



10 March 2025

**To: Chair Lively, Vice-chairs Gamba and Levy, and members of the House Committee on Climate, Energy and the Environment:**

**From: Dr. John Perona, on behalf of *Mobilizing Climate Action Together***

**Re: Support for HB 3681**

Mobilizing Climate Action Together (MCAT) is a group of experienced volunteer healthy climate advocates affiliated with the Oregon League of Conservation Voters. We write to urge the Committee to support streamlining regulations for siting electric power facilities and transmission lines, as embodied in HB 3681. In our view, this is crucial legislation essential for Oregon to meet its goal of supplying abundant, zero-carbon electricity to consumers.

Many of Oregon's environmental regulations that govern the siting of electricity power plants and transmission lines were written many years ago, when very thorough rules were required to help mitigate air, water and solid waste pollution in our state. Mirroring the national success, in Oregon we were able to substantially clean up our land, air and water, in part through these regulations. However, the strict rules that were once necessary to mitigate pollution remain in place today, where they create excessive delays to permitting and building the clean power infrastructure necessary for Oregon to meet its climate targets. Reflecting the urgency of climate change, and the fact that most or all new proposed power facilities will no longer rely on fossil fuels, it is appropriate to judiciously relax some of our most time-consuming regulations, so that the clean energy transition can proceed more expeditiously. This bill offers a common sense approach to meet this need.

One key way that HB 3681 will help Oregon to meet its clean energy targets is by streamlining regulations for construction of new facilities. Delays in the construction of both new electric power plants and transmission lines are already hampering our ability to meet climate targets. Presently, the allowed times for construction of these facilities under EFSC regulations are quite short given the complexities of the projects. Failure to meet the timelines then triggers time-consuming procedures to amend the certificates. Under this bill, EFSC will be directed to grant two automatic extensions of the construction timelines. This will expedite projects with little environmental risk - since the project will have already undergone thorough review at the time the initial certificate is proposed. We support this common-sense change to the rules governing construction of energy facilities.

HB 3681 also (i) shortens the timelines for contested cases at EFSC, (ii) expedites appeals of EFSC decisions by directing them immediately to the Supreme Court on a short timeline, (iii) allows minor changes to site boundaries without the need for a lengthy amendment process and (iv) requires a proper showing of judicial standing before allowing appeals of EFSC decisions, eliminating spurious actions by opponents who are not clearly associated with or impacted by the



project. These are all common sense changes that will help expedite construction of the new clean energy infrastructure needed to achieve the state's goals for addressing climate change.

HB 3681 also streamlines the review of decisions made by the Oregon Public Utilities Commission (OPUC). For example, OPUC has expertise in, and is appropriately involved with, analyzing the public need for transmission lines. However, OPUC has little expertise in other areas that are (in any event) already considered in the EFSC process - such as evaluating the environmental and cultural impacts of new lines. HB 3681 therefore limits the scope of OPUC's review in granting Certificates of Public Convenience and Necessity, to those areas where it has clear expertise, shortening the overall approval process by eliminating unnecessary duplication.

MCAT strongly supports HB 3681 for these and other reasons that we need not further elaborate in detail. We ask that the Committee support the bill as well, as it is so clearly necessary to enable the success of much other legislation and rulemaking associated with Oregon's clean energy transition. It is one thing for Oregon to set lofty targets; quite another to create the regulatory processes within which the work to reach those targets is actually done. It is past time to reimagine how government oversight can effectively protect environmental and social health without stifling progress. This bill takes a large and important step in that direction.

Thank you very much for considering our comments. Questions should be directed to Dr. John Perona at [johnjperona@gmail.com](mailto:johnjperona@gmail.com)

Sincerely,

John Perona

On behalf of: Mobilizing Climate Action Together (MCAT)

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