

Submitter: Miles Johnson  
On Behalf Of: Columbia Riverkeeper  
Committee: Senate Committee On Energy and Environment  
Measure, Appointment or Topic: SB634

On behalf of Columbia Riverkeeper, I write to oppose SB 634 in the strongest possible terms.

SB 634, regarding hydropower's eligibility in the Oregon Renewable Portfolio Standard (RPS), would undermine public interest and safety, impair environmental protection, and threaten the integrity of the RPS and its Renewable Energy Credit (REC) market. Oregon's current RPS statute includes commonsense and necessary (and, frankly, minimal) eligibility requirements for hydropower. Under Oregon's current law, hydroelectric generation can count towards Oregon's RPS only if the electricity is attributable to post-1995 efficiency upgrades or if it is certified as low impact hydro. Oregon's current RPS law also excludes hydropower generated in ecologically protected areas, areas protected under the federal Wild and Scenic Rivers Act, or the Oregon Scenic Waterways Act.

SB 634 would remove these minimal, commonsense sideboards and allow any hydropower to be used to meet Oregon's RPS, notwithstanding a project's safety, community, and environmental impacts. This would allow old hydroelectric dams, such as those on the Columbia River, with devastating impacts on fisheries and river communities to count as "renewable" and access the incentives of the RPS by generating RECs. In Oregon, climate change and the mounting pressures on river systems have already highlighted the growing tensions between power generation and ecosystem health. Consequently, it is important now more than ever to ensure that hydropower does not do further harm to communities, Tribes, and ecosystems. SB 634's blunt approach will do the opposite, by removing sideboards and allowing projects with safety concerns and profound socio-ecological costs to be rewarded through the RPS program.

Furthermore, because hydropower accounts for a large portion of the energy generation in Oregon, allowing any and all hydropower to qualify for the RPS may undermine the integrity and value of Oregon's REC market. Flooding the market with a large volume of RECs derived from old, ecologically harmful hydropower generation could crowd out investments in other renewables, including solar and wind. Weakening the RPS eligibility requirements could also undermine the economics of existing higher-efficiency, lower-impact hydropower projects that currently participate in the RPS program, as well as disincentivizing the development of similar, future projects.

We appreciate the leadership of Oregon Waterwatch and the Low Impact Hydro

Institute in opposing SB 643, and we have borrowed liberally from their opposition testimony above. Please vote against SB 634, which would be a step backwards for Oregon's people, rivers, and climate commitments.