Outlook

Carbon Dioxide Monetary Offset Rate Rulemaking

From Jaberi, Sarah <Sarah.Jaberi@nexteraenergy.com>
Date Wed 9/23/2026 11:37 AM
To tom.jackman@energy.oregon.gov <tom.jackman@energy.oregon.gov>
Cc ESTERSON Sarah * ODOE <sarah.esterson@energy.oregon.gov>; Feehan, Ross <Ross.Feehan@nexteraenergy.com>; Lawlor, David <David.Lawlor@nexteraenergy.com>; Leone, Christine <Christine.Leone@nexteraenergy.com>; Curtiss, Sarah Stauffer <sarah.curtiss@stoel.com>; Hicks, Paul <Paul.Hicks@nexteraenergy.com>

1 attachment (252 KB)
Comments on Proposed Amendments to Site Certificate Compliance and Enforcement Rules_NEER_9.23.2026.pdf;

Hi Tom,

NextEra Energy Resources appreciates the opportunity to comment on the Energy Facility Siting Council's proposed amendments to OAR chapter 345, divisions 26 and 29, described in the Notice of Proposed Rulemaking related to "Amendments to Site Certificate Compliance and Enforcement Rules" filed July 30, 2026.

Please see the attached document containing our comments. We highly appreciate your consideration.

Regards,

Sarah Jaberi
Senior Project Manager, Development
c: 561-267-9627

September 23, 2026

VIA EMAIL (tom.jackman@energy.oregon.gov)

Energy Facility Siting Council
c/o Tom Jackman
Rules Coordinator
Oregon Department of Energy
550 Capitol Street NE
Salem, Oregon 97301

Re: Comments on Proposed Amendments to Site Certificate Compliance and Enforcement Rules (Rulemaking R182)

Dear Members of the Council:

NextEra Energy Resources, LLC ("NEER") appreciates the opportunity to comment on the Energy Facility Siting Council's ("Council" or "EFSC") proposed amendments to OAR chapter 345, divisions 26 and 29, described in the Notice of Proposed Rulemaking related to "Amendments to Site Certificate Compliance and Enforcement Rules" filed July 30, 2026.

NEER owns and operates renewable energy facilities throughout the United States, including multiple facilities in Oregon that fall under the Council's jurisdiction. NEER generally supports the proposed rulemaking and appreciates the Council's and the Oregon Department of Energy's ("Department") efforts to provide greater clarity, predictability, and administrative efficiency in the compliance and enforcement process. In particular, NEER supports the Department's proposal to authorize administrative updates to ensure site certificates accurately reflect the facilities they govern while reducing the administrative burden on Department staff.

Consistent with the overall goal to right-size the administrative process so that it corresponds to whether the proposed action requires the Council to make a new substantive finding, NEER respectfully requests that the Council consider revising proposed OAR 345-026-0088 to establish two related but distinct administrative pathways: administrative updates of the site certificate holder and administrative site certificate splits. As outlined below, new section (4) would authorize an administrative update of a site certificate holder when the new site certificate holder is a wholly owned subsidiary of the same parent company. New section (5) would separately authorize an administrative split of an approved facility and its site certificate into two or more resulting facilities and corresponding site certificates. Both pathways would be limited to circumstances in which the certificate holder's parent company remains unchanged, and the proposed action does not alter the substantive basis for the Council's prior findings.

A. Background and Rationale for Proposed Revisions

1. Developing a Renewable Energy Project

Obtaining a site certificate from EFSC for a utility-scale renewable energy project is a multi-year process. To maintain a viable development project, developers must often begin permitting before a project has secured a customer or its final commercial structure has been established. Advancing a project from early due diligence to a marketable development opportunity requires meaningful permitting progress, as customers generally expect to see a viable, permitted project before committing to long-term power purchase agreements or other commercial arrangements. As a result, developers often seek approval for a project before final commercial details—including size, phasing, and ownership configuration—are determined. This sequencing is an inherent feature of utility-scale project development and allows projects to respond to evolving commercial, technical, and regulatory conditions without requiring duplicative permitting or delaying deployment of renewable generation.

The ultimate size, timing, and configuration of a project are influenced by several factors, including:

- **Customer demand and commercial negotiations**: Utilities and other customers procure renewable energy based on their individual capacity needs, procurement schedules, ownership objectives, and evolving resource plans. The ultimate project size, phasing, commercial structure, and construction schedule are often determined through these negotiations, many of which occur after EFSC permitting. An Oregon utility may, for example, elect to purchase one portion of a project through a build-transfer arrangement while purchasing energy from another portion under a long-term power purchase agreement. Accommodating these commercial structures may require the project to be owned by separate project companies even though the facilities remain part of the same previously evaluated development, requiring an administrative split of the project into two.

- **Transmission availability and interconnection**: Interconnection studies, transmission planning, queue timelines, and required network upgrades are managed by transmission providers and can take several years to complete. These processes influence the amount of generation that can be interconnected, the timing of available transmission capacity, the sequencing of project energization, and whether a project is developed in one phase or multiple phases within the approved site certificate boundaries.

- **Financing and market conditions**: Capital markets, equipment availability, supply chain constraints, tax policy, and broader market conditions continue to evolve throughout project development and may influence project timing, ownership structure, and construction sequencing without changing the overall environmental footprint of the permitted project.

To navigate these uncertainties, developers often develop projects in multiple phases and transfer those phases to separate project entities as individual phases secure interconnection rights or

commercial agreements. These changes reflect the realities of project development rather than changes to the facility components or impacts evaluated during the permitting process.

Administrative adaptations like permit splitting thereby provide multiple benefits, including:

- Timely deployment of renewable generation;
- Preservation of the environmental review already completed;
- Reduced agency burden otherwise required for duplicative permitting;
- Commercial flexibility without changing environmental impacts; and
- Procurement of projects in the structures customers require.

2. EFSC's Current Rules

Under EFSC's current site certificate amendment and transfer rules, a full site certificate amendment is required whenever there is a change of the certificate holder. In practice, this requirement applies even where ownership is transferred between wholly owned project companies within the same corporate family and the same parent company continues to provide the organizational expertise and financial backing on which the Council relied when issuing the site certificate.

Likewise, under EFSC's current amendment rules, a full site certificate amendment is required to split a site certificate and facility even when each resulting facility consists solely of components previously approved by the Council and remains under the ownership and control of wholly owned affiliates of the same parent company.

In each case, the current rules require the same formal amendment process, public notice, transfer hearing, Council approval, and amended site certificate regardless of whether the transfer or site certificate split involves a new parent entity, for which the Council is evaluating organizational expertise and financial capability for the first time, or a transfer or split between or among affiliated project entities of an established parent company that has previously demonstrated compliance with the Council's standards. These requirements can impose significant administrative costs and delay on both certificate holders and the Department, even where the transaction does not present the substantive concerns that EFSC's amendment rules were intended to address. EFSC has already reviewed and approved the facility and already evaluated the parent company's organizational and financial capabilities. Requiring essentially the same amendment process when neither the facility nor the parent company changes creates process without corresponding regulatory benefit.

In the last several years, NEER secured Council approval for multiple site certificate splits and associated affiliate transfers. In each case, each resulting facility consisted solely of components previously approved by the Council and remained under the ownership and control of wholly owned affiliates of NEER, a company that has owned and operated EFSC facilities in Oregon for

over two decades. Those proceedings provide practical examples in which this letter's proposed administrative pathways would have reached the same result without the full amendment process and related administrative burden placed on agency staff.

B. Proposed Amendments

The rationale underlying the language in proposed OAR 345-026-0088 supports the addition of language that would allow administrative updates of the site certificate holder and administrative site certificate splits. If the Department may administratively update a site certificate to ensure that the facility description accurately reflects the facility as constructed and operated, the Department should also be authorized to approve these limited actions when the parent company remains unchanged and the actions do not alter the basis for the Council's prior findings. Under this proposed administrative pathway, the Department would issue a written determination consistent with the process that applies to other administrative authorizations and the Council would retain appropriate oversight.

1. Amendments to Proposed OAR 345-026-0088

NEER requests that the Council consider revising proposed OAR 345-026-0088(3) and adding new sections (4) and (5) as follows. Additions are underlined and deletions are shown in strikethrough.

(3) An update issued under this rule, <u>including an administrative update approved under section (4) or (5)</u>, does not authorize construction or operation of any facility component, structure, corridor, or activity not previously approved by the Council and does not expand the approved facility beyond that previously authorized by Council order or site certificate.

<u>(4) Administrative Certificate Holder Updates.</u>

<u>(a) Upon written request of the certificate holder, the Department may administratively update a site certificate to identify a new certificate holder without requiring an amendment if:</u>

<u>(A) The new certificate holder is a wholly owned subsidiary of the same parent company as the existing certificate holder;</u>

<u>(B) The existing certificate holder relied on that parent company to demonstrate compliance with applicable Council standards regarding organizational expertise and retirement and financial assurance;</u>

<u>(C) The new certificate holder agrees in writing to comply with all terms and conditions of the site certificate; and</u>

<u>(D) The parent company confirms that the new certificate holder will have sufficient access to resources to construct, own, operate and maintain the facility.</u>

(b) A request under this section must include:

(A) Documentation sufficient to demonstrate compliance with subsection (a);

(B) A proposed updated site certificate identifying the new certificate holder and any conforming revisions necessary to reflect the certificate holder update.

(5) Administrative Site Certificate Splits.

(a) For purposes of this section, "administrative site certificate split" means the division of a previously certificated facility into two or more resulting facilities and corresponding site certificates, where each resulting facility consists solely of facility components previously approved by the Council.

(b) Upon written request of the certificate holder, the Department may approve an administrative site certificate split without requiring an amendment if:

(A) Each resulting certificate holder is a wholly owned subsidiary of the same parent company as the existing certificate holder;

(B) The existing certificate holder relied on that parent company to demonstrate compliance with applicable Council standards regarding organizational expertise and retirement and financial assurance;

(C) Each resulting certificate holder agrees in writing to comply with all terms and conditions applicable to the resulting facility assigned to that certificate holder; and

(D) The parent company confirms in writing that each new certificate holder will have sufficient access to resources to construct, own, operate, and maintain the resulting facility assigned to that certificate holder.

(c) A request under this section must include:

(A) Documentation sufficient to demonstrate compliance with subsection (b);

(B) A description of the proposed allocation among the resulting facilities and certificate holders of facility components; and

(C) Proposed site certificates identifying each resulting facility and certificate holder and showing the proposed allocation of site certificate conditions and obligations.

2. Conforming Amendments to OAR 345-026-0353 and OAR 345-027-0400

To avoid ambiguity and clearly identify when an amendment is not required, NEER recommends conforming amendments to OAR 345-027-0353 and OAR 345-027-0400 that specifically exempt administrative certificate holder updates and administrative site certificate splits. Additions are underlined and deletions are shown in strikethrough.

345-027-0353 Changes Exempt from an Amendment

* * *

(7) To administratively update the certificate holder under OAR 345-027-0088(4) or split the certificate under OAR 345-027-0088(5).

345-027-0400 Request for Amendment to Transfer Ownership, Possession or Control of the Facility or the Certificate Holder

(1) For the purpose of this rule:

(a) A request for amendment to a site certificate to transfer the site certificate is required for a transaction that results in a change in the ownership, possession or control of the facility or the certificate holder, except for an affiliate site certificate transfer approved as an administrative certificate holder update under OAR 345-026-0088(4) or an administrative site certificate split approved under OAR 345-026-0088(5).

C. Conclusion

The proposed revisions regarding administrative certificate holder updates and administrative site certificate splits would not eliminate substantive review where substantive review is warranted. Rather, these revisions would allow the Department to distinguish between changes that require new Council findings and organizational changes that leave the Council's existing findings intact. NEER appreciates the opportunity to provide comments and would be pleased to discuss these recommendations with the Department or the Council.

Sincerely,



David Lawlor
Executive Director
NextEra Energy Resources, LLC

Outlook

Re: [External]Re: Compliance Rule Making Comments

From Bauer, Andrew <Andrew.Bauer@nwnatural.com>
Date Fri 9/25/2026 11:15 AM
To JACKMAN Tom * ODOE <Tom.JACKMAN@energy.oregon.gov>

1 attachment (269 KB)
NWN Comments - EFSC Compliance and Enforcement Rules 092526.pdf;

Tom,

Great, here's our comment letter. Thank you for the help and running the meetings.

Have a great weekend,
Andy

From: JACKMAN Tom * ODOE <Tom.JACKMAN@energy.oregon.gov>
Sent: Thursday, September 24, 2026 2:06 PM
To: Bauer, Andrew <Andrew.Bauer@nwnatural.com>
Subject: [External]Re: Compliance Rule Making Comments

CAUTION: This email originated outside NW Natural. Please DO NOT CLICK LINKS OR OPEN ATTACHMENTS unless you recognize the sender and know the content is safe.

To me!

Tom

From: Bauer, Andrew <Andrew.Bauer@nwnatural.com>
Sent: Thursday, 24 September 2026 14:04:08
To: JACKMAN Tom * ODOE <tom.jackman@energy.oregon.gov>
Subject: Compliance Rule Making Comments

Tom,

We have comments for the compliance rule making, but I cannot find the email. Is there a link or email I can submit our comments to?

Thanks,

Andrew Bauer RG,LG
NW Natural – Environmental Compliance Manager
w: 503.610.7060 m: 503.593.7913 I nwnatural.com

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Portland, OR 97204

503-226-4211
nwnatural.com

Energy Facility Siting Council
September 25, 2026

VIA EMAIL (tom.jackman@energy.oregon.gov)

Energy Facility Siting Council
c/o Tom Jackman
Rules Coordinator
Oregon Department of Energy
550 Capitol Street NE
Salem, Oregon 97301

Re: Comments on Proposed Amendments to Energy Facility Siting Council Site Certificate Compliance and Enforcement Rules

Dear Members of the Council:

Please accept the following comments from Northwest Natural Gas Company ("NW Natural") on the Energy Facility Siting Council's ("Council" or "EFSC") proposed amendments to OAR chapter 345, divisions 26 and 29, described in the Notice of Proposed Rulemaking filed July 30, 2026. NW Natural owns and operates several energy facilities that fall under EFSC's jurisdiction and appreciates the opportunity to provide feedback on the draft amendments.

NW Natural generally supports the efforts to make the compliance program clearer, more predictable, and more efficient. NW Natural is concerned, however, that the amended rules, as proposed, would require NW Natural to provide detailed facility location information, including maps and geospatial data for components of its operational facilities, without adequately accounting for the unique safety, security, and regulatory considerations applicable to natural gas pipeline systems and related natural gas infrastructure. The proposed rule amendments do not adequately account for the federal regulatory framework governing pipeline safety and transportation security, including the Transportation Security Administration's ("TSA") restrictions on Sensitive Security Information ("SSI"). Under these provisions, federal law requires NW Natural to safeguard information that constitutes SSI from unauthorized disclosure, and federal agencies carefully control access to detailed pipeline information even when that information is submitted for legitimate regulatory purposes. In addition, the proposed rule amendments are broader than necessary for the Department to determine compliance with site certificate terms and conditions or maintain an accurate site certificate record. They also would require NW Natural to recreate or resubmit detailed information already maintained for, and reviewed by, agencies charged with pipeline safety, transportation security, and protection of the environment.

NW Natural therefore respectfully requests that the Council consider several targeted revisions to the proposed amendments. The revisions, described below, would preserve the Department's access to information necessary to verify compliance with EFSC site certificate conditions. These revisions would also minimize unnecessary collection and duplication of detailed natural gas facility location information and allow alternative submissions that protect safety- and security-sensitive infrastructure information.

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503-226-4211
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A. The Issues

1. Requiring NW Natural to provide detailed facility location information raises safety and security concerns.

Detailed, system-level information concerning natural gas infrastructure can reveal the location, configuration, function, and criticality of pipeline components. Depending on its source, content, and connection to federal security requirements, that information may constitute SSI governed by 49 C.F.R. pt. 1520 or otherwise be subject to limitations on access and dissemination controls. SSI includes, among other categories, critical-infrastructure asset information and other information TSA determines would be detrimental to transportation security if disclosed.

These restrictions do not necessarily prohibit every submission of pipeline information to a state agency. They do, however, make it inappropriate for the Department to require routine submission of information that may reveal protected security measures, vulnerabilities, or critical assets without first determining that the information is necessary to determine compliance with a site certificate condition and that the Department is equipped to receive and safeguard it. Persons subject to the SSI regulations, including pipeline operators like Northwest Natural, must safeguard SSI from unauthorized disclosure and share it only in accordance with applicable federal requirements.

The proposed amendments to the compliance rules do not sufficiently distinguish between an ordinary site certificate map, which may be appropriate to establish an approved site boundary or general facility configuration, and precise, downloadable geospatial data depicting the locations and attributes of significant components of an operating natural gas system. Proposed OAR 345-026-0080(2)(e)(E) and (F) would require maps and geospatial data showing the final locations of all significant facility components. Proposed OAR 345-026-0080(4)(d)(A) would require the final or proposed location of a modified component and any geospatial information requested by the Department. Proposed OAR 345-026-0080(7) would further authorize the Department to prescribe geospatial formats and standardized submission requirements. Taken together, these provisions could require information materially more detailed than necessary to determine compliance with site certificate conditions and create an additional governmental repository from which sensitive natural gas infrastructure location information could be requested, accessed, or disseminated.

NW Natural appreciates the language proposed OAR 345-026-0105(2), which recognizes that geospatial and other facility information may be subject to state or federal confidentiality, security, or critical-infrastructure requirements and allows the Department to approve an alternative form, scale, format, or level of detail. As drafted, however, the provision does not adequately address the federal framework applicable to sensitive pipeline information. First, the provision is triggered only when law "restricts" the certificate holder from submitting the requested information. The SSI framework does not necessarily prohibit every transfer to a governmental entity, but it regulates who may receive SSI, the circumstances under which it may be received, how it must be marked and safeguarded, and how a request for public access must be handled. Second, the proposed rule would make approval of an alternative discretionary with the Department even when the Department can determine compliance without receiving precise geospatial information. Third, the proposed rule places the burden on the certificate holder to establish a legal prohibition, even when the more fundamental issue is that EFSC has not demonstrated a need to collect and separately maintain the sensitive information.

2. The proposed amendments conflict with the stated goal of reducing duplicative reporting.

The Department has identified reducing duplicative reporting as a central objective of this rulemaking. The staff report explains that certificate holders should be able to rely on prior submissions and reports submitted to other agencies or the Department, and proposed OAR 345-026-0080(6) is intended to implement that objective. Requiring NW Natural to

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503-226-4211
nwnatural.com

prepare and submit new, detailed maps or GIS datasets that duplicate information already provided to the Department would produce the opposite result.

B. Proposed Amendments

For the reasons outlined above, NW Natural requests that the Council consider the following targeted revisions attached hereto as **Exhibit A**. Additions are underlined and deletions are shown in strikethrough.

C. Conclusion

NW Natural supports the Council's goal to establish a clearer and more efficient compliance program. NW Natural's proposed revisions would advance that objective by focusing Department requests on information necessary to evaluate compliance with EFSC requirements, avoiding duplication of information already provided to specialized pipeline safety and environmental regulators, and protecting sensitive infrastructure information. The revisions would not diminish EFSC's authority to determine compliance with a site certificate. They would instead ensure that the form and level of information requested are proportionate to that role.

NW Natural appreciates the opportunity to provide comments and would be happy to discuss these recommendations with the Department or the Council.

Sincerely,

Andrew Bauer

Andrew Bauer, RG, LG
NW Natural Environmental Compliance Manager

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250 SW Taylor Street
Portland, OR 97204

503-226-4211
nwnatural.com

Exhibit A

Northwest Natural Compliance Rule Language Markup

345-026-0080 Reporting Requirements for Energy Facilities

(2) Final construction compliance and facility design report.

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(e) The final facility design report must include:

***

(F) Geospatial data for the site boundary and all significant components of the energy facility and related or supporting facilities, in a format requested by the Department, subject to subsection (g) of this section.

(g) For a natural gas pipeline, a surface facility related to an underground gas storage reservoir, or a storage facility for liquified natural gas, the certificate holder is not required to submit precise geospatial data or detailed component-location information.

(4) Annual report contents.

***

(d) Facility modification report.

(A) For any change that modifies, relocates, removes, or replaces a facility component, the facility modification report must describe the affected component, explain the reason for the change, identify the final or proposed location of the component at a level of detail necessary to determine compliance with an identified site certificate term or condition, and include any geospatial information requested by the Department.

(B) For a natural gas pipeline, a surface facility related to an underground gas storage reservoir, or a storage facility for liquified natural gas, the certificate holder is not required to submit precise geospatial data or detailed component-location information.

(6) Use of reports submitted to other agencies or the Department.

***

250 SW Taylor Street
Portland, OR 97204

503-226-4211
nwnatural.com

(d) The certificate holder is not required to duplicate information submitted to another agency or to the Department under another requirement if the excerpted report or a clear cross-reference to the prior submission provides the information required by this rule in a form that allows the Department to determine compliance with the site certificate, Council standards, Council rules, or a Council order.

(7) Form and manner of submittals. The certificate holder must submit reports, plans, tables, geospatial data, supporting documentation, and other information required under this division, a site certificate, or a Council order in the form and manner requested by the Department, except as provided in sections (2)(g), (4)(d)(B), and (7)(c) of this rule.

(a) The Department may require use of templates, tables, file-naming conventions, electronic formats, geospatial data formats, or other standardized submission requirements reasonably necessary to support efficient review, inspection, compliance tracking, or maintenance of the site certificate record.

(b) The Department's requested form and manner must be reasonably related to determining compliance with the site certificate, Council standards, Council rules, or a Council order, or to maintaining the site certificate record.

(c) For a natural gas pipeline, a surface facility related to an underground gas storage reservoir, or a storage facility for liquified natural gas, the Department will not request precise geospatial data or detailed facility component-location information.

345-026-0105 Reliance on Federal or Other State Agencies

(1) If a certificate holder relies on a permit, approval, report, correspondence, or other document from another federal, state, or local agency to demonstrate compliance with a site certificate condition, Council standard, Council rule, or Council order, the certificate holder must provide the document or relevant excerpt to the Department upon request. The Department may rely on another agency's permit, approval, inspection, or compliance determination when the Department determines that the other agency's action provides sufficient information to demonstrate compliance with the applicable site certificate condition, Council standard, Council rule, or Council order.

(2) If a certificate holder asserts that state or federal law restricts the certificate holder from submitting information requested by the Department, including geospatial data or security-sensitive facility information, or that submission in the requested form, scale, format, or level of detail would create a safety, security, or critical-infrastructure concern, the certificate holder must identify the specific information, the legal basis for the restriction or the basis for the safety, security, or critical-infrastructure concern, and an alternative form of information sufficient for the Department to determine compliance, if available. The Department ~~may~~must approve an alternative form, scale, format, or level of detail for geospatial data or other facility information when necessary to comply with state or federal confidentiality, security, or critical-infrastructure information requirements or to avoid unnecessary safety, security, or critical-infrastructure risk, provided the alternative submission allows the Department to determine compliance.

Outlook

PGE Comment on Proposed Compliance and Enforcement Rules

From Lenna Cope <Lenna.Cope@pgn.com>
Date Fri 9/25/2026 4:19 PM
To JACKMAN Tom * ODOE <tom.jackman@energy.oregon.gov>
Cc Sarah Buchwalter <sarah.buchwalter@pgn.com>

Tom,

Portland General Electric appreciates the opportunity to comment on the proposed Amendments to the Site Certificate Compliance and Enforcement Rules. Following up on our conversation a couple of weeks ago, PGE wishes to provide comment on the revisions to OAR 345-026-0080 “Reporting Requirements for Energy Facilities.” Moving the due date of the Annual Reports from April 30 each year to January 31 each year will strain site certificate holders’ compliance staff due to overlapping existing regulatory requirements. We recognize that the current annual report due date of April 30 of each year provides limited time to review and start onsite inspections for the remainder of the year. As the Department has focused on improvements to the compliance program, the level of detail and supporting documentation requested with each annual report is significant and entails substantial effort. Moving the due date up by three months would present a significant challenge to site certificate holders' compliance and operations teams to provide the meaningful and accurate information the Department expects. We request the Department consider revising the due date from January 31 each year, to March 31 each year. This would still result in the Department receiving annual reports earlier in the year and provide site certificate holders the ability to balance existing regulatory reporting requirements during the first quarter of the year. Thank you for considering our comment.

Thank you.

Lenna Cope, P.E.
Pronouns: she/her
Senior Environmental Specialist | 503-464-2634 | 503-313-5022
portlandgeneral.com | Follow us on social @PortlandGeneral
An Oregon kind of energy.