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August 3, 2021

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High St SE, Suite 100
Salem, Oregon 97301

**RE: LC - 75 AWEC'S FINAL COMMENTS ON AVISTA'S 2021 INTEGRATED
RESOURCE PLAN**

Dear Filing Center:

Alliance of Western Energy Consumers (AWEC) files these final comments on Avista's 2021 Integrated Resource Plan.

Community Climate Goals.

AWEC found Avista's comments regarding Community Climate Goals informative, and representative of the concerns expressed by many end-users of natural gas over potential mandates to fuel switch from natural gas to electricity. For many end users of natural gas, fuel switching is either not possible or cost prohibitive, and such mandates would force many businesses to shut down or move to locations that continue to allow the use of natural gas. Further, the natural gas and electric systems rely heavily on each other to fuel the region, and simply building more renewable electric generation will not replace the reliability and energy supplied by the natural gas system. As the discussion of electrification continues, in addition to the costs and impact on ratepayers, a detailed study needs to be developed showing how the electric system can operate safely and reliably with existing loads, increased loads from the transportation sector and increased loads from customers potentially moving from natural gas to electricity. The recent blackout in Texas is a good reminder of what happens when energy planning is not done correctly.

Renewable Natural Gas and Renewable Hydrogen.

AWEC does not understand Avista's comments regarding "rate recovery uncertainty" for RNG developments, and would like Avista to explain this in further detail. Because of Senate Bill 98, Avista can move forward on RNG projects, and seek recovery of prudently incurred qualified investments just like any other project. Further, while AWEC understands that there are a finite number of projects in Oregon, AWEC notes that NW Natural's first RNG project is in Nebraska. AWEC encourages Avista to continue to dedicate resources to such projects and is

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willing to discuss Avista's concerns over "rate recovery uncertainty" as part of this or separate docket.

Thank you for the opportunity to provide these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chad M. Stokes". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Chad M. Stokes