

April 14, 2015

Senator Chris Edwards Chair, Senate Committee on Environment & Natural Resources Members of Senate Committee on Environment & Natural Resources Oregon State Capitol 900 Court St, NE Salem, OR 97301

Dear Chair Edwards and Members of the Committee:

The Portland Business Alliance represents more than 1,800 small, medium and large businesses in the Portland-metro area, all of whom may be impacted by the proposed "gut and stuff" amendment ("amendment") to Senate Bill 477. The amendment would upend the agreement reached between utilities, business and the environmental community when the Emissions Performance Standard ("EPS") was passed in 2009. The original goal was to limit new, long-term financial interests in or investments to extend the life of coal facilities. This "no new coal" goal was reaffirmed in 2013, when amendments to the EPS were passed in order to remove a perceived loophole in the standard and preserve its original intent.

The amendment would alter the provisions of the EPS, potentially adding significant costs for electricity customers served by Pacific Power and Portland General Electric, who together serve the vast majority of the Portland-metro area. In going beyond the agreement to prohibit new, long-term investments in coal facilities, the amendment provides for additional restrictions on investments in existing coal facilities that serve Oregon customers, including investments necessary to meet required state or federal environmental laws.

Not only would the amendment have the perverse effect of prohibiting investments to comply with the Clean Air Act and other environmental laws, the purpose of the amendment appears designed to require utilities to forego necessary investments, thereby ultimately forcing early closure of existing coal plants. While we all need to work together to make progress on addressing global climate change, the amendment is an end run around the utility planning process that also takes into account critical issues such as customer cost impacts, system reliability impacts, replacement power costs and the like.

The Portland Business Alliance recognizes the need to take actions to reduce greenhouse gas emissions. We also recognize the need to do so in a thoughtful way that takes into account the financial impact of such decisions on families and businesses. The proposed amendment to Senate Bill 477 should be rejected so that a more inclusive discussion can take place to ensure clean energy future.

Sincerely,

Sandra McDonough President & CEO

Sanda Medney