Dear Mr. Budeau,

Thank you for the opportunity to provide comments in regard to the Oregon Department of Fish and Wildlife’s “Greater Sage-Grouse Conservation Assessment and Strategy for Oregon.” Portland General Electric (“PGE”) is a vertically integrated utility serving over 815,000 customers in the northern Willamette Valley in a service territory of approximately 4,000 square miles. While none of PGE’s service territory overlaps any of the current or historic range of the sage-grouse, we anticipate a future where electric transmission and electric generating facilities to serve our customers might be located within those habitat areas.

Utilities in the State of Oregon have a mandate to meet at least 25% of their load with renewable resources by 2025. This statutory mandate was adopted by the 2007 Legislative Assembly and constitutes a partial expression of Governor Kulogoski’s Renewable Energy Action Plan developed in 2005. That plan, along with statutory guidance found, among other places, in ORS 469.010 show a distinct state preference for the development and siting of renewable energy resources.

Renewable energy resources differ from fossil based generation resources in that they are typically locationally dependent on their fuel: wind turbines must be sited where there is wind and photovoltaic systems must be sited where there is a good solar profile. In addition to the generation resources themselves, once the power is generated, it must be able to be transmitted to the people who need the energy. In Oregon, some of the best renewable energy generation sources can be found in the eastern portions of the state and much of the load needing to be served by those sources is in the western portion of the state. To get that power to the people who need it will require additional transmission facilities. Moreover, as the state moves to reduce the carbon dioxide emitted from all sources in the effort to achieve the state climate goals, utilities in the state may need to utilize existing or new transmission corridors to access renewable energy sources located

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1 ORS 469.010 provides in part “It is the goal of Oregon to promote the efficient use of energy resources and to develop permanently sustainable energy resources.”

2 ORS 468A.205
outside the state and these corridors may need to go through the habitat areas designated by the department.

Whenever land is taken out of productive use, the costs and benefits for that protection must be carefully weighed. Routing interconnection paths around conservation areas for the sage-grouse could be very expensive or impossible depending on the extent of the designated conservation areas. A better approach would be to encourage the responsible development of renewable resources and associated transmission. That approach would balance the state policies regarding energy development and climate change with those of the needs of the sage-grouse.

PGE believes that a carefully balanced pursuit of environmental conservation and renewable energy project development can support jobs, expand the economy, protect the sage-grouse and reduce carbon emissions for the long-term. On the other hand, a protection plan that prioritizes species protection over all other resources is too narrowly focused and may seriously side-track the recent advances made in renewable energy development.

PGE has a long track record of working for reasonable environmental solutions and we have a longstanding commitment to the protection of other species, especially the restoration and protection of our native salmonids. In recent years we have invested hundreds of millions of dollars in fish protections, including our selective water withdrawal facility at Pelton/.Round Butte Dam and the removal of the Marmot Dam in the Sandy River drainage. We believe that energy generation and species protection can coexist, but as we read the conservation plan, the plan might exclude nearly all renewable energy development in southeastern Oregon – and we anticipate that these lands will become of significant value for solar and wind development in the next five years.

We ask that the department consider these views when drafting its final conservation plan. Thank you for the opportunity to comment and we look forward to following this process through to its conclusion.

Respectfully submitted,

Brendan McCarthy
State Government Affairs
Portland General Electric