



August 11, 2022

Regarding: Docket AR 626 Certificate of Public Convenience and Necessity Rule Update

To: The Oregon Public Utilities Commission
puc.filingcenter@puc.oregon.gov

I am writing on behalf of the Greater Hells Canyon Council (GHCC) to provide comments on the proposed Certificate of Public Convenience and Necessity Rule Update.

Greater Hells Canyon Council is a non-profit conservation organization based in La Grande. Our mission is to protect and restore the inspiring wildlands, pure waters, unique habitats and biodiversity of the Hells Canyon-Wallowa and Blue Mountain Ecosystems through advocacy, education and collaboration, advancing science-based policy and protective land management.

We must object in the strongest terms possible to the proposed changes in rules to allow condemnation /Eminent Domain proceedings of private property before all required permits have been completed.

Taking land through Eminent Domain is a very serious matter and must absolutely be the last step in any process. We are very concerned that the proposed changes will negatively impact the wildlife habitats of Oregon. Additionally, we are very concerned about the Environmental Justice impacts that these proposed “shortcuts” will unfairly and negatively impose upon the disadvantaged communities in our state.

Thank you for the opportunity to provide these comments. Please don’t hesitate to contact me with any questions.

Sincerely,

Brian Kelly

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