



January 29, 2025

Representative John Lively, Chair
House Committee on Climate, Energy & Environment
Oregon State Capitol
900 Court Street NE
Salem, OR 97301

RE: Oregon Municipal Electric Utilities Association Support for HB 3119

Dear Chair Lively, Vice Chair Gamba, Vice Chair Levy and Members of the House Committee on Climate, Energy & Environment:

The Oregon Municipal Electric Utilities Association (OMEU) is made up of eleven not-for-profit, city-owned electric utilities. Our electric rates are set to cover the costs of service, not to earn a rate of return for investors. Many of the communities we serve have poverty rates well above the state average, so keeping rates affordable is paramount.

Our utilities are fortunate to be “full requirements” customers of the Bonneville Power Administration (BPA), purchasing nearly all of our energy from the BPA. As BPA customers, we have the cleanest energy resources of all the utilities in the country. Our resource mix averages 95% carbon free today. The bulk of this power is an allocation of the Federal Columbia River Power System.

As long-time leaders in the fight against climate change, we are committed to the reduction of GHG emissions in Oregon. In addition to our clean energy mix, many of our utilities have robust EV programs and all have ratepayer-funded energy efficiency programs. On par with our commitment to environmental stewardship is providing reliable power at affordable rates.

We are concerned about some of the practical and economic implications of DEQ’s Advanced Clean Truck (ACT) rules, particularly given our use of highly specialized trucks that must restore power during emergencies.

While the Oregon rule does not yet have specific zero-emission vehicle (ZEV) fleet purchasing requirements like California, manufacturers are already telling our utilities that they must sell a certain number of electric vehicles before they can produce a diesel unit. Utilities have already had to endure lengthy waits to procure new trucks due to supply chain challenges; the ACT rule will just exacerbate those issues.

We are most concerned that the new rules will hinder our ability to respond to emergencies, natural disasters, and significant service disruptions. Customers will be at risk. We need only look to the January 2024 ice storm, when thousands of Oregonians were without power for multiple days in frigid temperatures, to know that ZEV utility bucket trucks will not have the longevity to meet those

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challenges. During the 2024 event, our crews, and mutual aid crews from other utility service territories, deployed trucks 24 hours a day, for multiple days in a row, to restore power.

The heavy specialty vehicles that utility crews use must reach power lines; clear debris; transport, remove, and set utility poles; and move and set other critical utility infrastructure, like transformers. During emergencies, this important work is often done under challenging conditions and in more rural, isolated locations. DEQ must provide reasonable accommodation when a ZEV cannot do the same emergency work as a traditional utility vehicle.

We cannot rely on an electric vehicle to restore power when there is no electricity to keep the vehicle charged. Beyond the availability and performance of ZEV vehicles for power restoration, utility bucket trucks are already extremely expensive. We have heard from a utility working to implement the California Air Resources Board (CARB) rules in Northern California that the typical cost of a bucket truck of around \$200,000 went to \$1 million. Our ratepayers cannot afford a 400% increase in these costs.

Another consideration is the availability of commercial charging infrastructure. This infrastructure does not exist, and ratepayers should not have to incur these additional costs, not to mention exploding electrical load forecasts. There is a significant question whether heavy, commercial truck charging loads can realistically be met in the short-term.

We hope Legislature will take our emergency response concerns seriously and ensure utilities have access to new internal combustion engine trucks. When the grid goes down, restoring essential public services quickly is our highest priority for safety and keeping our economy going strong. Power outages also affect air quality when homes and businesses turn on their gas-powered generators until service is restored.

Please support HB 3119 which provides a sensible delay in the implementation of the Advanced Clean Truck rules to ensure that we can continue to provide safe, reliable, and affordable power.

Sincerely,

/s/ Jennifer Joly

Jennifer Joly, Director

Oregon Municipal Electric Utilities Association