



December 30th, 2022

To: Oregon Public Utility Commission (PUC), PUC.FILINGCENTER@puc.oregon.gov

From: Small Business Utility Advocates (SBUA)

Re: LC 79 NW NATURAL INTEGRATED RESOURCE PLAN (IRP)

Pursuant to Administrative Law Judge Sarah Spruce's November 10, 2022 Memorandum in November 10th, 2022 regarding the above-referenced matter identifying this date for comment by Staff, intervenors, and the public please find herein SBUA's public comment.

Small Business Utility Advocates (SBUA) thanks the OPUC for this opportunity to comment. SBUA is a nonprofit 501(c)(3) organization that represents, protects, and promotes the interests of small business utility customers in Oregon. SBUA membership in Oregon includes businesses working in many industries in our communities across the utility's service territory including food and beverage, smaller grocery, dry cleaning, bicycle sales and repairs, commercial agriculture, local hardware supply, fine jewelers, auto repair, architecture, beauty salons, among others. SBUA supporters include chambers of commerce and small business consultants. These businesses are impacted not only by rising energy rates from but also as a customer class are bearing costs of the COVID-19 pandemic and inflation.

Northwest Natural's 2022 Integrated Resource Plan (IRP) is an important process for these small business customers of this utility particularly as Oregon recovers from the pandemic and implements decarbonization legislation which is significantly shifting the energy landscape, and impacts how businesses power their operations especially heating their spaces, cooking their food product, and transporting people and goods. These aspects include forecasting customer energy demands, determining the options of resources available to meet these needs, and identifying a portfolio of resources that will result in the best combination of least cost and risk.

Reviewing this IRP from a perspective of the small commercial customer SBUA recommends focus on the following:

- Small commercial customer load in Oregon including how load is calculated with regard to equations based on population growth (Oregon variable) perhaps compared to local economic activity (Washington variable);
- Small commercial total demand predicted to increase throughout planning horizon with or without energy efficiency, with focus on new construction commercial customers on average using more gas than existing customers;
- Commercial cooking, and strategic energy management and reviewing this topic in the context of changing Energy Trust gas cooking incentives;
- Commercial space heating which are among or are the highest avoided costs;
- Transportation as it impacts the smaller commercial customers;
- Other topics.

Respectfully submitted,

Guillermo Castillo, guillermo@utilityadvocates.org