

House Committee on Energy and Environment Oregon State Capitol 900 Court St. NE Salem Oregon 97301

April 28, 2021

Dear Chair Marsh, and members of the committee,

The Oregon Solar + Storage Industries Association (OSSIA) is a trade association founded in 1981 to promote clean, renewable, solar technologies. OSSIA members include businesses, non-profit groups, and other solar industry stakeholders. We provide a unified voice of the solar industry and focus exclusively on the solar value chain; from workforce development to permitting, advocacy, policy, and regulation for manufacturing, residential, commercial, community, and utility scale solar and storage projects on the local, state and regional level.

OSSIA urges this committee to support SB 589 and the proposed amendments. It is our understanding that the proposed amendment would have the Oregon Department of Energy (ODOE) pull together information regarding Regional Transmission Offices (RTOs) around the country and then bring stakeholders together to discuss what Oregon needs to consider if an RTO is created.

As the West considers the possibility of an RTO, it is important for Oregon stakeholders to convene and discuss the role the state could play in an RTO, what challenges and barriers to market participation might be, and how joining an ETO can help Oregon meet clean energy goals and mandates in the most cost effective and efficient manner. This legislation is important to ensure the voices of all stakeholders are heard, including the utilities, renewable energy advocates, independent power producers, labor, equity organizations and environmental organizations.

OSSIA supports this bill since there are many issues that deserve exploration when considering the possibilities of an RTO. For example, when PURPA qualifying facilities have access to transmission and interconnection services such as an RTO and competitive wholesale markets, the Investor Owned Utilities (IOUs) may ask the Federal Energy Regulation Commission to suspend their must-purchase obligation for qualifying facilities that are larger than 5 MW. It is important that the effort undertaken by ODOE in this bill reviews the impact an RTO may have on PURPA in Oregon and whether an RTO can be structured to ensure IOUs cannot manipulate the RTO to disadvantage smaller non-utility-owned projects. It is critical that small projects can still be built in Oregon; small projects are often easier to site and bring economic development benefits to rural areas.

Sincerely,

Angela Crowled-Koch
Executive Director