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ADMITTED IN OREGON AND WASHINGTON

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Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, #100
PO Box 1088
Salem, OR 97308-1088

Re: Docket No. LC 76 – Comments of Alliance of Western Energy Consumers

Dear Filing Center:

Alliance of Western Energy Consumers (“AWEC”) appreciates the opportunity to provide opening comments on Cascade Natural Gas Corporation’s (“Cascade”) 2020 Integrated Resources Plan (“IRP”). AWEC appreciates the work that Cascade and other stakeholders have invested in this IRP which demonstrates the long-term role of natural gas in our region.

AWEC applauds Cascade’s dedication to demand side management, which Cascade estimates will save approximately 62 million therms system wide over the 20-year planning horizon, of which 12.09 million therms of savings is estimated for Oregon. If these estimates are accurate, this will be a significant achievement. AWEC also finds it noteworthy that for the first time in recent Cascade IRP history, the only resource selected by the SENDOUT model for the Top-Ranking Candidate 20-year Portfolio was incremental energy efficiency. Cascade should continue to pursue cost effective opportunities for energy efficiency which benefits Cascade, customers and the environment.

In the IRP, Cascade dedicated a chapter to renewable natural gas (“RNG”). AWEC encourages Cascade to pursue RNG and renewable hydrogen projects to help mitigate the carbon footprint of Cascade’s natural gas distribution system. While Cascade indicates it has met with producers, municipals and others, none of the proposed projects will be online for the foreseeable future. AWEC is supportive of voluntary programs that encourage bringing RNG and other low carbon resources into the natural gas distribution system so long as gas quality is not degraded, and such costs are reasonable. Cascade has also developed a complicated RNG cost effectiveness evaluation methodology that is discussed in the IRP. While AWEC agrees that it is appropriate to have a framework to evaluate these types of projects, such a methodology has many limitations and does not replace a prudence review for each project. When developing an RNG project, it is important to balance the interest and share the costs and benefits between the developers, Cascade and ratepayers.

LC 76

November 20, 2020


Page 2

Cascade has identified several potential distribution system enhancements for the Bend District, the Eastern Oregon District and the Pendleton District in the next four years because of system growth. Cascade argues that these projects are required to maintain safe and reliable service for customers. AWEC will review the prudence of these projects when Cascade files to include them in rates.

Cascade appears to have a diverse set of supply side resources to continue to meet the energy needs for its core customers. As described in the IRP, Cascade has contracted with a variety of sources that combines purchasing adequate gas supplies and winter peaking services with long-term pipeline transportation contracts and sufficient distribution system capacity. As demonstrated from the Enbridge Pipeline rupture, it is important to have a diverse set of resources to draw from to help ensure reliable service.

Thank you for the opportunity to provide these opening comments.

Very truly yours,



Chad M. Stokes