process. Issues such as circuit loading, electrical service capacity, receptacle configuration, mounting, labeling, and fire department operations are inherently technical matters best resolved through code, not statute.

Photovoltaic systems are known to present hazards during firefighting operations, including the potential for energized components even when utility power is disconnected. Fire suppression, ventilation, and overhaul operations depend on predictable, standardized electrical system design and labeling to reduce the risk of electrical shock and other injuries. These operational realities are routinely evaluated and addressed through the code development process, where firefighter safety impacts can be fully considered.

The bill further allows installation of up to 1,200 watts of generating capacity without electric utility review, approval, or an interconnection agreement. It also relies on landlords, homeowners associations, and condominium associations to restrict installations when electrical capacity is insufficient. These approaches highlight the core concern with legislating code: the statute establishes permission for a technology without first establishing comprehensive, uniform, and enforceable technical standards to ensure safe application across diverse building types and conditions.

Our objection is not limited to the specific design of House Bill 4080, but to the precedent it sets. Once technical building and electrical requirements are placed in statute, future modifications require legislative action rather than routine code updates, making it more difficult to respond to safety issues, new data, or evolving best practices.

If the Legislature wishes to advance policy related to portable, plug-in solar photovoltaic energy devices, OFCA and the SDAO Fire and EMS Chapter respectfully recommend a code-first approach. This would direct the appropriate state agencies and code bodies to evaluate these devices and, if appropriate, develop clear, enforceable standards through the existing code process before any broad statutory authorization is considered.

For these reasons, the Oregon Fire Chiefs Association and the Special Districts Association of Oregon Fire and EMS Chapter respectfully oppose House Bill 4080 as introduced and urge the Legislature to allow Oregon's established building, electrical, and fire code development system to do the work it was created to perform.

Thank you for your consideration.