

Southern Oregon Climate Action Now

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Reference Northwest Natural Gas Request for a Rate Hike

Chair Decker; Commissioners Tawney and Perkins,

Thank you for providing the opportunity to offer oral comments on this proposal yesterday evening. This is a follow-up regarding comments offered during that session.

I appreciate that it is difficult to serve as arbiters of an issue when witnesses are offering testimony that is simply untrue. In my previous testimony, I made the case that Northwest Natural Gas has exhibited an ongoing pattern of offering claims to the PUC and in its marketing that are based on misinformation and disinformation. Apparently, some of the builders and their association representatives have adopted similar tactics. Some of these claims deserve a response.

I will readily acknowledge that there are probably many Oregonians who prefer to have the option of including both gas and electricity in their homes. There are also many Oregonians who still have a habit of smoking even though the negative health effects of this habit are well understood. The fact that folks have a preference for behaving in a way that threatens their own health, does not mean this should be supported and exempt from agency rules and regulations. Indeed, in an effort to protect those who recognize the health hazards of second-hand smoke, there are many restrictions limiting where Oregonians can smoke. By the same token, it makes perfect sense that the PUC, acting as the arbiters of what best serves Oregonians, should take into consideration the health impacts of natural gas for users, and the long-term climate impacts of the greenhouse gas emissions that result from gas usage.

I was particularly disturbed by the consistent claim from builders that gas is a clean fuel when the evidence that its use compromises the health of inhabitants of homes served by gas (e.g., Gottlieb and Dyrszka 2017; Bushkin-Bedient et al. 2019; O'Rourke et al. 2022). That gas offers a very efficient source of instant heat for cooking I do not challenge. However, it is an obvious act of dissembling to ignore the fact that induction cooktops powered by electricity are at least as effective at providing instant heat as gas-powered appliances.

The claim that promoting gas constitutes a social justice issue is another false claim. Indeed, as Sadosa (2023) concluded, all-electric homes are far cheaper to construct, and thus will cost the buyer less. This author also reports: "Not only are all-electric homes cheaper to build, they reduce monthly energy bills thanks to the incredible efficiency of appliances such as heat pumps." This echoes a report from RMI (McKenna et al. 2020) that concluded "In every city we analyzed, a new all-electric, single-family home is less expensive than a new mixed-fuel home that relies on gas for cooking, space heating,

and water heating.” Indeed, NBI (2022) concluded that “The all-electric single-family home is \$7,500-\$8,200 cheaper to construct than the baseline code home.” In terms of lifecycle comparison, they concluded “The all-electric scenario reduced total energy consumption by 34%...”

A common refrain was that in a power outage gas appliances are necessary. However, as the Citizens Utility Board (Shuff 2020) noted for power outages: “While natural gas can still flow into your home during a blackout, many appliances still require power to operate.” Those promoting mixed energy sources rarely acknowledge this limitation. Meanwhile, in a comparison between heat pumps and gas furnaces Muro (2024) noted that heat pumps both heat and cool, while those with gas furnaces also need air conditioning and concluded: “heat pumps do not just outperform gas furnaces in energy efficiency, they also hold the upper hand in terms of cost-effectiveness, carbon footprint, and longevity.” And “if your goal is both energy efficiency and sustainability, the switch to a heat pump over a traditional gas furnace is a smart move.” He also suggests: “By making the switch to a heat pump system, you’re not only reducing your carbon footprint, but also ensuring a cozy home for all seasons.”

I was particularly disturbed to hear one of the apologists for the builders’ promotion of the Line Extension Allowance arguing that electrification served no benefit because a substantial percentage of Oregon’s electricity is generated from coal or gas. While this is accurate currently, the statement represents further dissembling since HB2021 passed in 2021 requires that retail electricity must be generated 100% by clean sources by 2040.

It appears to me that too many builders and association representatives are so focused on maximizing their own profits that they ignore the health of home inhabitants, the climate crisis, and evidence that would lead to a more socially responsible position. When it comes to considering affordable homes, the comments of a builder who proudly noted his cheapest home cost \$2 million should probably be completely discounted.

In reviewing the comments of those testifying, please take time to evaluate the claims and assess whether the testimony is germane and accurate or merely self-serving.

Respectfully submitted

A handwritten signature in black ink that reads "Alan Journet". The signature is written in a cursive, flowing style.

Alan Journet

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