



February 4, 2020

Representative Karen Power, Chair  
House Committee on Energy & Environment  
Oregon State Capitol  
900 Court Street NE  
Salem, OR 97301

RE: Wildfire Utility Amendment 4066-2

Dear Chair Power, Vice-Chair Bonham, Vice-Chair Sollman and Members of the House Committee on Energy & Environment:

Thank you for the opportunity to provide comment on the -2 amendment to HB 4066, which implements utility recommendations from the Governor's Council on Wildfire Response. Our comments are limited to sections 4, 5, and 7 of the amendment pertaining to consumer-owned utilities (COUs).

First, we want to thank Governor Brown and members of the Council on Wildfire Response for their critical work on behalf of the State of Oregon. In many of our service territories, wildfire is a threat to our mission of safe, reliable, and affordable electricity. In those areas most at risk, COUs have been redoubling our prevention and mitigation efforts. The -2 amendment builds on those efforts.

While we agree that it makes sense for all utilities to evaluate their wildfire risk, we appreciate the recognition in the -2 amendment that IOUs and COUs have different business and governance models that warrant unique statutory treatment.

Additionally, while all consumer-owned utilities are not-for-profit and governed by locally elected boards, each of Oregon's 36 COUs has its own unique service territory. These service territories vary widely – from the smallest COU with just 15 miles of distribution line that are primarily underground in the City of Drain, to Harney Electric Cooperative with over 2,400 miles of distribution and 350 miles of transmission line, serving farmers and ranchers in six rural counties. Because our service territories have different risk profiles, we appreciate the flexibility that the -2 amendment provides in allowing the wildfire mitigation plan to be tailored to the unique risks of the COU. We also appreciate the amendment's recognition that these plans are operational decisions that should be approved by the governing body of our utilities.

Thank you for your consideration. We look forward to ongoing discussion of best practices at the PUC-hosted workshops.