



**GREEN ENERGY
INSTITUTE**
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Oregon State Legislature
House Committee on Commerce and Consumer Protection
900 Court St. NE
Salem, Oregon 97301

RE: Comments in Support of House Bill 3179-1 (2025).

Dear Chair Sosa, Vice Chairs Chaichi and Osborne, Committee Members,

The Green Energy Institute at Lewis & Clark Law School (GEI) writes to ask you to **support HB 3179-1**, which will protect Oregon residents by facilitating a more balanced utility ratemaking process. GEI is a grant-funded climate and energy policy institute within Lewis & Clark Law School's Environmental, Natural Resources and Energy Law Program. Our mission is to develop equitable, comprehensive, effective strategies to prevent catastrophic climate change by furthering the just transition to a sustainable, carbon-free energy grid for all Oregonians, including by representing environmental justice intervenors in utility rate cases. For the below reasons, we urge you to support HB 3179-1; this bill rights imbalances within the utility ratemaking process and returns power to Oregonians to help lower household energy bills.

Oregon law requires the Commission to set utility rates by “balanc[ing] the interests of the utility investor and the consumer” to ensure rates are “fair and reasonable.”¹ But the **current law and process tends to favor the utility**; the Commission has enumerated factors to weigh related to the utility investors' needs,² without related corresponding factors contemplating consumer concerns, including the transparency related to utility spending, the current abbreviated review time for rate cases, and the season in which rate raises kick in.

This bill would *not* modify the Commission's consideration of investors' interests.³ Instead it **rights the imbalance between the utility investors and consumers by adding considerations protective of ratepayers**. These additional considerations will first lessen the burdens of engaging in the ratemaking proceedings by providing more forgiving timelines and better access

¹ O.R.S. § 756.040(1).

² *Id.*

³ See *In the Matter of PacifiCorp dba Pacific Power, Request for a General Rate Revision*, Docket No. UE 433, Order No. 24-447 at 12 (Dec. 19, 2025) (describing the Commission's responsibility to set a return on investment for the utility); O.R.S. § 756.040(1)(a)–(b).

to relevant information, for example by requiring utilities to include relevant residential information with rate filings. Additionally, this bill supports residential affordability concerns by clarifying *how* ratepayer interests can be considered.

Oregon's HB 2475, passed in 2021, introduced funding for environmental justice intervenors seeking to engage with utility proceedings. Meanwhile, **high energy bills are some of the most pressing concerns** voiced by these intervenors.⁴ More work is needed to truly effectuate environmental justice stakeholders' work. As an attorney who has supported such intervenors, GEI can attest that this bill would provide clearer pathways toward the Commission's consideration of the concerns of *all* ratepayers.

For these reasons, we ask you to support HB 3179-1 and the protections this bill will offer to utility ratepayers through these considerations.

Respectfully submitted,

/s/ Carra Sahler

Carra Sahler, Director & Staff Attorney

/s/ Jamie Johnson

Jamie Johnson, Staff Attorney

Green Energy Institute

⁴ See, e.g., Docket No. UE 433, Coalition's Opening Br. at 5 (Oct. 14, 2024).