

January 28, 2025

Chair Lively
Vice Chairs Gamba and B. Levy
House Committee on Climate, Energy and Environment
900 Court Street NW
Salem, Oregon 97301

RE: HB 3119 – Advanced Clean Truck Rules

Chair Lively, Vice-Chairs Gamba and Levy, and members of the committee,

My name is Tucker Billman, and I am the Director of Government Relations for the Oregon Rural Electric Cooperative Association (ORECA). ORECA represents the state's 18 not-for-profit electric cooperatives that serve the geographic majority of the state and 500,000 Oregonians. I am submitting testimony in support of House Bill 3119, which would delay implementation of the Advanced Clean Truck (ACT) regulations.

Oregon's electric cooperatives have been early adopters of many electric vehicle (EV) models. However, due to range restrictions of EVs and sparse charging infrastructure, use cases of EVs for electric cooperatives are limited. Co-ops are also improving the accessibility of charging infrastructure by installing charging stations on their systems or supporting the efforts of their customers – who we call members – as those members adopt EV technology.

However, the ACT regulations create substantial concerns for electric cooperatives as they work to keep the lights on. Electric cooperatives work with dealers to purchase vehicles that are crucial to keeping their systems reliable and resilient, and many co-ops have been informed by their dealers that ACT regulations will impact both the dealer and the vehicle manufacturers whose vehicles they sell.

ORECA's members have vast service territories with minimal EV charging infrastructure. They travel significant distances with few – or no – opportunities to charge EVs. It is our understanding that the current EVs that co-ops would rely on for line construction and emergency response have an effective range of roughly 150 miles. Many of our cooperatives travel far beyond that range to respond to outages. Once they arrive at the cause of an outage, co-ops continue using the vehicles – often for hours at a time – to repair systems and restore power. In severe weather conditions, this

process can take days. Co-ops would be required to tow diesel generators with the EVs to charge them as they work, resulting in additional carbon emissions.

In the case of an outage during a severe winter storm – such as the January 2024 ice storm – or extreme heat during summer days, the lack of adequate charging infrastructure could dramatically increase the time to restore power if they are relying on EVs to travel such vast distances. This would put Oregonians who rely on co-op power to heat or cool their homes at substantial risk. To charge their response vehicles, electric cooperatives would very likely rely on the same electric system that is experiencing the outage – meaning there would be no way to charge the vehicles, and therefore no way to repair the damaged systems.

We are also told these vehicles are more expensive than traditional diesel-powered vehicles, and that ACT requires that a certain number of EVs be purchased before a diesel vehicle of a similar model can be purchased. This would greatly increase the cost of doing business for our not-for-profit electric cooperatives – a cost ultimately passed on to ratepayers in Oregon.

All of this assumes that electric cooperatives can source vehicles that are compliant with the regulations in the ACT – something that currently is uncertain with many types of vehicle co-ops rely on. Ultimately, the ACT will increase costs for co-ops and their members, delay response time, and potentially risk the safety of ratepayers who rely on electric cooperative electricity for essential services.

Additionally, energy system resiliency is a priority of the state, and this policy seems to be out of step with that priority. As previously mentioned, co-ops would very likely be unable to charge the EVs used in response to outages since they would rely on the same system that is experiencing the outage to charge the EVs. This prohibits power restoration, which inherently makes energy systems in Oregon less resilient.

Finally, Oregon's electric cooperatives purchase their vehicles from local dealers whenever possible. If HB 3119 does not pass and implementation of the ACT moves forward, electric cooperatives will likely look to other states to source the vehicles that are critical to keeping the lights on. Doing so has negative economic ramifications for vehicle dealers in small communities.

For these reasons, we urge your support for HB 3119. Thank you for this opportunity to submit written testimony into the record. If there are further questions from the committee, please do not hesitate to contact me at tbillman@oreca.org.

Tucker Billman

Director of Government Relations

Oregon Rural Electric Cooperative Association