



June 3rd 2022

To: Oregon Public Utility Commission

Re: Public Health Experts' Concerns about the UM 2178 Draft Report

Dear Oregon Public Utility Commission Staff and Commissioners,

On behalf of Oregon Physicians for Social Responsibility, a statewide organization of more than 2,400 health professionals and public health advocates, we write to provide some feedback on the OPUC Staff's Draft Report in the "Future of Gas" study (UM 2178 or "Natural Gas Fact-finding Investigation). As we have outlined in the report "[Methane Gas: Health, Safety, and Decarbonization](#)" (see attached), we have significant concerns about the climate, public health, and social justice impacts of the use of methane gas, especially in buildings. While we applaud the Commission's decision to open this docket in an effort to better understand whether and how gas utilities plan to meet state climate goals, the Draft Report is woefully lacking in relevant facts and recommendations to ensure we transition off methane gas and ensure a livable climate and healthy communities.

We urge Commission Staff to strengthen the final report by 1) including a section on public health harms of methane gas use in communities, 2) recommending an immediate halt gas system expansion and 3) recommending both short- and long-term regulatory tools to support low- and moderate-income communities in this transition.

Addressing methane gas use in buildings is particularly important to alleviate public health harms. Buildings are where people live, learn, work, and play. Indoor gas appliances release numerous pollutants, including carbon monoxide, particulate matter, and nitrogen oxides. A recent study of indoor air quality in homes with gas appliances found that after cooking for just an hour with a gas stove and oven, the levels of nitrogen dioxide exceed both state and federal outdoor air quality standards in more than 90% of the homes tested.¹ These pollutants are very harmful to human health, particularly for children and individuals with respiratory illnesses.²

Fortunately, the solutions to reduce methane gas use in buildings can also make our communities more resilient to climate harms. For example, energy-efficient buildings with heat pumps can help protect families from wildfire smoke and other outdoor air pollutants while providing critical cooling needs. Gas stoves should not be used when the Air Quality Index(AQI) is high as with wildfire smoke.

¹ Zu, Y. et al. (2021). "Effects of Residential Gas Appliances on Indoor and Outdoor Air Quality and Public Health in California." UCLA Fielding School of Public Health. <https://ucla.app.box.com/s/xyz8jc1ixnetiv0269qe704wu0ihif7>

² Jonathan J Buonocore (Harvard T.H. Chan School of Public Health) et al. "A decade of the U.S. energy mix transitioning away from coal: historical reconstruction of the reductions in the public health burden of energy." 2021 Environ. Res. Lett. 16 054030. <https://doi.org/10.1088/1748-9326/abe74c>.

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Thank you for the opportunity to weigh in on this critical process. Again, we urge you to do all you can to ensure a healthy and equitable transition off methane gas as quickly as possible.

Sincerely,

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Healthy Climate Program Director
Oregon Physicians for Social Responsibility

