

From: [REDACTED]
To: [Rep. Donna Mears](#); [Rep. Ky Holland](#); [Rep. Chuck Kopp](#); [Rep. DeLena Johnson](#); [Rep. Justin Ruffridge](#); [Rep. Mia Costello](#); [Rep. Bryce Edgmon](#)
Cc: [REDACTED]
Subject: Chugach Electric's Comments to HB 369, version G
Date: Wednesday, March 18, 2026 3:27:16 PM
Attachments: [image001.png](#)

Honorable members of the House Energy Committee:

Representatives Mears, Holland, Kopp, Johnson, Ruffridge, Costello, and Edgmon:

We appreciate your efforts to improve electric service to Alaskans and the time you and your respective staff members have dedicated to the issues contained in the House Energy Committee's Energy Omnibus bill.

Safety – for our employees, members, and the public – is our highest priority, followed closely by reliability and affordability. With these priorities in mind, we offer the following comments to HB 369, version G.

Chugach Electric Association, Inc. (Chugach) does not support extending our area of responsibility to include adjacent properties outside our existing easements or rights-of-way. Beyond the challenges of accessing private property – including obstacles such as fences and pets - the responsibility of managing an area up to 30 times wider than our existing right-of-way would significantly increase cost, expand liability exposure, and likely generate substantial public concern.

Determining whether vegetation growing outside our easements and rights-of-way constitutes a high risk for wildland fire is not within the expertise of an electric cooperative. We have a duty to maintain our easements and rights-of-way through regular maintenance and line clearing activities. But our area of responsibility and legal rights are within established easement and right-of-way corridors that we access for maintenance purposes. We clear distribution lines on a three-to-five-year rotation, and transmission lines on a seven-to-ten-year rotation; widening the scope of our responsibility will take longer and increase costs.

Chugach regularly works with state and local fire agencies. For example, during the Swan Lake fire in 2019, we de-energized lines as the fire swept through areas that included our infrastructure. We receive warnings from state and local agencies about conditions that heighten the risk of fire, such as the combination of high temperatures, low humidity, and strong winds. We use this information when we consider which tools to put into use to mitigate risk, such as disabling automatic reclosing and using enhanced powerline safety settings. We are not, however, responsible for notifying state and local fire response agencies or the public about the threat of wildfire. Indeed, doing so could possibly be at cross-purpose with

government agencies who have this responsibility, increasing the likelihood of mixed messages.

Regarding the diversified portfolio standard (DPS) section of the bill, should a DPS be established, we believe a more appropriate target date would be no sooner than 2040, rather than 2036, to accommodate the longer lead time necessary for hydroelectric projects. You may be aware that Chugach is currently looking at four possible hydroelectric sites. Development of new hydro projects takes between ten and fifteen years, so it would be prudent for a target date to accommodate those and other potential hydro projects that may be considered.

If a DPS were established, the 1.5 factor should apply to any DPS project that is shared by two or more utilities, regardless of when it is put into service or how many megawatts in size. We do not see a benefit in limiting the 1.5 factor only to projects that are in service by the end of 2032 or that are at least 100 megawatts in size.

HB 369 provides that pipeline gas sourced from above 68 degrees latitude may qualify toward the DPS requirement if its cost is less than that of renewable energy resources. However, because renewable resource costs vary widely by technology, location, and project configuration, additional clarification would be necessary to ensure consistent and transparent application of this provision. It is important to define the appropriate cost metric. Clarification is needed on whether costs should be evaluated on a point-in-time basis, such as at commercial operation, or on a lifecycle basis, such as through a levelized cost of energy calculation over the expected life of the project.

Thank you for the opportunity to comment.

Respectfully,

Trish Baker

Trish Baker
Senior Manager, Government and Business Affairs



5601 Electron Drive
Anchorage, AK 99518



