



February 7, 2026

Representative Nancy Nathanson, Co-Chair
Senator Khanh Pham, Co-Chair
Joint Committee on Information Management and Technology
Oregon State Capitol
900 Court Street NE
Salem, OR 97301

RE: Oregon Municipal Electric Utilities Association Opposition to HB 4055; Seeking An Amendment to Remove Electric Utilities

Dear Chair Nathanson, Chair Pham, and Members of the Joint Committee on Information Management & Technology:

Oregon Municipal Electric Utilities Association (OMEU) is made up of eleven municipally owned and operated electric utilities. Our rates are not-for-profit and set to cover the costs of service, not to earn a rate of return for investors. As you are likely aware, investor-owned utilities and rural electric cooperatives, who also provide electric service in Oregon, would not be subject to the reporting requirements in this bill, only municipals and People's Utility Districts (PUDs), who are also "public bodies." This disparate treatment does not make sense.

Regretfully, OMEU just became aware of this bill concept upon introduction this Session. Chair Nathanson indicated that the Advisory Council for the Cybersecurity Center for Excellence released this concept in the fall. As part of their deliberations, I am not certain if the Council focused on any existing reporting requirements for the electric sector, which is heavily regulated in this area. If not, I would like to provide some background for your consideration.

All electric utilities are required to report cyber events impacting operational systems with the US Department of Energy through form 417 (DOE-417). A subset of electric utilities is also required to report cyber incidents to NERC (North American Electric Reliability Corporation). Another layer of mandatory reporting will be required when the Cyber Incident Reporting for Critical Infrastructure Act (CIRCIA) is fully implemented. It will require covered critical infrastructure entities to report cyber incidents within 72 hours and ransomware payments within 24 hours to the Department of Homeland Security's Cybersecurity and Infrastructure Security Agency (CISA). The electric sector is waiting for the final rule to implement CIRCIA, which is expected this spring.

CIRCIA clearly contemplates this information on cyber incidents and ransomware payments will be shared with the states. For example, 681e(a)(5) says that states cannot use information received in a CIRCIA report for state regulatory actions.

OMEU believes that CISA should be the single streamlined reporting portal so that covered entities could submit information in one place, and the website would then forward the relevant pieces of

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information to all state and federal agencies that have voluntary or mandatory reporting of cyber incidents.

For these reasons, OMEU respectfully requests that electric utilities be amended out of HB 4055.

Electric utilities are already well covered when it comes to cyber incident reporting. Adding an additional layer of reporting just distracts from actually mitigating the cyber incident and fulfilling existing reporting obligations to the federal government.

If the committee is disinclined to an amendment to carve out municipal electric utilities and PUDs, please consider language that declares reporting to the federal government satisfies the state law and direct the State Chief Information Officer to work with federal counterparts to obtain the information from them.

Thank you for your consideration.

/s/ Jennifer Joly

Jennifer Joly, Director

Oregon Municipal Electric Utilities Association