

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 83**

In the Matter of

CASCADE NATURAL GAS  
CORPORATION,

2023 Integrated Resource Plan (IRP)

PETITION TO INTERVENE BY  
GREEN ENERGY INSTITUTE AT  
LEWIS & CLARK LAW SCHOOL,  
CITIZENS CLIMATE LOBBY,  
CLIMATE REALITY PROJECT,  
CLIMATE SOLUTIONS,  
COLUMBIA RIVERKEEPER,  
ELECTRIFY BEND, OREGON  
PHYSICIANS FOR SOCIAL  
RESPONSIBILITY, SIERRA CLUB,  
THE ENVIRONMENTAL CENTER,  
AND 350DESCHUTES

The Green Energy Institute at Lewis & Clark Law School, Citizens Climate Lobby, Climate Reality Project, Climate Solutions, Columbia Riverkeeper, Electrify Bend, Oregon Physicians for Social Responsibility, Sierra Club, The Environmental Center, and 350Deschutes petition to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information (name, address, email address) of the petitioners are:

Name: Carra Sahler  
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Name: Lynne Haroun  
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Name: Greer Ryan  
Company: Climate Solutions  
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Name: Audrey Leonard  
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Name: Kristi Kimball  
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Email Address: kristi.kimball@gmail.com  
Telephone:

Name: David De La Torre  
Company: Oregon Physicians for Social Responsibility  
Street Address: 4110 SE Hawthorne Blvd #758  
City, State, Zip: Portland, OR 97214  
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Telephone:

Name: Jim Dennison  
Company: Sierra Club  
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Name: Neil Baunsgard  
Company: The Environmental Center  
Street Address: 16 NW Kansas Ave  
City, State, Zip: Bend, OR 97703  
Email Address: neil@envirocenter.org  
Telephone: (541) 385-6908

Name: Diane Hodiak  
Company: 350Deschutes

Street Address: P.O. Box 1664  
City, State, Zip: Bend, OR 97703  
Email Address: dhodiak@350deschutes.org  
Telephone: (206) 498-5887

[X] Please include these contacts on the service list.

2a. The petitioners [X] will not be represented by counsel in this proceeding.

2b. Additional contacts to be included on the service list (a petitioner is limited to three contacts on the service list):

Name: Satya Austin Opper  
Company: 350Deschutes  
Street Address: P.O. Box 1664  
City, State, Zip: Bend, OR 97703  
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3. If the petitioner is an organization, the number of members in and the purposes of the organization:

The Green Energy Institute at Lewis & Clark Law School is a climate and energy policy institute within Lewis & Clark's Environmental, Natural Resources, and Energy Law Program. GEI's mission is to develop equitable, comprehensive, effective strategies to prevent catastrophic climate change by furthering the just transition to a sustainable, carbon-free energy grid.

Citizens Climate Lobby, Bend Chapter is a division of a nationwide movement to transition away from fossil fuels and towards renewable energy. Citizens Climate Lobby is a grassroots organization driven by their volunteers who are passionate about accelerating solutions to climate change through democracy. In Bend, Citizens Climate Lobby connects with the local community and organizations to provide climate education and form relationships to encourage participation in the democratic process.

The Climate Reality Project is a nonprofit, national and international organization that focuses on public education and advocacy for climate solutions that are available today. The Central Oregon chapter comprises members from Bend and nearby communities. Chapter activities include educational presentations about the science and impacts of climate change and the identification and importance of taking both individual and collective actions to reduce carbon emissions. The Chapter also collaborates with other climate organizations in support of the adoption of climate policies at local and state levels.

Climate Solutions is a regional non-profit working to accelerate clean energy solutions to the climate crisis. As part of this work, Climate Solutions supports a

rapid and equitable transition to clean, fossil-free buildings for all. Climate Solutions has over 18,000 supporters in the Pacific Northwest, and almost 8,000 supporters in the State of Oregon.

Columbia Riverkeeper's mission is to protect and restore the water quality of the Columbia River and all life connected to it, from the headwaters to the Pacific Ocean. Riverkeeper's vision is to unite people to fight for clean water, abundant fish and wildlife, and our climate. Columbia Riverkeeper represents approximately 16,000 members and supporters.

Electrify Bend is a project of The Environmental Center located in Bend, Oregon. In the decades since its creation in 1989, The Environmental Center has grown into a regional leader in environmental education, engagement, and action with the mission "To embed sustainability into daily life in Central Oregon." Specifically, Electrify Bend carries out that mission by educating residents and advocating for policies to promote electrification.

Oregon Physicians for Social Responsibility (Oregon PSR) works to protect communities from the threats to human health posed by climate change. Oregon PSR is an organization of health professionals and public health advocates working collaboratively with community partners to educate and advocate for societal and policy change to protect human health, and works towards a rapid transition to a highly efficient clean energy economy that will provide direct improvements to public health.

Sierra Club, founded in 1892, is the nation's oldest nonprofit, grassroots environmental organization. The Oregon Chapter of the Sierra Club and its members promote the conservation of the Oregon natural environment by influencing public policy decisions—legislative, administrative, legal, and electoral. The Oregon Sierra Club has more than 19,500 members in the state. Sierra Club's over 716,000 members nationwide are dedicated to the protection and preservation of the natural and human environment, including protecting public health. One of the Sierra Club's priorities is to advance smart and equitable clean energy solutions that address critical problems from the climate crisis, air pollution, and our nation's dependence on fossil fuels.

The Environmental Center's mission is to "embed sustainability into daily life in Central Oregon." The Environmental Center team works at the individual, organizational, and policy levels with a solutions-oriented approach to advocate for and implement practical decarbonization strategies. The Environmental Center also supports local policies and infrastructure that protect the environment and support economic success.

Named after 350 parts per million, the safe concentration of carbon dioxide in the atmosphere, 350Deschutes follows similar purposes and goals of the global organization 350.org. These goals include climate advocacy, education, and development of policy to create a just transition to a low-carbon economy.

350Deschutes accomplishes these goals through its expansive website, which includes petitions. Current petitions include efforts to stop pipeline expansion and to electrify Bend.

4. The nature and extent of the Petitioners' interests in the proceeding is:

Petitioners have substantial interest in the company's IRP. Petitioners represent a broad group of environmental, climate, and community-based organizations which represent the interests of thousands of members and supporters—many of whom are gas utility ratepayers in the State of Oregon, including within Cascade's service territory. Petitioners are concerned about the investments proposed by Cascade that will continue to build out fossil fuel infrastructure during the climate crisis when the State of Oregon is pursuing statutory targets to reduce its carbon emissions and transition away from fossil fuel reliance. Petitioners are concerned that investments in fossil fuel infrastructure will become stranded, leaving environmental justice and low-income communities financially responsible for those assets.

5. The issues the Petitioners intend to raise at the proceeding are:

Petitioners intend to assess Cascade's analyses to ensure the company is properly evaluating its investments in a manner that is in the best interest of its customers, the climate, and the state. Petitioners anticipate evaluating Cascade's demand forecast; assumptions about price, availability, and regulatory limitations of biomethane, hydrogen, and synthetic methane; consistency with Bend's Community Climate Action Plan; inconsistency of GTN contracts with state climate policies; and appropriate pathways for compliance with the Climate Protection Program and the need to take near-term emissions reduction actions.

6. The special knowledge or expertise of the Petitioners that would assist the Commission in resolving the issues in the proceeding is:

Some of the petitioners were involved in LC 79, the docket opened to address NW Natural's 2022 Integrated Resource Plan. Some of the petitioners participated in the Public Utility Commission's UM 2178 Natural Gas Fact Finding workshops, which involved submitting extensive comments on the regulatory tools presented by staff. Some of the petitioners have raised important climate, equity, and cost considerations in gas rate cases. All of the petitioners have experience with climate policy, many have intimate knowledge of Bend's climate goals, and many will offer a voice and perspective not yet heard at the Commission. Petitioners can provide knowledge related to their participation in those proceedings, as well as their expertise described more fully above.

7. Based on the information provided above in accordance with the Commission's rules of procedure, the petitioners request to participate in this proceeding as intervenors. The petitioners will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-001-0300.

/s/ Carra Sahler  
Green Energy Institute at Lewis & Clark Law School

/s/ Dan Duffy  
Citizens Climate Lobby

/s/ Lynne Haroun  
Climate Reality Project

/s/ Greer Ryan  
Climate Solutions

/s/ Audrey Leonard  
Columbia Riverkeeper

/s/ Kristi Kimball  
Electrify Bend

/s/ David De La Torre  
Oregon Physicians for Social Responsibility

/s/ Jim Dennison  
Sierra Club

/s/ Neil Baunsgard  
The Environmental Center

/s/ Diane Hodiak  
350Deschutes

July 14, 2023  
Date Signed