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August 29, 2023

To: Oregon Public Utility Commission  
201 High St. SE, Suite 100  
Salem, OR 97301

**Re: Avista Gas Company's 2023 Integrated Resource Plan (LC 81)**

Chair Decker and Members of the Commission,

Rogue Climate appreciates the opportunity to comment on Avista Gas Company's 2023 IRP. Rogue Climate is a community-based environmental justice organization dedicated to empowering Rogue Valley and South Coast communities most impacted by the climate crisis, including low-income, rural, youth, seniors, and communities of color.

Communities in Southern Oregon are already facing the worst harms of the climate crisis. In Ashland, the average temperature has already increased by 2.5 degrees Fahrenheit since 1910 (which is one degree more than the average of the Pacific Northwest as a whole), snowpack has decreased an average of 17% between 1960 and 2014, and the wildfire season has lengthened by roughly one day per year since 1984, resulting in a season that is 28 days longer in 2011 than 1984.<sup>1</sup> These climate impacts have real, tangible effects on Rogue Valley communities. In 2020, the Rogue Valley saw the most destructive wildfire in Oregon history, when more than 2600 homes were lost, mostly in mobile home neighborhoods where low-income, migrant, elder, and disabled groups primarily lived.

Methane gas is a primary driver of the climate crisis. The carbon footprint from methane gas combustion in 2020 was nearly twice that of coal combustion in the United States.<sup>2</sup> Over a 20 year period, methane is 80 times more powerful a climate change driver than carbon dioxide.<sup>3</sup> When combusted, methane gas releases carbon monoxide, nitrogen oxides, formaldehyde, and particulate matter – all of which worsen indoor air quality and cause public health problems.<sup>4</sup> And even before combustion, methane leaks into our communities and atmosphere at every step of the process: from the extraction to transportation, in power plants, and even in homes and businesses.<sup>5</sup>

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<sup>1</sup> *Climate Change Vulnerability in Ashland and the Rogue Valley*, GEOS Institute, 6 (Sep. 2016), [https://www.climatewise.org/images/projects/Geos\\_RogueValleyVA2016.pdf](https://www.climatewise.org/images/projects/Geos_RogueValleyVA2016.pdf)

<sup>2</sup> Brian Palmer, *Natural Gas 101*, Natural Resources Defense Council, (Nov. 15, 2021), <https://www.nrdc.org/stories/natural-gas-101#whatis>

<sup>3</sup> *Id.*

<sup>4</sup> *Id.*

<sup>5</sup> *Id.*



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The best way to avoid both climate and individual harms is to phase out methane gas use in buildings and transportation and move toward an energy future powered by renewable electricity and greater energy efficiency. It is critical that all utilities, including Avista, evaluate these alternative pathways and related risks in their long-term plans in order to protect communities and the climate. Rogue Climate believes that Avista has not done a sufficient analysis in their Integrated Resource Plan (IRP) and instead is relying on a “business-as-usual” approach of customer growth with heavy investments in risky alternative gases such as RNG and synthetic methane, which are still methane gas and still pose the same leakage and public health risks as traditional fossil gas.

**Avista’s short and long-term plans are not in-line with Rogue Valley community needs or the climate emergency.**

The IRP is not reflective of conditions in Southern Oregon, where communities like Ashland are looking to electrify. In a June city council meeting, the council directed the city attorney to draft an ordinance that would ban new methane gas hookups in new construction.<sup>6</sup> Youth organized a walk-out of the local high school to present the mayor with a proposed ordinance in March.<sup>7</sup> This proposed ordinance is in line with the city’s Climate and Energy Action Plan that (among many other things) lists “promote switching to low and non-carbon fuels” and “increase outreach efforts to expand participation in energy efficiency programs and promote climate-friendly practices in building and construction.”<sup>8</sup> Neighboring cities are on a similar track with the City of Talent having an established Clean Energy Action Plan that they are actively implementing, and new city wide processes happening in the City of Medford and City of Grants Pass to develop community wide clean energy and climate action plans. As we stated during the June 2023 public hearing for Avista’s rate case, “the PUC should be following the lead of communities taking action on climate, rather than allowing the gas industry to continue to expand.”<sup>9</sup> Avista’s IRP continues to encourage methane gas use and neglects to plan for a future without gas, which goes against community wishes, at both the city and individual levels.

The preferred resource strategy presented in Avista’s IRP represents an overreliance on renewable natural gas (RNG), hydrogen, and other alternative fuels when communities in

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<sup>6</sup> Gosia Wozniacka, *Ashland Moves Towards a Natural Gas Ban in New Homes*, The Oregonian (Updated: Jun. 07, 2023, 9:40 p.m.)  
<https://oregonlive.com/environment/2023/06/ashland-moves-toward-natural-gas-ban-in-new-homes.html>

<sup>7</sup> *Id.*

<sup>8</sup> *Ashland Climate & Energy Action Plan*, City of Ashland, 52; 54 (Mar. 2017),  
[https://ashlandor.org/wp-content/uploads/Ashland-Climate-and-Energy-Action-Plan\\_pages.pdf](https://ashlandor.org/wp-content/uploads/Ashland-Climate-and-Energy-Action-Plan_pages.pdf)

<sup>9</sup> Rate Case Testimony,  
[https://oregonpuc.granicus.com/player/clip/1186?view\\_id=2&redirect=true&h=1f3fcd17501e66d28a81d4e218cd01c1](https://oregonpuc.granicus.com/player/clip/1186?view_id=2&redirect=true&h=1f3fcd17501e66d28a81d4e218cd01c1)



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Southern Oregon would receive greater benefit from efficiency and electrification. RNG is the same heat-intensive molecule as fossil methane gas, which means that it still has the same heat potential when it leaks from pipelines and in transportation.<sup>10</sup> RNG and synthetic methane gas do not avoid the emission of harmful molecules when combusted, so the negative health effects are not avoided either.<sup>11</sup> The better option is to eliminate the use of methane molecules altogether to prevent such leakage. This must be done through electrification and investments in energy efficiency and conservation. In the last few years, Rogue Climate's ductless heatpump programs in partnership with Spark Northwest have made energy efficiency incentives in the South Coast, Rogue Valley, and Klamath County more accessible and have brought community benefits through local job creation, cost savings for households, and safer, more efficient ways to heat and cool a home, yet these are limited-time programs.<sup>1213</sup> There needs to be more opportunities, collaboration, and support for Oregonians, especially in low-income and rural communities, to have healthy homes.

We respectfully request that the Commission suggest Avista go back to the table and create a plan that actually optimizes community benefits and protects ratepayers as we transition to cleaner forms of electricity.

Sincerely,

Alessandra de la Torre  
Advocacy & Programs Director, Rogue Climate

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<sup>10</sup> *A Pipe Dream or a Climate Solution? The Opportunities and Limits of Biogas and Synthetic Methane to Replace Fossil Gas*, Natural Resources Defense Council, 3 (Jun. 2020)

<https://nrdc.org/sites/default/files/pipe-dream-climate-solution-bio-synthetic-gas-ib.pdf>

<sup>11</sup> *Id.* at 6

<sup>12</sup> *Coos County residents eligible for discounted heating system upgrades through Energize South Coast*, The World Newspaper (Oct. 2021)

[https://theworldlink.com/news/local/coos-county-residents-eligible-for-discounted-heating-system-upgrades-through-energize-south-coast/article\\_d5f52f38-260e-11ec-bbb1-67c882a9ee47.html](https://theworldlink.com/news/local/coos-county-residents-eligible-for-discounted-heating-system-upgrades-through-energize-south-coast/article_d5f52f38-260e-11ec-bbb1-67c882a9ee47.html)

<sup>13</sup> *Energize Klamath Brings Efficient Heating System Upgrades To Klamath County Residents*, Basin Life Magazine (Aug. 2022)

<https://www.basinlife.com/2022/08/18/energize-klamath-brings-efficient-heating-system-upgrades-to-klamath-county-residents/>