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To: **Senators:** Dembrow; Olsen; Bentz, Prozanski; Roblan; Thatcher  
**Representatives** Noble; Post

**Re: I OPPOSE [SB 451] as written.**

I oppose [SB 451] for it does not contain the need to review Oregon's Renewable Portfolio Standards (RPS) for the following reasons:

The issue with facilities that "generate electricity from combustion of municipal solid waste" created before 1995 and those created before January 1, 2011 depending on when the "facility" registered with the Western Renewable Energy Generation Information System (WREGIS) is confusing at best. Are there "facilities" currently not "registered" with WREGIS? The language gives the impression these "facilities" were in operation a couple of hundred years ago to January 1, 2011.

The "Renewable Energy Certificates (REC)" are financially lucrative to the Energy Companies. The rush to get a "REC" is the sole impetus of this ill-conceived piece of legislative manure.

I am also concerned with the permitting process that may allow more municipal solid waste combustion facilities for electrical energy "popping-up" in rural areas using [SB 408] as a pretext for approval.

At what time has there been a comprehensive review of all "facilities that generate electricity from the direct combustion of municipal solid waste?"

Do all existing facilities comply with the standards set forth in RPS?

Are there mandated implementation of "new technologies" that will eliminate air pollutants generated from these facilities? There is "No" requirement in [SB 451] to do so.

There is "No" discussion to require a more frequent review and updating of RPS as new proven technologies are introduced.

Oregon has significant municipal solid waste disposal issues. Burning municipal solid waste to generate electricity attempts to solve the accumulation of municipal solid waste headed for landfills but it creates multiple and substantial environmental and health problems.

ZERO WASTE-complete recycling and composting of garbage generated by municipalities is the only solution.

The garbage incinerators have to go or be reconfigured to eliminate all "harmful" emissions.

On a related matter, "Fahrenheit 451" was the temperature at which books were burned. Perhaps [SB 451] should be burned at a similar temperature to generate electricity.

*Respectfully submitted,*  
/s/ David S. Wall