



May 14, 2025

Senator Janeen Sollman, Chair  
Senate Committee on Energy & Environment  
Oregon State Capitol  
900 Court Street NE  
Salem, OR 97301

RE: **Oregon Municipal Electric Utilities Association Opposition to the -2 Amendment to HB 3336**

Dear Chair Sollman, Vice Chair Brock Smith, and Members of the Senate Committee on Energy & Environment:

Oregon Municipal Electric Utilities Association (OMEU) is made up of eleven municipally owned and operated electric utilities. Our rates are not-for-profit and set to cover the costs of service, not to earn a rate of return for investors. We receive our power from the Bonneville Power Association (BPA), hydropower that averages 95% carbon free today.

We are here in opposition to the -2 amendment that was posted the morning of the public hearing. However, we have no concerns with the underlying bill as it moved out of the House, which was clearly limited to “electric companies” or investor-owned utilities (IOUs).

OMEU has not been engaged on this bill as it did not apply to us. However, Section 4 of the -2 amendment has a broader application that would apply to all existing transmission lines, including those owned by consumer-owned utilities (COUs). COUs have not been invited to any of the discussions about the details of the -2 amendment.

As city-owned utilities, we coordinate closely with local jurisdictions on our transmission projects. In many cases we have quite a bit of flexibility once the local government has approved a transmission route. For example, the utility may opt to overbuild transmission at the intersection of two routes, or under build from feeders to substations. While not commonplace, the utility may “double stack” two transmission lines one on top of the other within the same right of way as a reliability measure in case a feed from a BPA substation goes down. Our utilities need redundancies to keep the power flowing in a different way. This may be precluded or altered by the language on page 2, line 10 of the -2 amendment.

Additionally, we do not see a definition of “advanced reconductoring” in the bill. Municipal electric utilities do a lot of reconductoring projects today, which involve installing bigger wires with more capacity. Reconductoring can require stouter/stronger poles in order to comply with the National Electric Safety Code (NESC). We do not want to bog down existing projects that are already proceeding by subjecting them to different processes in the -2 amendment.

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While we support the use of grid enhancing technologies (GETs) when practical and cost effective, as well as investor-owned utility efforts to streamline adoption of GETs across multiple local government jurisdictions, we do not want to introduce new statewide processes where flexibility is already in place.

At this time, we recommend a carve out for COU-owned transmission lines to avoid any unintended consequences that might result from new statewide statutory provisions that COUs have not have an adequate opportunity to evaluate.

Thank you to the committee and Representative Gamba for rejecting the -2 amendment and incorporating a COU carve out for the next amendment to HB 3336.

Sincerely,

*/s/ Jennifer Joly*

Jennifer Joly, Director

Oregon Municipal Electric Utilities Association