

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

LC 79

In the Matter of

NORTHWEST NATURAL GAS  
COMPANY, dba NW NATURAL,

2022 Integrated Resource Plan

PETITION TO INTERVENE BY  
GREEN ENERGY INSTITUTE AT  
LEWIS & CLARK LAW SCHOOL,  
CLIMATE SOLUTIONS,  
COLUMBIA RIVERKEEPER,  
COMMUNITY ENERGY  
PROJECT, ELECTRIFY NOW,  
METRO CLIMATE ACTION  
TEAM, NATURAL RESOURCES  
DEFENSE COUNCIL, and SIERRA  
CLUB  
& REQUEST FOR HB 2475  
INTERIM INTERVENOR  
FUNDING FOR COMMUNITY  
ENERGY PROJECT

The Green Energy Institute at Lewis & Clark Law School (GEI), Climate Solutions, Columbia Riverkeeper, Community Energy Project, Electrify Now, Metro Climate Action Team, Natural Resources Defense Council, and Sierra Club petition to intervene in this proceeding.

The Community Energy Project notes its intent to pursue intervenor funding pursuant to Implementation of House Bill 2475, UM 2211, Order No. 22-043 (Feb. 10, 2022). The Community Energy Project is an eligible organization for HB 2475 interim intervenor funding and this proceeding is an eligible proceeding under Commission Order No. 22-043.

In support of this petition, the following is provided:

1. The contact information (name, address, email address) of the petitioners are:

Name: Carra Sahler  
Company: Green Energy Institute  
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Name: Greer Ryan  
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Name: Lauren Goldberg  
Company: Columbia Riverkeeper  
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Name: Alma Pinto  
Company: Community Energy Project  
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Name: Brian Stewart  
Company: Electrify Now  
Street Address: 5322 SW Hewett Blvd.  
City, State, Zip: Portland, OR 97221  
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Telephone: 503-803-5020

Name: Pat DeLaquil  
Company: Metro Climate Action Team (MCAT)  
Street Address: 155 SE 16<sup>th</sup> Ct.  
City, State, Zip: Gresham, OR 97080  
Email Address: pdelaquil@gmail.com  
Telephone: 202-494-8836

Name: Angus Duncan  
Company: Natural Resources Defense Council (NRDC)  
Street Address: 2381 NW Johnson St.  
City, State, Zip: Portland, OR 97210  
Email Address: angusduncan99@gmail.com  
Telephone: 503-248-7695

Name: Jim Dennison  
Company: Sierra Club  
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Please include these contacts on the service list.

2a. The petitioner  will  will not be represented by counsel in this proceeding.

2b. Additional contact to be included on the service list:

Name: Bradley Cebulko  
Company: Strategen Consulting  
Street Address: 10265 Rockingham Dr., Suite #100-4061  
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3. Green Energy Institute at Lewis & Clark Law School is a climate and energy policy institute within Lewis & Clark's Environmental, Natural Resources, and Energy Law Program. GEI's mission is to develop equitable, comprehensive, effective strategies to prevent catastrophic climate change by furthering the just transition to a sustainable, carbon-free energy grid.

4. Climate Solutions is a regional non-profit working to accelerate clean energy solutions to the climate crisis. As part of this work, Climate Solutions supports a rapid and equitable transition to clean, fossil-free buildings for all. Climate Solutions has over 18,000 supporters in the Pacific Northwest, and almost 8,000 supporters in the State of Oregon.

5. Columbia Riverkeeper's mission is to protect and restore the water quality of the Columbia River and all life connected to it, from the headwaters to the Pacific Ocean. Riverkeeper's vision is to unite people to fight for clean water, abundant fish and wildlife, and our climate. Columbia Riverkeeper represents approximately 16,000 members and supporters.

6. Community Energy Project (CEP) provides free services focused on safety, health, and energy efficiency from community education and supplies to direct home energy upgrades and repairs. CEP believes that everyone deserves a safe, healthy, efficient home, regardless of incomes. CEP works with frontline communities, many of whom struggle to pay existing utility bills. CEP is an eligible organization for HB 2475 under Order No. 22-043, Appendix A.

7. Electrify Now is a volunteer organization primarily focused on educating the public about the economic, performance, and safety advantages of electrification and renewable energy. Electrify Now conducts research on energy, carbon emissions and electrification technologies and communicates that information in an easily digestible way to its audience of homeowners and energy consumers through its website, newsletter, webinars, YouTube channel, and public speaking engagements, and by working directly with homeowners to help them eliminate fossil fuels in their homes.

8. Metro Climate Action Team (MCAT) is a community of experienced volunteers sponsored by the Oregon League of Conservation Voters to steward significant greenhouse gas-reduction policy into law in Oregon. MCAT believes immediate reductions in greenhouse gases are needed to attain our long-term goals of ensuring a stable climate while spurring economic development in the state. Oregon's frontline communities hardest hit by pollution and climate change, both urban and rural, must be first to benefit. MCAT recognizes that many of the forces driving resistance to climate action are also responsible for the systems of inequality and injustice that now stand starkly exposed and must be eliminated. MCAT believes that its work to solve the climate crisis must also help create a more just and equitable society.

9. Natural Resources Defense Council (NRDC) is a not-for-profit, tax-exempt membership organization created in 1970. NRDC works to safeguard the earth—its people, its plants and animals, and the natural systems on which all life depends. NRDC combines the power of more than three million members and online activities with the expertise of some 700 scientists, lawyers, and policy advocates across the globe to ensure the rights of all people the air, the water, and the wild. NRDC is tackling the climate crisis at its source: pollution from fossil fuels. NRDC works to reduce dependence on dirty sources by expanding clean energy across cities, states, and nations. NRDC fights oil and gas projects that would pump out even more pollution.

10. Sierra Club, founded in 1892, is the nation's oldest nonprofit, grassroots environmental organization. The Oregon Chapter of the Sierra Club and its members promote the conservation of the Oregon natural environment by influencing public policy decisions—legislative, administrative, legal, and electoral. The Oregon Sierra Club has more than 20,000 members in the state. Sierra Club's nearly 740,000 members nationwide are dedicated to the protection and preservation of the natural and human environment, including protecting public health. One of the Sierra Club's priorities is to advance smart and equitable clean energy solutions that address critical problems from the climate crisis, air pollution, and our nation's dependence on fossil fuels.

11. Petitioners have substantial interest in the company's IRP. Petitioners represent a broad group of environmental, climate, and community-based organizations which represent the interests of thousands of members and supporters—many of whom are gas utility ratepayers in the State of Oregon, including within the NW Natural service territory. Petitioners are concerned about the investments proposed by NW Natural that will continue to build out fossil fuel infrastructure during the climate crisis when the State of Oregon is pursuing statutory targets to reduce its carbon emissions and transition away from fossil fuel reliance. Petitioners are concerned that investments in fossil fuel infrastructure will become stranded, leaving environmental justice and low-income communities financially responsible for those assets.

12. Petitioners intend to assess NW Natural's analyses to ensure the company is properly evaluating its investments in a manner that is in the best interest of its customers, the climate, and the state. Petitioners anticipate evaluating NW Natural's demand forecast, assumptions about price and availability of renewable natural gas and hydrogen, the natural gas price forecast, and appropriate pathways for compliance with the Climate Protection Program.

13. Most of the petitioners attended NW Natural’s technical working group meetings in the utility’s development of its 2022 IRP. All of the petitioners participated in the Public Utility Commission’s UM 2178 workshops on the Natural Gas Fact Finding, and submitted extensive comments on the regulatory tools presented by staff. Petitioners can provide knowledge related to their participation in those proceedings, as well as their expertise described more fully above.

14. Based on the information provided above in accordance with the Commission's rules of procedure, the Green Energy Institute at Lewis & Clark Law School, Climate Solutions, Columbia Riverkeeper, Community Energy Project, Electrify Now, MCAT, NRDC, and Sierra Club seek to participate in this proceeding as intervenors. We, and the organizations we represent, will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-001-0300.

15. Community Energy Project also respectfully requests that this Commission grant its request to receive HB 2475 interim intervenor funding as an eligible organization.

/s/ Carra Sahler  
Green Energy Institute at Lewis & Clark Law School

/s/ Greer Ryan  
Climate Solutions

/s/ Lauren Goldberg  
Columbia Riverkeeper

/s/ Alma Pinto  
Community Energy Project

/s/ Brian Stewart  
Electrify Now

/s/ Pat DeLaquil  
MCAT

/s/ Angus Duncan  
NRDC

/s/ Jim Dennison  
Sierra Club

November 3, 2022  
Date Signed