

OREGON GLOBAL WARMING COMMISSION

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October 23, 2013

Oregon Public Utility Commission
3930 Fairview Industrial Drive SE
PO Box 1088
Salem, OR 97308-1088

ATTN: Filing Center

RE: Commission Advice No. 13-10 – Schedule H, High Pressure Gas Service Rider
Chair Ackerman; Commissioners Bloom and Savage:

The action proposed by Northwest Natural Gas Company (NNG) in this proceeding, to extend compressed/high pressure natural gas service for the fueling of fleet vehicles, is consistent with the unanimously adopted recommendations of the Oregon Global Warming Commission for development of a “Modern Gas Infrastructure (EN-6)¹, to wit:

“In the next decade, natural gas infrastructure and operations will need to drive net reduction in greenhouse gases through: . . . c) serving a growing fleet of natural gas-powered vehicles.”

Extending such service is also consistent with the Commission’s Recommendation (TLU-12, p. 56) that Oregon permanently adopt its Low Carbon Fuel Standard, enabling compressed natural gas, among other low-carbon fuels, to mitigate the 25% of Oregon’s GHG emissions deriving from light vehicles.

My understanding is that NNG proposes to provide this service in a manner that fully charges the recipients for the cost of service, and that no costs are expected to shift to other customers in consequence of offering the service; and that these conditions can and would be embedded in any OPUC decision to allow the company to proceed.

I appreciate concerns expressed by the Citizen’s Utility Board, but respectfully disagree that delay is in the State’s best interests. On the contrary, the need to materially reduce GHG emissions is urgent, and warrants urgent action on the part of the community, the company and the OPUC. This is particularly so when the risks are minimal and easily managed. Thus, should unanticipated issues arise about allocation of costs, anti-

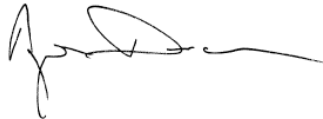
¹ OGWC 2011 Report to the Oregon Legislature: Roadmap to 2020, page 44

competitive effects or other issues, these can be dealt with by establishing a schedule for OPUC review and, as needed, revision of the conditional approval being sought today.

To be clear, my Commission adopted the broad policy positions referenced above and not the specific conditional arguments I propose in this letter (which are my own, but which are not inconsistent with the Commission's deliberations on Roadmap recommendations considered and leading to adoption in 2010).

Thank you for hearing this perspective.

Regards,

A handwritten signature in black ink, appearing to read 'Angus Duncan', with a long horizontal flourish extending to the right.

Angus Duncan, Chair

Oregon Global Warming Commission