

OREGON CITIZENS FOR  
**Energy Security**

PO Box 375, Walterville, OR 97489

February 24, 2025

THE OREGON ENERGY STRATEGY ADVISORY GROUP,  
Submitted via on line portal

**RE: Proposed removal of Leaburg Dam - FERC Filing P-2496-287**

Dear Advisory Group,

In January 2023 the EWEB board decided to remove the Leaburg Hydroelectric plant after deliberations.

Since that time, the Oregon Citizens for Energy Security (OCES), has examined the decision, its basis, and consequences.

Oregon Citizens for Energy Security made a filing with the Federal Energy Regulatory Commission (FERC) on December 12th, 2024. We attach that filing.

This letter focusses on the impact of the decision to Oregon, locally and statewide.

The need for a decision by EWEB was spurred by the end of the license period in 2040. Standards required for the construction of Dams have been progressively raised by the Federal Energy Regulatory Commission (FERC). The standards required are now so onerous that a major upgrade is required. EWEB had addressed this directly with FERC and asked if a lesser standard might be used. The basis for this question is not without merit, since Leaburg Dam itself is rated as a low hazard potential, but the canal and forebay as a high hazard potential by FEMA.

The anchoring tool as a basis for decision was a triple bottom line study. There are many questions over the data acquisition and usage which will not be explored in this context.

Examining the decision support package, however, showed that the impacts and effects of such a decision had not been fully explored or understood when the decision was

made. Indeed, more than a year after the decision, surveys were still being made to determine potential routes for roads and spoil after removal of the dam.

Looking further into the economics presented, both to the board and the public, the numbers have been shown in a way which is not a true indicator.

From the perspective of the State of Oregon it was noted that the decision support package did not detail any discussion which addressed the needs of Oregon. This meant that resiliency was not considered, nor any potential reduction in reliability.

Since much of Oregon is served by relatively few lines from the Bonneville Power Authority (BPA), it is very exposed to any damage to those lines. Tremendous effort is put in to assuring the best reliability, and that the latest technology is used. It remains an inescapable fact that an earthquake, wildfire, mechanical impact or bad actors could defeat and topple the lines.

The Department of Energy is expending great efforts, together with many others, in assembling a crucial resiliency plan. The plan identifies resources which might be needed subsequent to a major event.

The ice storm of January 13th, 2024 toppled power lines unexpectedly over quite a wide area. The efforts made by the utilities in reconnecting was impressive, especially in considering men and women working in a hostile weather environment. It was notable however, that the entire McKenzie Valley was without power, and yet line damage was minimal. The Leaburg Power Station (not generating since 2018), had it been functional, would have easily been able to supply the entire valley. Indeed, located as it is, it is uniquely located well to supply both EWEB and Lane Electric customers. It would save thousands of portable generators running for potentially long periods. This is increasingly important with the large numbers of electric cars now on the road. The resiliency plan identifies critical fuel supplies, but electric vehicles would be challenged.

In considering the strategic plan, the cost of keeping Leaburg Dam would appear not be as onerous as indicated by numbers submitted to the EWEB board. That is primarily since keeping the dam would in reality be to 2080 - the end of the next license period. The EWEB numbers attempt to amortize costs within the present license period now at 15 years away. Amortizing the costs over 55 years is much less painful. EWEB also indicates that they would anticipate some grant money coming. We examined the costs and allocation centers for the Klamath Dams and applied similar weightings for Leaburg. The high level cost to remove the Dam is \$200MM. If the example of Klamath held, then Federal funds would account for \$50MM and Oregon \$50MM.

Costs of \$100MM would likely be passed on to EWEB customers, and State residents would pay taxes for the Federal and State funding. The question is why, when a viable buyer approached EWEB and was turned away without due diligence. Their acquisition to continue running the dam would have been cost neutral for the Federal government and State government.

The impact of removing the dam to the local economy was not a major part of the EWEB decision. Contributions to the “People” part of the triple bottom line were extensively taken some 40 miles away from the area impacted.

Pressure for a critical examination of the EWEB decision by the State from a more strategic perspective is mounting. Although EWEB assured all that no work would be done until many years from now, there are indications that is not so. We have had indications that the canal could be filled in very soon, compromising any ability to retain the generating plant operating.

Your most urgent attention is sought to retain Leaburg Hydro Electric plant as a significant generator, especially in time of Emergency - great reliability, and short lines.

Sincerely,

Capt. Robert Weeks

President

cc. rep Darin Harbick. Oregon State Legislature

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