



May 8, 2023

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

Dear Oregon Public Utility Commission,

As a participant in the Renewable Natural Gas (RNG) industry, ENGIE Energy Marketing NA, Inc. sees first-hand how RNG is decarbonizing the natural gas system. This form of renewable energy is delivered day-in and day-out directly to customers who not only count on it to fuel their businesses and homes, but also to reduce their carbon footprints. RNG market participants facilitate capturing waste methane from a variety of sources and putting it to productive use in the nation's natural gas infrastructure.

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,

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Kenneth Robinson
President
ENGIE Energy Marketing NA, Inc.