



**Oregon Public Utility Commission**  
**Re: Natural Gas Fact-Finding (UM 2178) Draft Report**

June 3, 2022

Dear Oregon Public Utility Commission Staff and Commissioners,

On behalf of the ZERO Coalition, thank you for the opportunity to weigh in on Staff's Draft Future of Gas study (UM 2178). It is our belief that the only plausible way to decarbonize buildings by 2050 is to convert nearly all heating and water heating to high efficiency heat pump technology. We are expressing strong support for climate and energy justice advocates' request that the Final Report be strengthened.

The following are specific recommendations for your consideration. OPUC should:

- Eliminate subsidies for gas system infrastructure (e.g., line extension allowances, gas appliances, and the gas promotional materials);
- Expand outreach to and relieve administrative burdens for BIPOC, tenants, and low- and moderate-income populations to facilitate participation in incentive programs;
- Ensure BIPOC and low- and moderate-income Oregonians benefit from high-efficiency electric heating, cooling, and water heating technologies.

As public utility regulators, we need you to ensure that the state makes a clean energy transition across all of its actions. We need you to prioritize communities that suffer the first and worst impacts of climate disruption and use every tool in your toolbox to reduce greenhouse gas emissions and advance the transition to a carbon-free future.

Thank you again for covering this important topic and for significantly strengthening the Final Report.

Signed,

ZERO Coalition Members:



**climate  
solutions**  
*accelerating the transition  
to our clean energy future*



