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

Submitted via electronic filing to puc.filingcenter@puc.oregon.gov

RE: OPUC Docket LC 79 – Comments on NW Natural's 2022 IRP

On behalf of the Linnton Neighborhood Association (LNA), I'm writing to express concerns about NW Natural's plan to spend approximately \$10 million to replace its cold box at the LNG facility located in the CEI Hub. LNA represents all of 1500 residents who live along the 6 miles of the Willamette River that include the CEI Hub Evaluated from a seismic vulnerability perspective and the soon-to-be-released DEQ rules for facility assessment and mitigation, replacing the cold box seems to be an unwise investment.

I served on the Rulemaking Advisory Committee (RAC) as LNA's representative to DEQ's Fuel Tanks & Seismic Stability Program charged with regulatory authority over liquid fuel facilities in the CEI Hub following the passage of Oregon's Senate Bill 1567 in March 2022. Our committee recently concluded a 6-month commitment. DEQ rules will be released soon. All liquid storage facilities in the Hub, including NW Natural's, will be mandated to conduct seismic vulnerability studies and submit mitigation plans to be implemented following approval. We know that 91% of tanks currently in use in the Hub were constructed before building standards were implemented in 1993. NW Natural's cold box was constructed in 1968.

Because of their age, a large number of tanks are not expected to be candidates for mitigation, as old tanks cannot be mitigated to the performance level of new construction; additionally, mitigation is more costly than new construction according to environmental and engineering consultants Haley and Aldrich, hired by DEQ. Because facilities in the CEI Hub sit on liquefiable soil, the most cost-effective approach may be relocation as soil hardening technology and other options are exceptionally costly. With the decreasing demand for natural gas, is it likely that financial investments of this echelon will be acceptable?



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Most recent earthquake reports cite the huge safety, health, and environmental risks of a Cascadia Subduction Zone event. Seemingly less newsworthy, the Portland Hills Fault that runs under NW Natural's facility is less predictable for recurrence but will cause more destruction and result in more casualties than a 9.0 CSZ event.

We are aware that the LNG tank foundation is supported by pilings that extend to the underlying bedrock and that a consultant's recommendation was adopted to reduce LNG storage levels by 24% to reduce sloshing that exacerbates the risk of the tank's failure. Is **anyone** certain that the foundation and the reduced storage capacity is adequate for a CSZ 9.0 earthquake or the even greater risk of a Portland Hills Fault quake? This information, known to DEQ's expert consultants, will be included in the criteria used to measure NW Natural's resilience.

Supporting PUC staff's initial uncertainty, it is relevant to consider that the Oregon Department of Energy's (ODOE) fuel security plan, also mandated by SB 1567. The plan is predicted to identify alternative locations for fuel storage in the state. Having 90-95% of Oregon's liquid fuel storage in one location creates a threatening vulnerability.

Lastly, people increasingly understand gas risks better than ever before and are taking opportunities to electrify. Reimbursements are available for converting from gas to electricity. Measures are being considered to financially support conversion to electrification and heat pumps. Business construction and the automotive industry also are defaulting to electrification, perhaps faster than experts predict. News just broke on 4/28/23 that California has banned new diesel trucks effective 2036. This is a world first. Will Washington and Oregon follow?

Thank you for this opportunity to express the sentiment shared by many people in my community. LNA requests that the Commission not acknowledge the proposed cold box investment at this time, or defer consideration of the investment until after NW Natural has completed its seismic vulnerability analysis and DEQ has approved its mitigation plan and following ODOE's decisions that may have additional impact. These will allow both NW Natural and the PUC to understand the financial commitments of maintaining this facility or a facility in another location.

Sincerely,

Nancy Hiser

On behalf of the Linnton Neighborhood Association

A handwritten signature in blue ink that reads "Nancy Hiser". The signature is written in a cursive, flowing style.