

Draft Report on Reducing Barriers to Clean Energy Deployment



DRAFT
for Public Comment

by the
**OREGON
DEPARTMENT OF
ENERGY**

June 2026



**OREGON
DEPARTMENT OF
ENERGY**

DRAFT REPORT ON REDUCING BARRIERS TO CLEAN ENERGY DEPLOYMENT – 2026

Acknowledgements

To be included in final version.

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Author’s Note: How This Report Fits In

This document is the draft Report on Reducing Barriers to Clean Energy Deployment. ODOE is seeking public comment on this draft.

This report’s development implements one of the 42 policy actions in the Oregon Energy Strategy. For more information on the Oregon Energy Strategy and its implementation, please visit <https://energystrategy.oregon.gov/implementing-the-strategy>.

ODOE is undertaking this report now to comply with Executive Order 25-29 section I(2)(a):

The Oregon Department of Energy (ODOE), in coordination with the PUC and the Department of Land Conservation and Development (DLCD), shall inventory, assess, and analyze barriers to the permitting, construction and interconnection of clean energy projects and associated infrastructure. ODOE will recommend actions to overcome those barriers while balancing opportunities for public participation with the state’s interest in accelerating deployment of clean energy infrastructure that benefits Oregon ratepayers. Recommended actions will be brought for discussion by ODOE to the Energy Facility Siting Council. ODOE will report its findings and recommendations to the Governor no later than September 1, 2026.

To comply with another section of Executive Order 25-29, section I(2)(c), ODOE is also working on a related report, the [Report on Siting and Permitting Large-Scale Electricity Infrastructure](#). While this Report on Reducing Barriers to Clean Energy Deployment focuses on understanding and overcoming the barriers being faced by proposed clean energy facilities that have received site certificates from the Energy Facility Siting Council or from an Oregon county, the Report on Siting and Permitting Large-Scale Electricity Infrastructure examines EFSC’s processes and seeks to identify opportunities for increased efficiency. ODOE will also share a draft version of that report and seek public comment on it.

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Executive Summary

The [Oregon Energy Strategy](#) identified five pathways that together represent the direction Oregon needs to take to meet its energy policy objectives – including an energy transition that will deliver clean, reliable, and affordable energy to all Oregonians. The five pathways are: (1) Energy Efficiency, (2) Clean Electricity, (3) Electrification, (4) Low-Carbon Fuels, and (5) Resilience. The second pathway, Clean Electricity, highlights the need to increase transmission capacity to access out-of-state generation resources as well as the potential benefits – from energy resilience to local economic development – of deploying more clean energy generation within the state. The Energy Strategy calls for the state to facilitate energy infrastructure enhancement and expansion while avoiding, minimizing, and mitigating negative impacts on Tribal trust resources, energy burden, natural and working lands, cultural resources, and communities ([Clean Electricity Policy 2a](#)).

As one near-term policy action ([Electricity Action 5](#)), the Energy Strategy recommended investigating why some proposed clean energy facilities have received approved site certificates from the Energy Facility Siting Council only to wait months or years before beginning construction or simply abandoning their project. To comply with Governor Kotek’s [Executive Order 25-29](#) section 1(2)(a), the Oregon Department of Energy, in coordination with the Public Utility Commission and the Department of Land Conservation and Development, is pursuing the Energy Strategy’s recommended investigation through this report process. This report aims to understand and identify ways to reduce barriers to the deployment of proposed wind, solar, and battery storage facilities with a nameplate capacity over 20 megawatts that have received siting approval from the Energy Facility Siting Council (via an approved site certificate) or from a county but are not yet built. ODOE hopes that identifying and addressing the barriers these types of clean energy facilities face may provide value to proposed clean energy facilities of all sizes and technology types.

The report is organized in three parts:

1. [The Overview](#) describes Oregon’s need for additional clean energy, including in-state generation. It explains the focused scope of this report and acknowledges where further investigation could be done. It describes the public process supporting this report’s development, including how the initial inventory of barriers was developed. It describes considerations on implementing the [Equity and Justice Framework for Decision-making and Program Implementation](#) developed as part of the Energy Strategy. Finally, it acknowledges the potential benefits of in-state generation.
2. [Barriers to Clean Energy Deployment](#) provides an initial inventory of barriers to permitting, construction, and interconnection for proposed energy facilities within the scope of this report. Each barrier is described. Where possible based on research and comments to date, this draft report provides examples of specific facilities being affected by the barriers described.
3. [Recommendations to Overcome Barriers](#) provides recommendations for policymakers to consider to overcome the inventoried barriers. It highlights a subset of relevant policy actions already recommended in the Energy Strategy (some of which are already underway). It then proposes additional recommendations identified in the development of this draft report.

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Key Takeaways: Overview

- Oregon’s current supply of electricity generating facilities will not be sufficient to meet rapidly rising demand for electricity from various sources, including data centers and electrification. More resources are needed.
- This report focuses on accelerating the development of new clean energy facilities, specifically by identifying and addressing barriers to permitting, construction, and interconnection faced by proposed facilities after receiving siting approval from EFSC or a county. For example, it includes consideration of barriers that may arise in certain federal permitting requirements. However, it does not examine any aspect of EFSC’s processes nor any aspect of Tribal consultation requirements that must be met before EFSC issues a site certificate or a county issues a land use permit.
- Supporting public engagement and the participation of wide range of voices is critical for this report’s success and for ODOE’s implementation of the Equity and Justice Framework. ODOE appreciates the input received so far and looks forward to further engagement on this *draft* report.
- While the barriers to clean energy deployment are substantial, overcoming them has the potential to deliver significant benefits to Oregonians.

Key Takeaways: Barriers to Clean Energy Deployment

- Based on ODOE’s ongoing research and analysis of public comments, this draft report provides an initial inventory of seven barriers to permitting, construction, and interconnection for proposed clean energy facilities that have obtained siting approval from EFSC or a county.
- The table below lists each of the seven barriers and indicates whether it might affect permitting, construction, and interconnection. The order in which each barrier is listed is not indicative of the magnitude of the barrier.

Table 1. Initial Inventory of Seven Barriers to Clean Energy Deployment

Barrier	Permitting	Construction	Interconnection
Cost	Yes	Yes	Yes
Unexpected delays	Yes	Yes	Yes
Limited cross-jurisdictional coordination	Yes	-	Yes
Limited availability of equipment and supplies	-	Yes	Yes
Limited staffing capacity	Yes	-	-
Unmet workforce needs	-	Yes	-
Limited grid capacity	-	-	Yes

Key Takeaways: Recommendations to Overcome Barriers

- Many of the recommended policy actions in the Oregon Energy Strategy aim to address the barriers described in this report. Several of these policy actions are already underway. The following page provides a summary table of five of these recommended policy actions and indicates the barriers each might help address.

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- This draft report provides four additional recommendations to overcome the barriers identified above. A table below lists these additional recommendations in approximate chronological order of potential implementation and indicates the barriers each might help address.
- At this time, ODOE believes these are all potential actions that could be undertaken pursuant to existing agency authority, but they might not be feasible with existing agency resources. (Please see the Oregon Energy Strategy’s recommendation “Increase agency capacity” below).

Table 2. Recommended Policy Actions in the Oregon Energy Strategy

Policy Action from the Oregon Energy Strategy	Barrier(s) It May Help Address
<p><u>Cross-Cutting Action 7.</u> Identify gaps in current and estimated occupation-level employment to meet Oregon’s future energy needs. ODOE should recommend actions to support and expand workforce development efforts that complement existing efforts. (Workforce needs assessment) <i>(This work is ongoing.)</i></p>	<ul style="list-style-type: none"> • Cost • Unmet workforce needs
<p><u>Cross-Cutting Action 8.</u> Advocate for federal policies that support advancement of state energy objectives. (Federal support and advocacy) <i>(This work is ongoing.)</i></p>	<ul style="list-style-type: none"> • Cost • Unexpected delays • Limited cross-jurisdictional coordination • Limited availability of equipment and supplies • Limited grid capacity
<p><u>Cross-Cutting Action 11.</u> Increase resources, funding, and staff levels at agencies as needed, and as funding becomes available, to implement actions necessary to advance Oregon’s energy policy objectives. (Increase agency capacity)</p>	<ul style="list-style-type: none"> • Cost • Unexpected delays • Limited cross-jurisdictional coordination • Limited staffing capacity
<p><u>Electricity Action 3.</u> Review and share key findings with the Legislature regarding near-term transmission needs and opportunities, and identify opportunities for the state to support transmission. ODOE would lead this work and build on it to inform the role that a state transmission entity may play in enabling investment. (Transmission needs and support) <i>(This work is underway, pursuant to Executive Order 25-29 section 1(2)(e).)</i></p>	<ul style="list-style-type: none"> • Cost • Unexpected delays • Limited cross-jurisdictional coordination • Limited grid capacity
<p><u>Electricity Action 7.</u> Study government incentives for local electricity generation investments and identify opportunities for the state to better advance infrastructure needs, economic development and energy justice objectives. (Local generation incentives study) <i>(The work underway for Executive Order 25-29 section 1(3)(a) may advance this action.)</i></p>	<ul style="list-style-type: none"> • Cost • Unmet workforce needs • Limited cross-jurisdictional coordination

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Table 3. Additional Recommendations to Overcome Barriers

Additional Recommendation	Barrier(s) It Could Help Address
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.	<ul style="list-style-type: none"> • Cost • Unexpected delays • Limited grid capacity
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.	<ul style="list-style-type: none"> • Cost • Unexpected delays • Limited cross-jurisdictional coordination • Limited grid capacity
Analyze new day-ahead market operations data to inform potential mechanisms for the state to support the prioritization and funding of different interconnection costs.	<ul style="list-style-type: none"> • Cost • Limited grid capacity
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.	<ul style="list-style-type: none"> • Potentially all seven barriers, and others unique to facilities beyond the targeted scope of this report

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Tribal Land Acknowledgement

ODOE acknowledges that Indigenous Tribes and Bands have been with the lands that we inhabit today throughout Oregon and the Northwest since time immemorial and continue to be a vibrant part of Oregon today. We would like to express our respect to the First Peoples of this land, the nine federally recognized Tribes in Oregon:

- Burns Paiute Tribe
- Confederated Tribes of Coos, Lower Umpqua & Siuslaw Indians
- Confederated Tribes of Grand Ronde
- Confederated Tribes of Siletz Indians
- Confederated Tribes of the Umatilla Indian Reservation
- Confederated Tribes of the Warm Springs Reservation
- Coquille Indian Tribe
- Cow Creek Band of the Umpqua Tribe of Indians
- The Klamath Tribes

As the state engages in discussions about deployment of energy infrastructure in Oregon, it is important that we recognize and honor the ongoing legal and spiritual relationship between the land, plants, animals, and people indigenous to this place we now call Oregon. The interconnectedness of the people, the land, and the natural environment cannot be overstated; the health of one is necessary for the health of all. We recognize the pre-existing and continued sovereignty of the nine federally recognized Tribes who have ties to this place and thank them for continuing to share their traditional ecological knowledge and perspective on how we might care for one another and the land, so it can take care of us.

We commit to engaging in a respectful and successful partnership as stewards of these lands. As we are obliged by state law and policy, we will uphold government-to-government relations to advance strong governance outcomes supportive of Tribal self-determination and sovereignty.

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List of Acronyms and Abbreviations

Acronym/Abbreviation	Complete Name
BPA	Bonneville Power Administration
DLCD	Department of Land Conservation and Development
EFSC	Energy Facility Siting Council
EIA	U.S. Energy Information Administration
EO	Executive Order
GW	Gigawatt
LBNL	Lawrence Berkeley National Laboratory
LCDC	Land Conservation and Development Commission
MW	Megawatt
NERC	North American Electric Reliability Corporation
NWPPC	Northwest Power & Conservation Council
ODOE	Oregon Department of Energy
OPUC	Oregon Public Utility Commission
PNUCC	Pacific Northwest Utilities Conference Committee

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Overview

The Need for Clean Energy Deployment in Oregon

Oregon’s current supply of electricity generating facilities will not be sufficient to meet rapidly rising demand for electricity from various sources, including data centers and electrification. More resources are needed. The [Oregon Energy Strategy](#) recognizes this imperative: “To reliably serve Oregon’s current and growing electricity needs, the electricity system must expand.” Other reports similarly highlight this as a pressing near-term priority for Oregon and the Pacific Northwest, including:

- The Northwest Power and Conservation Council’s [Pacific Northwest Power Supply Adequacy Assessment for 2029](#) (August 2024), which states “Over the next five years across the Pacific Northwest, significant load growth and changing system dynamics are creating risks for maintaining power system adequacy.”
- The Western Electricity Coordinating Council’s [2025 Western Assessment of Resource Adequacy](#) (January 2026), which states “The West’s planned resource buildout will not keep up with anticipated load growth over the next decade, particularly in the Basin and Northwest subregions ... If planned resource additions are delayed or canceled, the reliability risk becomes greater.”
- The North American Electric Reliability Corporation’s latest annual [Long-Term Reliability Assessment](#) (January 2026), which states for the Northwest region, “Rapid forecasted demand growth is driving the need for more resources. Resource additions nearing completion are predominantly solar PV, battery, and wind, leading to a more variable resource mix. Periods of unserved energy are projected for both summer and winter.”
- The Pacific Northwest Utilities Conference Committee’s [2026 Northwest Regional Forecast](#) (April 2026), which states “Utilities are actively pursuing a range of strategies to meet growing demand, including energy efficiency, demand response, load flexibility, distributed energy resources, new large-scale generating resources and expanded transmission. However, while utility plans identify significant future resource needs, new generating resource additions are falling short of the scale and pace required, constrained by transmission limitations, long supply chain lead times and siting and permitting challenges that slow project development.”

These and other studies are sounding the alarm: load growth is outpacing resource development.ⁱ

The Energy Strategy highlights the need to increase transmission capacity to access out-of-state generation resources as well as the potential benefits – from energy resilience to local economic development – from deploying more clean energy generation within the state. The Energy Strategy calls for the state to facilitate energy infrastructure enhancement and expansion while avoiding, minimizing, and mitigating negative impacts on Tribal trust resources, energy burden, natural and working lands, cultural resources, and communities ([Clean Electricity Policy 2a](#)). As one near-term action ([Electricity Action 5](#)), the Energy Strategy recommended investigating why some clean energy facilities have received approved site certificates from the Energy Facility Siting Council only to wait months or years before beginning construction or simply abandoning their project. To comply with Governor Kotek’s [Executive Order 25-29](#) section I(2)(a), the Oregon Department of Energy, in coordination with the Public

ⁱ For more information, please see [Appendix A](#), “Additional Materials,” and [Appendix B](#), “Oregon’s Electricity Needs.”

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Utility Commission and the Department of Land Conservation and Development, is pursuing the Energy Strategy’s recommended investigation through this report process.

The Scope of this Report

Executive Order 25-29 section I(2)(a) directs ODOE, in coordination with the Oregon Public Utility Commission and the Department of Land Conservation and Development, to “inventory, assess, and analyze barriers to the permitting, construction and interconnection of clean energy projects and associated infrastructure” and “recommend actions to overcome those barriers while balancing opportunities for public participation with the state’s interest in accelerating deployment of clean energy infrastructure that benefits Oregon ratepayers.” ODOE must report findings and recommendations to the Governor no later than September 1, 2026.

For purposes of this report, “clean energy projects and associated infrastructure” means proposed clean energy facilities that received siting approval from the Energy Facility Siting Council (via an approved site certificate) or from a county but are not built or under construction. Specifically, this report focuses on proposed wind, solar, and battery storage facilities with a nameplate capacity over 20 megawatts. This focus is practical in nature. As of May 1, 2026, there is no other type of proposed clean energy facility at EFSC under review or with an approved site certificate but not built or under construction.ⁱⁱ

For purposes of this report, “barriers to the permitting ... of clean energy projects” includes consideration of barriers that may arise in permitting processes that are outside EFSC’s jurisdiction and are not required to be completed prior to receipt of an approved site certificate from EFSC or an approved county land-use permit. For example, it includes consideration of barriers that may arise in certain federal permitting requirements. However, it does not examine any aspect of EFSC’s processes nor any aspect of Tribal consultation requirements that must be met before EFSC issues a site certificate or a county issues a land use permit. This interpretation is consistent with the above interpretation that “clean energy projects” means certain facilities that already received siting approval but are not built or under construction.

Other reports are underway regarding land use and siting, including DLCD’s forthcoming report pursuant to EO 25-29 section I(2)(b) on “opportunities and barriers to clean energy development under Oregon’s land use planning goals” and ODOE’s forthcoming [Report on Siting and Permitting Large-Scale Electricity Infrastructure](#) pursuant to EO 25-29 section I(2)(c), which examines EFSC’s processes and seeks to identify opportunities for increased efficiency. ODOE is coordinating internally and externally and may reference key findings from these other reports as appropriate in the final version of this report.

ODOE hopes that this report’s identification of barriers and recommendations to overcome barriers may provide value to proposed clean energy facilities of all sizes and technology types. However, some clean energy facilities, such as rooftop solar and behind-the-meter battery storage, likely face unique barriers and may benefit from future investigation. Similarly, some clean energy technologies are not yet commercially available. To comply with EO 25-29 section I(3)(b), ODOE will report progress and key

ⁱⁱ For more information, please see [Appendix C](#), “Clean Energy Facilities Under EFSC.”

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findings on opportunities for advanced and emerging carbon-free energy technologies in the forthcoming 2026 [Biennial Energy Report](#). Those technologies are not within the scope of this report.

Public Process Supporting this Report

ODOE is pursuing a near-parallel public engagement process for this report and the [Report on Siting and Permitting Large-Scale Electricity Infrastructure](#). ODOE will provide both reports to the Governor’s Office on September 1, 2026, as directed in Executive Order 25-29.

ODOE held an initial open comment period for both reports in February and March 2026. In an online comment portal, ODOE posed 19 questions to commenters about their professional or lived experiences of developing a clean energy facility or participating in a development process, and the barriers they experienced. ODOE also asked commenters for input on potential solutions. In response, ODOE received 12 written public comment submissions from a range of different interested parties. ODOE also held two listening sessions to receive oral comments, which were attended by approximately 19 interested persons. A compilation of comments received is [posted on ODOE’s website](#).

[Appendix D](#), “Assessment of Public Comments on Barriers to Clean Energy Deployment,” documents the comments received so far about barriers and ODOE’s assessment of that input, considering ODOE’s ongoing research into barriers. Appendix D contains every public comment’s statement about a barrier. Also noted in the Appendix: 1) where ODOE disagreed that an item constituted a distinct “barrier”ⁱⁱⁱ for purposes of this report’s inventory; 2) where a public comment addresses something beyond the scope of this report; and 3) where a statement informed ODOE’s identification of any of the barriers described in this report. ODOE reviewed all comments and appreciates the input.

ODOE is holding a second round of public comments for this report from June 1 to July 2, 2026. ODOE is seeking feedback on this draft version of the report. ODOE will hold a listening session to receive oral comments on Monday, June 29, 2026 beginning at 4:30 p.m. ODOE will host an office-hours event to discuss environmental justice and equity perspectives throughout the report with a particular focus on the [Equity and Justice Framework](#) from 9-10:30 a.m. on Wednesday, June 17, 2026. Information on how to attend these events will be posted to [the project webpage](#). If you have questions or need additional information to facilitate your engagement, please reach out to us. ODOE will accept written comments through the [online comment portal](#). **Please submit any comments on this draft report on or before 5 p.m. on July 2, 2026.** As required by Executive Order 25-29, ODOE plans to bring the draft recommendations in this draft report to the [EFSC](#) for discussion at a [public meeting](#) scheduled for June 26, 2026. ODOE encourages interested persons to listen to the live or recorded discussion at the EFSC meeting and join the listening session on Monday, June 29, 2026, to share oral comments.^{iv}

ⁱⁱⁱ ODOE did not adopt a formal definition for what constitutes a “barrier” for purposes of this draft report, but in its review, ODOE did consider the draft definition proposed by DLCDC for their forthcoming report pursuant to EO 25-29 section I(2)(b): ““Barriers” means existing state or local land use provisions or policies, or the absence of such provisions or policies, that unnecessarily constrain siting approvals for clean energy generation project or transmission in areas considered well suited for development. When provisions or polices are present, barriers may be found based on complexity, redundancies, superfluous, or a lack of local resources.” As noted in the prior section, land use is largely outside this report’s scope.

^{iv} Information on how to attend the EFSC meeting and a link to the meeting recording will be posted at <https://www.oregon.gov/energy/facilities/Pages/Council-Meetings.aspx>.

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Considerations on Implementing the Equity and Justice Framework for Decision-making and Program Implementation

As part of the Oregon Energy Strategy, the [Equity and Justice Framework](#) was informed by the Environmental Justice and Equity Policy Working Group and is designed to be used in the development and implementation of energy policy by policy makers, agencies, and other implementors. ODOE is committed to using the Equity and Justice Framework when addressing the actions of the Energy Strategy to reduce inequities and increase equitable and just outcomes in our work.

To implement the framework in this report, ODOE staff developed framing guidance to inform the agency’s decision-making for both the process and outcome of this report. That framing guidance and notes on implementation done so far is provided in [Appendix E](#), “Framing Guidance for ODOE on Incorporating the Equity & Justice Framework.” ODOE staff intends to revisit this framing guidance before and after finalizing the report.

ODOE urges policymakers to apply the [Equity and Justice Framework](#) in the development and implementation of energy policy, including in considering this report’s policy recommendations.

Not All State Requirements for Energy Facilities Are “Barriers” the State Should Remove

While Oregon has a pressing need for new electricity supply, not all energy facilities are created equal. Different facilities come with different costs and benefits. For instance, some solar or wind facilities can produce more electricity than other solar or wind facilities because they are in areas that are naturally sunnier or windier. Those facilities can be more cost-effective to build because they deliver more electricity. This is a significant reason for Oregon to pursue opportunities to import clean energy from sunnier and windier areas of the country. On the other hand, some particularly sunny or windy areas may be more costly for energy development because there is less demand for energy in that area and more grid infrastructure would be needed for a new facility to make deliveries to customers. Some areas that could be used for wind or solar may be more valuable for other purposes, such as agriculture or preservation of unique wildlife habitat. Some facilities, through their construction or their operations, may risk harming other values, such as Tribal trust resources. Some facilities may risk exacerbating past and continuing costs borne by [environmental justice communities](#). Different types of energy facilities may have workforce needs that better match a local community’s workforce and thereby provide more value to the local economy. These and many other factors all affect the potential societal benefits a facility may provide and the societal costs of its development.^v

Market competition alone does not fully account for a proposed facility’s societal benefits and societal costs. One way of considering the market for new energy facilities is to consider the resource procurement processes that Oregon’s investor-owned utilities undertake under the Oregon Public Utility Commission’s oversight. Those processes seek to identify the energy facilities that will help the procuring utility meet its customer’s electricity needs at the lowest cost and risk to that utility’s

^v The term ‘societal cost’ describes both costs considered in the market and costs not considered in the market, which are called negative externalities. Similarly, the term ‘societal benefit’ describes both benefits that are compensated for in the market and benefits that are not considered in the market, which are called positive externalities. Externalities can be difficult if not impossible to quantify.

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customers. This routinely and appropriately includes competition between both in-state facilities and out-of-state facilities, both of which are needed to cost-effectively meet Oregon’s energy demands. Utility resource procurement processes address one dimension of an energy facility’s value and are intentionally distinct from processes that evaluate other dimensions, such as the benefits and costs to neighboring utilities’ systems, to customers of a different utility, or to the economy. Yet while some costs and benefits are not directly evaluated in a utility resource procurement process, an energy facility developer’s bid in a utility’s resource procurement can be expected to reflect the costs and risks of that facility.

Because market competition alone cannot fully account for societal benefits and societal costs, government policies are necessary to advance those energy facilities whose societal benefits outweigh their societal costs. Policies may increase some developers’ bids by requiring developers to pay costs or provide benefits that the market would not otherwise require. For example, environmental policies can require developers to pay for and obtain permits to ensure development does not impose undue harms. Similarly, policies may decrease some developers’ bids by rewarding developers for providing benefits that would otherwise not be considered in the market. For example, local tax incentives aim to support economic development and job creation from new development. This report does not consider all government policies that may increase developers’ bids as “barriers” to clean energy deployment. Some policies are necessary to reflect negative externalities that the market would otherwise not account for. Removing those policies would only shift costs, not reduce them.

To accelerate clean energy deployment in Oregon, state and local policymakers must consider whether the overall portfolio of policies affecting developers is striking the right balance between policies that increase developers’ bids and policies that reward developers for providing benefits. As Oregon looks to accelerate clean energy deployment overall, the challenge for state and local policymakers is to identify and advance those energy facilities whose societal benefits outweigh their societal costs. ODOE plays an important supporting role here, consistent with ODOE’s mission to responsibly balance needs and impacts for current and future generations.

Overcoming Barriers to Clean Energy Deployment Has the Potential to Deliver Significant Benefits

While the barriers to clean energy deployment are substantial, overcoming them has the potential to deliver significant benefits to Oregonians. Several public comments for this report highlighted the potential benefits from additional clean energy deployment in Oregon, including additional job opportunities, increased tax revenue, and improved resiliency. Clean energy facilities present opportunities for landowners to diversify and increase their income streams. For example, farmers and ranchers may find value in dedicating croplands or grazing lands with marginal production capability to solar energy production. Those same lands can then provide higher per-acre revenues than before, which helps preserve the economic viability of Oregon’s working lands. Though beyond the scope of this report, increased support for the use of agrivoltaics^{vi} where feasible would allow landowners to diversify income streams without wholly sacrificing the land’s ability to produce agricultural commodities. Innovative solutions, like agrivoltaics, operationalize several statewide resiliency goals by increasing

^{vi} Agrivoltaics is the practice of producing both agricultural crops and electricity using solar panels on the same parcel of land.

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clean energy production while still delivering resiliency and economic benefits under EO 25-26. Finding ways for the state to encourage such innovations to support economic development in rural Oregon is an opportunity highlighted in the Oregon Energy Strategy’s recommended [Electricity Action 7](#): “Study government incentives for local electricity generation investments and identify opportunities for the state to better advance infrastructure needs, economic development and energy justice objectives.” This is one of several near-term actions recommended in the Oregon Energy Strategy that are also highlighted later in this report.

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Barriers to Clean Energy Deployment in Oregon

Inventory of Barriers to Permitting, Construction, and Interconnection for Facilities with Siting Approvals

Executive Order 25-29 directs ODOE, in coordination with OPUC and DLCD, to “inventory, assess, and analyze barriers to the permitting, construction and interconnection of clean energy projects and associated infrastructure.” Based on ODOE’s ongoing research and analysis of public comments, this draft report provides an initial inventory of seven barriers to permitting, construction, and interconnection for proposed clean energy facilities that have obtained siting approval from EFSC or a county.

The table below lists each of the seven barriers and indicates whether it might affect permitting, construction, and interconnection. The order in which each barrier is listed is not indicative of the magnitude of the barrier. These barriers are not mutually exclusive.

Table 1. Initial Inventory of Seven Barriers to Clean Energy Deployment

Barrier	Permitting	Construction	Interconnection
Cost	Yes	Yes	Yes
Unexpected delays	Yes	Yes	Yes
Limited cross-jurisdictional coordination	Yes	-	Yes
Limited availability of equipment and supplies	-	Yes	Yes
Limited staffing capacity	Yes	-	-
Unmet workforce needs	-	Yes	-
Limited grid capacity	-	-	Yes

Barrier: Cost

Barrier to Permitting; Barrier to Construction; Barrier to Interconnection

Cost may be the single biggest barrier to energy deployment for any facility type or size. Significant investments are needed to successfully deploy large clean energy facilities, including investments in grid infrastructure. Some investments are necessary to maintain reliable electricity service, but utilities face a challenging environment to balance investments for reliability with the pressing concerns of energy affordability.

From the perspective of an individual developer, the issue of cost is intertwined with issues of time and financing. It often takes years to develop a facility and begin generating electricity for sale. The developer must make significant investments to construct the facility and pay for related work to be done, such as the construction of upgrades to the grid to facilitate interconnection or transmission service. Financing for those investments can be dependent on meeting certain development milestones, such as securing a power purchase agreement with an interested buyer.

One example of this is from a facility now under construction, Oregon Trail Solar. According to published meeting materials for EFSC’s July 18, 2025, meeting, Oregon Trail Solar reportedly had to seek an

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amendment to its approved site certificate to extend the allowed time for construction in part because the project had not yet been able to secure a power purchase agreement.^{vii} In other words, the facility was unable to begin construction due to the barrier of cost. Several months later, the facility secured a power purchase agreement, and it is now under construction.^{viii} It is not obvious what specific factors may have affected Oregon Trail Solar’s ability to secure a PPA, but this example illustrates one way that cost can be a barrier to deployment for proposed facilities with site certificates from EFSC.

A developer may be unable to successfully negotiate a PPA until after the facility has undertaken a significant amount of development work, such as obtaining necessary permits and progressing far enough in the interconnection process to have some certainty that connecting to the grid will be feasible. These are common requirements for developers who bid in utility resource procurement processes. The more costs a facility has to incur before the opportunity to generate revenue is known, the more likely a developer will face increased financing costs for their investment. Many developers of larger facilities pursue development opportunities in multiple states and even multiple countries. If a facility does not appear cost-effective to develop in Oregon, a developer may take their capital and focus on opportunities in other jurisdictions.

From the perspective of a utility, the more costs all proposed facilities incur, the more costs a purchasing utility will face to obtain the resources it needs. Limitations on investment capital – including growing concerns about energy affordability and utility consumers’ ability to support new investments – impact the market appetite for new supply and can deter the deployment of new supply (i.e., new facilities). This is true even though procuring new facilities may be less costly in the long term than other options, such as reliance on short-term market purchases.

While there is a cost to develop a facility, there is also an opportunity cost associated with the decision to not develop a facility. Investing in renewable energy facilities like wind and solar has the potential to reduce a utility’s reliance on other resources, such as coal or natural gas, and this may reduce the utility’s risk exposure to fuel price volatility. Additionally, some landowners, including some farmers, find lease payments from clean energy facilities to provide significant opportunities to grow and diversify their income streams.

Another example of cost acting as a barrier is the Sunstone Solar Project. This proposed facility is being affected by bankruptcy proceedings. The certificate holder of the Sunstone Solar Project is Sunstone Solar, LLC, a wholly owned subsidiary of Pine Gate Renewables, LLC. In November 2025, roughly a year after Sunstone Solar received its site certificate from EFSC, Pine Gate initiated voluntary bankruptcy proceedings. In the court-supervised sales process, the company is transitioning ownership of its solar and storage facilities, including the Sunstone Solar Project.^{ix} The transition has been particularly noteworthy since Amazon outbid regional utilities like Puget Sound Energy for the proposed facility in

^{vii} EFSC July 18, 2025 meeting materials, Item F: Compliance Program 6 month Review (Information Item), <https://www.oregon.gov/energy/facilities-safety/facilities/Council%20Meetings/2025-07-18-EFSC-Item-F-Staff-Report-Compliance-Program-Update.pdf>.

All meeting materials for EFSC may be reviewed at <https://www.oregon.gov/energy/facilities-safety/facilities/Pages/Council-Meetings.aspx>.

^{viii} Avangrid, Press Release, Avangrid Announces New Oregon Solar Project to Help Power Data Centers (Sept. 22, 2025), <https://www.avangrid.com/w/avangrid-announces-new-oregon-solar-project-to-help-power-data-centers>.

^{ix} See Pine Gate Renewables’ website for more information at <https://www.pgrsaleprocess.com/>.

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Oregon. It is not clear at this time what Amazon’s plans are for the facility, or the extent to which cost concerns might drive Amazon’s business decisions. However, at minimum, the facility would need an amended site certificate from EFSC before it could be developed.^x

It is not clear which cost(s) were the straw that broke the camel’s back for the Sunstone Solar Project. The changes to federal government tax credits through [H.R. 1](#) were likely a significant factor, as the approaching deadlines for developers have created new risks that some financiers may not be willing to take on. Interconnection costs and timelines are also rising across the power sector, as discussed below for the barrier to interconnection of limited grid capacity. ODOE also received comments indicating that permitting costs are rising. This may be related in part to the federal permitting delays described below.

Barrier: Unexpected Delays

Barrier to Permitting; Barrier to Construction; Barrier to Interconnection

While the time needed to complete different development processes can increase costs, as discussed above, a materially different issue is *unexpected* delays. For at least some developers, predictability that can be planned around is more important than a shorter timeline.^{xi} Delays that are unexpected because they are hard or impossible to predict are an additional barrier to clean energy deployment.

Example: Unexpected Delays in Federal Permitting

EFSC aims to provide a one-stop shop for permitting energy facilities in Oregon, but there are permits beyond EFSC’s jurisdiction. Obtaining these permits therefore occurs outside the EFSC process or county process, and unexpected delays may affect proposed facilities despite having received siting approval from EFSC or a county.

Delays in federal permitting processes have become a more significant concern after President Trump issued a series of executive orders in 2025 that ordered several federal agencies to slow or stop work on issuing the necessary federal authorizations for wind and solar facilities.^{xii} While some delays are a known risk and should be somewhat expected, these recent delays appear to rise beyond the level of reasonable expectations. These executive orders and subsequent federal agency actions are the subject of active litigation. On April 21, 2026, a federal judge found several challenged actions to be contrary to federal law and issued a preliminary injunction ordering the federal agencies to stop delaying work.^{xiii}

^x OPB, Amazon buys site of Oregon’s largest planned solar and energy storage project (March 11, 2026), <https://www.opb.org/article/2026/03/11/oregon-amazon-solar-energy-storage-project/> (this article includes clarifying statements from ODOE staff).

^{xi} *E.g.*, Federal permitting is ‘outsized’ factor in clean energy delays, cancellations: *Crux* (April 7, 2026), UtilityDive, <https://www.utilitydive.com/news/federal-permitting-outsized-factor-clean-energy-permitting-crux/816824/> (news coverage on an industry survey that reportedly found “72% of respondents chose more predictable outcomes as the single change they would most like to see made to the federal permitting process, while only 12% said they wanted to see faster timelines”).

^{xii} In August 2025, the law firm K&L Gates provided a summary of the executive orders and subsequent implementing actions at the federal level, which can be found here: <https://www.klgates.com/Department-of-the-Interior-Issues-Flurry-of-Actions-Targeting-Wind-and-Solar-Energy-Projects-8-25-2025>.

^{xiii} A copy of the order is available at <https://storage.courtlistener.com/recap/gov.uscourts.mad.293725/gov.uscourts.mad.293725.89.0.pdf>.

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The judge’s order is limited to the proposed facilities of the plaintiffs, who include trade associations active in Oregon.^{xiv} The case is still ongoing.

ODOE has not identified a specific example of a proposed facility with siting approval from EFSC or a county where these recent federal permitting delays are clearly and directly affecting development. However, ODOE shares this as a widespread concern and example of how delays can be unexpected. The issuance of the preliminary injunction is a major development for affected facilities seeking to overcome this barrier.

Barrier: Limited Cross-Jurisdictional Coordination

Barrier to Permitting; Barrier to Interconnection

Energy deployment may require the attention of multiple different entities. When processes lack adequate supportive pathways to facilitate cross-jurisdictional coordination, the result can be a less efficient process for proposed facilities. This issue can be exacerbated by limited staffing capacity, as noted below.

One example of this barrier is reflected in the divergent federal and state policies today. The implications of the loss of federal tax credits are discussed above under the barrier of cost. The effects of federal permitting delays are discussed above under the barrier of unexpected delays.

ODOE has not identified an example of a specific generating facility with siting approval from EFSC or a county where limited cross-jurisdictional coordination is clearly affecting development, beyond the prior discussion of costs and unexpected delays. However, ODOE shares this as a widespread concern.

Recent State Activities to Support Tribal Coordination

Tribal coordination is a critical aspect of clean energy deployment. ODOE and DLCD have both undertaken recent work to clarify expectations for developers around Tribal coordination. ODOE staff recently supported a rulemaking for the Energy Facility Siting Council that adopted rules requiring energy facility developers going through the EFSC process to make a good-faith effort to meet with affected Tribes before submitting a Notice of Intent. Similarly, the Department of Land Conservation and Development recently concluded a rulemaking to protect cultural areas – places with archaeological sites or landscapes that hold deep meaning for Tribes and Oregon communities. DLCD’s new rules will take effect in January 2027. These process improvements recognize and uplift the importance of early engagement with Tribes as sovereigns and other affected persons for successful clean energy deployment consistent with all Oregon’s policy objectives.

For more information, see EFSC, Tribal Communication Rulemaking, <https://www.oregon.gov/energy/get-involved/Pages/EFSC-Tribal-Communication.aspx>; DLCD, Goal 5 Cultural Areas Rule: An overview of Oregon Administrative Rule 660-023-0210, https://www.oregon.gov/lcd/LAR/Documents/20251229_Two_Pager.pdf.

^{xiv} The plaintiffs are: RENEW Northeast, the Green Energy Consumers Alliance, Inc., MidAtlantic Renewable Energy Coalition Action, Alliance for Clean Energy – New York, Renewable Northwest, Southern Renewable Energy Association, Interwest Energy Alliance, Clean Grid Alliance and the Carolinas Clean Energy Business Association.

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Barrier: Limited Availability of Equipment and Supplies

Barrier to Construction; Barrier to Interconnection

Construction requires adequate equipment and supplies. A widespread concern in the power sector is the continuing effects of supply chain issues exacerbated by the pandemic. For example, the Western Electricity Coordinating Council has noted that “Wait time for transformers and circuit breakers is between two and four years ... Switchgears and substation switches have seen delays, too.”^{xv}

ODOE has not identified a specific example of how limited availability of equipment and supplies is affecting the proposed facilities that have obtained siting approval from EFSC or a county. However, ODOE understands this to be a widespread concern. It may affect construction of individual facilities as well as construction of necessary interconnection upgrades.

Barrier: Limited Staffing Capacity

Barrier to Permitting

Limited staffing capacity can hinder the efficiency of permitting authorities, including Tribes, federal entities, state agencies, and local jurisdictions such as counties. Limited staff capacity or training can lengthen review processes or limit the exploration of creative solutions, ultimately hindering the speed of development. Limited staffing capacity can be a concern prior to issuance of siting approval, but that is not within the scope of this report.

ODOE has not identified an example of a specific facility with siting approval from EFSC or a county where limited staffing capacity is clearly affecting development. As noted above, there are widespread delays in some federal permitting processes, but that does not appear to be primarily a matter of limited staffing capacity at federal permitting authorities. ODOE shares this as a widespread concern.

Barrier: Unmet Workforce Needs

Barrier to Construction

Unmet workforce needs encompasses both a company’s need for qualified employees as well as a worker’s need for a high-quality job. Creating high-quality jobs is an important potential benefit of clean

^{xv} Western Electricity Coordinating Council, *2025 Western Assessment of Resource Adequacy*, <https://feature.wecc.org/2025wara/index.html> PNUCC also flagged concern with “long supply chain lead times.” PNUCC, *2026 Northwest Regional Forecast* at 4, <https://www.pnucc.org/wp-content/uploads/2026-PNUCC-Northwest-Regional-Forecast-4-21-26-final.pdf>.

Supply constraints do not only affect clean energy facilities. Wood Mackenzie reported on April 1, 2026 that gas turbines face six-year lead times, and the limited supply of turbines has increased gas turbine prices 195%. Wood Mackenzie, *Gas turbine prices soar 195% as market faces supply-demand crisis* (April 1, 2026), <https://www.woodmac.com/press-releases/gas-turbine-prices-soar-195-as-market-faces-supply-demand-crisis/>. This example is shared to illustrate the widespread nature of this barrier. New natural gas facilities 25 MW or larger cannot be sited in Oregon.

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energy deployment. ODOE received comments highlighting that Oregon’s clean energy workforce has grown in recent years, driven by legislation like HB 2021 (2021).^{xvi}

ODOE has not identified a specific facility with siting approval from EFSC or a county where unmet workforce needs are clearly affecting development. Instead, ODOE has heard that there are currently not enough opportunities available for skilled and trained workers in clean energy right now. Addressing these unmet needs of Oregon’s current clean energy workforce is critical to achieving the full potential benefits of clean energy deployment in the coming years, especially at the local scale. ODOE notes there are other active workstreams at ODOE underway to further examine workforce needs.

Oregon Energy Strategy Workforce Needs Assessment

ODOE, in partnership with the Institute for Policy Research and Engagement at the University of Oregon, is conducting the Oregon Energy Strategy Workforce Needs Assessment. Advancing the pathways and mission of the Oregon Energy Strategy will require a larger workforce across areas such as renewable energy generation, transmission, energy efficiency, and clean transportation. This assessment aims to understand how well current workforce and training systems are positioned to meet modeled demands and to develop recommendations that support the growth of Oregon’s clean-energy workforce.

Learn more at <https://energystrategy.oregon.gov/workforceneeds>

Barrier: Limited Grid Capacity

Barrier to Interconnection

Limited grid capacity is a significant driver of rising costs and delays. This issue could be encompassed in the above barriers of Cost or Unexpected Delays, but ODOE addresses it separately because the issue is so widespread in Oregon and across the country. While some sophisticated developers may be able to afford to finance these costs and mitigate the delays, not all developers can do so.

The interconnection process exists to ensure that when generation facilities (including storage) connect to the grid, they do so without negatively affecting the continued safety and reliability of grid operations. This process serves important purposes. However, developers face significant headwinds in completing this process.

One issue is the time required, which has increased significantly in recent years. This is not an issue unique to Oregon. Lawrence Berkeley National Laboratory provides a significant amount of literature on generator interconnection processes across the nation. According to their research, “The typical project built in 2024 took 55 months from the interconnection request to commercial operations, compared to 36 months in 2015 and 22 months in 2008.”^{xvii} These data reflect average time requirements nationwide. Some facilities face longer timelines to interconnect.

^{xvi} One commenter shared a report that includes a longer discussion of recent clean energy workforce legislation in Oregon. Cornell University Climate Jobs Institute, [Building the Future: A Bold Vision for Climate Jobs in Oregon](#) (Jan. 2026) at 14-15.

^{xvii} LBNL, *Queued Up: 2025 Edition, Characteristics of Power Plants Seeking Transmission Interconnection*, slide 4, <https://emp.lbl.gov/sites/default/files/2025-12/Queued%20Up%202025%20Edition%20-%2012.15.2025.pdf>

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ODOE received comments highlighting delays experienced in the interconnection processes with the Bonneville Power Administration and PacifiCorp dba Pacific Power. Both entities are implementing reforms to their interconnection processes to reduce these delays. These reforms will be addressed further in the final report in [Appendix F](#), “Interconnection Processes in Oregon.” In brief, reforms have aimed to address some of the causes of recent delays, such as the issue of cascading restudies. Cascading restudies can occur when a proposed facility with a high cost estimate to interconnect decides to withdraw from the interconnection process. That withdrawal can change the study assumptions for other proposed facilities and move an assigned upgrade from the withdrawing facility to the next facility in line. That next facility might then receive a high cost estimate and choose to withdraw, with the cycle repeating itself over and over again. These reforms are underway. In addition, OPUC continues to closely review interconnection processes to identify additional areas where reforms might provide value.^{xviii} However, the OPUC’s ability to improve interconnection processes for large facilities is extremely limited. The overwhelming majority of interconnection requests for facilities over 20 megawatts are to BPA or are subject to processes set by the Federal Energy Regulatory Commission.

An example of limited grid capacity increasing the time required for deployment can be seen with Obsidian Solar Center. ODOE received comments that the Obsidian Solar Center had to obtain an amended site certificate from EFSC to extend the facility’s deadline to begin construction specifically because of delays in the facility’s interconnection. This is an example of how delays in one process (such as interconnection) can complicate other processes (such as permitting or construction).

Another issue is the rising costs. One aspect of this is increasing costs to support the transmission system. There is a separate process, the transmission service process, to review and grant requests to move electricity across the grid. However, necessary upgrades to the transmission system are increasingly being identified in the interconnection process. In many places, the current transmission system, as it is currently utilized, is at or nearing its limits.^{xix} As a result, a significant number of interconnection studies are identifying a need for investments to the transmission system (a “network upgrade”), which can be prohibitively expensive.

Here is one example: in March 2024, Pacific Power produced an interconnection study for three proposed facilities seeking to interconnect to Pacific Power’s system in the Willamette Valley area, one 100 MW wind facility, one 100 MW battery storage facility, and one 199 MW battery storage facility. The study identified that interconnecting all three facilities would require network upgrades, potentially including a new 120-mile long high-voltage transmission line at an estimated cost of \$327.6 million.^{xx} Two facilities withdrew. The 199 MW battery storage facility paid for an updated study, which identified

^{xviii} E.g., Docket No. [AR 683](#), In the Matter of Temporary Interconnection Rules in Response to Executive Order 25-25.

^{xix} Historically, utility procurement processes have required developers to hold “firm” long-term transmission rights regardless of the facility’s likely need for transmission. It has been recognized that, for intermittent renewable energy resources, this means a significant amount of the system’s physical capacity is both over-reserved and under-utilized. See Elaine Hart, Sylvan Energy Analytics, *Toward a more holistic and adaptive treatment of BPA transmission rights in Northwest utility planning and procurement processes* (March 2025), available at [Sylvan-and-GridLab Renewables-Transmission-Rights.pdf](#).

^{xx} Pacific Power, Generation Interconnection Cluster 3 Study Report Cluster Area 19 (March 8, 2024), <https://www.oasis.oati.com/woa/docs/PPW/PPWdocs/2023CA19CS.pdf>. The three facilities were also studied for a lower level of interconnection service that would have included some network upgrades but not the 120-mile long line. The total cost for the lower level of service for all three facilities was \$20.2 million, of which \$5.1 million was for network upgrades.

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the 199 MW battery storage facility, by itself, could interconnect without needing the new transmission line. Its updated cost estimate in the new study was \$10.36 million, total.^{xxi} In this example, limited grid capacity was a barrier to interconnecting three proposed clean energy facilities, and two of the three projects did not overcome the barrier.

Like the increasing time frames, this issue is not unique to Oregon. For example, LBNL recently published a new report, [Generator Interconnection Costs to the Transmission System in non-ISO Balancing Authorities](#) (Feb. 2026), which includes analysis of both BPA and Pacific Power. Here are some of LBNL’s key findings:

- “Interconnection costs have increased since the early 2000s.” “Network upgrade costs are the primary driver of recent cost increases, especially among withdrawing projects.” “Overall, network upgrade costs as a proportion of total interconnection costs have increased over time, rising from 35% in the 2000s to 85% in 2018-2024 (across all projects irrespective of request status).”
- “High interconnection costs impact project economics and often lead to withdrawal of the interconnection request...”
- “Interconnection costs are not available as pre-request information and costs assessed in completed studies are challenging to collect. Developers engage in the interconnection process as a means of cost discovery...”^{xxii}
- “Recent (2018-2024) projects that complete all studies have the lowest interconnection costs” and “Recent average interconnection costs for complete projects are lowest in BPA.”

In summary, developers face significant headwinds to achieve interconnection. The interconnection process has sometimes been used to discover cost information. However, many facilities receive cost estimates that are cost prohibitive. Those facilities withdraw, which often causes delays to other facilities being studied. As discussed earlier, the average time to interconnect is lengthening. Importantly, LBNL acknowledged the above report is primarily based on data from before the recent adoption of significant reforms to the interconnection process. As noted earlier, both BPA and Pacific Power are still implementing reforms.

LBNL also observed that “Recent interconnection costs in our BA sample are higher than in ISOs.” ISOs are Independent System Operators that operate competitive wholesale markets. Oregon is not part of an ISO. As noted in the Oregon Energy Strategy, “Considering the billions of dollars the West has saved through the real-time electricity market since 2014, much work is already underway to further progress

^{xxi} Pacific Power, Generation Interconnection Cluster 3 Study Report Cluster Area 19 (January 23, 2025), <https://www.oasis.oati.com/woa/docs/PPW/PPWdocs/2023CA19CS1.pdf>. The one facility was also studied for a lower level of interconnection service with a total cost estimate of \$9.41 million.

^{xxii} The availability of information prior to submitting an interconnection request and obtaining study results can vary depending on the interconnecting provider. In Oregon, for example, the Public Utility Commission has required investor-owned utilities to publicly post certain information since 2019. *E.g.*, *In the Matter of PUBLIC UTILITY COMMISSION OF OREGON, Investigation into PURPA Implementation*, OPUC Docket No. [UM 2000](#), Order No. 19-051, Staff Report at 7-8 (Feb. 19, 2019) (requiring additional information be made available to inform future interconnection requests). Requiring more information be publicly available was a contentious issue before the Federal Energy Regulatory Commission, but in 2023, FERC adopted requirements for more information to be posted. *See* FERC Docket No. RM22-14, Order No. 2023 at 117 (July 28, 2023); *see also* FERC Order No. 2023-A (Mar. 31, 2024).

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toward an organized electricity market.”^{xxiii} As of May 1, 2026, the California ISO’s Extended Day-Ahead Market is now live, with Pacific Power participating as a non-ISO entity.^{xxiv} Portland General Electric Company is expected to join the EDAM later this year. BPA has announced it intends to join a different day-ahead market, the Southwest Power Pool’s Markets+, in late 2028. It is not yet clear how much the operation of the extended day-ahead market may begin to address the barrier of limited grid capacity in 2026 or 2027. It is widely expected to provide significant benefits to customers, including cost savings and increased reliability.

The anonymized nature of the interconnection process and lack of publicly available data on which costs or delays are affecting specific proposed facilities in Oregon makes it hard to describe which specific facilities are facing the barrier of limited grid capacity. But it is clear that limited grid capacity is an area of critical concern, as reflected in the case of Obsidian Solar Center and in comments highlighting this as a widespread issue.

Other Activities Underway on Transmission

Except as it relates to interconnection, transmission is beyond the targeted scope of this report on electricity generating facilities. ODOE is separately evaluating these issues pursuant to Executive Order 25-29 section 1(2)(e), which directs ODOE to propose a framework for strategic transmission siting.

^{xxiii} Oregon Energy Strategy at 58.

^{xxiv} Pacific Power, *EDAM is live: PacifiCorp and CAISO successfully launch new market May 1* (May 1, 2026), <https://www.pacificorp.com/about/newsroom/news-releases/extended-day-ahead-market-live.html>.

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Recommendations to Overcome Barriers

Executive Order 25-29 calls for ODOE to “recommend actions to overcome those [inventoried] barriers while balancing opportunities for public participation with the state’s interest in accelerating deployment of clean energy infrastructure that benefits Oregon ratepayers.” The first section below highlights five policy actions from the Oregon Energy Strategy that could help address barriers identified in this report. The second section below describes four additional recommendations identified in this process of developing this report.

Recommended Policy Actions from the Oregon Energy Strategy

ODOE offers the following table to highlight just a subset of policy actions from the Energy Strategy that could help address barriers identified in this report. Where an action is underway or in planning, ODOE has provided that context in parentheses.

These five policy actions are highlighted as relevant examples for this report. ODOE continues to recommend policymakers consider all 42 policy actions in the [Oregon Energy Strategy](#).

Table 2. Recommended Policy Actions in the Oregon Energy Strategy

Policy Action from the Energy Strategy	Barrier(s) It May Help Address
<p>Cross-Cutting Action 7. Identify gaps in current and estimated occupation-level employment to meet Oregon’s future energy needs. ODOE should recommend actions to support and expand workforce development efforts that complement existing efforts. (Workforce needs assessment) <i>(This work is ongoing.)</i></p>	<ul style="list-style-type: none"> • Cost • Unmet workforce needs
<p>Cross-Cutting Action 8. Advocate for federal policies that support advancement of state energy objectives. (Federal support and advocacy) <i>(This work is ongoing.)</i></p>	<ul style="list-style-type: none"> • Cost • Unexpected delays • Limited cross-jurisdictional coordination • Limited availability of equipment and supplies • Limited grid capacity
<p>Cross-Cutting Action 11. Increase resources, funding, and staff levels at agencies as needed, and as funding becomes available, to implement actions necessary to advance Oregon’s energy policy objectives. (Increase agency capacity)</p>	<ul style="list-style-type: none"> • Cost • Unexpected delays • Limited cross-jurisdictional coordination • Limited staffing capacity
<p>Electricity Action 3. Review and share key findings with the Legislature regarding near-term transmission needs and opportunities, and identify opportunities for the state to support transmission. ODOE would lead this work and build on it to inform the role that a state transmission entity may play in enabling investment. (Transmission needs and support) <i>(This work is underway, pursuant to Executive Order 25-29 section 1(2)(e).)</i></p>	<ul style="list-style-type: none"> • Cost • Unexpected delays • Limited cross-jurisdictional coordination • Limited grid capacity

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Policy Action from the Energy Strategy	Barrier(s) It May Help Address
Electricity Action 7 . Study government incentives for local electricity generation investments and identify opportunities for the state to better advance infrastructure needs, economic development and energy justice objectives. (Local generation incentives study) (<i>The work underway for Executive Order 25-29 section 1(3)(a) may advance this action.</i>)	<ul style="list-style-type: none"> • Cost • Unmet workforce needs • Limited cross-jurisdictional coordination

Additional Recommendations to Overcome Barriers

The following recommendations are additional to the above recommendations from the Oregon Energy Strategy. They are listed in approximate chronological order of potential implementation.

At this time, ODOE believes these recommendations could be undertaken pursuant to existing agency authority, but they might not be feasible within existing agency resources. (Please see the recommendation “Increase Agency Capacity” above).

Beyond the potential resources needed to pursue these recommendations, none of the additional recommendations listed below seek additional direct state funding. Providing additional state dollars through incentive programs or other means would be a clear option to accelerate the deployment of clean energy facilities. However, ODOE is mindful that the state faces a challenging budgetary situation. An interim action, as noted above, could be the Oregon Energy Strategy’s recommended “Study Local Generation Incentives.”

Below is a summary table of each additional recommendation and the barrier(s) it could help address. Each additional recommendation is then described.

Table 3. Additional Recommendations to Overcome Barriers

Additional Recommendation	Barrier(s) It Could Help Address
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.	<ul style="list-style-type: none"> • Cost • Unexpected delays • Limited grid capacity
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.	<ul style="list-style-type: none"> • Cost • Unexpected delays • Limited cross-jurisdictional coordination • Limited grid capacity
Analyze new day-ahead market operations data to inform potential mechanisms for the state to support the prioritization and funding of different interconnection costs.	<ul style="list-style-type: none"> • Cost • Limited grid capacity

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Additional Recommendation	Barrier(s) It Could Help Address
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.	<ul style="list-style-type: none"> Potentially all seven barriers, and others unique to facilities beyond the targeted scope of this report

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.

Barrier(s) It Could Help Address: Cost; Unexpected delays; Limited grid capacity

This recommendation aims to facilitate economically efficient market outcomes by supporting better informed business decisions and facilitating private partnerships in the generation interconnection process. It would encourage interconnection applicants to voluntarily report plans to withdraw from any generator interconnection process before withdrawing. As an example, say Applicant A and Applicant B are being studied together in a cluster study, but Applicant A cannot finance the estimated costs and expects to withdraw. Under this recommendation, Applicant A would voluntarily report that expectation, thereby providing notice to Applicant B (and others) that there is a risk of delays to their interconnection due to a re-study. This notice would invite Applicant B (and others) to offer support, such as funding, so that Applicant A does not withdraw. Applicant B might prefer to provide funding to Applicant A rather than risk a re-study when Applicant A withdraws. Other interested persons could include large load customers interested in the speedy development of new resources, such as Applicant B’s facility. This opportunity for interested persons to act is likely not a decision that can be made today, because information about interconnection applicants is largely anonymized. That anonymity may be of less concern for interconnection applicants preparing to withdraw, like Applicant A in the above example.

This recommendation would not change the reforms recently adopted and still being implemented. Any interconnection applicant that chooses not to withdraw would still face increasing costs to remain in the interconnection queue, including the increasing risk of future penalties for withdrawing late in the interconnection process. This recommendation would only have an effect if an interested person would prefer to assume those cost risks on behalf of the interconnection applicant as a way to mitigate the risks that interested person faces of delays if the applicant were to withdraw.

This is a near-term action that could be pursued using existing state agency authority and existing agency resources. The requirement should not be mandatory. OPUC does not have jurisdiction over the vast majority of interconnection applicants. Further, a mandatory requirement of only state-jurisdictional interconnection applicants may be less effective despite requiring a larger commitment of state resources to enforce compliance and adjudicate any disputes. The information could potentially be

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provided on utility OASIS^{xxv} webpages, where information about interconnection processes typically resides.

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.

Barrier(s) It Could Help Address: *Cost; Unexpected delays; Limited cross-jurisdictional coordination; Limited grid capacity*

This recommendation aims to support ongoing education of and alignment across different processes critical to clean energy deployment, including permitting, interconnection, and construction. This ongoing action would build on this report and other ongoing workstreams to support continued improvements over time.

ODOE aims to provide a venue for problem-solving Oregon's energy challenges. Consistent with ODOE's mission, this action proposes to host a forum of interested parties to jointly consider the varied processes that a clean energy facility must undertake. The forum could recur every year or every few years as needed, to support cross-jurisdictional conversations. Each event could feature presentations on different processes, such as county siting processes and BPA and utility interconnection processes. It could also feature roundtable discussions and surveys to gather information and hear from different perspectives. In this way, the forum would offer opportunities to establish a common understanding of issues and emerging concerns in different processes. Significant questions this forum could help address include:

- Where do different development processes intersect, and how do they affect one another?
- What intersections between processes are most significant for developers? Which are most significant for Oregon ratepayers?
- What opportunities exist to improve alignment across processes and facilitate development? What risks might be created by pursuing each opportunity?
- What level of state support, if any, would be needed to pursue each opportunity?

The forum would also offer opportunities to identify and avoid potential unintended consequences across processes. After the event, ODOE could issue a forum report summarizing key findings and any recommended near-term actions, including where legislative action may be needed.

This forum would focus on cross-jurisdictional challenges and opportunities. Implementing cross-cutting strategies requires significant collaboration. While facilitating the forum is consistent with ODOE's mission, the forum will be most successful with broad participation and collaboration, including co-creating agendas and other reference materials. ODOE looks forward to this collaboration.

^{xxv} OASIS stands for "Open Access Same-Time Information System." FERC ordered the creation of OASIS webpages to facilitate wholesale competition. They include information about interconnection, transmission, and other matters. See FERC, Open Access Same-Time Information System, <https://www.ferc.gov/OASIS>; see, e.g., BPA, OASIS, <https://www.oasis.oati.com/BPAT/>; Pacific Power, OASIS, <https://www.oasis.oati.com/ppw/index.html>; PGE, OASIS, <https://www.oasis.oati.com/PGE/>, and Idaho Power, OASIS, <https://www.oasis.oati.com/ipco/>.

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ODOE recommends the first annual forum focus on interconnection processes for generating facilities over 20 MW and explore what new or changed aspects of the interconnection process, as reformed, most intersect with other processes. For example, ODOE could invite BPA and Oregon utilities to present information about recent interconnection reforms, such as increased site control requirements, and ODOE could facilitate a dialogue among forum attendees – such as county planners – about the potential implications for siting and permitting processes. To support this forum and provide a needed resource, in the final version of this report, ODOE and OPUC intend to provide an appendix summarizing interconnection processes as recently reformed. An early outline of this appendix is provided as [Appendix F](#), “Interconnection Processes in Oregon.” However, this resource is meant to be an introductory resource only, to help participants understand the significance of the reforms adopted to interconnection processes in recent years.

This is a near-term action that could be pursued using existing state agency authority. It may be difficult to pursue with only existing agency resources; additional state or external funding would likely be needed.

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

Barrier(s) It Could Help Address: Cost, Limited Grid Capacity

This recommendation aims to address the rising costs of interconnection in the context of the state’s budget-constrained environment. As discussed above for the barrier of Limited Grid Capacity, it is not yet clear how much the operation of California ISO’s Extended Day-Ahead Market (which launched on May 1, 2026) may begin to address the barrier of limited grid capacity in 2026 or 2027. The new market offering is widely expected to provide significant benefits to customers, including cost savings and increased reliability. This recommendation aims to revisit this question of whether and how the state could address rising interconnection costs once there is new day-ahead market operations data.

One option the state could consider is creating or expanding state incentive programs to facilitate certain interconnection work. This may be most appropriate to explore within the context of the full implementation of the Oregon Energy Strategy’s recommended [Electricity Action 7](#): “Study government incentives for local electricity generation investments and identify opportunities for the state to better advance infrastructure needs, economic development and energy justice objectives.” Alternatively, the new data may identify opportunities for improved state-state coordination or state-federal coordination.

This is a near-term action, but it should not be undertaken until a critical mass of market data becomes available in mid-2027 or later. Once data are available, it could be pursued using existing state agency authority. It may be difficult to pursue with only existing agency resources; additional state or external funding would likely be needed.

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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.

Barrier(s) It Could Help Address: Potentially all seven barriers, and others unique to facilities beyond the targeted scope of this report

This Report on Barriers to Clean Energy Deployment in Oregon focuses specifically on wind, solar, and battery energy facilities with a nameplate capacity over 20 MW that have already received siting approval from EFSC or a county. This focused scope is necessary to conduct a reasonable assessment within a short time frame.

ODOE recommends a similar study be undertaken that focuses on smaller clean energy resources, including behind-the meter and community-based resources. These resource types are an important part of the portfolio of resources needed to meet Oregon’s clean energy and climate goals. However, they can face barriers, including high costs that can limit access especially for low- and moderate-income households. The study should consider these barriers as well as innovative solutions for new smaller clean energy resources, such as solar installations on the pivot corners of farmland or floating on irrigation reservoirs. Medford Irrigation District recently celebrated the launch of Oregon’s first floating solar array at the District’s Central Point irrigation reservoir.^{xxvi}

ODOE also recommends a similar study be undertaken that focuses on existing small-scale energy resources, including hydroelectric and biomass facilities. These existing resources may provide valuable capacity and resilience benefits to the electricity system but, like all existing infrastructure, they face costs to maintain or recommission operations that they may not be able to secure financing for without state policy support.

This recommendation could be implemented without legislative action, but the timing of either study would be dependent on the availability of state agency resources (see Limited Staffing Capacity above).

^{xxvi} Medford Irrigation District, Ribbon Cutting (May 8, 2026), <https://medfordirrigation.specialdistrict.org/ribbon-cutting/>; fca, Medford Irrigation District Floating Solar, <https://fcasolutions.org/projects/medford-irrigation-district-floating-solar/>.

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Appendix A: Additional Materials

Project resources:

- Webpage for this report: <https://energystrategy.oregon.gov/cleanenergydevelop>
- Public Comments Received through March 20, 2026 for this Report and for the [Report on Siting and Permitting Large-Scale Electricity Infrastructure](#), available at <https://energystrategy.oregon.gov/s/OES-EO25-29-BarrierstoCleanEnergyDeployment-Comments-March2026.pdf>
- *Oregon Energy Strategy* (Nov. 2025), available at <https://energystrategy.oregon.gov/>
- *EO 25-29* (Nov. 2025), available at <https://www.oregon.gov/gov/eo/eo-25-29.pdf>
- *EO 25-29 FAQ* (Nov. 2025), available at <https://drive.google.com/file/d/1tKZNftztjfKAd8CDK0ozMHcsjitFenLA/view>

Related projects currently underway:

- ODOE, *Report on Siting and Permitting Large-Scale Electricity Infrastructure* (forthcoming), information available at <https://energystrategy.oregon.gov/largescale>
- ODOE, *Oregon Energy Strategy Workforce Needs Assessment* (forthcoming), information available at <https://energystrategy.oregon.gov/workforceneeds>
- DLCD, forthcoming report on accelerating clean energy deployment through Oregon’s land use planning framework per EO 25-29 section I(2)(B)
- See generally ODOE, *Implementing the Oregon Energy Strategy*, <https://energystrategy.oregon.gov/implementing-the-strategy>
 - For example, ODOE is conducting research and participating in [a technical assistance project with the National Governor’s Association](#) as part of EO 25-29 I(2)(e) to develop a framework for strategic transmission siting.
- See also OPUC, Docket No. UM 2417, *Identifying Priorities in Implementation of Executive Orders 25-25 and 25-29*, <https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=24859>

Additional resources highlighted in public comments relevant to this and other ongoing workstreams:

- Climate Jobs Institute at Cornell University, *Building the Future: A Bold Vision for Climate Jobs in Oregon* (Jan. 2026), available at <https://www.ilr.cornell.edu/climate-jobs-institute/report-summary/bold-vision-climate-jobs-oregon>
- Columbia River Inter-Tribal Fish Commission, *Energy Vision for the Columbia River Basin* (Sept. 2022), available at <https://critfc.org/energy-vision/>
- *Oregon Renewable Energy Siting Assessment (ORESAs) Tool*, available at <https://oregon-explorer.apps.geocortex.com/webviewer/?app=7501a78d26844019892269bc295ea36b&viewer=renewable>

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- ODOE et al., *2022 Oregon Renewable Energy Siting Assessment*, available at <https://hub.oregonexplorer.info/documents/OSUGISci::oregon-renewable-energy-siting-assessment-oresa-final-report/explore>
- DLCD, *Finding Opportunities and Reducing Conflicts in Siting Photovoltaic Solar Power Generation Facilities* (Dec. 2025), available at <https://www.oregon.gov/lcd/Publications/HB%203409%20%E2%80%94%20Finding%20Opportunities%20and%20Reducing%20Conflicts%20in%20Siting%20Photovoltaic%20Solar%20Power%20Generation%20Facilities.pdf>
- Oregon Natural Desert Association et al., *Siting Renewable Energy in Oregon: Voluntary Guidelines Developed Through Outreach and Engagement* (March 2023), available at https://onda.org/wp-content/uploads/2023/04/OSSC_Renewable_Energy_Siting_Guidelines.pdf
- U.S. Bureau of Land Management, *Greater Sage-Grouse Approved Resource Management Plan Amendment for Oregon* (2025), available at https://eplanning.blm.gov/public_projects/?doc=%2F2016719%2F200502020%2F20126642%2F251026622%2FOregon%20ROD_ARMPA%20-%201.15.2025.pdf
- U.S. Bureau of Land Management, *Utility-Scale Solar Energy Development Programmatic Environmental Impact Statement/Resource Management Plan Amendment* (2024), available at <https://blmsolar.anl.gov/solar-peis-2023/>
- U.S. Bureau of Land Management, *West-wide Energy Corridor Information Center*, available at [West-wide Energy Corridor Information Center](#)

List of other appendices for this Report (listed by appearance in main report):

[Appendix B](#): Oregon’s Electricity Needs

[Appendix C](#): Clean Energy Facilities at EFSC

[Appendix D](#): Assessment of Public Comments on Barriers to Clean Energy Deployment

[Appendix E](#): Framing Guidance for ODOE on Incorporating the Equity & Justice Framework

[Appendix F](#): Interconnection Processes in Oregon

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Appendix B: Oregon’s Electricity Needs

The Report on Reducing Barriers to Clean Energy Deployment begins by acknowledging that Oregon’s current supply of electricity generating facilities will not be sufficient to meet rapidly rising demand for electricity from various sources, including data centers and electrification. More resources are needed. The report examines barriers affecting the development of certain types of electricity generation facilities. This appendix provides additional context on (1) rising demand for electricity and (2) the uncertainty of need for in-state resources. While this appendix provides information about statewide and regional issues, it is important to understand that not all Oregon utilities face the same challenges, and this appendix does not comprehensively describe all challenges that might exist at the scale of individual utility systems.

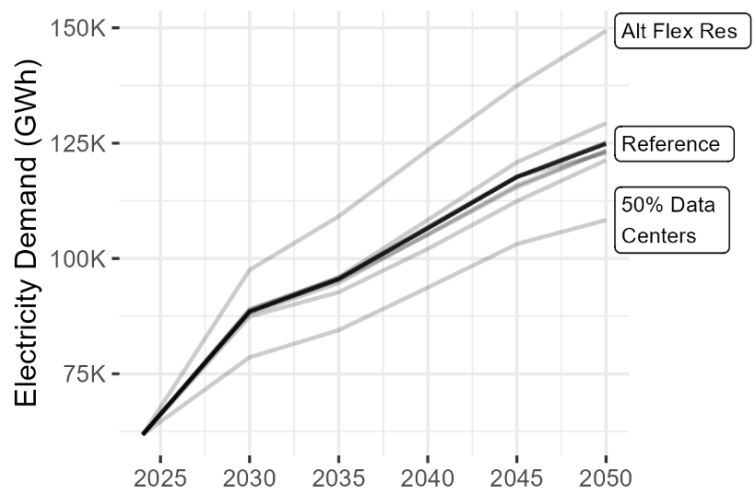
Tech Loads are the Single Greatest Driver of Near-Term Needs

As NERC notes, “Rapid forecasted demand growth is driving the need for more resources.”^{xxvii} At a regional scale, sources of increasing demand include population growth, increased use of air conditioning, transportation electrification, building electrification, and new large tech loads, such as data centers.^{xxviii}

Modeling undertaken for the Oregon Energy Strategy provides a state-level perspective for Oregon.^{xxix} In the near-term, it found that “tech loads are the greatest driver of growing electricity demand.”^{xxx} By 2030, in most modeling runs, Oregon’s electricity demand increases approximately 40 percent. The chart to the right shows growth in electricity demand in all 10 modeling runs.

This forecast is highly uncertain. A key modeling input, selected based on public engagement, was the NWPCC’s “mid-high” forecast of 3,976 megawatts of incremental tech load across the region, with a significant portion occurring in Oregon. In most Energy Strategy modeling runs, the “mid-high” forecast was used as the assumption for regional growth by 2030, with 1.5 percent load growth annually thereafter.^{xxxi} One modeling run halved this forecast for the region, with only 1 percent load growth

Figure 1: Electricity Demand in Oregon Across All 10 Modeling Runs (2024-2050)



Notes: Reference Scenario is shown in bold. All 10 modeling runs are shown but may not be distinguishable due to overlap. Modeling runs with the highest and lowest growth are labeled.

^{xxvii} NERC, [Long-Term Reliability Assessment](#) (January 2026) at 8.

^{xxviii} E.g., NERC, Long-Term Reliability Assessment at 157; PNUCC, [2026 Northwest Regional Forecast](#) (April 2026) at 4.

^{xxix} For a more comprehensive summary of the modeling, see the [Oregon Energy Strategy](#) at pages 25-37 (section titled “Modeling and Technical Analysis”) and additional project resources on ODOE’s [website](#), including the [Modeling Assumptions and Sources](#), [Energy Strategy Technical Approach](#), and [Energy Strategy Modeling Technical Report](#).

^{xxx} Similarly, PNUCC notes “Large new loads—particularly data centers—are the primary driver of regional load growth.” 2026 Northwest Regional Forecast at 9.

^{xxxi} [Energy Strategy Modeling Technical Report](#) at 22.

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annually after 2030.^{xxxii} In that case, by 2030, Oregon’s electricity demand still increases over 25 percent. Tech loads remain the single greatest driver of near-term needs.

Since the Energy Strategy’s publication, the NWPCC has developed a new tech load forecast, including a low, mid and high forecast. The low forecast is 1,513 MW of incremental tech load by 2030; the mid forecast is 2,475 MW; and the high forecast is 4,989 MW.^{xxxiii} The assumption used for the Energy Strategy thus falls between the new mid and high forecasts.

Another uncertainty to this forecast is the modeling assumption that tech loads will have high, constant demand throughout the year. This assumption is consistent with the NWPCC’s assumption in the [Northwest Power Supply Adequacy Assessment for 2029](#). However, the Energy Strategy noted that load flexibility could provide significant benefits.^{xxxiv}

More recent analyses have similarly highlighted this possibility. For example, a January 2025 analysis by GridLab and Sylvan Energy Analytics found that “Large load flexibility could mitigate most or all near-term winter resource adequacy needs under most load scenarios.”^{xxxv} Similarly, an April 2026 analysis by Energy + Environmental Economics (E3) found that “Additional energy efficiency or demand response [such as ‘large load demand flexibility’ can help avoid some further [resource adequacy] investments, if tailored to the unique NW energy-based reliability challenge.”^{xxxvi}

However, the Energy Strategy and both above studies also emphasize that having large load flexibility would *not* fully negate the need for additional electricity generating facilities. The electricity sector’s successful expansion is critical to achieving Oregon’s long-term goals.

One less discussed aspect of rapid tech load growth is the risk to reliability if operational tech loads unexpectedly stop drawing grid power. The loss of demand can cause imbalance on the grid and require significant corrective action. NERC’s 2025 State of Reliability (June 2025) describes this and other new challenges for grid operators relating to tech loads.^{xxxvii} On May 4, 2026, NERC issued a Level 3 Alert^{xxxviii} directing NERC-registered entities, which include many Oregon utilities, to consider taking certain actions immediately to reduce risks to grid reliability and to report to NERC on this issue by early August 2026 to inform a report to FERC.^{xxxix} These large load challenges are emerging issues that add to the continuing challenges that grid operators face in addressing the reliability impacts of a growing share of inverter-based resources like wind and solar. NERC’s 2025 State of Reliability report similarly summarizes the continued work on that issue.^{xl}

^{xxxii} [Energy Strategy Modeling Technical Report](#) at 22.

^{xxxiii} More information is available at the NWPCC’s [Ninth Plan Technical Elements webpage](#), under the linked [Demand Forecast Workbooks](#).

^{xxxiv} See Oregon Energy Strategy at 58.

^{xxxv} GridLab and Sylvan Energy Analytics, [Near-term winter resource adequacy challenges in the Pacific Northwest: A review of E3’s Northwest RA Study Phase 1 and independent evaluation of near-term winter challenges](#) at 11.

^{xxxvi} E3, [Resource Adequacy and the Energy Transition in the Pacific Northwest](#) at 19.

^{xxxvii} NERC, [2025 State of Reliability: Assessment Overview of 2024 Bulk Power System Performance](#) at 8 (June 2025).

^{xxxviii} A Level 3 Alert is NERC’s highly level alert. NERC, *About Alerts*, <https://www.nerc.com/programs/bulk-power-system-awareness/alerts>.

^{xxxix} NERC, NERC Issues Level 3 Alert, Reliability Guideline Focused on Large Load Challenges (May 4, 2026), <https://www.nerc.com/newsroom/nerc-issues-level-3-alert-reliability-guideline-focused-on-large-load-challenges>.

^{xl} NERC, 2025 State of Reliability at 13.

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Oregon’s Data Center Advisory Committee

On January 20, 2026, Governor Kotek announced the convening of a statewide Data Center Advisory Committee, tasked with developing a set of policy recommendations and actions to address issues of statewide significance associated with the growing expansion of new data centers across Oregon. The Committee’s report will be due to the Governor no later than October 2026.

Learn more at <https://www.oregon.gov/energy/Get-Involved/Pages/Oregon-Data-Center-Advisory-Committee.aspx>

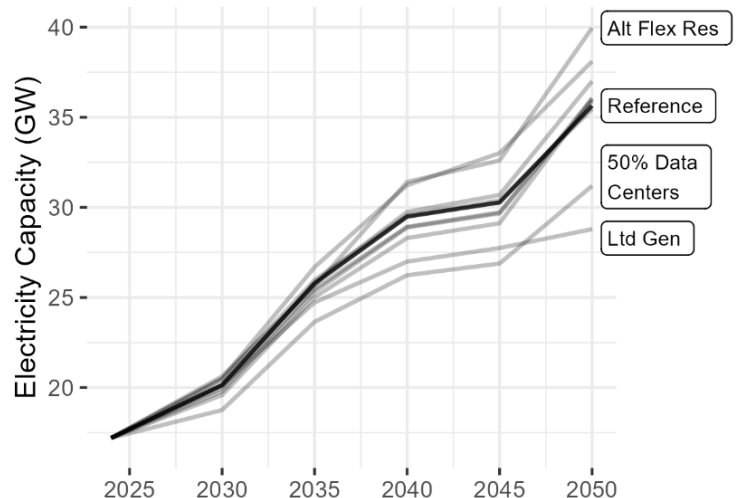
Rapid Load Growth is Driving Near-Term Resource Needs

The Energy Strategy’s modeling runs all showed a substantial increase in installed nameplate capacity of electricity generation facilities in Oregon, predominantly new wind and solar facilities. Critically, these additions contribute to the existing grid, where the modeling showed that hydropower remains Oregon’s biggest source of electricity and existing natural gas facilities operate as needed for reliability purposes for decades to come. These additions also complement significant investments in energy efficiency and demand response measures.

Future needs are highly uncertain, owing in significant part to the uncertainty around large load growth described above. However, the Energy Strategy’s modeling provides some context to help frame the question. The chart to the right shows the modeled growth in total in-state nameplate capacity over time. The modeling run with half the tech load forecast showed a total increase of roughly 2 gigawatts by 2030, predominantly solar. Most modeling runs showed a total increase of over 3 GW by 2030.^{xii}

This need is extremely uncertain. These modeling results may understate utilities’ actual needs by 2030 if significant tech loads materialize as expected. Further, the model could not account for some of the real-world inefficiencies in power sector operations. For example, when the model selects a new resource, that new resource is assumed to be operational in the year selected, meaning development must have begun some time beforehand. However, as discussed in

Figure 2: Electricity Capacity in Oregon Across All 10 Modeling Runs (2024-2050)



Notes: Reference scenario is shown in bold. All 10 modeling runs are shown but may not be distinguishable due to overlap. Modeling runs with the highest and lowest growth are labeled.

^{xii} The data underlying the chart and these numbers can be reviewed at ODOE’s website in the Energy Pathways Modeling Data Library, <https://www.oregon.gov/energy/data-and-reports/Documents/2025-OES-Energy-Pathways-Modeling-Data-Library.xlsx>.

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this report, unexpected delays are a significant barrier to clean energy deployment. Further, the model could not fully account for inefficiencies in utilization of the transmission system. Limited grid capacity is another barrier described in the report.

On the other hand, these modeling results may overstate utilities' actual needs by 2030 if new tech loads are not developed or if they operate more flexibly than modeled, as discussed above. Finding ways to reduce overall demand without unduly restricting the use of electricity is an important cost-saving measure. Cost – including energy affordability concerns – is a barrier described in the report.

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Appendix C: Clean Energy Facilities at EFSC

The Oregon Department of Energy is preparing several appendices to summarize additional information relevant to the [Report on Reducing Barriers to Clean Energy Deployment](#). This appendix provides information about proposed wind, solar, and battery storage facilities with a nameplate capacity over 20 megawatts that have received siting approval from the Energy Facility Siting Council (via an approved site certificate) but were not built, were not fully built, or are not yet built.

This appendix is still under development and will be included with the final version of the report in September. For those reviewing the draft version of the report, ODOE suggests as a possible reference the [latest monthly facility status update](#). For more information, please see the [EFSC website](#).

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Appendix D: Assessment of Public Comments on Barriers to Clean Energy Deployment

This appendix provides additional information about the comments ODOE received about barriers to clean energy deployment and how ODOE considered them in developing the initial inventory of barriers in the main report.

As described in the report, this appendix documents the comments received so far about barriers and ODOE’s assessment of that input, considering ODOE’s ongoing research into barriers. This appendix contains every public comment’s statement about a barrier. Also noted in this appendix: 1) where ODOE disagreed that an item constituted a distinct “barrier”^{xlii} for purposes of this report’s inventory; 2) where a public comment addresses something beyond the scope of this report; and 3) where a statement informed ODOE’s identification of any of the barriers described in this report. ODOE reviewed all comments and appreciates the input.

Please remember this report has a focused scope. As described in the report, “barriers to the permitting ... of clean energy projects” includes consideration of barriers that may arise in permitting processes that are outside EFSC’s jurisdiction and are not required to be completed prior to receipt of an approved site certificate from EFSC or an approved county land-use permit. For example, it includes consideration of barriers that may arise in certain federal permitting requirements. However, it does not examine any aspect of EFSC’s processes nor any aspect of Tribal consultation requirements that must be met before EFSC issues a site certificate or a county issues a land use permit. This interpretation is consistent with the report’s interpretation that “clean energy projects” means certain facilities that already received siting approval but are not built or under construction.

Below are two tables. Table 1 is a simplified version of Table 2. Table 2 has five columns:

- The first column is the number of the statement (ODOE counted 82 total),
- The second column either is marked as null (“-”) or is the number of the statement within the scope of this report (ODOE counted 22 total);
- The third column is an abbreviated form of commenter’s name;^{xliiii}
- The fourth column is the exact language of the comment received; and
- The fifth column indicates how the statement was inventoried into the draft report or indicates why the statement was not included. Rows for the latter category are color-coded in gray and are marked as null (“-”) in the second column.

^{xlii} ODOE did not adopt a formal definition for what constitutes a “barrier” for purposes of this draft report, but in its review, ODOE did consider the draft definition proposed by DLCD for their forthcoming report pursuant to EO 25-29 section 1(2)(b): ““Barriers” means existing state or local land use provisions or policies, or the absence of such provisions or policies, that unnecessarily constrain siting approvals for clean energy generation project or transmission in areas considered well suited for development. When provisions or polices are present, barriers may be found based on complexity, redundancies, superfluous, or a lack of local resources.” As noted in the prior section, land use is largely outside this report’s scope.

^{xliiii} The first time an abbreviated form is used in either table, there is a footnote with the commenter’s full name.

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The first table is limited to the 22 statements within the scope of this report. It omits the first column described above.

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Table 1. Public Comment Excerpts About Barriers Within the Scope of this Report and ODOE’s Assessment

Scope #	ID	Comment	ODOE’s Assessment
1.	CREA ^{xliv}	<p>13. Have you experienced or witnessed any barriers to permitting large-scale energy infrastructure that are not described in a prior response?</p> <p>“Overall, we hear the barriers are length of time to go through the permitting process and the cost to get the permit. Those has been consistently the concerns we hear in discussions. Reducing those two pieces would be encouraged, since it is helpful for developers.”</p>	<p>Barrier: Cost</p> <p>Barrier: Unexpected delays</p>
2.	CREA	<p>15. Have you experienced or witnessed any market-driven barriers to interconnection of largescale energy infrastructure that are not described in a prior response? Please identify the specific interconnection queue(s) and whether the project(s) at issue was subject to state or federal jurisdiction.</p> <p>“Insufficient high voltage transmission capacity - incumbent utilities are understandably reluctant to expose ratepayers to the risks of developing inter-regional high voltage transmission, which is necessary to connect new, diverse energy sources. Such projects are high-cost, high-risk endeavors that, if unsuccessful, can lead to including the cost of development costs and stranded assets in rates.”</p>	<p>Barrier: Cost</p> <p>Barrier: Limited grid capacity</p>

^{xliv} “CREA” is the Community Renewable Energy Association.

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Scope #	ID	Comment	ODOE’s Assessment
3.	CREA	<p>17. Have you experienced or witnessed any market-driven barriers to construction of large-scale energy infrastructure that are not described in a prior response? ODOE anticipates that market-driven barriers to construction may arise from national or international markets, such as the cost and availability of needed equipment, or from state or local markets, such as local workforce availability.</p> <p>“Solar and wind are clean energy options we can produce in our state today, with many benefits – supplemental funds for landowners, increased taxes and benefit agreements, jobs, and resiliency from home-grown power. Solar remains the cheapest energy source, yet the Federal government seems determined to bring back more coal and oil, which will not help Oregonians or the energy industry here. CREA would prefer to see more investment and consideration of innovative clean technologies, like off-shore wind or hydrogen production and transport.”</p>	<p>Barrier: Cost</p> <p>Barrier: Limited cross-jurisdictional coordination</p>
4.	Joint ^{xlv}	“State agencies involved in siting and permitting may face staffing constraints that affect review timelines.”	Barrier: Limited staffing capacity
5.	NSE ^{xlvi}	“part of the difficulty is the lack of communication between the agencies [ODOE, PUC, DLCD] themselves”	Barrier: Limited cross-jurisdictional coordination
6.	NSE	“The Public Utility Commission oversees the request for proposals (“RFP”) process. This is the process utilities must use to procure generation to meet their needs while complying with HB 2021 goals. This process has numerous flaws, but the two main barriers for developers like NewSun are the bias towards utility ownership, and Utilities have an incentive to select their own projects because they will earn a profit on those projects’ operation, whereas they do not earn a profit on power purchased from a facility owned by someone else.”	Barrier: Cost

^{xlv} “Joint” is the group of joint commenters: Climate Solutions, The Nature Conservancy, Oregon Environmental Council, Green Energy Institute at Lewis & Clark Law School, Columbia Riverkeeper, Renewable Northwest, Oregon Business for Climate, and Douglas County Global Warming Coalition.

^{xlvi} “NSE” is NewSun Energy.

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Scope #	ID	Comment	ODOE’s Assessment
7.	NSE	“The Public Utility Commission oversees the request for proposals (“RFP”) process. This is the process utilities must use to procure generation to meet their needs while complying with HB 2021 goals. This process has numerous flaws, but the two main barriers for developers like NewSun are ..., and the generally unfavorable contracts used in that process.”	Barrier: Cost
8.	NSE	“delays in several [“Grid Expansion and Reinforcement Portfolio” or “GERP”]] schedules”	Barrier: Unexpected delays Barrier: Limited grid capacity
9.	NSE	“the risk that ... timelines extend past ITC eligibility windows”	Barrier: Cost Barrier: Unexpected delays Barrier: Limited cross-jurisdictional coordination
10.	NSE	“Requiring developers to fund full network upgrades (as discussed below), even though system-wide benefits exist, increases project costs and discourages participation. ... For projects in the state queue, qualifying facilities (“QFs”) still have to pay 100% of any network upgrades they incur by making the interconnection request.”	Barrier: Cost Barrier: Limited grid capacity
11.	OSSIA <small>xlvi</small>	“The delay in 2026 for most solar projects in Oregon is not EFSC but BPA or Pacific Power interconnection. Eight years ago when industry concerns about EFSC surfaced, BPA was moving more quickly. Now BPA is the primary delay - it took 10 years for the recently completed Prineville substation to be constructed.”	Barrier: Unexpected delays Barrier: Limited grid capacity
12.	PGE <small>xlvi</small>	“PGE was pleased to see the strategy’s recognition of the most critical near-term challenges to providing reliable, affordable, and increasingly clean power including: • Customer affordability;”	Barrier: Cost

xlvi “OSSIA” is the Oregon Solar + Storage Industries Association.

xlvii “PGE” is Portland General Electric Company.

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Scope #	ID	Comment	ODOE’s Assessment
13.	PGE	<p>“PGE was pleased to see the strategy’s recognition of the most critical near-term challenges to providing reliable, affordable, and increasingly clean power including:</p> <p>....</p> <ul style="list-style-type: none"> • The ability to plan, build, and site new transmission infrastructure;” 	Barrier: Limited grid capacity
14.	PGE	<p>“PGE was pleased to see the strategy’s recognition of the most critical near-term challenges to providing reliable, affordable, and increasingly clean power including:</p> <p>...</p> <ul style="list-style-type: none"> • The loss of federal policy supports and incentives, as well as a constrained state budget environment.” 	Barrier: Cost Barrier: Limited cross-jurisdictional coordination
15.	PGE	<p>The sixth step in EFSC’s review process is the Contested Case. What barriers to project development or to public participation, if any, have you experienced or witnessed during this stage of the process?</p> <p>“Occasional appeals delaying decisions.”</p>	Barrier: Unexpected Delays
16.	PGE	<p>Have you experienced or witnessed any administrative barriers to interconnection of large-scale energy infrastructure that are not described in a prior response? Please identify the specific interconnection queue(s) and whether the project(s) at issue was subject to state or federal jurisdiction.</p> <p>“Transmission provider (BPA) interconnection queues contain more projects than the grid can accommodate.”</p>	Barrier: Limited grid capacity
17.	PGE	<p>Have you experienced or witnessed any administrative barriers to interconnection of large-scale energy infrastructure that are not described in a prior response? Please identify the specific interconnection queue(s) and whether the project(s) at issue was subject to state or federal jurisdiction.</p> <p>“Transmission provider (BPA) adjusting from serial to cluster study approach.”</p>	Barrier: Unexpected delays Barrier: Limited grid capacity

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Scope #	ID	Comment	ODOE’s Assessment
18.	PGE	Have you experienced or witnessed any administrative barriers to interconnection of large-scale energy infrastructure that are not described in a prior response? Please identify the specific interconnection queue(s) and whether the project(s) at issue was subject to state or federal jurisdiction. “Uncertainty as to magnitude of interconnection upgrade costs.”	Barrier: Cost Barrier: Limited grid capacity
19.	PGE	“long lead times and bottlenecks in the interconnection queue”	Barrier: Unexpected delays Barrier: Limited availability of equipment and supplies Barrier: Limited grid capacity
20.	REC ^{xlix}	“With respect to potential requirements for facility interconnection, pollution control, or other upgrades facing the continuing operation of Oregon PURPA resources, there is considerable concern and potential delay in the procurement and delivery timelines for essential components. Mostly, this concern in for the timely availability of transformers and substations should upgrades be required for recommissioning of mothballed PURPA facilities.”	Barrier: Limited availability of equipment and supplies
21.	RNW ^l	“Siting and permitting is only one step in the full development lifecycle of a project. Many subsequent processes like advancing in the interconnection queue and bidding into an RFP are dependent on the completion of EFSC permitting.”	Barrier: Limited cross-jurisdictional coordination
22.	RNW	“Further, some members have reported that permitting costs are increasing in all three categories where costs are incurred: pre-construction, construction, and operations.”	Barrier: Cost

^{xlix} “REC” is the Renewable Energy Coalition.

^l “RNW” is Renewable Northwest.

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Table 2. Public Comment Excerpts About Barriers and ODOE’s Assessment

#	Scope #	ID	Comment	ODOE’s Assessment
1.	1.	CREA ^{li}	<p>13. Have you experienced or witnessed any barriers to permitting large-scale energy infrastructure that are not described in a prior response?</p> <p>“Overall, we hear the barriers are length of time to go through the permitting process and the cost to get the permit. Those has been consistently the concerns we hear in discussions. Reducing those two pieces would be encouraged, since it is helpful for developers.”</p>	<p>Barrier: Cost</p> <p>Barrier: Unexpected delays</p>
2.	2.	CREA	<p>15. Have you experienced or witnessed any market-driven barriers to interconnection of largescale energy infrastructure that are not described in a prior response? Please identify the specific interconnection queue(s) and whether the project(s) at issue was subject to state or federal jurisdiction.</p> <p>“Insufficient high voltage transmission capacity - incumbent utilities are understandably reluctant to expose ratepayers to the risks of developing inter-regional high voltage transmission, which is necessary to connect new, diverse energy sources. Such projects are high-cost, high-risk endeavors that, if unsuccessful, can lead to including the cost of development costs and stranded assets in rates.”</p>	<p>Barrier: Cost</p> <p>Barrier: Limited grid capacity</p>
3.	-	CREA	<p>16. Have you experienced or witnessed any administrative barriers to construction of large-scale energy infrastructure that are not described in a prior response? Please note and describe if you see the barrier as arising specifically from a state administrative process.</p> <p>“Yes. Land use siting remains a huge barrier, especially for solar projects, even when being sited in rural areas in Eastern Oregon.”</p>	<p>Other: Land use siting</p> <p>ODOE disagrees that siting is itself a “barrier” for purposes of this report. Siting is one of many steps necessary in facility development.</p>

^{li} “CREA” is the Community Renewable Energy Association.

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#	Scope #	ID	Comment	ODOE's Assessment
4.	-	CREA	<p>16. Have you experienced or witnessed any administrative barriers to construction of large-scale energy infrastructure that are not described in a prior response? Please note and describe if you see the barrier as arising specifically from a state administrative process.</p> <p>“The EFSC process, as it applies to high voltage transmission project applicants, is designed for traditional utilities, rather than independent transmission developers. Independents, for example, construct projects on a cost-competitive EPC basis, therefore certain details required in the EFSC process, such as how many truckloads of dirt will be required, amount of concrete to be used, and where spoils will be disposed of, will be finalized by the bid-winning EPC provider. These cost and supply risks are taken by the EPC contractor and independent developer. A utility applicant that is performing detailed engineering internally, as many utilities do, or through established contracts is more likely be able to provide such details far in advance and the cost and supply risks borne by the utility and its ratepayers.”</p>	<p>Other: Aspects specific to EFSC and/or the EFSC process</p> <p>This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workstream.</p>

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#	Scope #	ID	Comment	ODOE’s Assessment
5.	3.	CREA	<p>17. Have you experienced or witnessed any market-driven barriers to construction of large-scale energy infrastructure that are not described in a prior response? ODOE anticipates that market-driven barriers to construction may arise from national or international markets, such as the cost and availability of needed equipment, or from state or local markets, such as local workforce availability.</p> <p>“Solar and wind are clean energy options we can produce in our state today, with many benefits – supplemental funds for landowners, increased taxes and benefit agreements, jobs, and resiliency from home-grown power. Solar remains the cheapest energy source, yet the Federal government seems determined to bring back more coal and oil, which will not help Oregonians or the energy industry here. CREA would prefer to see more investment and consideration of innovative clean technologies, like off-shore wind or hydrogen production and transport.”</p>	<p>Barrier: Cost</p> <p>Barrier: Limited cross-jurisdictional coordination</p>
6.	-	Joint ^{lii}	<p>“There is currently no standardized or transparent definition of what constitutes sufficient or effective community engagement for large-scale energy projects.”</p>	<p>Other: Competing Land Use Priorities</p> <p>This statement is out of scope for this draft report, which is focused on projects that have already obtained siting approval.</p> <p>Other: Aspects specific to EFSC and/or the EFSC process</p> <p>This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workstream.</p>

^{lii} “Joint” is the group of joint commenters: Climate Solutions, The Nature Conservancy, Oregon Environmental Council, Green Energy Institute at Lewis & Clark Law School, Columbia Riverkeeper, Renewable Northwest, Oregon Business for Climate, and Douglas County Global Warming Coalition.

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#	Scope #	ID	Comment	ODOE’s Assessment
7.	-	Joint	“Oregon’s land use framework is not fully aligned with state clean energy deployment goals. Most renewable energy projects permitted through EFSC require a “Goal 3 exception.” Under Oregon’s land use planning system, Goal 3 supports the protection of the state’s farmland and requires local jurisdictions to impose restrictions on development on farmland. To obtain a Goal 3 exception, developers have to provide “reasons” that justify such an exception to Oregon’s land use planning goals. Over time the criteria for justifying a Goal 3 exception have become increasingly narrow for siting large scale solar. For example, EFSC has historically considered local economic benefits broadly as a suitable justification, but more recently has required benefits specifically to the local agricultural economy. Moreover, developers cannot point to policies like HB 2021 or the statewide RPS as “reasons” that justify an exception to Goal 3. This creates a major barrier to deploying clean energy resources at the scale needed to meet state climate and clean energy laws and represents a fundamental misalignment between Oregon’s land use policies and energy policies.”	Other: Competing Land Use Priorities This statement is out of scope for this draft report, which is focused on projects that have already obtained siting approval. Other: Aspects specific to EFSC and/or the EFSC process This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workstream.
8.	4.	Joint	“State agencies involved in siting and permitting may face staffing constraints that affect review timelines.”	Barrier: Limited staffing capacity
9.	5.	NSE ^{liii}	“part of the difficulty is the lack of communication between the agencies [ODOE, PUC, DLCD] themselves”	Barrier: Limited cross-jurisdictional coordination

^{liii} “NSE” is NewSun Energy.

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#	Scope #	ID	Comment	ODOE's Assessment
10.	6.	NSE	“The Public Utility Commission oversees the request for proposals (“RFP”) process. This is the process utilities must use to procure generation to meet their needs while complying with HB 2021 goals. This process has numerous flaws, but the two main barriers for developers like NewSun are the bias towards utility ownership, and Utilities have an incentive to select their own projects because they will earn a profit on those projects’ operation, whereas they do not earn a profit on power purchased from a facility owned by someone else.”	Barrier: Cost
11.	7.	NSE	“The Public Utility Commission oversees the request for proposals (“RFP”) process. This is the process utilities must use to procure generation to meet their needs while complying with HB 2021 goals. This process has numerous flaws, but the two main barriers for developers like NewSun are ..., and the generally unfavorable contracts used in that process.”	Barrier: Cost
12.	-	NSE	“Barrier: Goal 3 and associated Exclusive Farm Use (“EFU”) constraints remain a primary barrier to siting energy infrastructure by limiting viable locations, increasing project costs, and creating uncertainty. ... From a land use perspective, the primary barrier and challenge to acquiring permits is the broad requirement to acquire a Goal 3 exception, which is an objective standard highly prone to appeal and unfavorable case law. EFU Zones cover large portions of have strong solar or wind power potential, but they are subject to Goal 3 protections, which makes renewable energy development difficult.”	Other: Competing Land Use Priorities This statement is out of scope for this draft report, which is focused on projects that have already obtained siting approval.
13.	8.	NSE	“delays in several [“Grid Expansion and Reinforcement Portfolio” or “GERP”)] schedules”	Barrier: Unexpected delays Barrier: Limited grid capacity

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#	Scope #	ID	Comment	ODOE's Assessment
14.	9.	NSE	“the risk that ... timelines extend past ITC eligibility windows”	Barrier: Cost Barrier: Unexpected delays Barrier: Limited cross-jurisdictional coordination
15.	-	NSE	“ODOT and local jurisdictions are consistently not allowing transmission and gen-tie lines within public rights-of-way, despite statutory direction under HB 3179. ... the Oregon Department of Transportation (“ODOT”) has regularly denied or refused to process applications to locate transmission lines within highway rights-of-way. ... House Bill 3179 amended ORS 374.305 to read, “In reviewing or granting an application for written permission [to place a transmission line in the right-of-way], the department or a county court or board of county commissioners may not discriminate against or favor a renewable energy facility.” Despite the statutory mandate, ODOT has not granted such decisions to our knowledge.”	Other: Limitations on transmission in public rights-of-way This report is not examining barriers to transmission development. This input has been shared with other agency staff for consideration in workstreams focused on transmission.
16.	10.	NSE	“Requiring developers to fund full network upgrades (as discussed below), even though system-wide benefits exist, increases project costs and discourages participation. ... For projects in the state queue, qualifying facilities (“QFs”) still have to pay 100% of any network upgrades they incur by making the interconnection request.”	Barrier: Cost Barrier: Limited grid capacity
17.	-	NSE	“Barrier: We will not meet the HB 2021 Clean Energy Targets. As reported by The Oregonian, it is very unlikely that Oregon utilities will meet the emissions targets for HB 2021 (see chart below).16”	Other: Projections of insufficient clean energy to meet clean energy targets ODOE disagrees that a projection of insufficient clean energy is itself a “barrier” to clean energy deployment.

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#	Scope #	ID	Comment	ODOE’s Assessment
18.	-	ONDA ^{liv}	“Certain past proposals for renewable energy siting in Oregon’s high desert were poorly designed and extremely contentious, pitting potential partners in clean energy development against each other in prolonged, costly litigation that could have been prevented with better planning and smarter siting prerequisites. Eighteen years ago proposals failed to consider other resource needs and were as audacious as siting wind turbines atop Oregon’s inimitable Steens Mountain.”	Other: Competing Land Use Priorities This statement is out of scope for this draft report, which is focused on projects that have already obtained siting approval.
19.	-	OSSIA ^{lv}	“1. Before applying to EFSC a project developer can undertake preliminary activities and begin public engagement. This time period before a developer comes to EFSC is referred to as PreNotice of Intent. What barriers to project development or to public participation, if any, have you experienced or witnessed during this time period? EFSC is not a body of experts in energy facilities, their construction or operation, but rather an expert in the process of navigating the path to approval. ...”	Other: Aspects specific to EFSC and/or the EFSC process This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workstream.
20.	11.	OSSIA	“The delay in 2026 for most solar projects in Oregon is not EFSC but BPA or Pacific Power interconnection. Eight years ago when industry concerns about EFSC surfaced, BPA was moving more quickly. Now BPA is the primary delay - it took 10 years for the recently completed Prineville substation to be constructed.”	Barrier: Unexpected delays Barrier: Limited grid capacity

^{liv} “ONDA” is the Oregon Natural Desert Association.

^{lv} “OSSIA” is the Oregon Solar + Storage Industries Association.

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#	Scope #	ID	Comment	ODOE's Assessment
21.	-	OSSIA	“When Obsidian’s Solar Center required an [EFSC] amendment to change the date for beginning of construction due to BPA [interconnection] delays, the date change required hundreds of hours of EFSC staff time and \$100,000 of additional developer expense.”	Other: Aspects specific to EFSC and/or the EFSC process This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workstream.
22.	-	OSSIA	“EFSC processes are stuck in the past and need modernize.. EFSC doesn’t need to hire people and pay them for 100’s of hours to confirm completion of application. AI algorithms can read through an application and figure out if the application is complete, providing automated notices to applicants to self correct inconsistent or insufficient information.”	Other: Aspects specific to EFSC and/or the EFSC process This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workstream.

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23.	-	OSSIA	<p>“EFSC has concluded that a solar farm will reach the end of its life and after must be completely dismantled and the site returned to a pre-development agricultural state.. This may make sense in some high value farm lands but the solar farms in EFSC jurisdiction are almost always on rocky, unirrigated, low productive farm land without expectation for returning to this pre-energy development, marginal value. The greatest level of effort for developing utility scale renewable energy resources is around siting, funding and constructing the substation and transmission lines. Once that has occurred, the land is now a rare and valuable energy asset and it will make sense to continue that use as an energy hosting site beyond the anticipated life of the solar or battery. For example, Obsidian Renewable’s Fort Rock property has never made any revenue from agricultural activities. The owners couldn't even fund fence maintenance. The land had never been cultivated, plowed, or irrigated and is situated in a watershed with a decades old development moratorium. Obligating the project developer to post a bond to pay for the entire cost of removal and decompaction of soils after 35 years and to maintain the bond even though this agricultural restoration is highly unlikely and not in alignment with Oregon’s clean energy objectives does not make sense. It is far more likely that after 35 years the site will be re-energized with updated renewable energy technology and remain in energy service to the state.”</p>	<p>Other: Aspects specific to EFSC and/or the EFSC process</p> <p>This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workstream.</p>
24.	-	OSSIA	<p>“EFSC is a volunteer council and does not have the capacity to assess/process applications thoroughly in a timely fashion.”</p>	<p>Other: Aspects specific to EFSC and/or the EFSC process</p> <p>This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workstream.</p>

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#	Scope #	ID	Comment	ODOE's Assessment
25.	-	OSSIA	“EFSC does not have a mechanism to approve non-controversial applications without fulfilling lengthy meeting requirements, leading to extensive agendas that take unreasonably long to complete - requiring more meetings.”	Other: Aspects specific to EFSC and/or the EFSC process This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workstream.
26.	12.	PGE ^{lvi}	“PGE was pleased to see the strategy’s recognition of the most critical near-term challenges to providing reliable, affordable, and increasingly clean power including: • Customer affordability;”	Barrier: Cost
27.	-	PGE	“PGE was pleased to see the strategy’s recognition of the most critical near-term challenges to providing reliable, affordable, and increasingly clean power including: ... • The escalating risks associated with wildfires;”	Other: Wildfire risk ODOE acknowledges wildfire risk can be a significant contributing factor to the issues of cost discussed in the report. However, wildfire risk is also an issue broader than the scope of this report. The Oregon Energy Strategy included a policy action on this issue (Electricity Action 2), which is now underway. For more information, please see OPUC Docket No. UM 2427 , In the Matter of Public Utility Commission of Oregon, Study on Utility Wildfire Liability and Accountability.

^{lvi} “PGE” is Portland General Electric Company.

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#	Scope #	ID	Comment	ODOE's Assessment
28.	-	PGE	<p>“PGE was pleased to see the strategy’s recognition of the most critical near-term challenges to providing reliable, affordable, and increasingly clean power including:</p> <p>...</p> <ul style="list-style-type: none"> • The need to maintain reliability amid increasingly severe weather, capacity shortages as baseload plants retire, and rapidly growing electricity demand;” 	<p>Other: Need to maintain reliability given challenges</p> <p>ODOE intends this report to help address this issue. However, this statement is not indicative of a discrete “barrier” for purposes of this report.</p>
29.	13.	PGE	<p>“PGE was pleased to see the strategy’s recognition of the most critical near-term challenges to providing reliable, affordable, and increasingly clean power including:</p> <p>....</p> <ul style="list-style-type: none"> • The ability to plan, build, and site new transmission infrastructure;” 	Barrier: Limited grid capacity
30.	14.	PGE	<p>“PGE was pleased to see the strategy’s recognition of the most critical near-term challenges to providing reliable, affordable, and increasingly clean power including:</p> <p>...</p> <ul style="list-style-type: none"> • The loss of federal policy supports and incentives, as well as a constrained state budget environment.” 	<p>Barrier: Cost</p> <p>Barrier: Limited cross-jurisdictional coordination</p>
31.	-	PGE	<p>Before applying to EFSC, a project developer can undertake preliminary activities and begin public engagement. This time period before a developer comes to EFSC is referred to as Pre-Notice of Intent. What barriers to project development or to public participation, if any, have you experienced or witnessed during this time period?</p> <p>“Fragmented ownership or unwilling landowners can slow or halt development, particularly as it relates to transmission”</p>	<p>Other: Competing Land Use Priorities</p> <p>This statement is out of scope for this draft report, which is focused on projects that have already obtained siting approval.</p>

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#	Scope #	ID	Comment	ODOE's Assessment
32.	-	PGE	<p>Before applying to EFSC, a project developer can undertake preliminary activities and begin public engagement. This time period before a developer comes to EFSC is referred to as Pre-Notice of Intent. What barriers to project development or to public participation, if any, have you experienced or witnessed during this time period?</p> <p>“Projects must show a viable transmission path and if BPA or another transmission provider hasn’t granted service, EFSC may request additional analysis.”</p>	<p>Other: Aspects specific to EFSC and/or the EFSC process</p> <p>This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workstream.</p>
33.	-	PGE	<p>The third step in EFSC’s review process is the Application. What barriers to project development or to public participation, if any, have you experienced or witnessed during this stage of the process?</p> <p>“A lot of information is required without clarity as to how it is used in determining if a site certificate should be issued.”</p>	<p>Other: Aspects specific to EFSC and/or the EFSC process</p> <p>This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workstream.</p>
34.	-	PGE	<p>The fourth step in EFSC’s review process is the Draft Proposed Order. What barriers to project development or to public participation, if any, have you experienced or witnessed during this stage of the process?</p> <p>“Wildlife and/or habitat concerns (sage grouse, avian).”</p>	<p>Other: Competing Land Use Priorities</p> <p>This statement is out of scope for this draft report, which is focused on projects that have already obtained siting approval.</p>
35.	-	PGE	<p>The fourth step in EFSC’s review process is the Draft Proposed Order. What barriers to project development or to public participation, if any, have you experienced or witnessed during this stage of the process?</p> <p>“Projects on high-value farmland or protected land often face significant restrictions or mitigation requirements.”</p>	<p>Other: Competing Land Use Priorities</p> <p>This statement is out of scope for this draft report, which is focused on projects that have already obtained siting approval.</p>

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36.	-	PGE	<p>The fourth step in EFSC's review process is the Draft Proposed Order. What barriers to project development or to public participation, if any, have you experienced or witnessed during this stage of the process?</p> <p>"Duplication of permit requirements as site certificate conditions, which could unnecessarily require an amendment down the road if the lead agency changes standard permit conditions that should not trigger an amendment and review by Council if the lead agency has evaluated the permit and determined the change is still protective."</p>	<p>Other: Aspects specific to EFSC and/or the EFSC process</p> <p>This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workstream.</p>
37.	-	PGE	<p>The fifth step in EFSC's review process is the Proposed Order. There is not an explicit process for public participation in this step. What barriers to project development, if any, have you experienced or witnessed during this stage of the process?</p> <p>"Organized local opposition of farmland, wildlife impacts, scenic impacts, property value concerns."</p>	<p>Other: Competing Land Use Priorities</p> <p>This statement is out of scope for this draft report, which is focused on projects that have already obtained siting approval.</p>
38.	-	PGE	<p>The fifth step in EFSC's review process is the Proposed Order. There is not an explicit process for public participation in this step. What barriers to project development, if any, have you experienced or witnessed during this stage of the process?</p> <p>"Extensive comment records and requests for additional studies that can result in an elongated and costly process."</p>	<p>Other: Competing Land Use Priorities</p> <p>This statement is out of scope for this draft report, which is focused on projects that have already obtained siting approval.</p> <p>Other: Aspects specific to EFSC and/or the EFSC process</p> <p>This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workstream.</p>

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#	Scope #	ID	Comment	ODOE’s Assessment
39.	-	PGE	The sixth step in EFSC’s review process is the Contested Case. What barriers to project development or to public participation, if any, have you experienced or witnessed during this stage of the process? “Intervention by landowner coalitions, environmental NGOs.”	Other: Competing Land Use Priorities This statement is out of scope for this draft report, which is focused on projects that have already obtained siting approval. Other: Aspects specific to EFSC and/or the EFSC process This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workstream.
40.	-	PGE	The sixth step in EFSC’s review process is the Contested Case. What barriers to project development or to public participation, if any, have you experienced or witnessed during this stage of the process? “Legal discovery and expert testimony.”	Other: Aspects specific to EFSC and/or the EFSC process This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workstream.
41.	15.	PGE	The sixth step in EFSC’s review process is the Contested Case. What barriers to project development or to public participation, if any, have you experienced or witnessed during this stage of the process? “Occasional appeals delaying decisions.”	Barrier: Unexpected Delays

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#	Scope #	ID	Comment	ODOE's Assessment
42.	-	PGE	<p>Have you experienced or witnessed any barriers to permitting large-scale energy infrastructure that are not described in a prior response?</p> <p>“Federally managed lands require BLM or US Forest Service action to obtain right of ways.”</p>	<p>Other: Permitting requirements</p> <p>ODOE disagrees that this statement reflects a “barrier” for purposes of this report. However, ODOE acknowledges the item can be implicated in certain barriers, including unexpected delays, limited staffing capacity, and limited cross-jurisdictional coordination.</p>
43.	-	PGE	<p>Have you experienced or witnessed any barriers to permitting large-scale energy infrastructure that are not described in a prior response?</p> <p>“NEPA processes can cause significant delays.”</p>	<p>Other: Permitting requirements</p> <p>ODOE disagrees that this statement reflects a “barrier” for purposes of this report. However, ODOE acknowledges the item can be implicated in certain barriers, including unexpected delays, limited staffing capacity, and limited cross-jurisdictional coordination.</p>

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#	Scope #	ID	Comment	ODOE's Assessment
44.	-	PGE	<p>Have you experienced or witnessed any barriers to permitting large-scale energy infrastructure that are not described in a prior response?</p> <p>“Tribal consultation and cultural resource protection play an increasingly important role.”</p>	<p>Other: Tribal consultation and cultural resource protection</p> <p>ODOE interprets this statement as acknowledging an important aspect of facility permitting, not as flagging a “barrier” for purposes of this report. However, ODOE includes the statement here to acknowledge it was offered in response to a request for information on any barriers. ODOE also acknowledges Tribes, relevant state agencies, and other interested parties like local historical societies can suffer from limited staffing capacity and unmet workforce needs, two of the barriers described in the draft report.</p>
45.	-	PGE	<p>Have you experienced or witnessed any barriers to permitting large-scale energy infrastructure that are not described in a prior response?</p> <p>“Federal environmental review if the project involves federal land, federal permits, or federal funding (grants).”</p>	<p>Other: Permitting requirements</p> <p>ODOE disagrees that this statement reflects a “barrier” for purposes of this report. However, ODOE acknowledges the item can be implicated in certain barriers, including unexpected delays, limited staffing capacity, and limited cross-jurisdictional coordination.</p>

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#	Scope #	ID	Comment	ODOE's Assessment
46.	-	PGE	Have you experienced or witnessed any barriers to permitting large-scale energy infrastructure that are not described in a prior response? "Federal endangered species trigger consultation."	Other: Permitting requirements ODOE disagrees that this statement reflects a "barrier" for purposes of this report. However, ODOE acknowledges the item can be implicated in certain barriers, including unexpected delays, limited staffing capacity, and limited cross-jurisdictional coordination.
47.	-	PGE	Have you experienced or witnessed any barriers to permitting large-scale energy infrastructure that are not described in a prior response? "Projects affecting wetlands or waterways require permits."	Other: Permitting requirements ODOE disagrees that this statement reflects a "barrier" for purposes of this report. However, ODOE acknowledges the item can be implicated in certain barriers, including unexpected delays, limited staffing capacity, and limited cross-jurisdictional coordination.
48.	-	PGE	Have you experienced or witnessed any barriers to permitting large-scale energy infrastructure that are not described in a prior response? "State wildlife and natural resource reviews."	Other: Permitting requirements ODOE disagrees that this statement reflects a "barrier" for purposes of this report. However, ODOE acknowledges the item can be implicated in certain barriers, including unexpected delays, limited staffing capacity, and limited cross-jurisdictional coordination.

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#	Scope #	ID	Comment	ODOE's Assessment
49.	16.	PGE	<p>Have you experienced or witnessed any administrative barriers to interconnection of large-scale energy infrastructure that are not described in a prior response? Please identify the specific interconnection queue(s) and whether the project(s) at issue was subject to state or federal jurisdiction.</p> <p>“Transmission provider (BPA) interconnection queues contain more projects than the grid can accommodate.”</p>	Barrier: Limited grid capacity
50.	17.	PGE	<p>Have you experienced or witnessed any administrative barriers to interconnection of large-scale energy infrastructure that are not described in a prior response? Please identify the specific interconnection queue(s) and whether the project(s) at issue was subject to state or federal jurisdiction.</p> <p>“Transmission provider (BPA) adjusting from serial to cluster study approach.”</p>	<p>Barrier: Unexpected delays</p> <p>Barrier: Limited grid capacity</p>
51.	18.	PGE	<p>Have you experienced or witnessed any administrative barriers to interconnection of large-scale energy infrastructure that are not described in a prior response? Please identify the specific interconnection queue(s) and whether the project(s) at issue was subject to state or federal jurisdiction.</p> <p>“Uncertainty as to magnitude of interconnection upgrade costs.”</p>	<p>Barrier: Cost</p> <p>Barrier: Limited grid capacity</p>

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#	Scope #	ID	Comment	ODOE's Assessment
52.	-	PGE	<p>Do you have any recommendations for the State of Oregon to address the barriers you have described?</p> <p>“Wildfire risk is the most immediate risk to the electric sector</p> <p>Unbounded wildfire liability remains the single largest risk facing the electric sector in Oregon. Customers are already paying the price – through higher insurance costs, higher borrowing costs, and higher mitigation costs. Oregon’s economy is at risk, as liability uncertainty deters investment, raises the cost of new clean energy projects, and undermines the state’s decarbonization and economic development goals. Without action at the state and/or federal level, this risk threatens Oregon’s economy, limits clean energy deployment, and drives higher costs for all customers.</p> <p>As Oregon Public Utility Commission Chair Letha Tawney wrote her August 1, 2025, letter to Governor Kotek:</p> <p>‘Unbounded utility wildfire liability will drive up the cost of utility capital, raising the overall cost of every utility investment. It will also continue to require the prioritization of scarce capital towards extensive grid hardening, pressuring customer bills and limiting capacity for goals such as economic development and decarbonization, as we have observed in California.’</p> <p>To meaningfully work toward affordable, reliable, clean energy in Oregon, the state must recognize the connections between wildfire risk and other many other energy policies and prioritize addressing wildfire liability risk in the electric sector. This is not just a PGE problem – it is an Oregon problem that requires a statewide solution. Oregon can learn from other states that have taken action to provide utilities with liability limits or coverage mechanisms that protect customers, investors, and communities alike.”</p>	<p>Other: Wildfire risk</p> <p>ODOE acknowledges wildfire risk can be a significant contributing factor to the issues of cost discussed in the report. However, wildfire risk is also an issue broader than the scope of this report. The Oregon Energy Strategy included a policy action on this issue (Electricity Action 2), which is now underway. For more information, please see OPUC Docket No. UM 2427, In the Matter of Public Utility Commission of Oregon, Study on Utility Wildfire Liability and Accountability.</p>

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#	Scope #	ID	Comment	ODOE's Assessment
53.	-	PGE	"One of the largest obstacles at EFSC is the inability of the council to evaluate any clean energy project as necessarily conducive to the state's climate and clean energy goals."	Other: Aspects specific to EFSC and/or the EFSC process This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workstream.
54.	19.	PGE	"long lead times and bottlenecks in the interconnection queue"	Barrier: Unexpected delays Barrier: Limited availability of equipment and supplies Barrier: Limited grid capacity

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#	Scope #	ID	Comment	ODOE's Assessment
55.	-	PGE	"Some of the technologies required to reach 100% clean electricity have not reached commercial maturity or are still in development."	<p>Other: Emerging technologies not yet commercially available</p> <p>This report is focused on commercially available forms of wind, solar, and battery energy storage. The Oregon Energy Strategy recognized that "The energy strategy modeling clearly indicated the value of having high-capacity resources to complement hydro and variable renewable resources on the electricity system. Several emerging technologies may help meet this need; however, today it is not clear which will present the most cost-competitive opportunities for Oregon." The Energy Strategy recommended a policy action to inform this need (Electricity Action 6). That work is now underway to comply with EO 25-29 section 1(3)(b), which directs ODOE to report progress and key findings about advanced and emerging technologies in ODOE's Biennial Energy Reports.</p>

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#	Scope #	ID	Comment	ODOE's Assessment
56.	-	REC ^{lvii}	<p>“Existing PURPA facilities are poised to continue or reinstate operations ahead of Oregon’s 2030 Small Scale Renewable obligation period but are at risk of closure upon expiration of PPAs if they are unable to align the costs of ongoing operations with published avoided costs that do not fully recognize and monetize facility attributes.</p> <p>In some cases, Title V, or other necessary environmental operating permit renewals, have included requirements for capital intensive facility upgrades upon expiration of the existing and execution of a new PPA. In this case, these highly reliable, Oregon located renewable energy assets face risk of permanent closure if unable to finance capital intensive upgrades.</p> <p>...</p> <p>The above described scenario [regarding interconnection uncertainty] is compounded by lack of certainty with respect to PPA offtake pricing necessary to support both the reliable operation of the facility and the debt service for any required interconnection investments. Without a price point, projects face offtake uncertainty. Without an offtake and a defined revenue projection project owners are unable to secure financing.”</p>	<p>Other: Existing facilities</p> <p>This statement is out of scope for this draft report, which is focused on proposed facilities that are not yet built. ODOE acknowledges further investigation into barriers faced by existing facilities may be appropriate.</p>

^{lvii} “REC” is the Renewable Energy Coalition.

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#	Scope #	ID	Comment	ODOE's Assessment
57.	-	REC	<p>“For some of REC’s existing and previous members, the expiration of a PPA subject to PURPA procurement has triggered closure of the facility based on contemporary avoided cost calculations that did not support continued operations. In these cases, previously permitted, constructed, operating, and interconnected facilities that were temporarily moth balled due to inadequate published avoided cost pricing, now contemplating recommissioning to serve Oregon ratepayers, face the daunting task of re-initiating the lengthy, costly, and uncertain pathway of new generation interconnection requests without any recognition or expeditious treatment consideration for their historical interconnected and load deliverability status. This lack of interconnect-ability certainty results in PPA availability and pricing uncertainty, both of which undermine a facilities ability to access the necessary capital to navigate and complete any necessary network or facility upgrades.”</p>	<p>Other: Existing facilities</p> <p>This statement is out of scope for this draft report, which is focused on proposed facilities that are not yet built. ODOE acknowledges further investigation into barriers faced by existing facilities may be appropriate.</p>
58.	20.	REC	<p>“With respect to potential requirements for facility interconnection, pollution control, or other upgrades facing the continuing operation of Oregon PURPA resources, there is considerable concern and potential delay in the procurement and delivery timelines for essential components. Mostly, this concern in for the timely availability of transformers and substations should upgrades be required for recommissioning of mothballed PURPA facilities.”</p>	<p>Barrier: Limited availability of equipment and supplies</p>

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#	Scope #	ID	Comment	ODOE’s Assessment
59.	-	RNW	<p>“The EFSC process has many advantages, including its standards-based nature, well-established stages, rigorous review, and robust public engagement, all of which serve to ensure that a project is sited appropriately, mitigates impacts on people and nature to the greatest extent possible, and complies with state standards. However, what we consistently heard in our conversations with our members is that the time and money required to permit a project at EFSC is a huge barrier. The extended timelines and costs are driven by a variety of factors, including the detailed analysis required very early in the development process, the lack of discretion in the review process afforded by EFSC, and the misalignment between land use policy and energy policy. Some developers have opted out of the EFSC process entirely because of the time and cost involved.</p> <p>Ultimately, the longer and more costly project development is, the more costly energy will be for Oregonians. While some of the siting and permitting barriers we outline in the following comments may seem minor, their cumulative impact is significant and can lead to continual delays and escalating costs.</p> <p>...</p> <p>Our members consistently pointed to the EFSC site certificate timeline as a key barrier to clean energy deployment. Clean energy projects typically take 18-24 months to permit at EFSC, and that timeframe does not include an extended contested case process. In comparison, projects that are permitted at the county level generally take a year at most.”</p>	<p>Other: Aspects specific to EFSC and/or the EFSC process</p> <p>This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration for that purpose.</p>

^{lviii} “RNW” is Renewable Northwest.

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#	Scope #	ID	Comment	ODOE's Assessment
60.	21.	RNW	“Siting and permitting is only one step in the full development lifecycle of a project. Many subsequent processes like advancing in the interconnection queue and bidding into an RFP are dependent on the completion of EFSC permitting.”	Barrier: Limited cross-jurisdictional coordination
61.	-	RNW	“projects can get caught up in endless cycles of requests for additional information (“RAIs”), with little additional value added”	Other: Aspects specific to EFSC and/or the EFSC process This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workstream.
62.	-	RNW	“contested cases are not time bound, which means this phase holds a lot of uncertainty for project developers. It is unclear how long contested cases are supposed to take and it is hard to know when the process will be completed	Other: Aspects specific to EFSC and/or the EFSC process This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workstream.
63.	-	RNW	“it is difficult to make minor changes to a project without triggering extended review. Site certificate amendments are required for circumstances like extending construction deadlines, adopting newer technologies, adding new facility components, and transferring the site certificate to a new owner. We acknowledge that EFSC has made several updates to what triggers an amendment including the extension of the site certificate validity period”	Other: Aspects specific to EFSC and/or the EFSC process This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workstream.

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#	Scope #	ID	Comment	ODOE's Assessment
64.	-	RNW	“EFSC does not currently have a mechanism to approve non-controversial applications or steps that are mostly procedural without fulfilling lengthy meeting requirements, leading to extensive agendas that take unreasonably long to complete - requiring more meetings.”	Other: Aspects specific to EFSC and/or the EFSC process This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workflow.
65.	-	RNW	“Members relayed that their projects often get bumped from one Council meeting to the next, resulting in further delays.”	Other: Aspects specific to EFSC and/or the EFSC process This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workflow.
66.	-	RNW	“RNW developer members have consistently said that the costs associated with permitting projects at EFSC are too high.”	Other: Aspects specific to EFSC and/or the EFSC process This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workflow.
67.	22.	RNW	“Further, some members have reported that permitting costs are increasing in all three categories where costs are incurred: pre-construction, construction, and operations.”	Barrier: Cost

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#	Scope #	ID	Comment	ODOE's Assessment
68.	-	RNW	“Preparing an application for a site certificate is a time consuming and expensive undertaking. The application requires thirty exhibits and usually ends up running hundreds to thousands of pages in length. The standards EFSC applies and the analysis it requires in the application are the same for every project that goes through the EFSC process. For example, wind and solar projects must complete the same visual analysis, despite wind facilities being visible from much farther away. As another example, small projects require the same type and level of analysis as much larger projects. ... In comparison, the scope of resource analysis required at the county level is smaller.”	Other: Aspects specific to EFSC and/or the EFSC process This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workstream.
69.	-		“Preparing evidence-based responses to each standard is time consuming and does not add additional value if the standard isn’t applicable to the project.”	Other: Aspects specific to EFSC and/or the EFSC process This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workstream.
70.	-	RNW	“the application generally requires a level of engineering detail that is unreasonable years before a project will actually reach construction. Solar, wind and inverter technology is all evolving rapidly; for example, the number of solar panels required to produce the same amount of energy can change significantly in just one year, resulting in changes to engineering. Requiring applicants to include information that will functionally be irrelevant by the time the project is constructed”	Other: Aspects specific to EFSC and/or the EFSC process This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workstream.

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#	Scope #	ID	Comment	ODOE's Assessment
71.	-	RNW	“Clean energy developers also encounter barriers to development because of capacity constraints and internal practices at EFSC that can delay project review, increase costs, and create unnecessary friction. These challenges include the need to spend significant time explaining development processes to Council members;... Despite the complexity and time consuming nature of the job, Council positions are currently volunteer in nature”	Other: Aspects specific to EFSC and/or the EFSC process This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workflow.
72.	-	RNW	“Clean energy developers also encounter barriers to development because of capacity constraints and internal practices at EFSC that can delay project review, increase costs, and create unnecessary friction. These challenges include... navigating multiple points of contact within EFSC; engaging extensively with EFSC consultants rather than staff; and Developers also face prolonged back-and-forth on project conditions that often yields limited additional value relative to the time and resources required.”	Other: Aspects specific to EFSC and/or the EFSC process This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workflow.
73.	-	RNW	“Clean energy developers also encounter barriers to development because of capacity constraints and internal practices at EFSC that can delay project review, increase costs, and create unnecessary friction. These challenges include... and experiencing delays when approvals from other agencies require additional confirmation by EFSC. ... EFSC often coordinates with other state agencies like the Oregon Department of Fish and Wildlife (“ODFW”) to gather feedback on site certificate applications, establish permit conditions, and ensure compliance with those conditions. ESFC plays the role of facilitator between the outside agency and the developer, but there are instances when this role slows down the development process and may not be necessary. For example, one developer relayed an experience where the developer coordinated with ODFW but ODOE then had to confirm that, essentially recreating the previous developer-ODFW coordination and causing delay.”	Other: Aspects specific to EFSC and/or the EFSC process This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workflow.

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#	Scope #	ID	Comment	ODOE's Assessment
74.	-	RNW	<p>“EFSC has historically been very deferential to other agencies in the permitting process, so much so that projects have been held up by antiquated standards. For example, until quite recently, noise regulations from the Oregon Department of Environmental Quality (ODEQ) were a barrier to solar development. Because many solar projects are in rural areas where ambient noise is very low to begin with, the projected increase in noise was often high enough to trigger the limit, even though the actual noise level of solar facilities is quite low. Moreover, even if the participating landowner where the project was proposed wanted the solar project to be sited on their land, the landowner could not receive an exception to the DEQ rule. Thankfully, these specific rules were updated in 2024, but there are likely other circumstances like these where deference to other agency rules may create perverse outcomes.”</p>	<p>Other: Aspects specific to EFSC and/or the EFSC process</p> <p>This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workstream.</p> <p>Regarding noise regulations, DEQ’s Noise Control Program was terminated in 1991. DEQ rules governing noise remain in place for city, county or municipal government entities to utilize, so it really depends on the location of the facility and the local jurisdiction. For more information, please visit https://www.oregon.gov/deq/Residential/Pages/noise.aspx</p>
75.	-	RNW	<p>“developers have experienced situations where EFSC staff or consultants interpret conditions and requirements more broadly than written, including adding monitoring or other measures that are not explicitly required by the condition. This often results in additional back-and-forth between the developer and EFSC, creating avoidable schedule delays and increasing project costs without a clear regulatory basis.”</p>	<p>Other: Aspects specific to EFSC and/or the EFSC process</p> <p>This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workstream.</p>

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#	Scope #	ID	Comment	ODOE's Assessment
76.	-	RNW	“pre-construction compliance filings have become increasingly burdensome and costly due to extensive analyses conducted by consultants”	Other: Aspects specific to EFSC and/or the EFSC process This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workstream.
77.	-	RNW	“the state’s land use policies are not well suited to addressing some of the problems we now face. In particular, none of the 19 goals are geared towards addressing the climate crisis and building clean energy at the pace and scale required to rapidly reduce greenhouse gas emissions”	Other: Competing Land Use Priorities This statement is out of scope for this draft report, which is focused on projects that have already obtained siting approval.
78.	-	RNW	“Goal 3, as currently interpreted and implemented by agencies, is a major barrier to clean energy development. While wind facilities are an allowable use on agricultural land, solar is not. This means that functionally all solar facilities permitted through EFSC must obtain a Goal 3 exception.”	Other: Competing Land Use Priorities This statement is out of scope for this draft report, which is focused on projects that have already obtained siting approval.

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#	Scope #	ID	Comment	ODOE's Assessment
79.	-	RNW	<p>“In conversations with our members, the definition of high value farmland (“HVF”) consistently came up as a barrier to clean energy deployment. Definitions of farmland, agricultural land, HVF, and exclusive farm use (“EFU”) are often inconsistent and overly broad, encapsulating land that has little value for agricultural production based on soils, access to irrigation, average rainfall, and other metrics. Because renewable energy is often sited on agricultural land, and often HVF, those definitions trigger exhaustive review and the need for Goal 3 exceptions, despite that land often being erroneously zoned. ... This dynamic is particularly problematic in the context of American Viticultural Areas (“AVA”) designations. The definitions of HVF relating to the Columbia Valley viticulture area include large swaths of land that are too arid to successfully grow grapes and have no access to irrigation.”</p>	<p>Other: Competing Land Use Priorities</p> <p>This statement is out of scope for this draft report, which is focused on projects that have already obtained siting approval.</p>
80.	-	RNW	<p>“Storage projects face unique barriers as a newer, dynamic technology that differ from wind, solar, and other generation projects that have a longer track record.”</p>	<p>Other: Storage faces unique barriers</p> <p>ODOE would be interested in more specific input as to the exact barriers that storage faces, particularly if they are not otherwise represented in the draft report. ODOE anticipates the barriers represented in the draft report of cost, limited staffing capacity, limited cross-jurisdictional coordination, and even limited grid capacity can all sometimes act as a greater barrier to storage than to wind or solar.</p>

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#	Scope #	ID	Comment	ODOE's Assessment
81.	-	RNW	“Interconnection remains a major barrier to clean energy deployment in Oregon and across the region”	Other: Interconnection ODOE disagrees that interconnection is itself a “barrier” for purposes of this report. Interconnection is one of many steps necessary in facility development.
82.	-	RNW	“Delays in EFSC permitting can directly impact a project’s position in the interconnection queue and its competitiveness in procurement processes. Specifically, delays can cause projects to miss key interconnection milestones or cluster study entry points, forcing them into later study cycles with higher upgrade costs and longer backlogs. This misalignment between EFSC milestones and interconnection processes exposes clean energy projects to multi-year delays and increased costs.”	Other: Aspects specific to EFSC and/or the EFSC process This report is not examining the EFSC process or opportunities to improve the EFSC process. This input has been shared with other agency staff for consideration in the EFSC process workstream.

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Appendix E: Framing Guidance for ODOE on Incorporating the Equity & Justice Framework

Overview

As part of the Oregon Energy Strategy, the Equity and Justice Framework was informed by the Environmental Justice and Equity Policy Working Group and is designed to be used in the development and implementation of energy policy by policy makers, agencies, and other implementors. The Oregon Department of Energy is committed to using the [Equity and Justice Framework](#) when addressing the actions of the Oregon Energy Strategy to reduce inequities and increase equitable and just outcomes in our work.

To incorporate the framework into ODOE’s work for the [Report on Reducing Barriers to Clean Energy Deployment](#), ODOE staff developed framing guidance to inform the agency’s decision-making for both the process and outcome of this report. That framing guidance is provided in this appendix, Appendix E, “Framing Guidance for ODOE on Incorporating the Equity & Justice Framework.” ODOE staff may revisit this framing guidance over time as this report is further developed.

Application of the Equity & Justice Framework

The framework provides five steps to apply when developing and implementing energy policies. This section walks through each step and how ODOE staff are applying the framework for the report’s development and recommendations.^{lix}

Step 1. Determine the universal goal for the issue being addressed and who may benefit, be harmed, or be burdened when taking action.

- Issue: Limited electricity supply, and more specifically barriers to in-state development of new proposed wind, solar and battery storage facilities with a nameplate capacity over 20 megawatts that have received siting approval from the Energy Facility Siting Council (via an approved site certificate) or from a county but are not yet built
- Goal: reliable, affordable, and clean electricity, specifically through in-state development
- Who may benefit: Oregonians generally, including those with limited or less reliable electricity supply today; private developers; workers hired for development projects; counties and their constituents who receive increased tax revenue; potentially others
- Who may be harmed or burdened: those with interests in the area where development occurs that are negatively affected by development; potentially others

^{lix} The report highlights recommended policy actions from the Oregon Energy Strategy as well as additional recommendations. This framework focuses specifically on the additional recommendations.

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Step 2. Use the four pillars of energy justice to provide direction to achieving just and equitable outcomes in energy policies.

Procedural pillar: All groups who stand to benefit or are burdened are provided space to participate and their input should be taken seriously throughout the process.

- For this report’s development, ODOE should pursue broadly available public participation opportunities. Those who may benefit or burden are difficult to narrowly identify, thus broad participation is needed. No group’s input should be disregarded.
- This report’s recommendations should preserve and not unduly reduce public participation opportunities in related processes, including processes relating to planning, siting, permitting, and constructing energy facilities.

Recognition pillar: No one group should dominate a process. The process addresses demographic, socio-economic, and geographic variables, disproportionate burdens, and lived experiences of environmental justice communities.

- ODOE should pursue input from multiple groups. If one group’s participation is hindering the process or ability of another group to participate, ODOE should take corrective action.
- Potential participants may face difficulties in participating. ODOE should try to design the process to reduce these difficulties and provide reasonable accommodations as needed.

Distributive pillar: Understanding of indirect and community benefits (health, jobs, environment, etc.) and intentional distribution of benefits to overburdened communities.

- In-state clean energy development can provide various benefits. ODOE should try to design policy recommendations to facilitate the distribution of any benefits broadly, particularly to communities already overburdened and communities newly burdened by energy development.

Restorative pillar: Recognizing and reflecting on past harms and injustices caused by the energy system and actively working to prevent future harms and maximizing future benefits.

- Existing energy infrastructure in Oregon has harmed individuals and communities, even while providing benefits to others. New infrastructure may cause harm. This report’s recommendations should aim to minimize future harms and maximize future benefits.

Step 3. Use the approaches in the framework table to develop targeted actions (targeted universalism) to meet the universal goal while keeping the four pillars in mind.

The following table identifies the approach and targeted actions performed or planned to be performed in the development of this report. The table does not indicate where performance could be improved. Please note targeted actions are listed only once even when they may advance multiple approaches.

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Approaches	Targeted Actions
1. Provide Equitable Access to Decision-Making Processes	<p>General</p> <ul style="list-style-type: none"> • DONE – Produce a webpage for this report and email alerts for public input that use plain language. • DONE – Provide a point of contact for any questions about the report or process • Ongoing through final publication – Update project webpage as needed • Ongoing through final publication – Ensure all materials posted by ODOE satisfy the agency’s accessibility requirements
1. Provide Equitable Access to Decision-Making Processes	<p>For first public comment period:</p> <ul style="list-style-type: none"> • DONE, 2/18/2026-3/20/2026 – Provide at least 30 days for public comments • DONE – Solicit input from a broad range of participants via email outreach • DONE – Solicit input through a comment portal with the functionality to automatically translate any questions being asked • DONE – Publish presentation materials for any listening session(s) before the session begins • DONE, 3/3/2026 1-2pm – Hold at least one listening session to invite oral comments • DONE, 3/3/2026 5-6pm – Hold at least one listening session outside of typical working hours • DONE – Conclude each listening session with a customer service survey • DONE – Publish a recording of all listening sessions where comments were received • DONE – Provide receipt of comment submissions when requested • DONE – Provide receipt of comment submissions to all commenters • DONE – Provide reasonable accommodations for commenters when requested
1. Provide Equitable Access to Decision-Making Processes	<p>After first comment period:</p> <ul style="list-style-type: none"> • DONE – Share comments from first public comment period on project webpage • DONE – Update project webpage as needed • Ongoing through final publication – Review all comments received • Ongoing through final publication – Evaluate and internally discuss outreach needs for group(s) not clearly represented in comments received; and pursue outreach where feasible • Ongoing through final publication – Consider comments received, where commenters are based and focus their work, and how that compares to data layers in the Climate Economic Justice Screening Tool, or new state environmental justice mapping tool if available, to consider where gaps may exist in ODOE’s outreach and evaluate options to fill gaps

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<p>1. Provide Equitable Access to Decision-Making Processes</p>	<p>For second comment period:</p> <ul style="list-style-type: none"> • Pending – Publish draft report that endeavors to fairly acknowledge and recognize input received to date • Pending – Provide copy of draft report’s executive summary on project webpage with the functionality to automatically translate the text • Pending – Provide at least 30 days for public comments • Pending – Solicit input from a broad range of participants via email outreach • Pending – Solicit input through a comment portal with the functionality to automatically translate the questions being asked • Pending – Publish presentation materials for any listening session(s) before the session begins • Pending – Hold at least one listening session to invite oral comments • Pending – Hold at least one listening session outside of typical working hours • Pending – Conclude each listening session with a customer service survey • Pending – Publish a recording of all listening sessions where comments were received • Pending – Share recommendations in a public meeting at the Energy Facility Siting Council, consistent with the directive in Executive Order 25-29 • Pending – Provide notice of the draft report and open comment opportunity in other public meeting(s) where feasible and appropriate • Pending – Provide receipt of comment submissions to all commenters • Pending – Provide reasonable accommodations for commenters when requested
<p>1. Provide Equitable Access to Decision-Making Processes</p>	<p>After second comment period:</p> <ul style="list-style-type: none"> • Pending - Share comments from second public comment period on project webpage • Pending – Evaluate and internally discuss outreach needs for group(s) not clearly represented in comments received; consider options for future projects • Pending – Evaluate and internally discuss outreach needs for group(s) not clearly represented in comments received; and identify potential improvements for future processes • Pending – Consider comments received, any self-identifying commenters in Environmental Justice communities, where other commenters are based and focus their work, and how that compares to data layers in available mapping tools to consider where gaps may exist in ODOE’s outreach and evaluate options to fill gaps

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1. Provide Equitable Access to Decision-Making Processes	<p>For final report:</p> <ul style="list-style-type: none"> • Pending – Publish final report that endeavors to fairly acknowledge and recognize all input received • Pending – Provide copy of final report’s executive summary on project webpage with the functionality to automatically translate the text • Pending – Hold at least one public webinar on the final report to broaden outreach on the final recommendations and the insights gained
2. Ensure Equitable Access to Infrastructure Development Processes	No additional actions for this approach for report development identified so far. ODOE staff may identify actions for this approach before report publication.
3. Invest In Long Term Incentive Programs for Environmental Justice Communities	No additional actions for this approach for report development identified so far. ODOE staff may identify actions for this approach before report publication.
4. Promote Holistic Workforce Development in Environmental Justice Communities	No additional actions for this approach for report development identified so far. ODOE staff may identify actions for this approach before report publication.
5. Develop Partnerships and Resources in Environmental Justice Communities	<p>Please see many related actions under Approach 1 above.</p> <p>Internal meetings between individual project lead and some or all members of the Strategic Engagement team and Strategic Engagement Analyst, as follows:</p> <ul style="list-style-type: none"> • Ongoing^{lx} - Hold at least one monthly meeting on outreach and engagement needs • Ongoing^{lxi} - Hold at least one monthly meeting focused on implementing the Equity & Justice Framework
5. Develop Partnerships and Resources in Environmental Justice Communities	<p>External outreach:</p> <ul style="list-style-type: none"> • Pending – Solicit input on this appendix from agency contacts in Environmental Justice communities, including through email and holding space for further discussions • Pending – In any meetings specifically on this report with utilities or local governments, inquire about opportunities to collaborate to best support communities and customers

^{lx} As of May 1, 2026, internal meetings between project lead and SET member(s) to discuss general outreach and engagement needs included meetings held on 12/18/2025, 1/16/2026, 2/13/2026, 2/27/2026, 3/30/2026, 4/13/2026, 4/20/2026, and 4/27/2026. This list does not include all instances where this topic may have been discussed.

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6. Consider The Effects of Energy Policies on Natural and Working Lands, Cultural Resources, and the Broader Environment	<p>For draft report</p> <ul style="list-style-type: none"> • Ongoing – Provide information about proposed wind, solar and battery storage facilities with a nameplate capacity over 20 megawatts that have received siting approval from the Energy Facility Siting Council (via an approved site certificate) or from a county but are not yet built (this report’s primary focus), to inform consideration of existing burdens and benefits • Ongoing – Consider this framework in drafting additional recommendations
6. Consider The Effects of Energy Policies on Natural and Working Lands, Cultural Resources, and the Broader Environment	<p>For final report</p> <ul style="list-style-type: none"> • Pending – Seek to fill any identified information gaps, or to acknowledge where information is not available, on subjects within the scope of this report • Pending – Consider this framework in finalizing additional recommendations • Pending – Identify metrics that can be collected before, during, and/or after implementation of each additional recommendation to demonstrate success and understand gaps in the policy implementation (see Step 4 below)

Step 4. Identify metrics that can be collected before, during, and/or after implementation to demonstrate success and understand gaps in the policy implementation.

Potential metrics to collect for report development

Below are metrics that ODOE seeks to collect for report development. These metrics for report development aim to build on the targeted actions noted above in Step 3. Like in the above table, a metric is listed only once even when it may apply to multiple approaches.

Approach	Metric for Report Development Process	Status (as of May 1, 2026)
1	# of targeted actions developed for this approach	41
1	# of targeted actions completed, in process, or pending for this approach	Completed: 15 In Process: 5 Pending: 21
1	% of website materials satisfying accessibility requirements	100%
1	% of public comment periods lasting at least 30 days	100%
1	% of questions for public comment provided on website with the functionality to automatically translate any questions being asked	100%
1	% of project materials professionally translated by a human being into one or more languages	0%

^{lxii} As of May 1, 2026, internal meetings between project lead and SET member(s) to discuss implementing the Equity & Justice Framework included meetings held on 1/5/2026, 2/2/2026, 3/6/2026, 3/27/2026, 4/7/2026, and 4/23/2026. This list does not include all instances where this topic may have been discussed.

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Approach	Metric for Report Development Process	Status (as of May 1, 2026)
1	# of email alerts to broad audiences soliciting input during first comment period	2
1	% of public meetings during first comment period where materials were shared before the meeting began	100%
1	# of public listening sessions held during first comment period	2
1	Percentage of meetings hosted with interpretation and/or translation services	0%
1	# of public listening sessions held outside typical working hours during first comment period	1
1	% of reasonable requests for accommodations received and provided to requestors during first comment period	100%
1	% of community-based organizations that participated in the first comment period by providing feedback	Under review
1	% of feedback provided by environmental justice participants in first comment period incorporated into recommendations	Under review
1	% of recommendations in draft report provided on project webpage with the functionality to automatically translate the text	Pending
1	# of email alerts to broad audiences soliciting input during second comment period	Pending
1	% of public meetings during second comment period where materials were shared before the meeting began	Pending
1	# of public listening sessions held during second comment period	Pending
1	# of public listening sessions held outside typical working hours during second comment period	Pending
1	% of reasonable requests for accommodations received and provided to requestors during second comment period	Pending
1	% of community-based organizations that participated in the second comment period by providing feedback	Pending
1	% of feedback provided by environmental justice participants in second comment period incorporated into recommendations	Pending
1	% of newly recommended policy actions in final report provided on project webpage with the functionality to automatically translate the text	Pending
5	# of targeted actions listed above for this approach	4
5	# of targeted actions completed, in process, or pending for this approach	Completed: 0 In Process: 2 Pending: 2

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Approach	Metric for Report Development Process	Status (as of May 1, 2026)
5	# of months where at least one internal meeting between individual project lead and some or all members of the Strategic Engagement team and Strategic Engagement Analyst was held to discuss general outreach and engagement needs	5 (December 2025, January 2026, February 2026, March 2026, April 2026) (as of May 1, 2026)
5	# of months where at least one internal meeting between individual project lead and some or all members of the Strategic Engagement team and Strategic Engagement Analyst was held specifically to discuss implementation of the Equity & Justice Framework	4 (January 2026, February 2026, March 2026, April 2026) (as of May 1, 2026)
5	# of meetings held specifically to solicit input on this Appendix	Pending
5	% of suggestions to this Appendix received and implemented during second comment period	Pending
6	# of targeted actions listed above for this approach	5
6	# of targeted actions completed, in process, or pending for this approach	Completed: 0 In Process: 2 Pending: 3
6	% of data gaps identified in public comments and filled or acknowledged in final report	Pending
6	% of additional recommendations where potential metrics were identified and provided in the final report to support implementation (see Step 4 below)	Pending

Potential metrics to collect or review for implementation of additional recommendations

ODOE intends to provide information in this section in the final report. ODOE is considering potential metrics for the additional recommendations in the draft report but would welcome public comment on this topic. ODOE intends to revisit the additional recommendations after the second comment period, which will also assist in refining and finalizing the additional recommendations.

Additional Recommendations	Potential Metrics	Status
<i>(forthcoming)</i>	<i>(forthcoming)</i>	<i>(forthcoming)</i>
<i>(forthcoming)</i>	<i>(forthcoming)</i>	<i>(forthcoming)</i>
<i>(forthcoming)</i>	<i>(forthcoming)</i>	<i>(forthcoming)</i>
<i>(forthcoming)</i>	<i>(forthcoming)</i>	<i>(forthcoming)</i>
<i>(forthcoming)</i>	<i>(forthcoming)</i>	<i>(forthcoming)</i>

Step 5. Review the outcomes through the lens of the determined universal goal, targeted strategies, and metrics. Complete an analysis to understand if there are gaps and if a new goal or strategy is needed to meet the metrics.

This review is ongoing; ODOE intends to conduct a gaps analysis after the public comment process has concluded to identify needs and opportunities for future activities.

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Initial reflections and items flagged for further review:

- It would be helpful to have additional information about commenters, including whether they identify as a community-based organization or as members of an environmental justice community. This was not asked in the first comment period. Aim to include this question clearly in the second comment period, as a voluntary option for commenters to self-identify.
- ODOE received inquiries on when the comments received would be published. Consider the feasibility of publishing a target date on the project webpage.
- Some commenters notified ODOE that it was unclear if their comments, including attachments, were received. Additional outreach was undertaken to confirm receipt. This is something under review for a more durable solution.
- Sharing a compilation of comments required ODOE to undertake additional steps to ensure the document satisfied ODOE’s website accessibility obligations. This is something under review for a more durable solution.

The gaps analysis will serve as one way for ODOE to reflect on its implementation of the Equity & Justice Framework and seek to fulfill the spirit as well as the letter of its commitment to incorporate the Equity & Justice Framework into the agency’s work to implement the Oregon Energy Strategy.

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Appendix F: Interconnection Processes in Oregon

The [Oregon Energy Strategy](#) recognized interconnection delays are a significant barrier to development.^{lxii} The Oregon Department of Energy and Oregon Public Utility Commission are collaborating on this appendix to summarize additional information relevant to the [Report on Reducing Barriers to Clean Energy Deployment](#). This appendix is still under development but will be included with the final version of the report in September.

A brief initial outline is provided below for reference while reviewing the draft report.

Section 1. Overview

This section will address high-level questions such as:

- What is a generation interconnection process?
- How many generation interconnection processes are there in Oregon?
- What interconnection process do most generating facilities in Oregon use?

Section 2. Recent Interconnection Policy Reforms

This section will summarize the policy reforms adopted in recent years.

Section 3. Current Requirements for Interconnection Applicants

This section will summarize the current requirements that exist for interconnection applicants.

Section 4. Potential for Further Reforms

This section will summarize areas of potential reform that have already been identified and are under discussion at OPUC for state-jurisdictional generators.

^{lxii} The Oregon Energy Strategy at page 112, <https://www.oregon.gov/energy/Data-and-Reports/Documents/Oregon-Energy-Strategy.pdf>.

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For More Information

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