

May 5, 2023

RE: NW Natural 2022 Integrated Resource Plan, Staff's Final Comments ([LC 79.](#))

Dear Oregon Public Utility Commission,

Anew was formed through the merger of Element Markets and Bluesource in February 2022. It is one of the largest climate solutions providers in North America and, through its legacy companies, has a successful track record in supporting client companies in quantifying and reporting on their greenhouse gas ("GHG") inventories and developing corporate climate strategies and targets, as well as within the markets for voluntary carbon credits, renewable natural gas, low carbon fuels, electric vehicle credits, emissions credits, and renewable energy credits.

Oregon Public Utility Commission (OPUC) staff has suggested that under Oregon's Climate Protection Program (CPP), gas utilities in Oregon should purchase Community Climate Investments (CCIs) in lieu of purchasing RNG to directly decarbonize its energy supply. The rationale appears to be strictly one of cost, as CCIs currently are priced lower than most RNG resources.

However, in practice we believe CCIs will not deliver the true, direct decarbonization of the gas system that RNG provides. We are writing in support of NW Natural's efforts to acquire renewable natural gas (RNG) as part of its decarbonization strategy in lieu of simply purchasing CCIs. We believe that the transition to RNG is an essential step toward reducing greenhouse gas emissions and meeting Oregon's ambitious emission reduction targets. Gas utilities are a critical long-term buyer of RNG. Historically most sellers of RNG have leveraged the lucrative but very volatile transportation credit markets. Gas utility demand represents a lower-risk revenue opportunity that is driving new project development and investment by RNG developers.

NW Natural's Integrated Resource Plan prioritizes the acquisition of RNG in accordance with the Oregon Renewable Natural Gas statute (ORS 757.396). This approach promotes the use of cleaner energy, and helps to decarbonize the broader natural gas system, which is vital for maintaining a reliable and resilient energy infrastructure. We encourage the Oregon Public Utility Commission to consider the merits of NW Natural's Integrated Resource Plan and its focus on RNG. By supporting their efforts, we can collectively work toward a more sustainable and resilient energy infrastructure in Oregon.

Thank you for your attention to this matter.

Sincerely,

Anew Climate

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