From:	
To:	
Cc:	
Subject:	FW: LC79 - NW Natural IRP
Date:	Tuesday, June 6, 2023 9:25:27 AM

## Comments received.

From: T		
Sent: Monday, June 5, 20	23 5:22 PM	
То:		
Cc: T		
Subject: LC79 - NW Natur	ral IRP	

To: Oregon Public Utility Commission

Re: LC 79 - NW Natural IRP

Date: June 5, 2023

Chair Decker and Members of the Commission,

Thank you for the opportunity to provide testimony. I am Dr. Take Town and I am environmental health scientist with a career in public health. I am a member of the Healthy Climate Action Team of Oregon Physicians for Social Responsibility and of the Climate and Health Committee of the American Public Health Association. There are several concerns about which I am testifying today.

As you are well aware, we are in a climate emergency and we must do everything we can to cut our emissions of green house gases drastically by 2030. Methane is over 80 times more potent a climate driver than carbon dioxide. In order to meet our climate goals, our gas utilities need to be downsized. We simply cannot afford to allow them to continue business-as-usual. Growth is unrealistic as well as out of the question because of the harms it would cause.

In the meantime, efforts to adapt to the need to reduce emissions of fossil fuels are proceeding. Electrification efforts have already started: heat pump sales currently exceed gas furnace sales. This is likely to accelerate when rebates under the federal IRA are made available toward the end of 2023.

I am concerned about the seismic stability of the CEI Hub and the risk of NWN's planned investments in this area. The location of their LNG tank is already of great concern in this urban populated area, due to its vulnerability to breach and explosion in the event of an earthquake. I urge the PUC to not acknowledge the cold box investment in particular, or at least to defer consideration until after more research and mitigation efforts. Please delay acknowledgement of the cold box until after the seismic evaluation under SB1567 is completed in 2024. The seismic stabilization costs may mean that the cold box replacement is financially untenable.

Second, please delay acknowledgment until we have more information about the pace of electrification. With enough home electrification this LNG tank is likely to be unnecessary. It would be unconscionable to allow NW Natural to charge its ratepayers \$15 million to put in a new cold box for the LNG tank that really should not be there in the first place.

Thank you for your consideration, your time, and your hard work.