



May 9, 2025

Chair Sollman
Senate Committee on Energy and Environment
Oregon State Capitol
Salem, OR 97301

Re: Support for HB 3681A

Chair Sollman and Members of the Committee,

Oregon must expand and modernize our transmission system to accommodate load growth, ensure reliability, and accelerate our clean energy transition. Timelines for transmission project permitting must match the urgency of our decarbonization trajectory. **For this reason, our organizations write in strong support of HB 3681A.**

Oregon's grid faces numerous challenges. It is aging, inefficient, and capacity limited. There are a number of short-term improvements that can be made to the grid, including innovations and technologies. However, in order to unlock clean energy resources currently sidelined in the interconnection queue, we also need new transmission lines.

In 2007 Idaho Power Company submitted plans for the Boardman to Hemingway project, a 500 kilovolt line crucial to delivering clean energy that will help meet Oregon's policy goals. 17 years later, and after exhaustive litigation and appeals, the project was finally approved. Construction has not yet begun on this critical resource. Transmission lines are extensive projects with significant footprints. They require thorough planning and environmental assessment. However, it is also critical that transmission line permitting be resolved in a timely manner.

HB 3681A updates and clarifies the appeals process for site certificates in two important ways. First, it requires that EFSC make *best efforts* to resolve contested cases within 12 months. This language gives EFSC specific direction to pursue a reasonable timeline while allowing leeway to ensure the agency's ability to compile an adequate Record of Decision. Second, the bill clarifies that EFSC final determinations must be appealed directly to the Supreme Court, making the resolution of such appeals more efficient as they need not move through the lower state courts. These reforms will ensure more timely resolution of appeals while retaining existing procedures.

Additionally, HB 3681A allows the holder of a site certificate to make minor changes to the site boundaries of a facility without seeking an amendment. This alleviates additional burden and time lag posed by de minimis changes to the site boundaries of energy facilities.

Finally, HB 3681A allows land use applications to be assessed in parallel with Certificates of Public Convenience and Necessity (CPCNs), removing the Catch-22 wherein applicants must present a land use approval to receive a CPCN and vice versa.

In order to meet projected load growth with clean energy, Oregon will need to swiftly expand our transmission system and bring generating resources online. HB 3681A is a reasonable measure that strikes an appropriate balance between the rights of appellants and the need for timely disposition of site certificate appeals. We acknowledge that the reforms in HB 3581A are a starting point, and that EFSC and county planning departments should seek additional avenues to reduce the timeline for finalizing site certificates.

We appreciate the bill sponsors for their extensive stakeholder engagement, and we are heartened that a number of concerns raised by the agricultural community have been alleviated via amendment.

For these reasons, we urge your support for HB 3681A.

Sincerely,

Joshua Basofin
Clean Energy Program Director
Climate Solutions

Diane Brandt
Policy and Legislative Affairs Director
Renewable Northwest