

Siting Managerial Restructure

Recommendations for Increasing Team Capacity and Program Effectiveness

Executive Summary

The Siting Division plays a central role in Oregon's clean energy buildout. However, ongoing increases in workload volume and complexity, combined with limited management capacity and process inefficiencies, have constrained the Siting Division's ability to proactively prioritize projects and sustain high quality, timely regulatory review. Internal modernization work and recent assessments highlight opportunities to strengthen program, project, and performance management, supporting a more proactive and sustainable workload approach.

This report proposes a set of restructuring recommendations intended to strengthen operational consistency, improve staff support, align the Siting Division with broader agency initiatives and team structures, proactively respond to external pressures for change in the Siting program, and is structured to answer the ongoing and consistently increasing workload. These recommendations are informed by summary interviews conducted with siting staff after they completed project management training, EO25-25, EO25-29, findings in [EO 25-29 - Siting Draft Report](#), EO 25-29 Strategic Transmission Siting, and [ODOE's 2026-2029 Strategic Plan](#).

Background and Purpose

As Oregon experiences significant growth in renewable energy proposals and grid-supporting infrastructure, the demands on the Siting Division have intensified. Internal evaluations highlight several key constraints:

Siting Division Current Responsibilities

Process Type	Number of Projects	Estimated FTE to Respond to Workload*
Notices of Intent	6	0** (will require 5-6 FTE at ASC phase)
Applications	4	6
Application Amendments	5	2
Amendment Determinations	3	0.5
Preconstruction Projects	6	9.24
Construction Projects	4	6.76
Operational Projects	33	7
Decommission Projects	1	0.5
On Deck Projects (Anticipating NOI Submittal in 2026)	4	2
Total	66	34

*These estimates assume all work is happening at the same time. Typically, work is staggered where the total staffing could be reduced to 23.8 based on 30% delays across projects for staggered steps/information.

**Typically NOI phase = .2-.3FTE, all current NOIs have been completed at the time of report, so no staff hours are needed for current workload.

Observed Challenges

Managerial Capacity

The Assistant Director of Siting role comprises of 3 main managerial focuses:

1. Answering legislative questions/concerns, responding to Executive Orders, and participating in larger agency coordination
 - On average 48% of the Assistant Director's time is spent on these tasks/areas
2. Siting Secretary and training new council members
 - On average 32% of the Assistant Director's time is spent on EFSC meeting and member training related tasks
3. People & workload management
 - This leaves only 20% for people and workload management.

This data is based on an assessment of timesheets for an 18mo period. As shown by the data, the time required for areas 1 and 2 is significant and reduce the amount of time available for the Assistant Director to programmatically support the Siting program and workloads of 12 direct reports, leaving approximately 2.75 hours per month for dedicated management engagement for each direct report.

It should be noted that currently the Assistant Director primarily manages the Compliance Program and related staff, while the Senior Policy Advisor, as the Lead Worker, primarily manages the workloads of the Siting Analysts. This structure does functionally decrease the direct report count from 12 to 8 and increases the time available from 2.75hrs/per-direct report to 4.12hrs/per-direct report per-month. However, the numbers alone do not give full context as time is not always split evenly across direct reports and does not accurately demonstrate or account for the time needed to programmatically manage Compliance, vs. managing individual people and their workloads.

Looking ahead to 2026-2027 and beyond, workloads are anticipated to increase. This upward trend is not temporary, workloads are expected to continue increasing for at least the next decade as Oregon's energy and infrastructure needs expand as outlined in the [Oregon Energy Strategy](#), and in the EO 25-29 Strategic Transmission Siting report.

Current Management Structure

The Division currently operates under a flat organizational structure in which all 12 Siting staff report directly to the Assistant Director for Siting. While the team benefits from a designated lead worker/Senior Policy Advisor who provides technical guidance to the Siting Analyst group and cross-divisional guidance between the compliance program and rulemaking, this role does not carry people management authority and cannot ensure accountability or address staff specific performance and workload challenges.

As project volume grows, regulatory review become more complex, and coordination needs expand across internal teams, contractors, and new EFSC member onboarding, this structure places a significant and sustained demand on a single manager. Reliance on external contractors, such as Haley Aldrich, helps offset technical workload but also increases supervisory and integration responsibilities for the Assistant Director and non-manager lead worker.

Flat structures can be highly effective for small teams with stable workloads; however, the Division's high volume, high complexity environment reduces these efficiencies. The current model limits the team's ability to shift from reactive workload management toward proactive planning, consistent process implementation, and progress on modernization efforts.

These structural constraints contribute to broader organizational gaps identified in prior assessments and reports. Strengthening the program, project, and performance management across the Siting Division will require additional management capacity, needs that cannot be fully supported under the existing single manager structure.

Financial Structure

As outlined in the EO 25-29 report, the Siting Division's current financial structure creates an additional operational constraint. While roughly 80% of staff time is billable to active projects, the remaining 20% is quickly absorbed by division level meetings, coordination across the agency and with other state and local reviewing agencies, and routine administrative trainings and obligations. This leaves limited time for essential activities such as professional development, staff training, agency outreach, and process improvement, functions that are foundational to sustaining a resilient, efficient, and modernized program. Restructuring the billable model to allocate 70% of staff time to active projects and dedicating 10% to process improvement work (funded through project billing) would provide more protected capacity for staff development and focused improvement efforts.

Division Assessment

Workload Pressures

Each area within the Division is experiencing both an increasing workload and growing complexity within that workload. For the Siting Analysts, this trend is driven by a substantial rise in renewable and transmission line applications. Although EO 25-25 enables some facilities to proceed through county processes, most applicants continue to choose the EFSC review pathway, resulting in consistently high demand on staff capacity. The heightened statewide focus on transmission line development is also contributing to more transmission-related proposals, projects that are typically more complex and require significantly more staff effort than standard facility applications.

The Division is also responsible for a continually expanding portfolio of operational facilities. Once a facility becomes operational, it remains under EFSC Compliance oversight for its lifetime. With 33 operational facilities, (additional projects in preconstruction and construction) the current workload supports a need for approximately 7 FTE Compliance Officers at an 80% billing target. At present, Compliance has three positions, with a fourth scheduled for July 2027, resulting in limited staff capacity and no redundancy to cover extended absences or turnover.

Based on existing data, pre-construction, construction, and operational activities require distinct levels of staffing support:

- Preconstruction projects require approximately **1.54** FTE per-project
- Construction projects require approximately **1.69** FTE per-project
- Renewable operational projects require an average of **287** hours annually, equating to a need for **4.66** FTE to

support current wind and solar facilities.

- Nonrenewable operational projects require approximately **.70** FTE annually for all nonrenewable.

The current Compliance workload exceeds available staffing, and work that cannot be completed by the Siting Division is supported by contractors such as Haley Aldrich. While contractors help meet regulatory obligations, they also require staff oversight, task assignment, deliverable review, and integration into Division processes. With an additional Compliance Officer expected in 2027, the number of direct reports to the Assistant Director will increase further, alongside contractor related supervision, adding to an already full portfolio of managerial responsibilities.

As the number of operational facilities grows, so does the need for additional qualified Compliance Officer capacity. Current estimates indicate that a reasonable caseload is roughly five facilities per Compliance Officer, assuming no additional preconstruction or construction obligations. Meeting this need will require additional qualified staffing and a more resilient management structure that can support long-term workload demands.

The Siting Analyst team faces similar pressures. Growth in renewable energy and transmission line applications justify an increase from four siting analyst positions to five positions, led by the aforementioned Senior Policy Advisor. Managing this larger team by task and deliverable tracking, quality control of documents, and budget management along with the increasing complexity of applications, is progressively difficult under the current organizational model, particularly given the Assistant Director's substantial responsibilities outside of direct supervision and workload management.

Recommendations for Team Restructuring

Increase Management Capacity

The limited staff management capacity within the Assistant Director role creates a cascading set of operational challenges across the Division. Increasing overall management capacity is the most direct and effective way to address these pressures. Adding additional manager positions would enable meaningful delegation, reduce workflow bottlenecks, and allow the Assistant Director to more effectively oversee the Division's three primary functional areas. With expanded support, the Division could shift from reactive workload management to a more proactive, strategic approach, strengthening program oversight, supporting program modernization, and improving long term operational resilience.

To fully align with ODOE's Strategic Plan, particularly the pillar "Aligned, Well Supported People and Operations", the Siting Division will require additional resources to ensure staff have the capacity to implement processes, support modernization efforts, and manage change effectively. Without these resources, progress toward strategic goals will remain challenging, and workflow and oversight pressures will continue to affect the Division.

Compliance Manager and Team Restructuring

With the current workload being higher than the current Compliance Program and management structure can handle there is a large gap which is being filled by a combination of contractor work and the Siting Operations and Policy Analyst. Although this functionally works as a short-term solution, it does not allow for a robust and resilient Compliance Program. By adding a Manager (Energy Manager 2) role to the overall Siting structure, the

program will have a stronger ability to address compliance concerns, complete compliance work in a timely manner, reduce bottle necks, and create a stronger onboarding process.

The Compliance Program also faces structural challenges related to position classification and workload expectations. Compliance Officers are currently classified as UAE2, yet they are frequently tasked with leading complex, high impact, and often sensitive work more closely aligned with UAE3 level responsibilities. Ensuring that roles, workloads, and classifications are aligned will be important for supporting staff and maintaining program resilience.

These changes should lead to consistent work product outputs, increased public transparency, increased transparency with certificated holders, higher staff retention rates, and an overall ability for the program to be proactive and responsive to compliance problems.

Analyst/Rulemaking Manager

As previously mentioned the Siting Analyst work is primarily directed and overseen by the Senior Policy Advisor, however due to the designation as Team Lead, rather than Manager, this role is not able to pursue or support people management aspects of the work. Due to the current and projected volumes of work it is impractical for the Assistant Director to manage the people aspect of the work, this can cause issues around work accountability and understanding of Quarterly Review goals.

Establishing a Manager (Energy Manager 2) position would allow for clearer workload and performance connection and ensure the Siting Analysts have consistent and clear supervisory support. Moving the Rulemaking role to be a direct report of the Siting Analyst Manager, work by the Rulemaking coordinator will have stronger feedback and implementation oversight and integration into the work performed by the Siting team.

Reclassification of Compliance Officers

Siting Compliance Officers are currently classified as UEA2; however, the responsibilities they carry across preconstruction, construction, operations, and retirement are comparable in complexity and impact to the work required to evaluate applications and recommend Site Certificates. Compliance plays a critical role in the siting process, particularly during preconstruction when many of the details of mitigation conditions are worked out, and during construction, when risks to communities and the environment are highest and strong subject matter expertise, and conditional oversight is essential for site protection and restoration.

While the UEA2 classification anticipates 'work of modest sensitivity and limited project leadership', Compliance Officers routinely 'lead complex, high impact, and often sensitive efforts'. Their duties frequently align more closely with the UEA3 classification, which encompasses projects with 'significant financial, environmental, or community implications.' Examples include leading multicounty weed mitigation initiatives, resolving water rights issues in Eastern Oregon, managing out of compliance site conditions, serving as primary reviewers for preconstruction projects, understanding and guiding transitions into construction, and overseeing contractor work completed in support of construction compliance.

Compliance Officers also manage sophisticated analytical work, such as revisions to Noxious Weed Control Plans, Revegetation Plans, Habitat Mitigation Plans, and Wildlife Mitigation and Monitoring Plans. This requires extensive coordination with counties, state agencies, certificate holders, and contracted technical experts. Reclassifying these positions would help ensure the Division can recruit and retain candidates with the

advanced expertise needed to perform these responsibilities effectively and support a resilient compliance program.

Proposed Structure

A more hierarchical organizational structure is recommended based on programmatic assessment and established business structure best practices. This approach aligns with management models already used within ODOE and across the broader State enterprise.

In addition to the changed structure Siting would still contract with Haley Aldrich to support workload, provide technical expertise, and conduct site inspections as needed. In the below proposed structure contractor work would be primarily managed by the Manager of Compliance and Compliance Officer Team Lead.

Immediate Solution: Implementable within 12-36mo

Assistant Director for Siting

Administrative Staff

Division Assistant, Financial Analyst, Operations & Policy Analyst

Manager of Siting Analysts (Energy Manager 2)

Siting Analyst Lead Worker (UAE3)

Siting Analyst (UAE3) – 4 positions

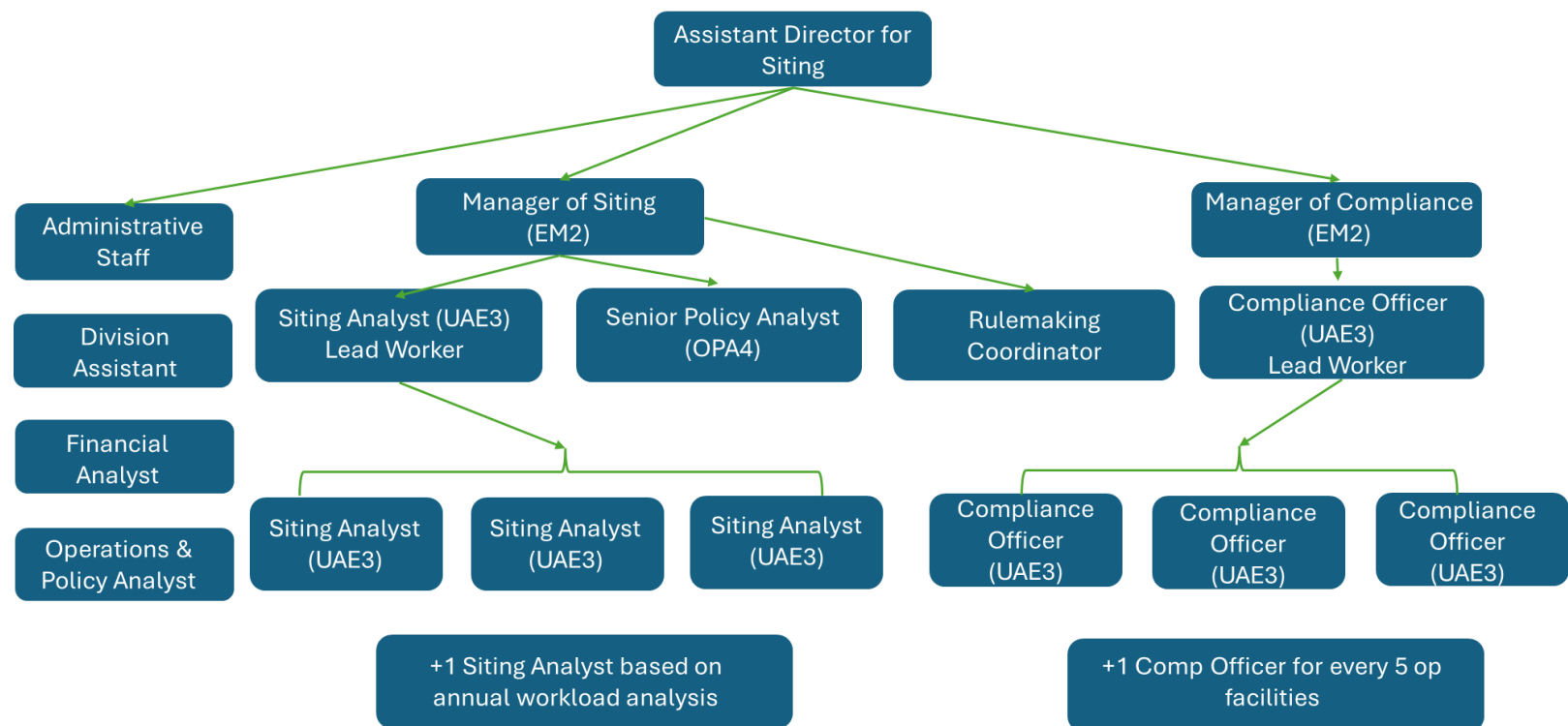
Senior Policy Advisor (OPA4) – Primary focus would be to implement rulemaking changes into siting operations and to work on session and be a siting team permitting sherpa that works closely with the Governor's Office authority to push sister agencies to review and provide analysis, lead on contested cases.

Rulemaking Coordinator (OPA3)

Manager of Compliance Officers (Energy Manager 2)

Compliance Officer Lead Worker (UAE3)

Compliance Officer (UAE3) – 3 positions with 1 additional position every year until 5:1 ratio of facilities to Compliance Officers is in place



Comparable structures across ODOE

Similar organizational models already exist across the agency, where managerial layers support complex program areas:

Assistant Director for Energy Development Services Division > 6 direct reports

Energy Incentives Manager > 6 direct reports

Assistant Director for Energy Planning & Innovation Division > 10 direct reports

Energy Efficiency & Conservation Manager > 8 direct reports

Codes and Standards Manager > 6 direct reports

Energy Technology & Policy Manager > 9 direct reports

Chief Operations and People Officer > 6 direct reports

Finance & Operations Manager > 12 direct reports

Budget and Fiscal Manager > 2 direct

Systems Administrator > 7 direct reports

Human Resources Manager > 2 direct reports

Currently, the Assistant Director of Siting is the only comparable position managing 12 direct reports without additional supervisory support, underscoring the need for expanded management capacity.

The short-term structure provides a clear, incremental pathway toward a stronger, more resilient organizational model capable of meeting growing workload demands and supporting consistent management oversight.

Long Term Solution

There are many opportunities for further restructuring and additional positions, however the first step (immediate/ short term solution) should be implemented and then evaluated for specific adjustments and additional position needs.

Rebalance Workloads Based on Expertise and Project Type

To enhance consistency, strengthen work products, and improve project timelines, the Division should more strategically align workloads with staff expertise. For applications and amendments, this includes using collaborative review models and assigning specific standards to analysts with relevant subject matter knowledge. Once these systems are fully established, cross-training can expand internal capacity and increase team resilience. This approach has already been developed and is currently being piloted by the lead worker - assessments as to approach effectiveness are ongoing.

For pre-construction work, pairing the lead Siting Analyst with a Compliance Officer would create a clear and structured handoff between teams. This model strengthens Compliance Officer familiarity with the project while preserving continuity from the application review phase. It also supports peer review, distributes workload more evenly, and helps ensure smooth transitions as projects move from pre-construction to construction and ultimately into operations.

Once preconstruction tasks are completed, Compliance Officers should assume full responsibility for construction oversight, supported by contractor resources when appropriate. Assigning two Compliance Officers to each construction phase project promotes cross-training, strengthens quality control, and ensures adequate coverage for site inspections and report reviews. Contractor work would then be managed by this assigned pair to maintain consistency in deliverables and expectations.

These recommendations are feasible, but success depends on enhanced management oversight and more staff support. Increasing management and team lead capacity is crucial for the Division's organizational and success strategy.

Implementation Roadmap

Phase 1: Foundation & Stabilization (0-12 months)

- Approve the restructuring plan and new staffing model.
- Create and hire for the Energy Manager 2 role for Siting Analysts.
- Hire for the unfilled UEA3 Siting Analyst position.
- Reclassify Compliance Officer positions from UEA2 to UEA3 to align work with classification standards.
- Formally implement the Compliance lead worker role.
- Communicate changes clearly to internal and external partners to manage expectations.

Phase 2: Structural Build Out & Role Alignment (12-24 months)

- Build a justification package for an additional Energy Manager 2 role to support Compliance, hire for role.

- Define clear scopes for each manager to ensure role clarity and workload transparency.
- Adjust team workflows to align workloads with subject matter expertise (e.g., -standard specific- analyst assignments, pairing lead Siting Analysts with Compliance Officers).
- Train managers and staff on the new organizational structure, supervisory expectations, and workflow processes.
- Strengthen cross team handoffs (e.g., pairing Siting Analysts and Compliance Officers during preconstruction).

Phase 3: Expansion & Modernization (24-36 months)

- Add additional Compliance Officer positions annually until the 5:1 facility-to-staff ratio is achieved.
- Expand analyst teams, including renewables, transmission, and technical SMEs, as needed through assessment of current and projected workloads
- Continue to assess implemented changes, adjust work lanes and workloads as needed and create additional recommendations based on data analysis of changes

Anticipated Benefits

Operational

Increasing managerial capacity will directly expand the Division's ability to process facility applications, strengthen the consistency and quality of compliance work, and improve responsiveness to workload fluctuations. These structural changes will also increase overall team capacity by improving onboarding and training for Compliance Officers, helping build confidence, support long term retention, and sustain reliable operational performance across programs.

Staff Experience

The proposed restructuring is expected to enhance role clarity, performance expectations, and workload distribution across the Division. With stronger managerial support, staff will have greater access to professional development opportunities and more consistent guidance. Research consistently shows that turnover decreases when employees understand expectations, have pathways for growth, and receive steady support from supervisors. Reduced turnover will help build a more experienced and well-supported team, contributing to a more sustainable and fulfilling work environment.

This direction also aligns strongly with ODOE's strategic emphasis on clear roles, intentional staff development, and a supportive operational environment as outlined in Pillar 4: "Aligned, Well Supported People and Operations."

Strategic Alignment

These changes directly support ongoing modernization efforts across the agency, including Siting rulemaking and the OPA2 workplan. Expanding managerial capacity and establishing clearer internal structures advances alignment with ODOE's strategic plan by strengthening operational readiness, improving the Division's ability to meet regulatory obligations, enhancing coordination with communities and partners, and increasing organizational resilience. Together, these improvements support a more proactive, disciplined, and sustainable approach to managing Oregon's energy siting workload.