Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301

July 2, 2026

Re: EO 25-29 – Joint Comments on Reducing Barriers to Clean Energy Deployment Draft Report

Renewable Northwest, Climate Solutions, The Nature Conservancy, Oregon Environmental Council, BlueGreen Alliance, NW Energy Coalition, Mobilizing Climate Action Together, Green Energy Institute at Lewis & Clark Law School, and Oregon Solar + Storage Industries Association ("joint commenters") appreciate the opportunity to provide feedback to the Oregon Department of Energy ("ODOE") on its draft report on *Reducing Barriers to Clean Energy Deployment*. Executive Order ("EO") 25-29 directs ODOE to coordinate with the Oregon Public Utility Commission ("OPUC") and the Department of Land Conservation and Development ("DLCD") to inventory and assess barriers to the permitting, construction, and interconnection of clean energy projects and associated infrastructure and recommend actions to overcome those barriers. We strongly support the EO's recognition that accelerating clean energy deployment is essential to meeting Oregon's clean energy goals, enabling economic growth, and supporting reliability and affordability. While the draft report identifies many of the barriers facing project development, it stops short of proposing the reforms necessary to overcome those challenges.

I. Feedback on Report Scope and Identification of Barriers

The scope of this particular report is limited to clean energy projects that have *already* received state or local land use approvals. We understand that this may be a practical consideration, scoping one report to be more focused on barriers within ODOE's control (i.e. the siting and permitting process at the Energy Facility Siting Council ("EFSC")) and barriers that are less directly connected to ODOE's work (i.e. interconnection and construction). This report falls in the latter category and is primarily focused on identifying barriers to the interconnection and construction of clean energy projects with a more limited look at federal permitting processes as well.

We largely agree with ODOE's identification and analysis of barriers including cost, unexpected delays, limited cross-jurisdictional coordination, limited availability of equipment and supplies, limited staffing capacity, unmet workforce needs, and limited grid capacity. However, we are disappointed by the recommendations that ODOE has put forward as they have limited connection to the identified barriers. ODOE largely leans on implementation of the Oregon Energy Strategy to ease interconnection and construction barriers, but these are actions the

agency is *already* supposed to be undertaking pursuant to the EO and pursuant to the Energy Strategy itself. We urge ODOE to reevaluate its recommendations and consider broader actions.

The report fails to recognize that while interconnection and construction of large-scale clean energy projects are largely outside the purview of ODOE, OPUC, and DLCD, there are many more creative solutions these agencies can implement to support the development of clean energy and transmission projects through known interconnection and construction challenges. Further, interconnection for smaller scale clean energy projects is almost entirely within the PUC's jurisdiction and should be evaluated as part of any future investigation into barriers to projects under 20 MW.

II. Feedback on Report Recommendations

We generally support the actions within the Oregon Energy Strategy and encourage ODOE to continue pursuing those. However, the connection between those recommendations and the identified barriers within this report often feels tenuous. From our perspective, the two recommendations with the clearest throughlines to barriers within the interconnection and construction landscapes are the workforce needs assessment (cross cutting action 7) and informing the role that a state transmission entity may play in enabling investment (electricity action 3). We urge ODOE to focus resources on those actions, as well as the ones we recommend in the following section.

Outside of implementing the Oregon Energy Strategy, ODOE recommends pursuing the four actions below. We provide brief feedback on each.

A. Encourage interconnection applicants to voluntarily report plans to withdraw from any generator interconnection process before withdrawing. This would offer an opportunity for other interested persons to pay to avoid the withdrawal when that is preferred to facing potential delays due to a withdrawal.

Though we understand the intent behind this proposal, we would appreciate further details on how this would work in practice and what guardrails would be in place to avoid undesirable outcomes.

B. Convene an annual or semi-annual forum to discuss and evaluate opportunities to improve alignment across different processes, including permitting, interconnection, and construction. Issue a forum report summarizing potential concerns and any recommended near-term actions that were identified at the event.

We appreciate ODOE's intent to support ongoing coordination across permitting, interconnection, and construction; however, this recommendation risks deferring action that EO 25-29 directed the agency to take. ODOE now has both clear directives under the EO and substantial information about the barriers that need to be addressed. We encourage the agency to use its existing authority under the EO to move forward with concrete process and policy changes in the near term, and to frame any ongoing forum as a supplemental venue for working through longer-term or more complex cross-jurisdictional issues, rather than as a prerequisite to timely action.

C. Analyze new day-ahead market operations data to inform potential mechanisms for the state to support the prioritization and funding of different interconnection costs.

We generally support this recommendation and agree that operational data from EDAM could be helpful in evaluating transmission use, congestion, and the need for grid upgrades. EDAM may help shed some light on where the state may want to encourage more transmission upgrades to alleviate constraints. However, the report could more clearly explain the relationship between EDAM operations and the barrier of limited grid capacity and also detail what kind of support and funding the state could provide related to interconnection costs.

D. Undertake similar investigations into the barriers affecting the deployment of clean energy facilities in Oregon under 20 MW in size, including rooftop solar and behind-the-meter storage resources, and into the barriers affecting the continued operations of existing small-scale energy resources, including small-scale hydroelectric and biomass facilities.

We support this recommendation since projects under 20 MW face unique barriers, particularly related to siting and interconnection.

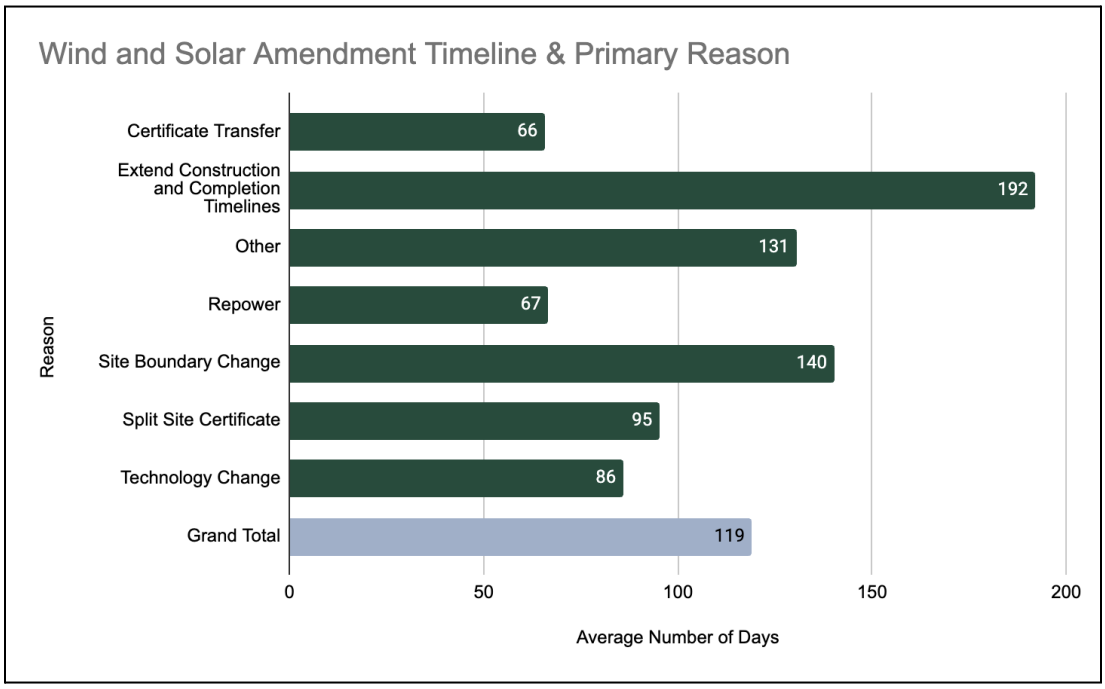
III. Recommendations of Joint Commenters

Our recommendations are focused on actions ODOE, OPUC, and to a lesser extent, DLCD, can take to facilitate clean energy and transmission deployment given known challenges to permitting, interconnecting, and constructing projects. Essentially, what is within these agencies' existing power to change.

A. Permitting

Despite the lack of focus on the permitting process, there are significant actions ODOE could take to facilitate deployment through its own permitting process, even after a site certificate has been granted. Based on our analysis of EFSC permitting data, 48% of certificate holders have to

make a change to a project after the site certificate has been issued. There are a number of reasons why this is the case ranging from project financing realities, to cost and technology changes that may have occurred throughout the development process, to larger headwinds in the clean energy industry and the specificity that is required when submitting an application. As seen in the figure below, the amendment process for wind and solar facilities takes an average of 119 days to complete, with the construction extension amendment process taking the longest at 192 days.



For amendment requests that are largely administrative in nature, EFSC should implement a fast track administrative update process. For requests like facility name changes, construction extension requests, and the division of a large facility into smaller ones, which have little to no impact on the environment or the public, EFSC Staff should evaluate the request administratively rather than requiring a formal amendment process and Council approval. Further, these kinds of requests should not require hundreds of pages of supporting documentation. These changes would substantially reduce delays after site certificates are issued and lower the cost of energy projects. In order to put appropriate guardrails on changes to a site certificate, EFSC staff can use discretion to allow limited for-cause construction extensions and in circumstances where full EFSC review may be warranted, move an administrative update back into an amendment process.

B. Interconnection

Interconnection is the process of getting new generators like wind, solar, and storage connected to the grid. Interconnection queues in the Pacific Northwest, like much of the country, are backlogged, and projects face multiyear timelines and major costs before being grid-connected. The key barrier is limited grid capacity, as this report notes, meaning that the transmission system cannot handle new generators without first undergoing major upgrades. Essentially, we don't have enough transmission capacity to support new generation.

The question is then, how can ODOE, OPUC, and DLCD facilitate interconnection, recognizing that the two agencies don't have much control over those processes. Most clean energy projects are either waiting in the Bonneville Power Administration's ("BPA") paused interconnection queue or are being processed through PacifiCorp or Portland General Electric's queues, which are FERC jurisdictional. **We suggest that ODOE, OPUC, and DLCD make it more likely that the transmission infrastructure needed to interconnect new clean energy already exists or is under development, before projects reach the queue.** While this approach may not have immediate results, it will ultimately lead to a grid that can absorb new generation capacity quickly without requiring massive upgrades borne by individual generators.

To that end, ODOE can support projects through the following actions:

- **Effectively implement HB 4076**. The law allows projects using surplus interconnection to qualify for a goal exception under statewide planning goals both at EFSC and at the county level. ODOE should streamline permitting for projects using surplus interconnection to incentivize efficient use of the existing transmission system.
- **Put forward a bold vision for the framework for strategic transmission siting**. EO 25-29 also directs ODOE to identify a framework to strategically accelerate transmission corridor designation, siting and permitting approvals within those corridors or existing right of way, and financial support for projects in the public interest. We urge ODOE to put forward concrete actions rather than relying on further study.
- **Evaluate how EFSC can support more efficient reviews of transmission infrastructure.** Use the experience of permitting Boardman to Hemingway ("B2H") to identify procedural and substantive changes that could have streamlined the siting and permitting process. Potential options include: an ODOE concierge service for transmission projects where one staff person plays a coordinating role between utilities, developers, local governments, tribes, and state and federal agencies. Another option is to standardize and make clear from the outset the environmental review requirements that agencies will seek on transmission projects. For example, applicants seeking to build transmission lines should know before they submit a notice of intent (NOI) what studies

and information will be required from the various state agencies that engage in EFSC's review of site certificates for transmission lines.[1]

- **Coordinate with state energy departments around the region.** The Western Transmission Expansion Coalition ("WestTEC") identified a number of transmission lines that will need to be built in the next decade, some of which are already in development and some of which are newly identified. ODOE should coordinate with other energy departments around the region on transmission projects within the WestTEC study that cross state lines.

The Oregon PUC can also do a number of things to increase transmission capacity and facilitate speedier interconnection.

- **Continue implementing HB 3336 in docket UM 2409.** Grid enhancing technologies ("GETs") can increase the capacity, reliability, and safety of the existing transmission system. GETs solutions are often considered the "low-hanging fruit" that allows us to get the most out of our current transmission system. The PUC should ensure that utilities are deploying all cost-effective GETs through a review of upcoming integrated resource plans ("IRPs"), and iterate on rules within the UM 2409 docket if necessary. GETs deployment should not be a check the box exercise, but rather a robust evaluation of transmission alternatives and the solutions that utilities turn to first and foremost to solve transmission constraints where appropriate.
- **Continue efforts to reform small generation interconnection in AR 688 and UM 2111.** The PUC is undertaking investigations and rulemakings to reform small generator interconnection (under 20 MW) and we encourage the Commission to continue making it easier and less costly for small generators to interconnect to the distribution system while maintaining safety and reliability.
- **Require utilities to proactively plan for transmission investments in IRPs**. Move utilities towards proactive transmission planning within regular IRP cycles. Utilities should identify where renewable generation is likely to be developed based on existing infrastructure and resource capacity factors and plan for the transmission needed to support the delivery of that electricity. This would move us toward a paradigm where individual clean energy projects are no longer on the hook for massive network upgrades that benefit the entire system.

[1] See recommendations from the Sightline Institute's "Four Ways to Get More Power Lines—and Clean Power—for Oregonians" by Kelly Trumbull: https://www.sightline.org/2026/03/26/four-ways-to-get-more-power-lines-and-clean-power-for-oregonians/

DLCD can facilitate the development of transmission through the rules it sets for the county-level siting and permitting process.

- **Effectively implement HB 4076**. The law allows projects using surplus interconnection to qualify for a goal exception under statewide planning goals both at EFSC and at the county level. DLCD should streamline county-level permitting for projects using surplus interconnection to incentivize efficient use of the existing transmission system.
- **Ensure consistent county interpretation of transmission siting statutes.** Counties may be interpreting the underlying land use regulations for transmission inconsistently. Transmission is generally considered a "utility facility necessary for public service" under ORS 215.213(1)(c). However, sometimes the "use" category for transmission is not clearly defined within county code and transmission's applicability in different zones is often unclear. DLCD should ensure consistent treatment of transmission infrastructure across counties.

The recommendations above are all possible within existing agency authority. However, **we also urge agencies to support the creation of a transmission authority to enable the buildout of significant transmission infrastructure for Oregon**. A transmission authority can help fill the gap between utility planning and project permitting by identifying, prioritizing, and then moving transmission projects that serve the public interest. It can also coordinate across utility footprints, state agencies, local governments, and neighboring states to move transmission lines of statewide significance forward, while leveraging public financing tools that lower the cost of the investments, ultimately saving ratepayers money. As Oregon continues to electrify and add new renewable energy resources, a transmission authority can help provide the capacity to proactively develop the grid and transmission system, rather than solely relying on utility driven projects.

C. Construction

The barriers to constructing clean energy projects identified by ODOE include cost, unexpected delays, limited availability of equipment and supplies. While the connection between these barriers and actions available to ODOE, OPUC, and DLCD is less direct than in the interconnection context, EFSC's site certificate amendment process has a clear nexus with construction and could be improved.

Projects experiencing construction delays must seek amendments to extend construction and completion deadlines. These take an average of 192 days. Lengthy amendment timelines can compound existing construction challenges by increasing project costs by tens to hundreds of thousands of dollars and creating additional regulatory uncertainty.

It is our understanding that HB 3049 extended the default construction and completion deadline windows to six years to better reflect the realities of energy development. We support that

change. In addition, **we recommend that EFSC move construction extension requests outside of the amendment process entirely,** as noted above**.** When a developer or utility is only requesting a deadline extension, that should not trigger an amendment to a site certificate or a re-opening of the site certificate in its entirety. Instead, these requests should be handled through administrative updates that EFSC Staff handles and does not go before the Council for formal approval. This would help reduce unnecessary costs, delays, and administrative burdens while maintaining EFSC's oversight of project development.

IV. Conclusion

We appreciate ODOE's work to identify barriers to clean energy deployment and recognize that many of the interconnection and construction related barriers are outside of ODOE, OPUC, and DLCD's purview. However, we believe there are more creative solutions, like the ones we've identified above, that can help facilitate project deployment despite known challenges. We urge ODOE to incorporate our recommendations into the final report to ensure that the state is maximizing the opportunity that Governor Kotek's executive order has provided.

Respectfully submitted this 2nd day of July 2026,

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