



May 23, 2023

**Written Comments to the Oregon Public Utilities Commission on the NWN Integrated Resource Plan - Docket LC 79**

To: Chair Decker and Commissioners Tawney and Thompson

The undersigned organizations are writing in support of staff recommendations for NW Natural to purchase Community Climate Investments (CCIs) rather than investments in “Renewable Natural Gas” (RNG) to meet the company’s compliance obligations with the Climate Protection Program (CPP). We agree with staff’s well researched conclusions that CCIs are significantly less costly and less risky as a compliance pathway. CCIs will have direct health, safety, comfort and air quality benefits to Oregonians which would not be delivered through RNG investments.

We urge the commission to reject NW Natural plans to pass risky investment costs in RNG on to ratepayers and to also reject Renewable Thermal Certificates (RTCs) as a compliance pathway. CCI funding is required to “support projects that reduce greenhouse gas emissions and prioritize benefits for environmental justice communities in Oregon.” CCI investments in energy efficiency and electrification will deliver cleaner air and safer and healthier homes right here in our state for those who need these benefits the most, as well as emissions reductions to help achieve state climate goals. RTCs sourced from outside the state of Oregon will provide none of these economic, health and environmental benefits. RTCs will not reduce greenhouse gas emissions in Oregon and it will be hard to verify their true carbon emissions reduction impact.

The fossil gas industry markets RNG as a way to keep pumping methane into our homes and buildings while appearing to honor their lofty environmental promises and meet the regulated emissions reductions mandated by the CPP. It has been well documented by climate advocates through the Natural Gas Fact Finding docket UM2178 that RNG is not available in sufficient quantities to offset the emissions from NW Natural’s operations and is likely to be far more expensive than company estimates. Importantly, RNG is still methane - burning RNG will still create the same air pollution and health harms to Oregonians as fossil gas does today. Risky investments in RNG should not be forced onto Oregon ratepayers when other less costly methods to decarbonize the gas system are readily available and have such direct economic and health benefits to ratepayers - specifically energy efficiency, weatherization and building electrification.

We strongly urge the commission not to acknowledge risky investments by NW Natural in RNG and RTCs as compliance pathways to meet their obligations under the CPP.

Sincerely,

**Electrify Ashland Now! - Ashland, Oregon**  
**Electrify Bend**  
**Electrify Corvallis - Corvallis, Oregon**  
**Electrify LO - Lake Oswego Sustainability Network**  
**Electrify PDX - Portland, Oregon**  
**Electrify Now - Portland, Oregon**  
**ZERO Coalition**

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**The Environmental Center - Bend, Oregon**  
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**Sustainable Silverton – Silverton Oregon**  
**First United Methodist Church - Corvallis, Oregon**  
**Breach Collective - Eugene and Portland, Oregon**  
**Metro Climate Action Team - Portland, Oregon**

**Southern Oregon Climate Action Now - Jacksonville, Oregon**  
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