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**To:** [JCCR Exhibits](#)  
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House Bill 2020 seeks to put a cap on Oregon's carbon emissions and invest allowance proceeds from polluters into clean energy. The current version<sup>3</sup> of the bill provides industries with excessive free allowances, exemptions, and loopholes. Please work hard to secure balanced legislation that will help stabilize our climate and better support underserved communities. Here are a list of recommendations:

- 1) Carbon reduction goals must be stronger.
  - 2) Rulemaking for the Program Must Be Broad, Inclusive, and Equitable. Need a Commission Form of Governance for Accountable Rulemaking & Oversight.
  - 3) Burning Garbage is Not Renewable Energy, Should Not Be Exempted (Section 10)
  - 4) Major Emitters Including Forestry, Agriculture, Marine, Aviation, and Railroad Industries Must Not Be Exempted In Perpetuity. (Section 10)
  - 5) Fluorinated Gases Must Never Be Exempted. (Sections 11-13)
  - 6) Electric Utilities Must Pay Their Fair Share - No Free Allowances. (Section 15)
  - 7) Energy Intensive, Trade-Exposed Manufacturers (EITEs) Must Be Better Regulated. (Sections 14, 18)
  - 8) Offsets: Oregon-Only, Capped at 2%, No link to Global Markets. (Section 19)
  - 9) The Allowance Market Must Not Have a Price Ceiling and California's Pre-2021 Allowances Must Not Be Retired in Oregon. (Section 21)
  - 10) Impacted Communities Need Investments for a Just Transition. (Section 29)
  - 11) Bill Must Allow "Renewable Energy" Investments Only. "Carbon-Free" or "Low-Carbon" Language Can Be Co-Opted to Fund Nuclear Power Technology And Forest Biomass. (Section 31, Subsection 6)
  - 12) Do Not Repeal the Energy Facility Siting Council CO2 Standard or Proof of Need. (Sections 54-60)
- Thank you for reviewing these points.

Sincerely, Monica Gilman

Sent from my iPad