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May 14, 2021

**VIA ELECTRONIC FILING**

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

**RE: LC 71 – AWEC’S COMMENTS ON NW NATURAL 2018 INTEGRATED  
RESOURCE PLAN UPDATE**

Dear Filing Center:

Alliance of Western Energy Consumers (AWEC) appreciates the opportunity to comment on Northwest Natural Gas Company’s (“NW Natural”) Update to its 2018 Integrated Resources Plan (IRP). AWEC appreciates the thoroughness of this update describing both what has happened since NW Natural’s 2018 IRP, and items that NW Natural will pursue in the future.

NW Natural should be commended for its pursuit of renewable natural gas and hydrogen projects, and appears to be actively seeking out available projects both on and off system. Indeed, AWEC encourages the other gas utilities to model NW Natural’s aggressive approach to “green” up the gas system. Notwithstanding the above, AWEC would encourage NW Natural to prioritize cost effective regional projects where renewable natural gas and hydrogen can be directly injected into the system.

AWEC is not prepared at this time to make a recommendation on whether to acknowledge the Newport Cold Box project or the North Coast Feeder project. Notwithstanding, improving and enhancing the gas distribution system is important to safely and reliably meet the demands of customers in all weather conditions. Projects should not be delayed because of speculation about what laws or policies may be in the future. The gas system, through the use of renewable natural gas, hydrogen and other renewables will evolve to meet future environmental standards.

Finally, in prior comments, AWEC requested that NW Natural supplement the 2018 IRP with a special analysis of how its system performed during the days immediately following the rupture on the Enbridge Pipeline, which resulted in the loss of deliveries at Sumas. The analysis should include an in-depth analysis of how curtailments of industrial loads kept NW Natural’s system from losing pressure or having to interrupt core customers. The analysis should also include a scenario where this type of event happened in winter, where it would not have been

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May 14, 2021

Page 2

possible to interrupt natural gas fired electric generation, including the effect on both gas and electric service. AWEC continues to believe this analysis would be beneficial and provide valuable guidance into how to manage and mitigate the impacts of major disruptions in the future.

AWEC reserves the right to respond to issues raised in other parties' comments and reserves all rights to participate in full as a party throughout this docket. Please let me know if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chad M. Stokes", with a long horizontal flourish extending to the right.

Chad M. Stokes