



CHAD M. STOKES
ADMITTED IN OREGON AND WASHINGTON

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December 3, 2021

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, #100
PO Box 1088
Salem, OR 97308-1088

Re: Docket No. UM 2178, Natural Gas Fact-Finding Under Executive Order 20-04
Comments of Alliance of Western Energy Consumers

Dear Filing Center:

Alliance of Western Energy Consumers (AWEC) appreciates the opportunity to comment on the utilities' alternative Climate Protection Plan (CPP) compliance scenarios. AWEC also appreciates the hard work and analysis done by the utilities in response to Staff's additional scenarios, which were developed at least in part in response to stakeholder comments in this docket.

While AWEC will not repeat its prior comments, AWEC remains concerned with the scope and direction of this docket. The CPP modeling, including the recent alternative modeling, is based on too many assumptions and unknowns to be useful for any regulatory purpose. A model is only as accurate as the inputs used to develop the model. Further, there has not been an Oregon specific "electrification" study that focuses on Oregon loads and customers, the costs associated with such efforts, and how to continue to provide safe and reliable service to Oregon customers. Finally, the goal of this process should be focused on reducing the use of fossil fuels in the most responsible and reasonable way possible, and should not assume from the outset that electrification is the best method to achieve that goal.

Thank you for the opportunity to provide these comments.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Chad M. Stokes', is written over a blue horizontal line.

Chad M. Stokes