

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

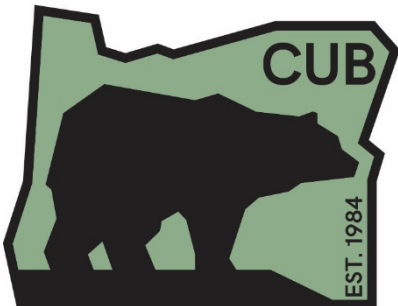
LC 76

In the Matter of)
)
)
CASCADE NATURAL GAS)
CORPORATION,)
)
)
2020 Integrated Resource Plan.)

OREGON CITIZENS' UTILITY BOARD

COMMENTS ON STAFF REPORT

April 16, 2021



**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 76

In the Matter of)	
)	COMMENTS OF THE OREGON
CASCADE NATURAL GAS)	CITIZENS' UTILITY BOARD ON
CORPORATION,)	STAFF REPORT
)	
<u>2020 Integrated Resource Plan.</u>)	

I. INTRODUCTION

The Oregon Citizens' Utility Board (CUB) hereby submits its comments on the Public Utility Commission of Oregon Staff (Staff) Report (Staff Report) in LC 76 – Cascade Natural Gas Company's (Cascade or the Company) 2020 Integrated Resource Plan (IRP).

CUB appreciates Staff's extensive analysis of the IRP. CUB also commends Cascade for involving and responding to stakeholders' concerns throughout the IRP process. In these reply comments to the Staff report, CUB supports Staff's recommendations for Cascade's 2020 IRP to the Commission and summarizes some of its earlier comments for consideration during the acknowledgement process.

II. COMMENTS

CUB re-emphasizes its comments on Alternatives to Cascade's planned pipeline projects. Non-pipe alternatives address greenhouse gas emissions from natural gas by lowering usage, and also aids the Company's transition to a low emissions future in a cost-effective way. CUB has

recommended that the Company expand its targeted energy efficiency programs and explore demand response programs. Gas demand response programs are less common in the region, but will likely become more prevalent and important amidst evolving climate policies and discussions around the future role of gas utilities. Demand response is cheap and has been shown to meet both winter and severe weather peaks.

CUB recognizes that there is a need and opportunities for innovative resource planning for gas utilities. The demand management measures would prevent costly pipeline investments and save customers significant sums of money and also foster the transition to a clean energy future in an equitable manner.

III. CONCLUSION

CUB appreciates the opportunity to participate in Cascade's 2020 IRP process. CUB supports Staff's recommendations for Cascade's Action Plan and looks forward to engaging in the Company's future IRP proceedings.

Dated this 16th day of April 2021.

Respectfully Submitted,



Economist
Oregon Citizens' Utility Board
610 SW Broadway, Ste. 400
Portland, OR 97205
T. 503.227.1984
C. 217.552.5680
E. sudeshna@oregoncub.org