



March 27, 2025

Chair Sollman

Vice Chair Brock Smith

Senate Committee on Energy and Environment

900 Court Street NW

Salem, Oregon 97301

RE: Protecting electric cooperative ratepayers from astronomical rate increases due to SB 330

Chair Sollman, Vice Chair Brock Smith, and Members of the Committee,

My name is James Ramseyer, President/CEO of Consumers Power. We are a not-for-profit, consumer-owned electric cooperative who serves 18,500 members. I am submitting written testimony in strong opposition to Senate Bill 330, which creates an unnecessary one-size-fits-all mandate to underground powerlines to reduce wildfire risk.

For Consumers Power, the cost of underground powerlines is approximately eight times more expensive per mile than the construction of overhead lines. Examining a random section of existing overhead line, CPI engineers estimated the cost to replace a single damaged power pole at \$10,163.34—a task completed in hours. In contrast, removing that pole and undergrounding the adjacent line spans was estimated at \$84,688.83, over eight times higher. These figures reflect material and labor costs alone, excluding the stark disparity in time. Pole replacement is swift and routine, while undergrounding demands months of permitting, NEPA reviews, and engineering—transforming a simple job into a complex, protracted project.

With just over 24,000 meters to spread these costs across, all of our members will experience substantial increases in their monthly bill.

I have particular concern regarding the impracticality of provision 2(B), which mandates the replacement of "an overhead electric power line that is functionally obsolete, damaged, or destroyed" with underground infrastructure. While we share the legislature's commitment to enhancing the reliability and safety of our electric grid, this provision presents significant operational, financial, and logistical challenges that render it neither practical nor realistic for electric cooperatives like ours, especially given the diverse and often unpredictable circumstances under which such replacements would be triggered.

Consider, for instance, the scenario of a power pole struck by a vehicle—a not uncommon occurrence in rural areas where our cooperative operates. Under provision 2(B), this single incident would compel us to



underground the affected service, regardless of the broader system's design or the feasibility of such a transition in that location. The costs associated with undergrounding—excavation, specialized materials, and labor—far exceed those of repairing or replacing an overhead line. For a cooperative serving expansive, low-density regions, this mandate would impose an unsustainable financial burden on our members, who rely on affordable rates to power their homes, farms, and businesses.

Similarly, during severe weather events such as winter storms, which frequently cause widespread damage to overhead lines, provision 2(B) would require a wholesale shift to underground infrastructure across potentially vast areas. In the aftermath of such events, our priority is rapid restoration of service to minimize disruption for our members. Undergrounding, however, is a time-intensive process, often taking months to plan and execute, compared to the days or even hours needed to repair overhead systems. This delay would leave communities without power for extended periods, undermining the very reliability this bill seeks to enhance. Moreover, the rugged terrain and frozen ground common in Oregon's winter months further complicate underground installation, making it an impractical response to storm-related damage.

As a condition for new construction, we already require all new line extensions to go underground. We recognize the appeal of undergrounding as a silver bullet solution. However, a one-size-fits-all mandate disregards the unique challenges of rural electric systems. Electric cooperatives need to continue to have the operational flexibility to utilize the right solutions to solve specific challenges.

Affordable, reliable power is our promise to our members, SB 330 jeopardizes that. I urge this committee to reject the bill outright, preserving our ability to deliver practical, tailored solutions for our communities.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J Ramseyer".

James Ramseyer
President/CEO