

Attachment 2



Oregon Department of Energy
Director Janine Benner
Tom Jackman
550 Capitol St NE, Salem, OR 97301

March 30th, 2026

Director Benner and Mr. Jackman,

Oregon Solar + Storage Industries Association (OSSIA) And Renewable Northwest submit these comments regarding the Tribal Communications rulemaking.

OSSIA is a trade association that promotes clean, renewable, solar and storage technologies and whose members include renewable energy businesses, non-profit groups, and other solar and storage industry stakeholders. Renewable Northwest is a regional, clean energy advocacy nonprofit dedicated to decarbonizing the electricity grid by accelerating the transition to clean energy. Our members include renewable energy and storage developers and businesses, environmental organizations, and consumer advocates. The rulemaking will directly affect Renewable Northwest and OSSIA's members.

Overall, OSSIA and Renewable Northwest support the draft rules and the inclusion of additional communication rules between developers and Tribes. We support accelerated, efficient clean energy deployment. By requiring developers to document early on engagement with Tribes, this rule change aligns with Executive Orders 25-25 and 25-29's goals to streamline siting and permitting, reduce barriers, and accelerate renewable energy development, and grid infrastructure while maintaining Tribal consultation.

Documented early engagement helps identify Tribal concerns before applications are submitted, lowering the chance of costly delays, contested cases, or redesigns, and helps ensure project designs address Tribal interests. This rule change also provides much needed clarity and predictability to projects and supports meaningful, respectful Tribal engagement by promoting two-communication with Tribes, thoughtful use of Tribal staff time, and relationship-building. This helps developers identify shared interests and plan projects more responsibly and collaboratively.

OSSIA and Renewable Northwest have some additional considerations that would help in effectuating this rulemaking. First, to promote participation, EFSC may want to provide a simple form or template to standardize reporting and reduce administrative burden. Second, ODOE could support relationship-building between developers and



Tribes by providing applicants with guidance, training, and resources to facilitate effective Tribal communication.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Angela Crowley-Koch".

Angela Crowley-Koch
Executive Director

A handwritten signature in black ink that reads "Katie Chamberlain".

Katie Chamberlain
Regulatory Manager