



State of Oregon Department of Environmental Quality

# Written Comments

CPP 2024 Rulemaking Advisory Committee Meeting 2

This document is a compilation of all written comments received in advance of the second advisory committee meeting held on May 14, 2024, through the close of the comment period, May 24<sup>th</sup>.



April 30, 2024

## **Supplemental Comments of the Alliance of Western Energy Consumers on the Oregon Department of Environmental Quality’s Climate Protection Program 2024 Rulemaking**

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Alliance of Western Energy Consumers (“AWEC”)<sup>1</sup> provides these supplemental comments on the Climate Protection Program (“CPP”) 2024 rulemaking of the Oregon Department of Environmental Quality’s (“DEQ”). AWEC appreciates the opportunity to participate in this rulemaking process and to discuss proposed improvements to the CPP, with the objective of enhancing the effectiveness of the rule in reducing carbon emissions while maintaining the competitiveness of Oregon business.

AWEC is a participant in the Rulemaking Advisory Committee (“RAC”) and participated in the DEQ’s April 2, 2024 RAC Meeting. In general, AWEC is supportive of the DEQ’s workplan to implement new CPP 2024 rules, as well as its openness to improvements to the rules to make them viable for Oregon business.

Attached to these comments as **Exhibit A** is a power point presentation containing several concepts for consideration for a new climate program. These concepts are intended to:

1. Recognize the unique characteristics of Energy Intensive Trade Exposed (“EITE”) Industries<sup>2</sup>;
2. Create a separate compliance pathway for EITE customers;
3. Regulate large emitters directly and require emissions reductions;
4. Incentivize greenhouse gas reductions and innovation;
5. Avoid economic and emissions leakage; and
6. Avoid unnecessary cost shifting to Oregon families through higher natural gas and transportation fuel prices.

AWEC believes it is possible to achieve Oregon’s climate policy objectives while also fostering a robust economy and making Oregon an attractive place to conduct business. Accordingly, AWEC’s proposals are intended to make compliance with the rule more feasible for Oregon businesses while competing in global markets.

### **AWEC Recommendation 1: Create an Alternative Compliance Pathway for EITE Customers with No-Cost Instruments**

AWEC’s primary recommendation is to create an alternative compliance pathway for EITE customers with no-cost instruments. Nearly every carbon market in the world has some form of EITE program.<sup>3</sup> The proposed CPP rule, in contrast, does not. AWEC views this as an essential part of an effective climate policy.

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<sup>1</sup> AWEC represents large energy consumers in the Pacific Northwest, including natural gas sales and transportation customers served by the three local distribution companies (“LDCs”) in the state—NW Natural, Avista and Cascade.

<sup>2</sup> An EITE Entity would be defined in the rule as a distribution service customer of a local distribution company that operates a trade or business in the state under the North American Industry Classification System (NAICS) codes, along with a new section with the specific NAICS references.

<sup>3</sup> See for example the joint California/Québec market; the Washington State Climate Commitment Act market; the Northeast, Regional Greenhouse Gas Initiative (“RGGI”) market; the EU Emission Trading System; The UK Emission Trading System; the Korea Emission Trading Scheme, among others, contain design elements to accommodate the unique carbon impacts and situation of EITE entities.

The purpose of an EITE program is simple. It is to address the widely accepted problem of carbon leakage. Most EITE businesses require natural gas in their operations, and currently no viable alternative source of energy exists. Adopting rules that will otherwise dramatically increase the cost of energy for EITE entities will harm their competitiveness in global markets and diminish their ability to make sales at economically viable prices. This in turn reduces output from entities in the State leading to a shift in production and energy consumption to regions with higher carbon footprints. Thus, imposing aggressive carbon costs on such entities can result in the counterproductive effect of increasing overall global carbon emissions. It also has negative impacts on the state economy, diminishing both employment and tax base. Simply stated, a greenhouse gas policy that functions by forcing EITE businesses out of the state is not viable; is bad for the Oregon economy; and will not produce positive impacts for the environment.

Prior to its invalidation, natural gas distribution service ratepayers had only experienced relatively minor cost increases associated with the former CPP rule. At the time, the local distribution companies had yet to purchase any CCI credits, which constituted the majority, if not all, of the compliance obligations for local distribution companies for the first CPP compliance period. The rate increases that were being forecast from required compliance in the first compliance period were staggering. On July 31, 2023, in the Public Utility Commission of Oregon Docket No. UG 485, NW Natural had proposed upwards of a 64% rate increase to large volume customers to address the cost of purchasing CCIs in the amount of \$43,243,609 for the second year of CPP compliance.<sup>1</sup> That request was later delayed due to the timing of the CCI entity certification and later withdrawn following the invalidation of the CPP rules. It was also just a preliminary glimpse into the full magnitude of the costs at issue. *AWEC's own estimates were that the CPP was going to result in distribution service rate increases that ranged from 435% in 2025 to 1,819% in 2035 (and as high as 6,700% increases for some customers).* This level of rate increase would have severely impacted the ability of trade exposed entities to conduct business in Oregon.

Implementing a greenhouse gas policy while considering the unique characteristic of EITE businesses are not mutually exclusive. The carbon programs of Washington and California, for example, provide special treatment to EITE businesses to offset the negative economic impacts of the program on their states and to prevent against carbon leakage. Therefore, adopting similar complementary programs in Oregon is vital to ensure that business does not move out of the state and out of the region. To do this, AWEC recommends that the DEQ adopt an EITE program that is generally based on the EITE programs in Washington and California.

The foundation of AWEC's alternative pathway concept is for DEQ to create a new distinct schedule of no-cost instruments for EITE customers following a similar trajectory as the Washington Climate Commitment Act ("CCA"). See **Exhibit A** p. 5-6. AWEC recommends that the cap for EITE customers be established in a manner consistent with the Washington CCA, which allowed for 3% reductions per compliance period, beginning in the second compliance period. A summary of AWEC's alternative compliance concept includes:

- Creating a new Table 4B distributing no-cost instruments to EITE Entities based on a stated percentages per compliance period (proposed Table 4B is shown in **Exhibit A p. 6**)
  - This is similar to Washington's EITE program with 3% reductions per compliance period. (*A 4-year compliance program like Washington would also be acceptable*).
- First compliance period used to measure EITE emissions and establish baseline.
  - Establish an EITE Baseline based on the highest two years of emissions in the first compliance period, normalizing the impact of abnormal plant outages or curtailment periods.
  - Establish new customer and facility expansion baselines on the highest two years of emissions in the first three years of operations.
  - Provide an opportunity to appeal to DEQ if EITE Baseline produced by the formula is unreasonable relative to the facility's full production capability.



- No-cost instruments allocated to cover 100 percent of EITE emissions at the end of first compliance period. No-cost allowances allocated to cover 97 percent of emissions at the end of the second compliance period, and reduced by 3% in each of compliance periods three and four.
- Following the fourth compliance period, the EITE program would undergo a holistic review and percentage reductions are subject to review and discussion.

Notably, AWEC recommends a distinct schedule of no cost instruments for EITE customers, separate from the Table 2 allowances available for other covered entities. Maintaining a distinct schedule is vital due to the characteristics of EITE entities, as capping their emissions under Table 2 may not effectively reduce emissions, but over time, will shift emissions to jurisdictions with more relaxed environmental regulations. Conversely, applying an EITE program with a slower trajectory alongside existing caps would be unfair to non-EITE customers, requiring them to reduce emissions at an even faster rate to compensate for the unique leakage and economic issues associated with EITE emissions.

AWEC acknowledges that its proposed program will result in a modest increase to the overall programmatic caps established in the CPP. It will still be necessary to adjust Table 2 and Table 4 to deduct EITE emissions from the state and LDC baselines. EITE emissions will be capped and will be subject to a schedule of reductions. Accordingly, the net effect of AWEC's proposal on the overall state targets will be relatively modest. Considering the massive benefits of retaining EITE businesses in the state, while aggressively promoting climate innovation for these customers, AWEC believes this change is justified and will produce an overwhelmingly more positive effect on carbon emissions.

## **AWEC Recommendation 2: Invest in Climate Innovation**

Another element of AWEC's proposal, which would apply generically, and not just to EITE entities, is the establishment of a new compliance instrument that is designated specifically to fund climate innovation for Oregon business. While AWEC appreciates the structure of the CCI program in the context of service provided to residential and small commercial customers, greater emphasis on technological and business innovation will be necessary if Oregon is going to be able to meet its GHG reduction targets. Oregon is poised to be a leader in climate innovation. If a business-oriented funding program is available in Oregon's climate program, technologically focussed climate solutions may be pursued more rapidly.

AWEC proposes a new type of compliance instrument called an Innovation Climate Investment ("ICI") credit. These instruments would be funded in a manner similar to the CCI program, with funds distributed to ICI entities. These entities would be non-profits focused on funding greenhouse gas reducing innovation for Oregon businesses. These entities would undergo an application and approval process in the same manner as CCI entities, and be required to be accountable for carbon reductions achieved through their activities.

Under AWEC's proposal, the use of ICI credits as compliance instruments would be limited to carbon emissions attributable to EITE customers and large volume customers of a local distribution company (e.g. NW Natural Schedule 32), with no cap.

A wide range of possible funding activities would be made available through the ICI program, ranging from simple solutions, such as fugitive emission audits, to more complicated infrastructure investments in developing on-site carbon capture equipment.

### **AWEC Recommendation 3: Allow Carbon Offsets as a Compliance Alternative**

Given the limited compliance alternatives available for the CPP, and the lack of a tradable market for instruments, AWEC believes that some level of carbon offsets should be allowed as a compliance instrument in the CPP. Based on existing technology, the local distribution companies realistically have only three available compliance alternatives under the proposed rule: (a) CCIs; (b) Renewable Natural Gas; and (c) Conservation. The CPP should be designed in a way that makes it possible to comply and at a reasonable cost. Accordingly, AWEC recommends that the program be improved to allow for the use of offsets for up to 20% of covered emissions. Many programs in other states allow for the use of offsets to meet compliance obligations, and absent a liquid tradable market for CPP compliance instruments, AWEC believes that the ability to use offsets would be a major improvement to the program.

### **AWEC Recommendation 4: Make EITE Entities a Separate Point of Regulation**

AWEC recommends that the DEQ establish EITE customers as a separate point of regulation. Establishing EITE entities as a separate point of regulation from the local distribution companies is appropriate because individual EITE Entities will have greater incentive to innovate and reduce carbon emissions if directly responsible for CPP costs of their facilities.

### **AWEC Recommendation 5: Link the Cost of Compliance Instruments to Regional Markets**

Another important element of AWEC's proposal is to tie the cost of compliance instruments—both CCIs and ICIs—to the cost of allowances in regional carbon markets. Absent having a separate tradable market for compliance instruments in Oregon, AWEC recommends that the cost be tied to the CARB/Québec market clearing prices. This will result in making Oregon business subject to the same level of costs as other states, keeping their competitiveness on par with industry in those other states. This will also potentially make it easier to integrate Oregon with a wider market footprint in the future as Oregon's state policy evolves.

### **AWEC Recommendation 6: Establish an Annual Cost Cap for Non EITE Customers**

It is impossible to evaluate the cost effectiveness of the CPP, absent a clear understanding of the cost. Accordingly, AWEC recommends that a programmatic cost cap be established that will limit the annual rate impacts to distribution service customer rates to no more than 5% per year. Under the prior CPP rule, ratepayers were expecting to receive major rate increases, and while the rule had a requirement in OAR 340-271-8100 that it would undergo re-evaluation if the rate impacts were greater than in other states, that requirement lacked any material affect.

AWEC recommends that a programmatic cost cap be established, where the rate impacts of the CPP are reviewed on an annual basis, with the ability to petition the DEQ for new instruments, outside of the statewide caps, if costs exceed the specified rate cap. This will provide ratepayers with assurance that the CPP objectives can be met without negatively impacting utility rates.

### **AWEC Recommendation 7: Program Caps and Instrument Distribution Be Reevaluated**

Finally, and not discussed in the attachment, AWEC also recommends that a new rule update the volume of compliance instruments being distributed based on more recent natural gas loads and carbon emissions data. First, under AWEC's proposal EITE customers have their own compliance pathway and should not be subject to the Table 2 program caps, requiring the existing caps to be reduced for the EITE emissions. Second, considering the growth in natural gas demands that have occurred since the original CPP rules were enacted, maintaining the same targets as the prior rule will make compliance, particularly in the first compliance period, challenging. Accordingly, in



**AWEC**

Alliance of Western Energy Consumers ♦ 3519 NE 15<sup>th</sup> Ave, #249 ♦ Portland, OR 97212 ♦ [AWEC.solutions](http://AWEC.solutions)

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addition to the recommendations in the attachment, AWEC recommends that the volume of distributed compliance instruments be refreshed, with perhaps a slightly more rapid trajectory of carbon emissions reductions through 2050.

AWEC appreciates this opportunity to provide these comments and the attached proposal. We look forward to future participation and discussion in the CPP 2024 rulemaking process.

Sincerely

William (Bill) A. Gaines  
Executive Director, AWEC



**AWEC**

Alliance of Western Energy Consumers ♦ 3519 NE 15<sup>th</sup> Ave, #249 ♦ Portland, OR 97212 ♦ [AWEC.solutions](http://AWEC.solutions)

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# Exhibit A

Supplemental Comments of the Alliance of Western Energy Consumers  
on the Oregon Department of Environmental Quality's  
Climate Protection Program 2024 Rulemaking

Oregon Climate Protection Program (“CPP”) Proposal  
prepared by  
Alliance of Western Energy Consumers

Alternative Compliance Pathway for  
Energy Intensive Trade Exposed Industries

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April 30, 2024





# CCP Program Proposals--EITE

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- 1. EITE No-Cost Compliance Instruments:** Create a separate schedule of new no-cost compliance instruments distributed to EITE Entities with 3% reductions per compliance period (similar to Washington's EITE program)
- 2. Innovation Climate Investments ("ICI"):** Create new class of compliance instruments with funding directed towards climate innovation for Oregon business applicable to EITEs and large volume distribution service rate schedules
- 3. Carbon Offsets:** Enable LDCs and EITEs to use of carbon offsets, including nature based offsets, to meet up to 20% of Covered Emissions (*This would apply to EITE and Non EITE customers*)
- 4. EITE Point of Regulation:** Make EITE Entities a separate point of regulation from the Local Distribution Company ("LDC")
- 5. Tie to Regional Markets:** Tie the cost of CCI's and ICIs to the settled CARB/QBC allowance auction market price (*This would apply to EITE and Non EITE customers*)

# CPP Program Proposal—Non EITE Customers

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- 6. Cost Cap:** Establish a programmatic cost cap equal to 5% per year for LDC distribution service customers (for non EITE customers)

# EITE Program Justification

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- Nearly every carbon market in the world has some form of Energy-Intensive Trade-Exposed (“EITE”) program
- EITE consumers have unique impact on economic and industrial development in the state, warranting unique CPP treatment: competitiveness, carbon leakage, neighboring EITE programs, etc.
- Increasing EITE costs will risk relocation of production outside of Oregon leading to a shift of energy consumption and production to regions with higher carbon footprints
- The impact of the former CPP rule on EITE customers was forecast to be severe: rate increases ranged from 435% in 2025 to 1,819% in 2035 (6,700% increases for some customers)
- The *Oregon Sectoral Competitiveness under Carbon Pricing* study prepared for the Oregon Carbon Policy Office in 2018 recommended the inclusion of an EITE program to avoid leakage and related issues
- Accordingly, there is sound justification to adopt an alternative compliance pathway for EITE customers, thereby protecting the economic and industrial development in the state

# 1. EITE No-Cost Compliance Instruments

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- New paragraph in § 340-271-0420:
  - (3) Annual distribution of compliance instruments to covered fuel suppliers that are EITE Entities. DEQ will annually distribute to each EITE Entity, or to its successor(s) due to a change in ownership or operation, the number of compliance instruments equal to the EITE Baseline multiplied by the percentages stated in Table 4B in OAR 340-271-9000.
    - (a) For EITE Entities existing as of the effective date of this rule the EITE Baseline shall be based on the average Covered Emissions from the EITE Entity in the two years with the highest Covered Emissions in the first compliance period.
    - (b) For new EITE Entities, including expansions of existing facilities, the EITE Baseline shall be based on the average Covered Emissions from the EITE Entity in the two years with the highest Covered Emissions in the first three years of the EITE Entity operations at full production.
    - (c) The EITE Baseline for an EITE Entity shall be adjusted based on a showing from the EITE Entity that the EITE Baseline calculated based on the foregoing formula does not accurately reflect the EITE Entity's full production capability.
- Create a new Table 4B distributing no-cost instruments to EITE Entities based on a stated percentages per compliance period (proposed Table 4B is shown on next slide)
- EITE Baseline based on the highest two years of emissions in the first compliance period, normalizing the impact of abnormal plant outages or curtailment periods
- New customers and facility expansion baselines would be based on the highest two years of emissions in the first three years of operations
- Opportunity to appeal to DEQ if EITE Baseline produced by the formula is unreasonable relative to the facility's full production capability

# No-Cost Compliance Instruments (Cont.)

- Proposed New Table 4B (to the right)
- Similar to Washington EITE program with 3% reductions per compliance period. (A 4-year compliance program like Washington would also be acceptable).
- First compliance period used to measure EITE emissions and establish baseline as discussed on previous page
- Following fourth compliance period, EITE program undergoes holistic review and percentage reductions are subject to review and discussion.

Table 4B		
Allocation of Compliance Instruments to EITE Entities		
Compl. Per.	Year	% of EITE Baseline
1	2025	100.0%
1	2026	100.0%
1	2027	100.0%
2	2028	97.0%
2	2029	97.0%
2	2030	97.0%
3	2031	94.1%
3	2032	94.1%
3	2033	94.1%
4	2034	91.3%
4	2035	91.3%
4	2036	91.3%
Thereafter		Subject to Future Rulemaking

*-Baseline Measurement*  
*3% Reductions Per C.P.*  
*Program Reevaluated*

## 2. Innovation Climate Investments

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- Create a new class of compliance credits e.g.:
  - (xx) “Innovation Climate Investment credit” or “ICI credit” means an instrument issued by DEQ to track a covered fuel supplier’s payment of innovation climate investment funds, and which may be used in lieu of a compliance instrument, as further provided and limited in this division.  
*Further conforming changes would be required throughout CPP specifying specific funding rules and requirements for ICI entities*
- Add ICIs as a compliance pathway § 340-271-0450(3):
  - (3) To demonstrate compliance for a compliance period, a covered fuel supplier must submit the following to DEQ:
    - (a) For each metric ton of CO<sub>2</sub>e of the total compliance obligation, either a compliance instrument, ~~or~~ a CCI credit, a Carbon Offset, or an ICI Credit subject to the following limitations:
      - ...
        - (D) The quantity of ICI Credits shall be limited to the Covered Emissions of EITE Entities and the Covered Emissions of a local distribution company attributable to a large volume rate schedule.
- ICI program specifically designed to advance the environmental sustainability and competitiveness of Oregon business
- Qualified organizations funded to invest in innovation, sustainability and carbon reduction for Oregon business
- Rules regarding certification and qualification as an ICI entity similar to those for CCIs, subject to further discussion

# 3. Carbon Offsets

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- Add Carbon Offsets to § 340-271-0450(3):
  - (3) To demonstrate compliance for a compliance period, a covered fuel supplier must submit the following to DEQ:
    - (a) For each metric ton of CO<sub>2</sub>e of the total compliance obligation, either a compliance instrument, ~~or~~ a CCI credit, or a Carbon Offset subject to the following limitations:
      - ...
        - (C) The quantity of Carbon Offsets shall be limited to 20% of the Covered Emissions of Local Distribution Companies or EITE Entities.
- ...Define Carbon Offset↓
  - 340-271-0020 (xx) Carbon Offsets means instruments tradable through the American Carbon Registry or nature-based global emissions including instruments tradable through the Chicago Mercantile Exchange CBL Nature-Based Global Emissions Offset futures contract.
- Provides more flexibility in meeting the compliance obligations, while still providing for verifiable emissions reductions
- A global emissions offset is consistent with the leakage caused by imposing carbon costs on EITE customers
- Programs in Washington, California and Quebec provide for the use of offsets, with limitations

# 4. EITE Point of Regulation

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- Define EITE Entity:
  - (xx) “EITE Entity” means a distribution service customer of a local distribution company that operates a trade or business in the state under the North American Industry Classification System (NAICS) codes specified in OAR 340-271-9001 [*add a new section with the specific NAICS references*]
- Establish point of regulation § 340-271-0110(4):
  - (a) The person is (i) a local distribution company that either produces natural gas, compressed natural gas, or liquefied natural gas in Oregon, or that imports, sells, or distributes natural gas, compressed natural gas, or liquefied natural gas to end users in the state, or (ii) an EITE Entity that self-supplies or procures natural gas through the distribution network of a local distribution company in the state.

*Further conforming edits throughout the rule adding EITE Entity where applicable.*

- Individual EITE Entities will have greater incentive to innovate and reduce carbon emissions if directly responsible for CPP costs of their facilities
- If costs are socialized at LDC, EITE entities will not realize direct benefits from their individual carbon reductions, thus providing less incentive for action



# 5. Tie CCI and ICI to Regional Markets

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- Tie costs of CCIs and ICIs to the the most recently settled CARB/QBC allowance market price.
- Strike the second and third sentence of 340-271-0820(3)(b) and add a new paragraph:
  - (6) The CCI credit contribution amount and the ICI credit contribution amount shall be the settlement price for greenhouse gas allowances in the most recent Joint Auction of California Air Resources Board (CARB) and Québec's ministère del'Environnement.
- Tying the compliance cost to the CARB market will result in a similar compliance cost in Oregon as neighboring states, thus preventing leakage and promoting Oregon business
- Will promote future efforts to regionalize carbon markets

# 6. Cost Cap for Non-EITE Customers

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- Establish a mechanism, with feedback from the LDCs and the Public Utility Commission of Oregon, that limits the effective rate increases of the CPP for customers to 5%
  - Modify § 340-271-0420(2):
    - (2) Annual distribution of compliance instruments to covered fuel suppliers that are local distribution companies.
      - (a) DEQ will annually distribute to each local distribution company, or to its successor(s) due to a change in ownership or operation, the number of compliance instruments from the calendar year's cap stated in Table 4 in OAR 340-271-9000; and
      - (b) If to the extent the average annual rate increase associated with CPP compliance for any distribution service rate schedule of a local distribution company exceeds 5%, the DEQ will distribute an additional number of compliance instruments to the local distribution company for the Covered Emissions of the applicable rate schedule in an amount sufficient to reduce the annual distribution service rate increase associated with CPP compliance to 5%, as determined in the CPP Rate Impact Report filed by the local distribution company with, and acknowledged by, the Public Utility Commission of Oregon.
- ...Define EITE Impact Report ↓
- 340-271-0020 (xx) CPP Rate Impact Report means an annual report filed by a local distribution company, with the Public Utility Commission of Oregon on November 1 of each calendar year detailing the additional compliance instruments, if any, necessary to reduce the annual distribution service rate increase for CPP compliance for each local distribution rate schedule to 5%.
- Requires LDCs to track and report rate impacts associated with CPP compliance for customers
  - Propose an annual report prepared by LDCs in conjunction with Purchased Gas Adjustment filings





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# Climate Protection Program 2024

## RAC 1 – Emissions and Costs

MAY 3, 2024



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# Climate Protection Program (CPP) 2024 - RAC 1 Proposed Requirements and Assumptions

Baseline of 2017 – 2019 emissions

Compliance begins in 2025 with 3 yr compliance periods

Compliance instrument allocations for 2025 are based on the decline of baseline emissions starting in 2022 resulting in 50% reductions by 2035 and 90% by 2050

CCIs can be used to meet 10% of compliance obligation in period 1, 15% in period 2, and 20% in period 3 and thereafter

CCI prices are in 2021 dollars and are increased by \$1 annually and adjusted for inflation. For example, 2025 CCI price is estimated at \$132.98

Assume CCIs are available for purchase in 2025

Cascade compliance is projected to include renewable natural gas and CCIs, as well as 2023 IRP forecasted core customer energy efficiency and conservation program savings

# CPP 2024 - RAC 1

## Cascade Cost Scenarios

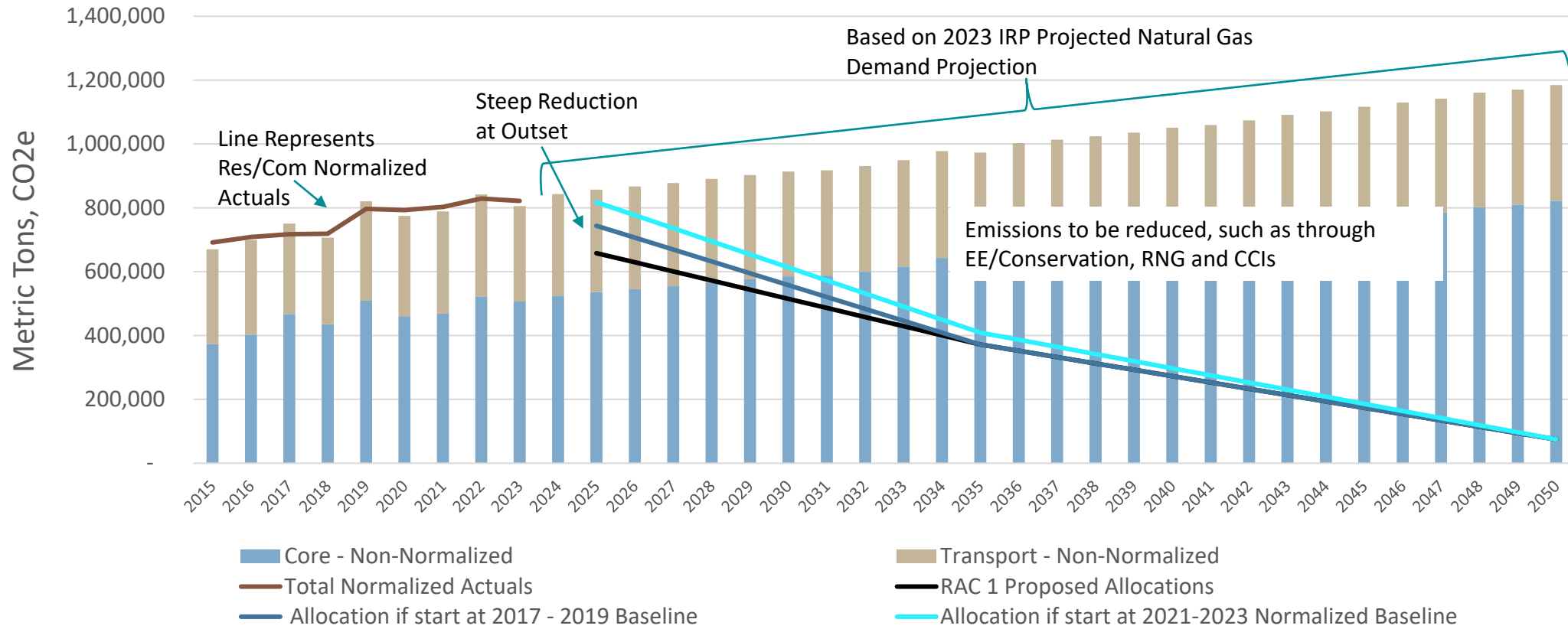
Scenario 1 - RAC 1 April draft as proposed

Scenario 2 – RAC 1 April draft as proposed, but modified to use 2017-2019 baseline emissions for 2025 compliance instrument allocation

Other adjustments, such as using contemporary baseline years and a weather-normalized baseline can further reduce cost impacts

# CPP 2024 - RAC 1

## Cascade Actual Emissions and Reduction Projections



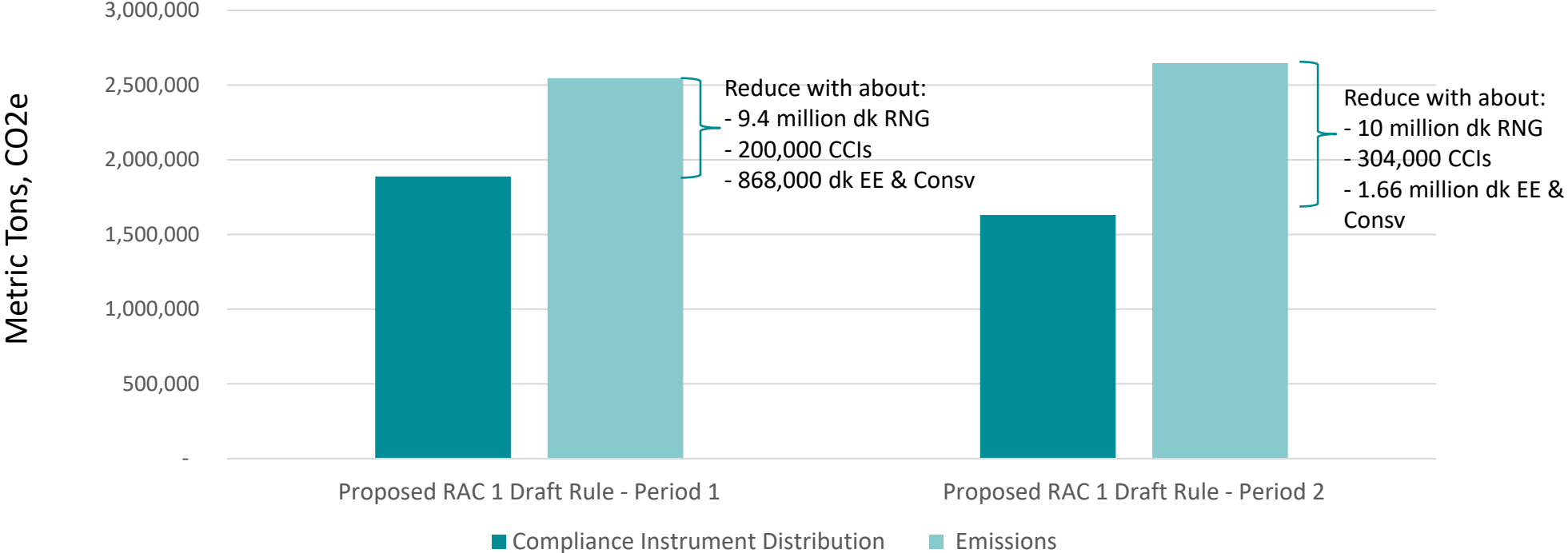
- Cascade's transport customers represent about 40% of total energy delivery (excludes electric gen) and do not purchase gas for these customers.
- 22% reduction at outset for 2025. Apply weather-normalization, make 2022 initial compliance distribution amount and consider recent years in baseline.
- Weather normalization method can be standardized with LDCs and OPUC.



# CPP 2024 - RAC 1

## Compliance Instruments

Compliance Instrument Distributions for Periods 1 and 2 and Projected Emissions



- Steep reductions in the first two periods will require significant purchases of RNG to meet compliance.
- Restrictions in near-term limit ability to develop a holistic and cost-effective long term decarbonization approach.
- Moderating the trajectory would minimize cost impacts and energy system resiliency and reliability issues.



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# CPP 2024 - RAC 1

## Emissions Reductions

Projected Emissions Reductions Required				
	Scenario 1		Scenario 2	
	Period 1	Period 2	Period 1	Period 2
EE and Conservation Savings, MT CO2e	46,104	88,315	46,104	88,315
RNG, MT CO2e	499,890	526,513	393,771	420,394
CCIs, MT CO2e	199,965	304,463	199,965	304,463
<b>Total Reductions</b>	<b>745,959</b>	<b>919,290</b>	<b>639,840</b>	<b>813,172</b>

- Not included in scenarios:
  - Note that 10% CCI limit and 2025 former CPP allocation result in more RNG purchases.



# CPP 2024 - RAC 1

## Projected Total Cost by Compliance Period

<b>Costs by Scenario</b>				
	<b>Scenario 1</b>		<b>Scenario 2</b>	
	Period 1	Period 2	Period 1	Period 2
RNG	\$ 164,955,666	\$ 172,880,718	\$ 122,955,666	\$ 130,880,718
CCIs	\$ 27,515,524	\$ 46,791,473	\$ 27,515,524	\$ 46,791,473
<b>Total</b>	<b>\$ 192,471,190</b>	<b>\$ 219,672,191</b>	<b>\$ 150,471,190</b>	<b>\$ 177,672,191</b>

- Not included in scenarios:
  - Note that 10% CCI limit and 2025 former CPP allocation result in more RNG purchases, increasing compliance costs.
- CCIs must result in real emissions reductions and directly benefit Cascade's customers.

Projections propose costs to be recovered from customers volumetrically. Cost will be dependent on many factors including actual energy demand, compliance option availability and prices. Cost projections do not currently include interest charges and other overhead expenses.

# CPP 2024 - RAC 1 Proposed Rule Requirements Projected Customer Bill Impacts for 2025 and 2030

Estimated Monthly Percentage Bill Impacts Compared with Current Bills*		
	2025	2030
Residential Customers	34%	43%
Commercial Customers	38%	48%
Industrial Customers**	41%	51%
Transport Customers***	562%	704%

\*Bill impacts are projections of CPP impacts and may vary due to other factors and costs. Projections propose costs to be recovered from customers volumetrically.

\*\*Cascade combined Schedules 105, 111, and 170 into the Industrial customer class.

\*\*\*Examples of Industrial and Transport customers include Window Manufacturing, Asphalt/Oil, Tire Manufacturing/Warehouse, Medical/Hospitals, Machine Manufacturing, Heating Fuel, Metal Casting, Wood/Lumber, Pellet Manufacturing, Asphalt/Construction, Biotechnology, Commercial, Food Processing, and Breweries



# Key Takeaways

Emissions Baseline – DEQ should weather-normalize natural gas supplier baselines and incorporate recent years to reduce customer cost impacts and minimize compliance risk.

Emissions Reduction Trajectory – Trajectory should reflect project and decarbonization technology development timelines to achieve long term lower cost decarbonization.

Covered Entities – DEQ should regulate natural gas transport customers separately to consider site-specific Energy/Emissions Intensive and Trade Exposed (EITE) situations and also exclude residential heating emissions.

## **Recommend continued DEQ consideration of:**

- Covered Emissions – DEQ should design the new CPP to align with its statutory authority.
- Energy System Resiliency – System resiliency is essential and relies on natural gas; phasing out of gas jeopardizes reliability.
- Consumer Protection – Clear cost containment and reliability assurance measures are needed to protect customers.
- CCIs must result in real emissions reductions and directly benefit Cascade's customers.

# Questions?

Abbie Krebsbach  
Environmental Director  
[abbie.Krebsbach@mdu.com](mailto:abbie.Krebsbach@mdu.com)  
701-222-7844

Chris Robbins  
Director of Gas Supply  
[chris.robbins@cngc.com](mailto:chris.robbins@cngc.com)  
509-734-4588

Lori Blattner  
Director of Regulatory Affairs  
[lori.blattner@intgas.com](mailto:lori.blattner@intgas.com)  
208-377-6015



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**From:** [Brent Walker via constituent@civicklick.com](mailto:Brent.Walker.via.constituent@civicklick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Wednesday, May 8, 2024 4:18:06 PM

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Dear Nicole Singh,

Natural gas is a clean alternative.  
Electricity is not always a reliable source, believe me, we know.  
Natural gas is plentiful and a cheaper alternative.  
Oregon's citizens should have a choice in the matter.

Sincerely,  
Brent Walker  
1945 E Cedar St  
Stayton, OR 97383  
[toniwalkerx3@gmail.com](mailto:toniwalkerx3@gmail.com)

**From:** [Carla Morreale via constituent@civiclick.com](mailto:Carla.Morreale.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Thursday, May 9, 2024 7:08:15 AM

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Dear Nicole Singh,

As an Oregonian, I am interested in maintaining the beauty and uniqueness of our state. I take every possible action to assist in this endeavor. I also believe in the rights of all Oregonians to responsibly utilize the resources around us in a way that is respectful and practical. We should absolutely have natural gas available for use in our homes. During several storms that have isolated my friends and family we were immensely grateful for the ability to cook and warm our homes by gas when our power went out. It is critical to maintain natural gas as an energy source in our homes. Do not be shortsighted, as is California, in creating obstacles that will endanger our health and welfare by eliminating our right to use natural gas as one source of energy for our homes.

Sincerely,  
Carla Morreale  
592 7th St  
Lake Oswego, OR 97034  
[carlamor22@gmail.com](mailto:carlamor22@gmail.com)

**From:** [Amanda Duncan](#)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Reinstate a strong Climate Protection Program  
**Date:** Friday, May 10, 2024 6:27:09 PM

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You don't often get email from ajwduncan@gmail.com. [Learn why this is important](#)

Hi,

I am a long-time Oregonian very concerned about climate change and its impact on our state and local communities. As you know, the Climate Protection Program (CPP) is critical for our state to meet its climate goals, so I was very disappointed and concerned when the previously-adopted CPP program was invalidated. I strongly support a rulemaking timeline that will restore the CPP rules this year. Climate change won't wait. The reinstated CPP should ensure the same cumulative emission reductions as the original program, which will require using a lower starting emissions cap to make up for the three-year delay of the program. In addition, the reinstated CPP should continue to include an independent Community Climate Investment program that can effectively respond to community needs. A strong CPP will not only protect the climate, but also improve health, help local economies, and encourage technical innovation.

Sincerely,

Amanda Duncan, PhD  
Beaverton, Oregon





April 2, 2024

DEQ Testimony Regarding Reinstatement of Oregon's Climate Protection Program

Dear DEQ Rulemaking Advisory Committee, EQC members, and DEQ staff,

I am a member of Climate Reality Project, Portland and am Chair of the Legislative Committee. Climate Reality fully supports your decision to quickly address the procedural issues found by the Court of Appeals and **reinstate the Climate Protection Program.**

Oregon's changing climate results in more erratic and extreme weather, drought, wildfires, and air and water pollution, impacting all our residents, and threatening all we hold dear, from our rugged coastline and beautiful forests, to our iconic rivers and mountains. It threatens our food and water security and our public health. The Climate Protection Program, with extensive community engagement, was our response, an ambitious program to reduce greenhouse gas and other pollution, enhance public welfare and environmental justice, and accelerate the transition off fossil fuels. Climate Reality commends your aggressive rulemaking timeline and encourages the Rulemaking Advisory Committee to make up for this time lost by strengthening the science-based emissions cap trajectory previously established.

Prior to the Court's decision to invalidate the rules, the CPP was projected to achieve a 45 percent reduction in statewide emissions by 2035, and invest hundreds of millions of dollars annually in environmental justice and other communities across Oregon. Substantially changing the program due to a mere procedural technicality would be a disservice to the thoughtful and well researched efforts that have already gone into this program.

We look forward to seeing the CPP reinstated before the end of 2024 so that the important work of reducing the dramatic and dangerous harms of our changing climate can continue and we can once again invest in our low-income, rural and communities of color, who have borne the brunt of climate and economic injustice for too long, and begin to see long overdue relief.

Thank you,

Karen Harrington

Climate Reality Project, Portland Chapter  
Chair, Legislative Committee

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**From:** Price, Jeremy <[Jeremy.Price@HFSinclair.com](mailto:Jeremy.Price@HFSinclair.com)>  
**Sent:** Friday, May 10, 2024 10:21 AM  
**To:** MCCONNAHA Colin \* DEQ <[Colin.MCCONNAHA@deq.oregon.gov](mailto:Colin.MCCONNAHA@deq.oregon.gov)>  
**Subject:** early adoption language

### **340-271-04XX**

#### **Distribution of Additional Compliance Instruments to Covered Fuel Suppliers for 2025 based on Early Adoption Actions.**

(1) In addition to the distribution of compliance instruments to covered fuel suppliers as described in OAR 340-271-0420, DEQ will distribute additional compliance instruments to covered fuel suppliers who conducted early adoption actions under the prior Climate Protection Program including those who:

- (i) imported, sold, or delivered in Oregon biofuels in 2022, 2023 or 2024;
- (ii) purchased Community Climate Investment Credits under the prior Climate Protection Program; or
- (iii) obtained compliance instruments through approved trades pursuant to OAR 340-271-0500 under the prior Climate Protection Program.

One compliance instrument will be distributed for: (1) each metric ton of a covered fuel supplier's biofuel emissions in 2022, 2023 and 2024, (2) each Community Climate Investment Credit purchased under the prior Climate Protection Program, and (3) for each compliance instrument obtained through an approved trade pursuant to OAR 340-271-0500 under the prior Climate Protection Program.

(2) To be eligible for the additional compliance instruments in 2025 under this section OAR **340-271-04XX**, the covered fuel supplier must have obtained a CPP permit pursuant to OAR 340-271-0150 under the prior Climate Protection Program.

(3) A covered fuel supplier who believes it is eligible for additional compliance instruments under this section must submit an application to DEQ on or before June 1, 2025. The application must include:

- (i) Name and full mailing address;
- (ii) Designated representative's contact information including name, title or position, phone number, and email address;
- (iii) The reason for the request, including description of eligibility according to section (1) together with verifiable information that the covered fuel supplier is eligible for the additional distribution of compliance instruments;
- (iv) The number of compliance instruments that the covered fuel supplier is requesting from the additional distribution; and

(v) The following attestation, signed by the designated representative of the covered fuel supplier:

I certify under penalty of perjury under the laws of the State of Oregon that I am a representative of [covered fuel supplier], am authorized to submit this application on its behalf, and that, to the best of my knowledge and belief, the information provided in this form is true, accurate, and complete. [Covered fuel supplier] was a covered fuel supplier under the prior Climate Protection Program and requests distribution of the additional compliance instruments for 2025 according to the information included in this application.

(4) DEQ will review an application submitted according to Section (3) to ensure that it meets the requirements of this section. DEQ will inform the applicant either that the submitted application is complete or that additional specific information is required to make the application complete. If the application is incomplete, DEQ will not consider the application further until the applicant provides the additional information requested by DEQ.

(5) If DEQ approves an application, DEQ will distribute qualifying corresponding compliance instruments to the covered fuel supplier no later than June 30, 2025. For clarity, compliance instruments issued under this section OAR **340-271-04XX** shall be a one-time distribution in 2025 based on the total number of qualifying applications received.

CONFIDENTIALITY NOTICE: This e-mail, and any attachments, may contain information that is privileged and confidential. If you received this message in error, please advise the sender immediately by reply e-mail and do not retain any paper or electronic copies of this message or any attachments. Unless expressly stated, nothing contained in this message should be construed as a digital or electronic signature or a commitment to a binding agreement.

**From:** [Cathy Stinson via constituent@civiclick.com](mailto:Cathy_Stinson_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Monday, May 13, 2024 2:56:08 PM

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Dear Nicole Singh,

Oregonians deserve a carefully thought out energy policy to transition to more environmentally compatible forms of energy production. This must include recognizing the continued use of natural gas as an integral part of that transition and not be driven by loud, uneducated political voices. Ask anyone who had to live through the extended power outages this past winter. For many people, there was no help. We don't need to limit ourselves on power options, any more than we already have.

Sincerely,  
Cathy Stinson  
2540 SW West Wind Dr  
McMinnville, OR 97128  
[catestinson@gmail.com](mailto:catestinson@gmail.com)

### Cost Comparison Summary

**Most likely scenarios show Oregon's CPP has lower costs.  
It costs less to buy a small quantity of credits at \$123 per ton  
than to buy a much larger quantity of credits at \$40 or \$50 or \$60 per ton.**

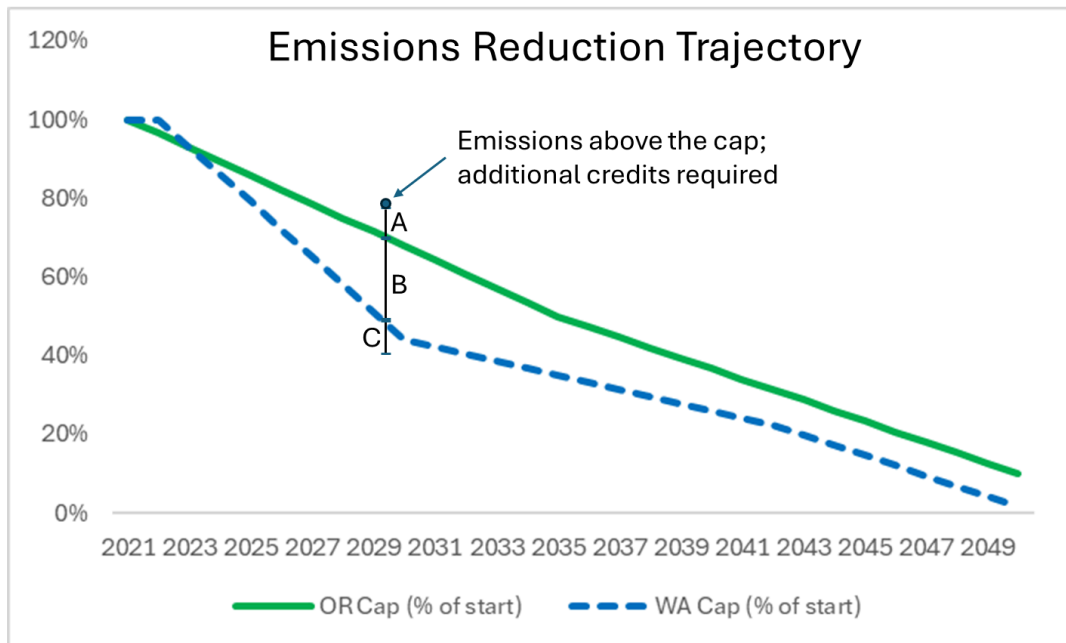
The following summarizes our comparison of program costs in Oregon under the Climate Protection Plan (CPP) and those in Washington under the Climate Commitment Act (CCA).

While we share the top priorities of reducing emissions and advancing environmental justice, the cost of compliance is also an important consideration given the implications on customers (both families and businesses). A comparison to nearby states is especially useful to evaluate questions of fairness and competitiveness.

**Results:** A relatively straightforward analysis shows that **Oregon's program is NOT more expensive than others**, looking no further than our state right next door. The results depend significantly on assumptions in modeling program compliance costs. In many likely scenarios, compliance under Oregon's program is less expensive than the costs would be in Washington. Why? In short, *it costs less to buy a small quantity of credits at \$123 per ton than to buy a much larger quantity of credits at \$40 or \$50 or \$60 per ton.*

Recognizing that Oregon's program costs are on par with those in Washington allows us to set aside over-blown questions about costs and focus program refinement efforts on efficiencies, maximizing benefits for communities, job creation and business opportunities across the state.

**Graphical analysis:** The chart below offers a view of this comparison without any calculations.



Oregon's trajectory (green line) is based on assuming the 2022 start in the initial program, assuming it continues as was planned restarting in 2025. Emissions cap declines by 50% by 2035, and by 90% by 2050. This simplified trajectory does not show the minor variations that occur due to inclusion of additional entities under program thresholds.

Washington's trajectory (blue dashed line) is based on the [CCA Rules](#) (see page 38). In brief, the cap declines by 7%/yr 2023-2030; 1.8%/yr 2031 to 2042; 2.6%/yr 2043 to 2050.

The green line shows the emissions reduction trajectory in Oregon (assuming continuation of the program) and the blue dashed line shows Washington's trajectory. Consider the costs for an Oregon natural gas utility (LDC) under the CPP, and their would-be cost of compliance if they were operating in Washington under the CCA. Assume the LDC's emissions are above the Oregon line, at the point indicated by the arrow.

To meet the Oregon cap, the LDC could contribute to CCIs (i.e. at \$123/ton), with the quantity of tons indicated by the vertical line near the letter A. But if the LDC were operating in Washington, they would need to buy credits for both that quantity (A), plus the credits they would need to get down to the Washington cap (quantity B). (They might also need to address quantity C, further raising these would-be Washington costs, not discussed in this summary.) The LDC would buy these Washington credits at the auction price in Washington. In other words, the cost difference in OR vs WA depends on the difference between the cost of quantity A at the CCI price, versus the cost of quantity A + B at the WA auction price. **The actual result depends on assumptions about quantities and prices. For many likely scenarios, Oregon's cost is lower.**

**Scenario analysis:** Taking this a step further, we can calculate these differences for scenarios using 1) an assumption that Oregon's CCI price stays as planned, 2) scenario assumptions about the percentage the LDC exceeds Oregon's cap, and 3) scenario auction prices in Washington. Likely scenarios show Oregon's costs are lower, while scenarios can be posed that show Washington lower. (Another smaller consideration is the percentage the LDC would invest auction proceeds in energy efficiency or things other than bill credits (shown as 'C' on the graph) but that is a smaller factor further raising WA costs and not detailed in this summary..)

**Three example scenarios:**

	<b>Excess emissions (over Oregon cap)</b>	<b>Auction price in WA</b>	<b>% as bill credits</b>	<b>Cost comparison (avg. cost per ton)</b>
<b>Scenario 1</b>	10%	\$40	100%	WA cost higher than OR cost every year after 2028
<b>Scenario 2</b>	15%	\$50	100%	WA cost higher than OR cost every year after 2028
<b>Scenario 3</b>	20%	\$55	90%	WA cost higher than OR cost every year after 2027

**Conclusions:**

- Oregon's program is NOT more expensive than others.
- In many likely scenarios, compliance under Oregon's program is less expensive than the costs would be in Washington.
- The actual results depend significantly on assumptions in modeling the cost.

**Further cost considerations:**

While CCIs are one path for compliance, Oregon utilities also have a range of other options under the CPP, including reducing their emissions, which can make compliance costs even lower:

- Buying credits from other covered entities (e.g. liquid fuel providers)
- Using banked credits the LDC has retained from prior years
- Investing in energy efficiency
- Investing in electrification and other non-pipe alternatives

If an Oregon LDC is able to reduce emissions down to the cap, or to any level between the Oregon cap and the Washington cap, then the cost is zero, while the cost in Washington would be above zero. In any year where this occurs, Oregon costs are below those in Washington.

Some of the scenarios use a lower auction price than Washington has seen to date. This conservative assumption allows for the potential that Washington merges their program with those in California and Quebec, driving auction prices down.

Washington covered entities have the ability to buy offsets for a small portion of excess emissions, as outlined [here](#): “In the first compliance period, offsets may be used for up to five percent of a covered entity’s compliance obligation, provided at least 50% of those offsets are from projects that provide direct environmental benefits to Washington. For the second compliance period (2028-31), the limit drops to four percent, and at least 75% of offsets come from projects with direct local environmental benefits.” Given this local benefit requirement, the market forces moving these offsets close to the auction price, and the limited allowable percentage use of these offsets, we expect this to have only a modest cost savings benefit in Washington in terms of this comparison analysis.

What if a utility needs more than the 20% CCI coverage originally allowed in Oregon? There are many tools for flexibility and compliance (banking, buying credits from others, 3-yr compliance windows). If, despite those tools, and contrary to public emissions reductions commitments made prior to the creation of the CPP, the utility is unable to make investments to reduce emissions, then they might choose to buy RNG or RTCs – but that could also apply in Washington, and would depend on market prices, credit auction prices, and other factors that can’t be accurately predicted for such a comparison.



**From:** [Ed Vachal via constituent@civiclick.com](mailto:Ed Vachal via constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Monday, May 13, 2024 3:30:42 PM

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Dear Nicole Singh,

Please DO NOT mess with Natural Gas. During January 2024 we experienced severe frigid weather. Electricity was compromised--we DO have solar on our home, but NO battery back-up. Trees were blown over, power lines were cut. People were without heat/lights for days. Fortunately, we have two gas fireplaces. When neighbors on our street lost power, we invited them to our home. While the blowers on our gas fireplaces didn't work, we still had radiant heat; and we all kept warm. I set up a cooking station in our garage just in case we needed to warm some food. Yes! a gas powered grill! None of this is possible without GAS. It is ridiculous to think that only wind and solar can sustain humans. The power grid is already in shambles. (Forest fires notwithstanding.) PLEASE do NOT abate ANY gas whatsoever!!!!

We love our GAS. Do not mess with GAS!!! Thank you. ED

Sincerely,  
Ed Vachal  
286 N W Linneman Av  
Gresham, OR 97030  
[edvachal@gmail.com](mailto:edvachal@gmail.com)



*The League of Women Voters of Oregon, established in 1920, is a grassroots nonpartisan political organization that encourages informed and active participation in government. We envision informed Oregonians participating in a fully accessible, responsive, and transparent government to achieve the common good. LWVOR Legislative Action is based on advocacy positions formed through studies and member consensus. The League never supports or opposes any candidate or political party.*

May 14, 2024

To: [Nicole Singh](#), DEQ, Senior Climate Change Policy Advisor

Re: Climate Protection Program (CPP) 2024 Proposed Rulemaking - **Comments**

The League of Women Voters believes climate change is a serious threat facing our nation and planet and supports climate goals consistent with the best available science to ensure a stable climate system for future generations. The League advocates in favor of laws, regulations, and policies to mitigate climate change and its impact.

We have participated actively in the CPP rulemaking since its inception in 2021, and strongly support the program's primary goals of achieving significant reductions in greenhouse gas (GHG) emissions; promoting benefits and alleviating burdens for environmental justice communities; and containing costs for businesses and consumers.

The Oregon Court of Appeals decision invalidating the CPP on the basis of a procedural technicality overturned many months of work by climate advocates and others to implement a fair and effective program that would secure public health and economic benefits for all Oregonians. In seeking to restore the CPP, DEQ's 2024 rulemaking offers opportunities to strengthen this cornerstone program beyond the rules that were in place at the end of 2023. Below, we highlight several key topics.

- **Emissions Cap:** The reinstated program must maintain, or preferably strengthen, the science-based emissions cap and trajectory established in the previously adopted rules. This is imperative to make up for GHG emissions that were not reduced in the years when the CPP should have been in place. To get Oregon's cumulative emission reductions back on track, DEQ should use a lower starting emissions cap for 2025 and every year thereafter.
- **Community Climate Investments (CCIs):** We urge DEQ to maintain an effective CCI program that will enable environmental justice and community-based organizations to proceed with the emissions-reducing projects and investment options they have identified. Specifically, we oppose reducing the price of CCIs and allowing offset investments by the regulated entities—particularly investments outside of Oregon—as a means of program compliance.
- **Stationary Sources:** We have consistently expressed our concern that the previously adopted rules exempted large stationary sources from binding requirements to reduce emissions, in favor of regulating emissions through an ineffective Best Available Emissions Reduction approach. The 2024 rulemaking gives DEQ an opportunity to ensure that the CPP deters expansion of existing sources or development of new sources of process-based GHG emissions. Once again, we urge DEQ to amend the rules to bring large industrial source emissions under the cap.

Thank you for the opportunity to discuss this rulemaking.

Handwritten signature of Rebecca L. Gladstone in black ink.

Rebecca Gladstone  
President LWVOR

Handwritten signature of Claudia Keith in black ink.

Claudia Keith  
Climate Emergency Coordinator

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**From:** Josh Proudfoot  
**Sent:** Tuesday, May 14, 2024 1:41 PM  
**To:** 'cPPP@2024@deq.gov' <cPPP@2024@deq.gov>  
**Cc:** Nicole SINGH <nicole.singh@deq.oregon.gov>; Sylvia Ciborowski <Sciborowski@kearnswest.com>  
**Subject:** Josh Proudfoot testimony to CPP process

Hi everyone.

My name is Josh Proudfoot, I am a co-founder of Good Company, a climate and sustainability research and consulting firm that has been doing work in Oregon and around the nation and world for 23 years. Our firm supported the Seeding Justice proposal for the CCI effort.

Recently we joined Parametrix, a 50-year-old, 840-person environmental science, planning and civil engineering firm after 9 other national and international firms offered to acquire us. Our work serves electric and water utilities, housing organizations, transportation systems receiving moneys from cap and invest systems, heavy and heat-based industries, venture and investment bankers, international consumer products companies and professional services firms that serve the largest corporations in the world. What do all these companies and government agencies have in common?

They - our clients, are managing their emissions - whether its shareholders protecting their

investments, their customers asking for change, or regulated parties complying with local, state, federal or International policies and laws, they must measure, manage, and decarbonize their operations with the most cost-effective transitions.

For both the CCI effort and all the rest, the calculation patterns are the same:

1. Use protocols for calculating benefits in metric tons of greenhouse gasses and dollars.
2. Where protocols don't exist – use tried and true methods for calculating benefits based on good science and good data.
3. Verify the methodology from another party if needed.
4. Develop an estimate of the project in advance – just as pro-forma is made for financial investments.
5. Track and report actuals and determine the final GHG benefit of the project using the same methods and audit trail.
6. Verify the calculations from an outside party to determine veracity of the measurement.

This is standard practice the world over and is becoming common place.

Lastly a note on the largest companies in our state those that sell around the world - know that the future is one that must and will be carbon free. Ask the largest publicly owned companies in Oregon what their plans are going forward. You will find that this transition is already underway. We want to make sure the rest of our industries can keep up with what clearly is a worldwide effort to save ourselves from extinction – whether you are a business or a family. It's not going to be easy as we know from serving industrials and other hard to decarb sectors. but it must be done ... and done sooner than later.

Thank you,  
Josh



**Josh Proudfoot**

*He/Him*

Director of Climate and ESG Group

[541-946-5057](tel:541-946-5057) | direct

[541-232-5674](tel:541-232-5674) | mobile





## MARION COUNTY BOARD OF COMMISSIONERS

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May 14, 2024

TO: Climate Protection Program, Rulemaking Advisory Committee for the Oregon Department of Environmental Quality

FROM: Marion County Board of Commissioners

RE: Testimony on Climate Protection Program

Oregonians are being asked to shoulder the burden for Community Climate Investments at a time when Oregonians are facing increasing costs by government agencies and the overall increase in the cost of living that is hurting the most vulnerable in our communities. It is unclear precisely what these Community Climate Investments are and what they will deliver since there is no clearly articulated return on investment. It appears that this program simply creates a significant cost burden without any benefit to the people that shoulder that burden.

From a local government perspective, cities and counties across the state are required to be thoughtful and responsible with the funding provided by the taxpayer. Increased energy costs on local government buildings actually creates an additional burden to the business or residential customer as they get to pay that bill twice, at home and then by the reduction in the services provided by their respective governments while costs increase, and tax revenue remains relatively flat, as it should.

This will also harm businesses. The increased cost on energy bills which would come from Community Climate Investment costs will inhibit the ability of these businesses to invest into decarbonizing projects for their own business due to the decrease of discretionary capital. The cost to do business will increase, which in turn will increase the cost of the goods and services they provide to consumers.

To my knowledge, Community Climate Investments are mechanisms that take credit for potential future savings and are not recognized under any other national or regional reporting programs or protocols. This is very concerning especially when local governments often depend on federal dollars for capital projects. Federal dollars that the state has already made almost impossible to access through policy directions that harm small communities and will only add to or create an even more challenging environment when applying for federal grant programs. Not to mention the burden already plaguing individual companies that are likely to face additional costs if they are trying to meet their corporate decarbonization goals based on national and international protocols that do not recognize Community Climate Investments (essentially paying twice to decarbonize the same metric ton of emissions). Add the additional costs and

burden of compliance with the Climate Protection Plan and the compliance requirements and the field of potential projects and available business begins to decrease and disappear.

Essentially, the structure of the Community Climate Investment program, where DEQ would be counting deemed future savings, that may or may not even be realized, **results in two sets of books for the State's Greenhouse Gas Emissions Inventory**. One that will show actual reported emissions and one that is artificially reduced using unrealized savings from Community Climate Investments.

- The previous structure of the Community Climate Investment program raised many concerns about the timeliness of any realized savings and the accountability of those savings.
  - o Without clearly outlined timelines and goals for Community Climate Investment funded projects, energy users will be paying higher costs for energy without clearly stated carbon reduction outcomes.
    - What are the guidelines for the return on “investment” energy consumers will be paying for?
- Unlike the Climate Protection Plan, other states allow for the use of offsets. These offset programs have established protocols for calculated emissions savings and are only counted as savings after those projects are completed and savings are realized. The previous Community Climate Investment program design lacks this level of accountability and accuracy.

Among the myriad of issues mentioned above, when it comes to the people who are going to shoulder this burden, we offer these ideas and thoughts in consideration before moving forward:

First thought, do the work before creating a program with no clear deliverable and no real understanding by those that this will impact the most. The Climate Protection Plan should not move forward until the work is completed. The DEQ or the Governor's Office, where the Executive Order was created, should be engaging with and sharing what the intended return on investment generated from this program is with the people that are being forced to pay it.

If this program absolutely must move forward please consider these questions:

- How will the state share the carbon reduction of the Community Climate Investment program with consumers across the state?
- What is the State's/Business Oregon's economic impact analysis and how are jobs affected on a county by county basis?
- How are Counties and Cities being informed by the State about future operational costs and are they being invited to comment and be part of this rulemaking?
- How does this tax/fee compare to other taxes/fee passed at the state level and is the process commensurate with the size of the economic impact?
- Where can Oregonians and affected organizations find video recordings of previous RAC meetings so they can be informed and be engaged? There is information available, but without recorded conversations, there is a lack of context around how these major decisions are being made. ([RAC Website](#))

We need to do better in Oregon and start realizing that the choices being made in downtown Salem have a very real and tangible adverse effect on the people of Oregon, especially those that can hardly afford it.

A handwritten signature in blue ink that reads "Kevin Cameron". The signature is fluid and cursive, with the first name being more prominent.

Kevin Cameron  
Chair

A handwritten signature in blue ink that reads "Danielle Bethell". The signature is bold and cursive, with the first name being the most prominent part.

Danielle Bethell  
Commissioner

A handwritten signature in blue ink that reads "Colm Willis". The signature is cursive and somewhat stylized, with the first name being the most prominent part.

Colm Willis  
Commissioner

Southern Oregon Climate Action Now

**SOCAN**

Confronting Climate Change

<https://socan.eco>

Alan R.P. Journet Ph.D.

Cofacilitator

Southern Oregon Climate Action Now

[alan@socan.eco](mailto:alan@socan.eco)

541-500-2331

May 15<sup>th</sup> 2024

[CPP.2024@deq.oregon.gov](mailto:CPP.2024@deq.oregon.gov)

Colleagues:

I comment on the DEQ RAC meeting regarding the Climate Protection Program as cofacilitator of Southern Oregon Climate Action Now, an organization of some 2,000 rural and coastal Oregonians. We judge there is no more serious threat facing humanity than the climate crisis driven by human activities, especially our use of fossil fuels. We seek state action that contributes our state's fair share to reducing emissions.

We understand that all of us have benefited from the advantages accruing from the use of fossil fuels in liberating us from human labor through the proliferation of machines. The financial benefits have accrued vastly, of course, to those leading and investing in the fossil fuel industry. Now that we understand the costs imposed on us all and all life on the planet from the use of those fossil fuels, it is incumbent upon us to adjust our behavior sufficiently to reverse the emissions trajectory as best we can and thus the problems created by our use of these fuels.

We must all bite the bullet, and both acknowledge our role in generating the problem and our responsibility for reducing the emissions that result from our use of fossil fuels. Undoubtedly, the responsibility falling on fossil fuel corporations is greater than that falling on individuals. It is frustrating to listen to the fossil fuel representatives on the RAC repeatedly argue against rules that would lead to emissions reductions without offering any credible alternative mechanisms for achieving the necessary reductions.

In relation to the revised Climate Protection Program:

I urge that DEQ maintain the integrity and science-basis of the program, and at least retain - if not strengthen - its intermediate and 2050 goals. The program must make up for the loss of timeliness imposed by the legal action undertaken by the coalition of litigants undermining the CPP. Thus, the trajectory must be more rigorous to get Oregon back on track.

I urge maintenance of an effective Community Climate Investment component to the CPP that serves Oregonians, especially through promoting environmental justice.



I oppose allowing fossil fuel utilities to evade the program by incorporating into their resource mix fuels misrepresented as being lower emissions fuels but derived out-of-state.

I urge that the industrial sector should be placed under the cap rather than retained under a Best Available Emissions Reduction protocol since the BAER component perversely allows them to increase emissions while pretending to lower emissions.

I urge that in developing the new CPP, DEQ establish a program that acknowledges that lifecycle emissions resulting from the production, processing and transport/transmission of biofuels means they are not zero emissions fuels. We cannot solve the climate crisis by relying on resources that are falsely defined as zero emissions. We must be smarter than falling for the illusion of zero emissions fuels generated by erroneous legislative decisions.

This effort is not a game; it represents Oregon's contribution to a necessary life-or-death global campaign. I am very disappointed that despite the claims from some RAC members that they accept the need to reduce emissions, what I am not hearing from the fossil fuel representatives is how to modify the program to allow them to reduce emissions better. Instead, what I am hearing is how they can avoid emissions reductions. If the fossil fuel corporations and their representatives here continue in this vein and are successful, the threat to life as we know it on this planet increases.

Respectfully submitted,

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

Alan Journet Ph.D.

Cofacilitator Southern Oregon Climate Action Now  
7113 griffin Lane  
Jacksonville OR 97530-9342

**From:** [Mary Regan via constituent@civiclick.com](mailto:Mary.Regan.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Thursday, May 16, 2024 9:33:39 AM

---

Dear Nicole Singh,

Click 'Customize Email' below, and type your email here.

Sincerely,  
Mary Regan  
12577 Coho Way  
Oregon City, OR 97045  
[regan43@msn.com](mailto:regan43@msn.com)



## TUBE FORGINGS *of* AMERICA INC.

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*Celebrating Over 65 Years of Quality, Service and Dependability*

March 28, 2024

Tube Forgings of America, Inc. (TFA) is a manufacturer of steel industrial products located in NW Portland. TFA is a privately held, third generation, company founded in 1955. TFA is one of the businesses within the The Zidell Companies. TFA offers very competitive starting wages, has an excellent Health Care plan, offers a 401K program, and when times are good, TFA employees participate in profit sharing. We also promote from within...ALL of our Production Dept Supervisors were once on the "floor" making products. TFA is an excellent employer; confirmed by the fact that the tenure of our employees goes from a few years to 30 to 40 years, and this is across the total workforce profile.

The company uses a special grade of steel tubing as the starting raw material for its products. The tubing is cut and then goes through various hot-forging or hot-forming manufacturing processes (some of the products are also heat-treated). After hot forging/forming, the products are machined into the finished products, then cleaned and painted, warehoused; and then shipped to Industrial Distributors throughout USA and Canada.

The heat required for the forging, forming and heat treatment processes is generated by using natural gas. TFA continues to invest in the most advanced furnace "burner" technologies. These continuous investments allow us to fine-tune our furnaces, so they are very efficient, resulting in substantial savings in natural gas usage and operating costs. We are constantly exploring ways to become more energy efficient. TFA is on its fourth generation of plant-wide lighting (LED) to improve the efficiency and costs of our electricity usage.

We have explored converting our "hot" processes to use electricity instead of natural gas. What we learned is that converting from natural gas to induction (electric) heating requires a massive investment in not just the induction heaters, but converting to induction heating will also require a total redesign of our forging and forming equipment, extensive infrastructure expansion, as well as a new plant layout.

About twenty-five percent (25%) of the production workforce is dedicated to the "hot" side of the production processes. Our current production manning is 85 employees, but when our markets are very active our production employee count can be as high as 145.



## TUBE FORGINGS *of* AMERICA INC.

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*Celebrating Over 65 Years of Quality, Service and Dependability*

The products that TFA markets are in a very competitive Market. Approximately fifty percent (50%) of the Market where we sell our products is serviced by lower-priced import products from Asia. The cost of utilities is a very important factor in allowing TFA to be competitive in this very competitive market and remain a viable and successful company.

Should our utility costs reach a point where our cost structure does not allow us to be competitive, we have very few options. As mentioned earlier, converting to induction heating is cost prohibitive.

The remaining option would be for TFA to shutdown permanently the "hot" side of the business, import our products as a semi-finished product, that we would then "finish" in our Portland manufacturing facility; and then unfortunately, permanently layoff at least twenty-five percent (25%) of our workforce.

Thank you in advance for your consideration.

Submitted,

Jay Zidell

President

Tube Forgings of America, Inc.

**From:** [Tom Chau via constituent@civiclick.com](mailto:Tom%20Chau%20via%20constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Friday, May 17, 2024 9:11:44 AM

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Dear Nicole Singh,

The snowstorm of January 2024 highlighted the important of a diversified and resilient energy supply for our communities. I live in Northwest Portland where downed trees caused blackouts for 3 days in freezing conditions. The only way we survived was by using our gas fireplace and stove. The fact is we live in a forested area with overhead power lines. This is not going to be the last time we experience widespread power outages.

Sincerely,  
Tom Chau  
10795 NW Reeves St  
Portland, OR 97229  
Tchau15@yahoo.com

May 16, 2024

To: The Oregon Department of Environmental Quality  
From: Stuart Liebowitz, Douglas County Global Warming Coalition  
RE: Comments on the second RAC meeting on the CPP

The Douglas County Global Warming Coalition, representing 500 residents in our rural community offers the following comments on the topics covered at the second RAC for the CPP:

We have an ongoing deep concern that the polluters on the RAC not only are disproportionately represented but that DEQ appears to go out of its way to listen to and potentially incorporate their suggestions - ideas that can only weaken our State's commitment to reaching its emission reduction goals.

It is particularly indefensible in light of the fact that the lawsuit that threw out the original CPP was based not on substance but a technicality. In this regard, DEQ should view this not as an opportunity to make substantive changes but rather to ensure the CPP is reestablished with minimal changes that reflect its original integrity. To do otherwise is to disingenuously ignore the overwhelming majority of Oregonians who voiced support for the original CPP.

It is well to keep in mind that these are the polluters who sued you to stop the CPP in its entirety.

It is well to keep in mind that these are the polluters who will absolutely turn around and sue you again irrespective of what compromises you offer.

It is well to keep in mind that these are the polluters who made actions such as the CPP necessary and last year brought global temperatures to its highest readings in 125,000 years.

And it is well to keep in mind what the "E" in DEQ stands for: Surely it does not stand for Earnings for polluters.

It is incumbent upon DEQ to reestablish the CPP as rapidly as possible and address any technical fixes. Further, the emissions timeline needs to be readjusted to make up for the lost years because of the lawsuit. To cite a Yiddish word, Chutzpah!, it is the height of arrogance to demand a reprieve because of the delay the polluters caused.

Finally, the demand by polluters for out of State offsets will severely compromise our ability to legitimately reduce emissions. Monitoring from afar becomes problematic and does not serve the cause of social justice. But do not listen to the polluters on this subject. Experts in this field offer a different perspective. For example:

Barbara Haya, director of the Berkeley Carbon Trading Project at the University of California, called offsets a misnomer. She stated: "It creates a fiction that you can emit greenhouses and and just pay for pay for these cheap credits and it erases your impact." Dr. Haya has studied these offsets for over twenty years and concluded: "Most credits don't represent the emissions reductions they claim. Others have had no measurable climate benefit at all."

Dr. Haya is not alone in her assessment. professor John Sterman, director of the MIT Climate Pathways Project, compared offsets to the magical healing elixirs of the Old West. He put it this way: "I could put anything into that bottle. And it isn't that it just might not work - it could be downright harmful. That's where we're at with carbon offesets. They're fooling people."

Finally, often people will use offsets when they fly. It is telling that the Chief Executive of United has called the majority of offsets "fraud" and has committed to sustainable aviation fuel and other methods of decarbonization.

And this should be the message to every polluter in the CPP. We can no longer afford the easy way out - particularly when the easy way out is little more than an escape hatch for the doing the hard and necessary work to save the planet.

This is the task before us. And DEQ must embrace this charge as quickly and dilligently as possible.

Sincerely,

Stuart Liebowitz, on behalf of the Board of the Douglas County Global Warming Coalition

Stuart Liebowitz  
Scott McKain

Polly Stirling  
Diana Bailey

Melanie MacKinnon  
Liz Gayner



May 20, 2024

Nicole Singh,

I am writing to you as a concerned business owner operating my business in Clackamas, Oregon. Met-Tek Inc., is a small heat-treating business located in Clackamas, Oregon. We have been supporting manufacturing in Oregon and Washington since 1969. Met-Tek employs 32 full-time employees. Over the last couple of years, the cost of doing business in Oregon has risen to an unprecedented level, making it extremely difficult to do business here. The new proposed tax will likely cause many smaller companies to leave the state of Oregon, downsize or go out of business. The heat treating requires gas and electricity for the metal hardening process. Since 2020 electricity costs have doubled making it impossible to convert exclusively to electricity.

Please reconsider this tax proposal, in my opinion it will do more harm than good.

Sincerely,

Jerry Shriner

President Met-Tek Inc.





May 20, 2024

ATTN: Nicole Singh  
700 NE Multnomah St., Room 600  
Portland, OR 97232-4100

**RE: NWGA Comments on 2024 Climate Protection Program Rulemaking – Advisory Committee Meeting 2**

The Northwest Gas Association (NWGA) represents the natural gas utilities and transmission pipelines serving warmth and comfort to over 800,000 households and 86,000 businesses, institutions, and industries in Oregon.

NWGA appreciates the opportunity to comment on the 2024 Climate Protection Program rulemaking following the second rulemaking advisory committee (RAC) meeting. Please consider the following:

- **Program Elements Need Further Discussion:** The agenda for the second RAC meeting included very important program elements – the cap, the CCI program, and EITE treatment under the CPP – all worthy of more than the time allotted during the second RAC meeting. We recommend that DEQ convene technical workgroups to flesh out these critical program elements more thoroughly.
- **Regarding CCIs:** EVERY CCI should result in a one-to-one GHG reduction, and a cap should be put into place on how long it takes to achieve that reduction. Reductions baked into a 20-year timeline aren't worth much and make the unreasonable assumption that technology will not change over time. Furthermore, we remain concerned about outsourcing a multi-billion-dollar program. We are particularly concerned about transparency and accountability and recommend keeping the program in-house. If outsourcing is absolutely necessary, there must be specific accountability metrics in place, including consequences for failure to deliver on the GHG reduction goals outlined in the program.
- **The Need for Economic Analysis:** This program will have economy-wide impacts. Therefore, DEQ should undertake a comprehensive economic analysis to get a full sense and appreciation for the impact this program will have on Oregonians and critical economic sectors such as hospitals, municipalities, schools, universities, etc. The economic analysis must



1914 Willamette Falls Drive, Suite 260  
West Linn, Oregon 97068  
t:503.344.6637 • www.nwga.org

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consider: (1) the price of a CCI; (2) the direct economic impact by sector, as well as the overall impact on State GDP; (3) economic impact by county, and (4) the economic impact on major policy initiatives such as CHIPS Act investments, transportation initiatives, etc.

- **What's Missing:** Finally, the lack of a residential ratepayer advocate in this process is glaring.

Thank you for considering our comments. We look forward to DEQ's response.

Sincerely,

Natasha Jackson  
Policy and Partnerships Manager



May 20, 2024

Nicole Singh, Senior Climate Change Policy Advisor  
Rulemaking Advisory Committee  
Oregon Department of Environmental Quality  
State of Oregon

Dear Nicole:

Willamette Falls Paper Company is a small independent mill with a long and influential history. For over 135 years the mill in West Linn, Oregon has been manufacturing paper. The mill is one of the first producers of coated paper in the U.S., the kind you see used for high-end catalogs and magazines. We are proud to be an American manufacturer of sustainably produced coated and uncoated paper products. The company also supports incentives to large manufacturers to change their environmental impact through new technologies

There are only 6 mills in North America, producing coated paper, as well as international suppliers. We are a critical part of the supply for printers on the west coast, as we are the only west coast producer, and if we were not operating, they would need to ship paper from the Midwest and East Coast, which has its own negative environmental impact. Sustainability is a key part of our culture, and we believe in environmentally producing products locally versus importing less sustainable products made elsewhere. Willamette Falls Paper reached out to both DEQ and the State of Oregon, after the predecessor company discontinued operations, to ensure their support for a restart of the paper-making facility in 2019. Both DEQ and the State of Oregon welcomed the restart and the State granted \$150,000 to Willamette Falls Paper based on certain benefits the State and the local community would receive. Willamette Falls Paper satisfactorily completed all the benefits required.

Today Willamette Falls Paper currently employs 232 active employees who enjoy competitive, living wage jobs, generous benefits, and a family-like atmosphere.

We request that you consider us an energy-intensive, trade-exposed company. In that light, we respectfully ask to be exempt from the proposed CPP program. To understand the impact of the CPP on our business, we only need to look to our north. NW Natural recently adjusted their tariffs to collect on Washington State Climate Commitment Act. Using those tariffs, Willamette Falls Paper would see a \$580,000 per month cost increase. Furthermore, Oregon is talking about doubling Washington State's carbon price which would add over \$13 million in annual cost to our operation. This is simply not sustainable for our company and certainly out of line with the DEQ and State of Oregon's promise to support local manufacturing.



Our investors, employees and customers look forward to continuing to produce our products and navigating the long, rich history of papermaking in West Linn, Oregon. Without an exemption, it will likely not happen.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Konen", written in a cursive style.

Brian Konen, President  
Willamette Falls Paper

Cc: Governor Kotek  
Senator Ron Wyden  
Representative Lori Chavez-Dereemer  
File



May 21, 2024

Re: 2024 Climate Protection Program Restoration; Rulemaking Advisory Committee #2

Dear DEQ Rulemaking Advisory Committee, EQC members, and DEQ staff,

The Climate Reality Project Portland Chapter fully supports DEQ's commitment to restoring the CPP's cornerstone climate and community protections by the end of 2024, and we urge DEQ to maintain the integrity of this program that is vital to our futures:

- 1) As in the previously adopted rules, keep a science-based emissions cap trajectory *and* maintain a strong, effective Community Climate Investment (CCI) program that is responsive to community needs.
- 2) Prohibit the use of offsets for compliance. Offsets would disproportionately harm environmental justice communities within Oregon and do not align with the stated goals of the CPP to enhance public welfare and environmental justice, or to accelerate the transition off fossil fuels.
  - a) Purchasing cheap offsets simply allows fossil fuel suppliers to count other products against their own ongoing emissions— it's like the old failed diet joke about the diet coke canceling out the calories in the cake. It doesn't work.
  - b) In California, "A torrent of cheap, polluting renewable diesel and dairy farm biogas credits have dragged down the price that LCFS credits can fetch for avoiding emissions, [diluting the incentive](#) to deploy new climate technologies and sapping what could be a key funding source for EV infrastructure in the state."<sup>1</sup>
- 3) Include the cost and variable-emissions risks of biofuels in your assessments.
  - a) Account for increasing per-unit carbon intensity and other human health harms as quantities of bio-fuel demanded increases.
    - For instance, a limited amount of renewable diesel can be made from used cooking oil— a relatively low carbon intensity per gallon product; However, increasing demand has led to fuel from purpose-planted crops and deforestation for agriculture— a carbon intensity per gallon on par with or higher than fossil fuel diesel. At this juncture, DEQ does not adequately account for indirect land use change issues in biofuels. It must, or the on paper emissions reductions will mean nothing in the real world.
    - Similarly, it is clear that solutions like biomethane (also commonly termed biogas or renewable natural gas) cannot be solutions at scale. The supply of waste from which to create biomethane is limited— Oregon DOE estimates that gross potential for production is only between 4.6 and 17.5% of Oregon's yearly natural gas usage. Any biomethane policy

that incentivizes additional waste production would be harmful to Oregonians, add greenhouse gas emissions, and in the case of incentivizing additional cow manure, would directly harm water quantity and quality. Additionally, biomethane leaks just like fossil methane, adding extremely potent greenhouse gas — with a global warming potential 86 times that of carbon dioxide over a 20 year period, and a 100 year GWP of 25— to our atmosphere from every leaking production site, pipe, or appliance.

- b) Account for the potential—and ease— to revert from biofuels to fossil fuels when bio-feedstocks run short or become expensive. This pivot back from “renewable” to fossil fuels is in fact already happening at an Alabama refinery.<sup>2</sup> **Drop-in bio-based-fuels require no change to the built environment that prevents the reversion back to fossil fuels.** This is the opposite of the CPP’s explicit goal to transition off fossil fuels. There is a viable pathway to truly facilitate the transition off fossil fuels and make our vehicles, homes and businesses healthier: electrification.

The climate crisis and the environmental justice crisis were created by unaccounted externalities. Make sure the CPP prevents adding fuel to that fire.

- 4) Cover large industrial source emissions under the cap. This is necessary for achieving Oregon’s emissions reduction goals, and necessary to protect air quality and public health in nearby communities.

Please keep in mind that the overwhelming majority of the 7,600 Oregonians who testified in the original rulemaking process asked for strong climate and community protections, especially when you hear industry and corporate interests complain about the cost of compliance. Consider that the cost of CCIs for compliance is a small chip out of company profits, while the cost of another emergency room visit for a child’s asthma attack could throw a low income family into debt. Consider the Oregonian lives, homes, and small businesses that would be destroyed by additional climate-exacerbated wildfires.

Consider those costs, and stop allowing the oil, gas, and other polluting industry to evade responsibility for their impacts on our lives, our families and our communities. Restore a Climate Protection Program that works on the ground as well as on paper.

Sincerely,  
Helena Birecki,  
Researcher, Legislative Committee,  
Climate Reality Project Portland Chapter

Endnotes:

1. <https://www.canarymedia.com/articles/food-and-farms/californias-biofuel-bias-is-hampering-its-ev-future-can-that-change>
2. <https://www.ogj.com/refining-processing/refining/operations/article/55039051/vertex-pivoting-mobile-refinery-hydrocracker-back-to-conventional-from-renewable-service>

Other References:

- <https://www.oregon.gov/deq/ghgp/cpp/pages/default.aspx>
- [https://files.wri.org/d8/s3fs-public/avoiding\\_bioenergy\\_competition\\_food\\_crops\\_land.pdf](https://files.wri.org/d8/s3fs-public/avoiding_bioenergy_competition_food_crops_land.pdf) “Meeting just half of transportation demand with biofuels would require displacing all of the world’s food crops (pg 10). It is worth noting that producing energy with solar power (PV) is far more efficient than biofuels, on a per acre basis: Solar requires 30 - 100 times less land (pg 4), and may even beneficially share space with food cropland.”

- <https://olis.oregonlegislature.gov/liz/2023R1/Downloads/PublicTestimonyDocument/58604>
- <https://oregoncapitalchronicle.com/2023/07/25/historic-change-facing-drought-legislators-impose-water-limits-on-livestock/> (Governor Kotek signed SB85 since the article was published)
- <https://www.oregon.gov/energy/Data-and-Reports/Documents/2018-RNG-Inventory-Report.pdf>
- <https://www.canarymedia.com/articles/fossil-fuels/aerial-and-satellite-imagery-can-find-methane-leaks-will-epa-bake-the-tech-into-new-rules>
- <https://www.energy.ca.gov/sites/default/files/2021-05/CEC-500-2020-034.pdf>  
<https://blogs.edf.org/energyexchange/2023/01/30/rule-1-of-deploying-hydrogen-electrify-first/>  
<https://acp.copernicus.org/articles/22/9349/2022/acp-22-9349-2022.pdf>

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### About The Climate Reality Project

The Climate Reality Project, Portland Chapter is a local, volunteer-led group affiliated with the international non-profit The Climate Reality Project founded by climate leader and former US Vice President Al Gore, whose mission is to catalyze a global solution to the climate crisis by making urgent action a necessity across every sector of society. With a global movement more than 5 million strong and a grassroots network of trained Climate Reality Leader activists, we're spreading the truth about the climate crisis and building popular support for clean energy solutions. For more information, visit the Portland Chapter at <https://climaterealitypdx.com/>, and the Climate Reality Project at [www.climaterealityproject.org](http://www.climaterealityproject.org).

**From:** [Carol Martin via constituent@civiclick.com](mailto:Carol.Martin.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Tuesday, May 21, 2024 5:47:13 PM

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Dear Nicole Singh,

We were without power for 2 weeks. Others in outlying areas had no power for more than a month. We have natural gas in our home for heating and cooking. If we did not have gas, we would have been cold and no way to have warm food. While we had a 1000 gas generator, we were able to keep warm and used it on our refrigerator and freezer. Our neighbor came over to keep warm.

The government should not decide to remove gas from new construction in homes and businesses. We the people should have the right to vote on such a final decision and not the government. I support natural gas 100% for anyone who wants it. If we had to rely solely on electricity in this last storm, we would not have been happy campers and would have been cold and hungry.

The more we rely solely on electricity, we will be in a world of hurt. KEEP NATURAL GAS.

Sincerely,  
Carol Martin  
Po box 787  
Pleasant Hill, OR 97455  
[ddcamartin2@gmail.com](mailto:ddcamartin2@gmail.com)





May 21, 2024

Nicole Singh  
Climate Protection Manager  
Oregon Department of Environmental Quality

Subject: Written Comment on 2024 Climate Protection Program Restoration  
Rulemaking Advisory Committee Meeting #2

My name is Dr. Pat DeLaquil, and I am an energy systems modeler and climate policy analyst. I am submitting these comments on behalf of MCAT (Mobilizing Climate Action Together), which is a community of volunteers working on advancing a healthy climate and a green economy for future generations.

MCAT has worked to develop a strong Climate Protection Program in Oregon since before DEQ's original 18-month rulemaking process, in which several members participated, along with industry and other environmental and social equity stakeholders, and the thousands of Oregonians who submitted supporting comments to DEQ. We are encouraged by DEQ's stated goals to restore the Climate Protection Plan with enforceable and declining limits on fossil fuels beginning in 2025 with a comparable scope and emissions reduction ambitions as original CPP. We have the following comments relative to the discussion at the 2<sup>nd</sup> RAC meeting.

### 1. Baseline Cap

The value of the baseline (or initial year) emissions cap is one of the most critical adjustments required by the delay in implementing the CPP. The 2017 to 2023 data, as provided by DEQ in Table 1 of the 2025 Base Cap Adjustment section of the Emissions Cap Rulemaking Brief, shows current emissions below the original 2025 target. This is a clear indication that the 2017-2019 period was not a good predictor for the start of the 2022-2024 period, and that the initial Cap was too high. This can be corrected as part of this rulemaking.

This most recent DEQ data indicates that maintaining the original CPP cap for 2025 (of 25.8 MMt) as the baseline for the revived program is both appropriate and manageable for the covered entities, although emission reductions were not the same for each of the covered sectors. Indeed, the fuel supply sector is trending down, largely due to the effectiveness of the Clean Fuels Program, rising demand for biodiesel, improvements in vehicle efficiency and vehicle electrification.

### 2. 2025 Check-in Validation Period

Given the delays in the original program, DEQ should make 2025 a check-in validation year to review the actual data from the 2022-2024 period, and to possibly make market share adjustments between covered sectors. Such a Check-in period would also allow DEQ to consider credit for covered entities that have taken clear actions to comply with the CPP, as discussed in the next point. This check-in validation process would also determine which measurable and verifiable emission reductions should be considered for credits. For example, reductions made thru the Clean Fuel Program should not also qualify for CPP credit.

The first formal compliance period would still be 2025-2027, but the check-in validation period would give a clearer understanding of where additional efforts may be needed.

### 3. Crediting Early Actions

We are concerned by the consideration that DEQ has given to idea of crediting entities for early actions taken under the now invalidated CPP. Given that we wouldn't be in this situation if the fuel suppliers and gas utilities hadn't raised the lawsuit in the first place. ***DEQ should not reward any entity that was a party to the lawsuit!***

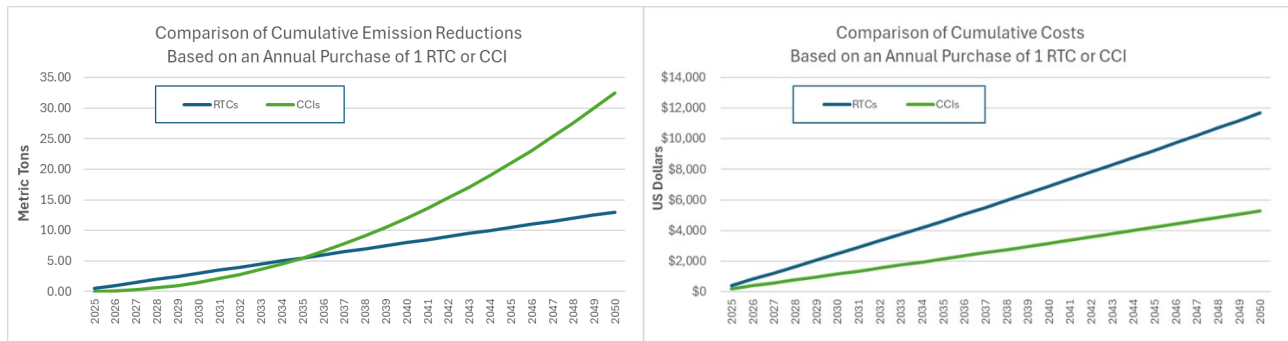
In addition, **DEQ should not consider any additional credits until the check-in validation period** for the following reasons:

- Many other factors contributed to the reductions in overall emissions, including in vehicle efficiency gains and electrification, and changing habits, and
- Criteria are needed to identify biofuel sales that qualify for CPP purposes.

Indeed, the example provided by DEQ in Table 1 of the CPP Base Cap Distribution section of the Emissions Cap Rulemaking Brief was quite disturbing in the implication that 4 MMT of allowances (the “extra” decrease in emissions) would be fully allocated based on sales only the 1MMt of biodiesel sales (with assumed CI=1). Only measurable and verifiable emission reductions should be considered for credits, which is one reason that we continue to recommend that **DEQ consider 2025 a Check-In Validation Period**, whereby DEQ reviews the 2022 to 2024 actual emission data, and compares that to the proportional market share of the **new baseline emission cap**, and provide bonus allowances only for direct actions, like biofuels delivery specifically for CPP credit. Referring to DEQ’s Table 1 referenced above, assuming both Fuel Suppliers had equal market shares and that their reported biofuel deliveries were specifically for the CPP, then Fuel Supplier A would get 250,000 Mt of bonus allowances and Fuel Supplier B would get 750,000 Mt of bonus allowances.

**4. Community Climate Investments**

Some concerns were expressed that Community Climate Investments (CCIs) are uncertain reductions that take place in the near future, while for example Renewable Thermal Credits (RTCs) are immediate and verified emission reductions. The energy efficiency and fuel switching measures expected to be implemented with CCI fund support all have proven measurement and validation protocols, just like RTCs. However, there is a fundamental timing difference in these two compliance options, but that does not mean CCI are less effective than RTCs. Indeed, the opposite is true. Over the implementation time period for the Climate Protection Plan, CCI will deliver 2.5 times more cumulative emission reductions and cost only 45% as much as purchasing RTCs.



Details of these calculation are summarized in the Annex to these comments. In summary, the calculation compares the cost and actual emission reductions resulting from an annual purchase of 1 RTC versus 1 CCI from 2025 thru 2050. The calculation includes an assumed 50% carbon intensity for RTCs, and cost data from the Tranche 1 and 2 cost categories in the NWN IRP. For CCIs, the most recent estimate for the social cost of carbon in 2025 of \$190/Mt was used, and the average time that projects return 1 Mt of cumulative emission reductions was estimated at 10 years based on a likely mix of projects and their overall effectiveness.

***This analysis shows conclusively that the CCI program, as originally conceived, provides significant better overall results for dramatically lower cost.*** In addition, the scope and nature of the program are also best suited to directly benefitting Oregonians, and to achieving the program’s equity-based goals.

Thank you for the opportunity to comment on this important matter.

**MCAT Steering Committee**

Brett Baylor, Rick Brown, Linda Craig, Pat DeLaquil, Dan Frye, Debby Garman, KB Mercer, Michael Mitton, Rich Peppers, Rand Schenck, Jane Stackhouse, Joe Stenger and Catherine Thomasson

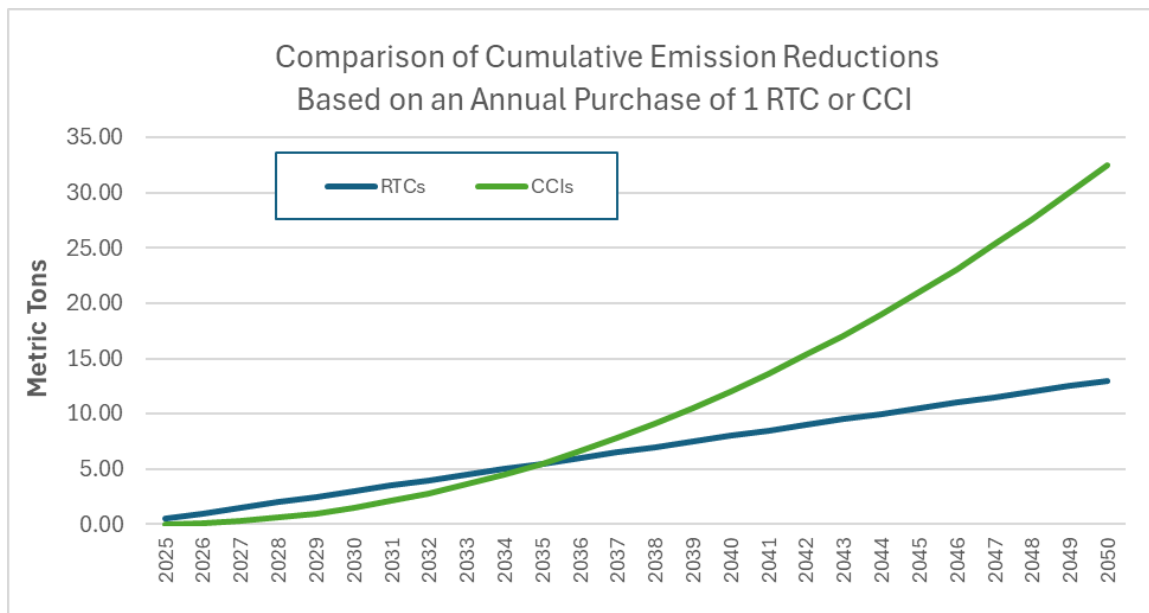
**Annex on CCI versus RTC Calculations**

This calculation compares the cost and actual emissions resulting from an annual purchase of 1 RTC versus 1 CCI from 2025 thru 2050. Because of limitations in DEQs authority, RTCs under the CPP are given a 0% carbon intensity, but in reality, such biofuel credits have a carbon intensity of 30% to more than 60% of fossil fuels. This calculation accounts for that reality. Similarly, the calculation also accounts for the average time that CCI projects will return 1 Mt of cumulative emission reductions. Data inputs and assumptions are summarized below:

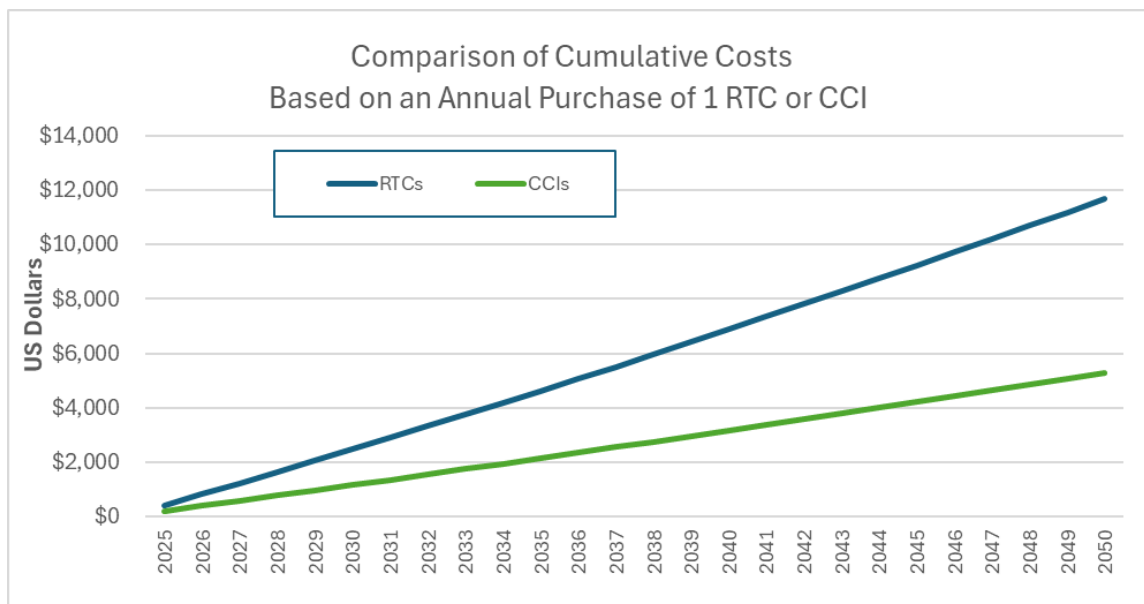
- RTC costs were based on the NWN IRP data for Tranche 1 and 2 RTC cost categories, and vary linearly from the 2025 to the 2050 values shown in the table to the right.
- For this example, the RTC carbon intensity was assumed to average at 50%, so we are comparing actual emission reduction and costs.
- The average time that CCI projects will return 1 Mt of cumulative emission reductions was estimated at 10 years based on a likely mix of projects and their overall effectiveness.

RTC Variables	2025	2050
Price per metric ton	\$200	\$250
Carbon Intensity	50%	50%
CCI Variables	2025	2050
Price per metric ton	\$190	\$215
Average CCI Intensity	1.00	1.00
Average CCI Lifetime	10.00	10.00

The figure below provides a comparison of the cumulative metric tons of actual emission reductions resulting from an annual purchase of 1 RTC versus 1 CCI from 2025 thru 2050. It shows RTCs have a small early edge, but after 2035 the CCI reductions begin to significantly exceed those from RTCs, such that cumulative emission reductions from CCIs are 2.5 times that from RTCs.



The next figure below shows the cumulative cost for the annual purchase of 1 RTC versus 1 CCI. Given that CCI are both less costly and more effective over time, the cumulative cost of CCIs is significantly lower than RTC over the entire time horizon.



The calculation was done on an annual basis, and a summary of the 5-year interval values is provided in the table below, which is based on the inputs provided in the table at the start of this Annex.

<b>RTC</b>	<b>2025</b>	<b>2030</b>	<b>2035</b>	<b>2040</b>	<b>2045</b>	<b>2050</b>
Assigned Emission Reductions (Mt)	1	1	1	1	1	1
Carbon Intensity	0.50	0.50	0.50	0.50	0.50	0.50
Actual Emission Reductions (Mt)	0.50	0.50	0.50	0.50	0.50	0.50
Price per ton	200.00	210.00	220.00	230.00	240.00	250.00
Cost per CI ton	\$400.00	\$420.00	\$440.00	\$460.00	\$480.00	\$500.00
Cumulative Emission Reductions (Mt)	0.50	3.00	5.50	8.00	10.50	13.00
<b>Cumulative Cost</b>	<b>\$400</b>	<b>\$2,460</b>	<b>\$4,620</b>	<b>\$6,880</b>	<b>\$9,240</b>	<b>\$11,700</b>
<b>CCI</b>						
Assigned Emission Reductions (Mt)	1	1	1	1	1	1
Price per assigned ton	\$190.00	\$195.00	\$200.00	\$205.00	\$210.00	\$215.00
Average CCI Intensity	1.00	1.00	1.00	1.00	1.00	1.00
Actual Emission Reductions (Mt)	1.00	1.00	1.00	1.00	1.00	1.00
Cost per Average CCI ton	\$190.00	\$195.00	\$200.00	\$205.00	\$210.00	\$215.00
Average CCI Lifetime	10.00	10.00	10.00	10.00	10.00	10.00
Actual Annual Emission Reductions	0	0.50	1.00	1.50	2.00	2.50
Cumulative Emission Reductions (Mt)	0.00	1.50	5.50	12.00	21.00	32.50
<b>Cumulative Cost</b>	<b>\$190</b>	<b>\$1,155</b>	<b>\$2,145</b>	<b>\$3,160</b>	<b>\$4,200</b>	<b>\$5,265</b>



Mark Bunch  
Regulatory Advisor  
US Biofuels Value Chain

bp America Inc.  
30 South Wacker Drive  
Chicago, IL 60606

May 22, 2024

Oregon Department of Environmental Quality  
VIA e-mail  
[Climate.2024@deq.oregon.gov](mailto:Climate.2024@deq.oregon.gov)

**Re: 2024 Climate Rulemaking Advisory Committee Meeting No. 2 – May 14, 2024**

Dear Department of Environmental Quality Staff:

On behalf of bp America Inc. (bp), we thank you for the opportunity to participate in the Rulemaking Advisory Committee for the Oregon Department of Environmental Quality's ("DEQ") 2024 Climate rulemaking. bp's ambition is to become a net zero company by 2050 or sooner, and to help the world reach net zero, too. Consistent with this ambition, we are actively advocating for policies that address greenhouse gas ("GHG") emissions.

After participating in the 2024 Climate Rulemaking Advisory Committee ("RAC") meetings, we wish to provide the following comments and suggestions for consideration.

**2025 Base Cap Adjustment / Distribution**

bp supports DEQ's proposal to make a one-time adjustment to the initial 2025 GHG emissions cap level to reflect differences between actual GHG emissions from 2022-2024 and the GHG emissions cap from the original Climate Protection Program ("CPP"). bp supports DEQ's objective of ensuring that cumulative GHG emissions reductions and cap trajectory for the original CPP be met while allowing fuel suppliers to be recognized for early action in reducing GHG emissions.

With respect to CPP base cap distribution, bp supports DEQ's proposed "option 2," whereby individual regulated entities under the previous CPP are proportionately recognized for their early action within the CPP. bp does not support "option 1" because it simply socializes program early action across the regulated entities. However, for newly obligated entities that have been subjected to the lowered GHG emissions threshold, bp believes that it would be prudent for DEQ to allow for a one-time adjustment equivalent to the proposal for "option 1."

There was discussion during the RAC meeting originating from misconceptions over "windfall" compliance instrument assignment to biofuel blenders. bp urges DEQ not to take action on this misconception. Ultimately, a healthy program needs a surplus of compliance instruments to encourage trading. A liquid compliance instrument trading environment will allow program price discovery to be established at the market level. This should be seen a priority for the CPP, as a market

compliance instrument price would help to support business investment decisions on the supply side and support consumer behavior change on the demand side.

## **Flexibility Mechanisms for Regulated Entities**

### **Compliance Periods**

bp supports entities having within their compliance account sufficient compliance instruments of former vintage years to cover at least a percentage of its covered emissions for the previous calendar year, with this followed by a true up at the end of the three-year compliance period. This would follow the methodology used within Washington’s Cap and Invest program that has this value set at 30%<sup>1</sup>. For the Oregon CPP, a higher proportion, closer to the total previous year’s GHG emissions, may be more appropriate if the aim is to encourage early bi-lateral trading of compliance instruments and earlier purchasing of Community Climate Investments (“CCIs”).

### **Offsets**

Offsets can play a valuable role in providing compliance flexibility. bp supports the inclusion of well-designed offset programs as a feature of climate programs. During the RAC meeting a spectrum of concerns were aired ranging from the ideological to the practical. There is a potential middle ground where offsets could prove to be of great value to Oregon and complementary to other in-state climate programs. A great example, explained during the RAC discussion, is using offsets to encourage in-state climate smart agricultural practices. There are many other possibilities for offsets in currently unregulated sectors within Oregon that would benefit from offset investment, and bp encourages DEQ to consider other applications for offsets that could be an appropriate fit for the state and support the overall health of the CPP.

### **Forward Forecasting for Pro-active Program Decisions**

The overall design goal for the CPP is to dramatically reduce GHG emissions in Oregon over the next thirty years. However, the CPP does not operate in a vacuum and has a level of dependence on the delivery of complimentary programs and initiatives to be successful in meeting this goal.

For regulated entities such as bp, there is a limited scope of actions that can be taken to comply with the declining CPP cap unless external factors outside of their control come into play. For example, within the non-Natural Gas Fuel Supplier category, bp’s options for compliance within the previous program were limited to:

- Blending biofuels in the liquid fuel pool up to the limit that legacy vehicles and fuel infrastructure will allow (c. 10-15% biofuel for gasoline and c. 80% biofuel for diesel; the Oregon finished fuel pool is approximately 65% gasoline and 35% diesel<sup>2</sup>). The most likely scenario is that around one-third of the total fossil liquid fuel pool in Oregon could be displaced by biofuels.
- Purchasing CCIs up to the limit permitted.
- Trading bilateral compliance instruments, assuming there is a liquid market with surplus instruments being traded).

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<sup>1</sup> <https://app.leg.wa.gov/WAC/default.aspx?cite=173-446-400>

<sup>2</sup> <https://www.oregon.gov/das/OEA/Documents/Clean%20Fuels%20Forecast%202023.pdf>

Once the above options have been exhausted, it is down to factors that are external to both bp and the CPP that influence consumer demand for liquid fuels, including reduced vehicle miles traveled, greater fuel efficiency, and switching to alternative fuel/ vehicle drive trains.

Given the above, if liquid fuel demand continues to remain flat -- instead of diminishing -- while compliance options become increasingly challenged, there may come a point where regulated entities do not have the line of sight to plan for compliant fuel supply into the state.

There is a program review mechanism in place in the first iteration of the CPP under section 340-272-8100, as follows:

*(4) If the average annual statewide retail cost of gasoline, diesel or natural gas in Oregon increases year-over-year by an amount that is more than 20 percent higher than the average change in cost for the same fuel over the same period in Washington, Idaho, and Nevada, DEQ will investigate the cause(s) of the increase and report to the EQC regarding whether changes to the rules in this division should be made that would ameliorate a relative increase in costs in Oregon. If necessary, DEQ will consider recommending rule changes, such as changes to caps and distribution of additional compliance instruments, changes to the compliance instrument reserve, or changes to the allowable usage of CCI credits.*

Although the above mechanism references potential mitigation actions available to DEQ through rule change, this is all retrospective in dealing with a crisis point that has happened rather than being proactive in mitigating structural issues that may be due to foreseeable external influences on the CPP. An example is if zero emission vehicle ("ZEV") adoption is lagging underlying state assumptions, thus resulting in greater than expected liquid fuel demand at a given stage within the CPP.

Regulated fuel suppliers, like bp, must supply compliant fuel. To support compliance planning, there needs to be compliance options available. If insufficient compliance options are accessible, fuel supply could be constrained.

Given the factors beyond a regulated entity such as bp's direct control that have been highlighted, there would be merit in adopting a mechanism to a review within the CPP that is linked to a forward forecast in much the same way as has been adopted for the Oregon Clean Fuels Program ("CFP").<sup>3</sup> In fact, there are many features currently in existence within the annual reports, generated by the Department of Administrative Services under the Office of Economic Analysis ("OEA"), that could be multi-purposed for the CPP.

Adopting a forward forecasting approach to complement the program review would give DEQ the opportunity to implement the same mitigating actions ahead of time. Such early action would be of particular importance for options that may have a lead time to be available – e.g. if choosing to increase the CCI availability, there would need to be advanced signaling to build the CCI project hopper to meet a growth in demand.

The value of a proactive forecasting approach would not only avoid the CPP potentially entering a phase where it is structural challenged, it would provide greater certainty for regulated entities that they can both meet consumer demand and remain compliant with the program.

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<sup>3</sup> <https://www.oregon.gov/deq/ghgp/cfp/Pages/Fuel-Supply-Forecast.aspx>

## Community Climate Investments

As stated under our proposal for forward forecasting, delivery of GHG reduction targets within the program will at some point become outside the control of the fuel provider and is heavily dependent on reduced demand for their fossil fuel products. As such, there should be an evaluation of CCI projects relating to the impact of demand destruction for fossil fuel and the lead time in which this is delivered. CCI's are a unique and untested tool regarding delivery of real, permanent and verifiable GHG emission reductions. Further, GHG mitigation is cumulative in its impact and early action is of much more value than a project that may take years to bear fruit. bp would encourage this aspect to be a part of the overall decision-making process in building up a CCI project portfolio. A key question is whether the delivery of the CCI portfolio's GHG benefits tracks with the cap reduction curve.

Questions relating to the percentage of CCIs that should be made available to regulated entities for purchase can be linked to our proposal for the adoption of forward forecasting, as this is a lever that can be deployed at an appropriate time in the program if there is insufficient liquidity of compliance instruments. And as previously stated, being proactive provides sufficient lead time for entities supporting CCI projects to keep pace with potential demand. bp would support greater flexibility, whether it be through the introduction of offsets or through the expansion of CCI availability. Having a forward forecasting mechanism could underpin this.

Concerns were raised during the RAC that having to reintroduce the CPP adds delay in the need for CCI purchasing. bp has already offered potential design features that could greater encourage early CCI participation, we would also suggest that DEQ consider CCIs be valued at a discount for the first three-year compliance period as this may help to prime the pumps for CCI activity and a lower discounted CCI price may serve as a more realistic pricing proxy for early compliance instrument trading.

We look forward to the opportunity to explore this proposed program feature enhancement over the course of the rulemaking process and via the RAC. Please reach out if you have any questions via [mark.bunch@bp.com](mailto:mark.bunch@bp.com).

Sincerely,

A handwritten signature in blue ink, appearing to read "M. J. Bunch". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

**Mark J Bunch**  
**Regulator Advisor; Biofuels Value Chain**

c.c. [james.verburg@bp.com](mailto:james.verburg@bp.com), [thomas.wolf@bp.com](mailto:thomas.wolf@bp.com), [katharyn.cordero@bp.com](mailto:katharyn.cordero@bp.com)



Nicole Singh  
Oregon Department of Environmental Quality  
CPP.2024@deq.oregon.gov

May 22, 2024

RE: Comments in Response to May 14<sup>th</sup> CPP 2024 Rulemaking Advisory Committee Meeting

Dear Ms. Singh,

Northwest Natural (“NW Natural”) appreciates the opportunity to provide public comments in response to the second Climate Protection Program (“CPP”) 2024 Rulemaking Advisory Committee (“RAC”) meeting.

NW Natural recognizes that our company will play a key role in implementing climate solutions and we urge DEQ to develop a program that achieves greenhouse gas emission reductions in an equitable, confirmable and cost-effective manner. While we continue to have concerns about the statutory authority for the program that DEQ is proposing, we provide these comments in response to the topics and questions posed by DEQ in the May 14<sup>th</sup> meeting.

### **Community Climate Investments**

NW Natural continues to have concerns about the Community Climate Investment (“CCI”) program, as proposed by DEQ. As an alternative compliance instrument for meeting the emissions goals for the program, it is paramount that these CCI projects reduce emissions in a verifiable and timely manner. NW Natural is concerned about the program’s design, accounting of emissions savings, and delaying of climate action.

As proposed, the CCI program outsources the potential generation of hundreds of millions of dollars a year to a non-profit while excluding covered entities from partnering. It is important that these dollars be used for actual emission reduction projects in a timely manner. These expenses would be borne by NW Natural customers. The company is regulated, and tariff bound to be prudent in how customers experience costs. NW Natural was pleased to hear the focus on energy efficiency and weatherization projects during the RAC meeting. As the largest gas utility in the state, we already fund many of these projects through existing programs collected via the public purpose charge and understand the challenges of implementation. Our Oregon Low Income Energy Efficiency (OLIEE) Program currently delivers these projects across the state in partnership with Community Action Agencies. To increase efficiency and leverage existing expertise, covered entities should be eligible for CCI funds. In addition, funds should also be directed toward decarbonizing the industries paying for the CCI credits. Many of these customers are located in neighborhoods that CCI projects are intended to target. By prioritizing funds for efficiency projects and upgrades at these customer’s

facilities, employers in the state would be able to reduce their impact on communities and their CPP compliance obligation in future years.

Emissions accounting and verification of emissions savings from CCI projects is imperative to ensure that the emission reductions all Oregonians will be paying for are actually realized. The currently proposed CCI program does not require the use of any recognized emissions accounting protocol and instead gives discretion to the implementer to assess how savings should be counted. In addition, as proposed, CCI projects will result in two sets of books for the state's greenhouse gas emissions. One set will be the true greenhouse gas emissions, as reported to EPA while the reports held by DEQ, will show lower greenhouse gas emissions based on unrealized future deemed emission reductions from the CCIs. Unlike offsets, anticipated emission reductions from CCI projects will be counted before they occur. This poses troubling issues with the integrity of the state's emissions inventory and GHG reporting.

Additionally, many businesses and municipalities in the state are already actively working on decarbonizing their operations through voluntary commitments. CCIs are not recognized in any other carbon reporting framework because they represent *future* potential reductions in emissions. As a result, businesses with decarbonization goals will be charged for compliance associated with CCI purchase in Oregon but also have to purchase offsets or other instruments to enable progress to be reportable under commonly accepted carbon accounting frameworks. Essentially energy users who are motivated to see real verifiable emission reductions will be paying twice to decarbonize the same metric tons of emissions.

The proposed CCI program continues to have the same structural problems of the prior CCI program: delayed climate action. Under the original CPP, the CCI portion of the program was never completed and CCI's were never available for purchase, even after two years in an active program projections of CCI availability were uncertain at the point disqualification. At the direction of the Public Utility Commission (PUC), NW Natural had prioritized purchase of CCIs for compliance under the original CPP. While NWN continues to believe CCIs are extremely risky as proposed, given they do not require nor calculate emissions reductions consistently, the PUC directed NWN to prioritize the purchase. However, without CCI's available for purchase, real investments in decarbonization technologies and fuels, such as renewable natural gas (RNG), were delayed.

It is unclear how the PUC will direct NW Natural to comply with future CPP rules, but if directed to prioritize CCIs again, any further delay in CCI program development will in turn further delay carbon savings and compress the cost impacts for customers in the first compliance period. To reduce immediate rate shock to natural gas customers, it is important that this program be established early in the compliance period, or clear timelines for availability need to be provided to inform PUC guidance.

## Offsets

NW Natural continues to advocate for the inclusion of offsets in the CPP. Offsets are a well-established and demonstrable compliance tool in other states' carbon reduction programs. They are verified using established protocols and represent actual emissions saved, not future deemed emissions savings. NW Natural believes that offsets should be included in the CPP as another means to provide real emission reductions and control costs ..

As the administrator of our own offset program, Smart Energy, we are keenly aware of the offset market, the verification bodies, and the benefits of offset projects. To date, our customers have offset almost 2 million metric tons of CO<sub>2</sub>e from projects in the Pacific Northwest and Southwestern Canada. These projects have provided benefits to our region and are rigorously verified by The Climate Trust. NW Natural urges DEQ to consider adding offsets as an alternative compliance instrument for covered entities.

## Emissions Intensive Trade Exposed Companies

NW Natural was encouraged to see the inclusion of Emissions Intensive Trade Exposed (EITE) proposal in the DEQ presentation on May 14th. We believe that if done correctly, these sorts of programs have the ability to decrease costs for these businesses, saving jobs and preventing the loss of manufacturing to other regions, while providing a pathway for emissions savings.

Placing the point of regulation for natural gas combustion on these large users is more appropriate than at the local distribution company (LDC) level. These businesses know their operations and are best situated to make decisions and changes to maximize emissions savings and minimize costs.

If developing an emissions cap for EITE's, NW Natural urges DEQ to create a separate cap from the LDC emissions and not push the compliance burden of meeting CPP program goals onto residential, commercial, and smaller industrial customers. Protecting large businesses should not mean harming smaller users of natural gas. The costs of this program are predicted to be significant for these smaller customers- residential and commercial-and shifting any additional compliance obligations on them will increase these costs further.

Additionally, NW Natural would like to highlight that the EITE program currently under consideration only applies to 26 manufacturers around the state. It does not do anything to reduce the costs to other large users of natural gas, like hospitals, universities, municipal buildings, and smaller manufacturing. As such, DEQ needs to prioritize other ways to make the cost of compliance with CPP lower for these other customers who would not benefit from the proposed EITE treatment.

## Costs

NW Natural is concerned that costs to energy users in the state has not received enough focus during this fast-paced rulemaking process. Based on the published agenda topics, it appears that fiscal impacts will only be discussed at the 3<sup>rd</sup> and final RAC meeting, but we have concerns that costs are being addressed so late in the rulemaking process and won't be discussed at a granular enough level to assess the impacts of these rule decisions.

The CPP will have significant cost impacts on residential, commercial, and industrial natural gas users. Using the 2023 CPP rule requirements, NW Natural estimated CPP compliance costs for each of these customer classes under a normal and cold weather scenario. Table 1 below includes the estimated rate increase for residential and smaller commercial customers in the first three compliance periods of the program.

**Table 1: CPP Cost Impacts for Residential and Small Commercial Customers**

Customer Category	Compliance Period 1	Compliance Period 2	Compliance Period 3
<b>Residential (Normal Weather)</b>	5.2%	16.6%	26.9%
<b>Residential (Cold Weather)</b>	10.8%	23.6%	30.3%
<b>Small Commercial (Normal Weather)</b>	6.6%	20.6%	32.2%
<b>Smaller Commercial (Cold Weather)</b>	13.5%	28.9%	35.6%

These estimates use the following elements from the 2023 CPP rules: the cost of CCI, CCI compliance percentage limitation (10% in compliance period 1, 15% in compliance period 2, and 20% in compliance period 3), the same compliance instrument distribution to LDC's (modeled year one equaling the 2022 distribution amount in the 2023 rules), and 3-year compliance periods. The normal weather scenario represents average weather from the last 36 years. The cold weather scenario is the 95th percentile of coldest weather for this area. These estimates could change based on timing of the CCI purchases, customer usage, weather, and changes to the rules, but provide an indication of the impact of these rule elements under the previous program.

NW Natural also calculated estimates of the rate impacts to large users of natural gas using the same assumptions described above. Because this customer class varies greatly from heavy manufacturing to hospital and governmental buildings, NW Natural selected customers in a variety of industries to show impact of the CPP on their bills from NW Natural. The anonymized cost impacts are presented in two tables below. The first includes our large sales customers for whom we purchase gas. The second table includes a variety of our transport customers, who purchase their own gas and only pay NW Natural a transportation fee.

**Table 2: CPP Bill Impacts for Large Sales Customers Per Business Segment (Cold Weather)**

Customer Type	2023 Annual \$ Billing	CP1 Annual Compliance Cost	YR1 CPP Billing % Increase	CP2 Annual Compliance Cost	YR4 CPP Billing% Increase
<b>Healthcare</b>	\$3,027,267	\$770,392	25%	\$1,872,422	29%
<b>Forest Products</b>	\$2,179,439	\$556,766	26%	\$1,353,209	29%
<b>Government</b>	\$762,243	\$182,369	24%	\$443,243	28%

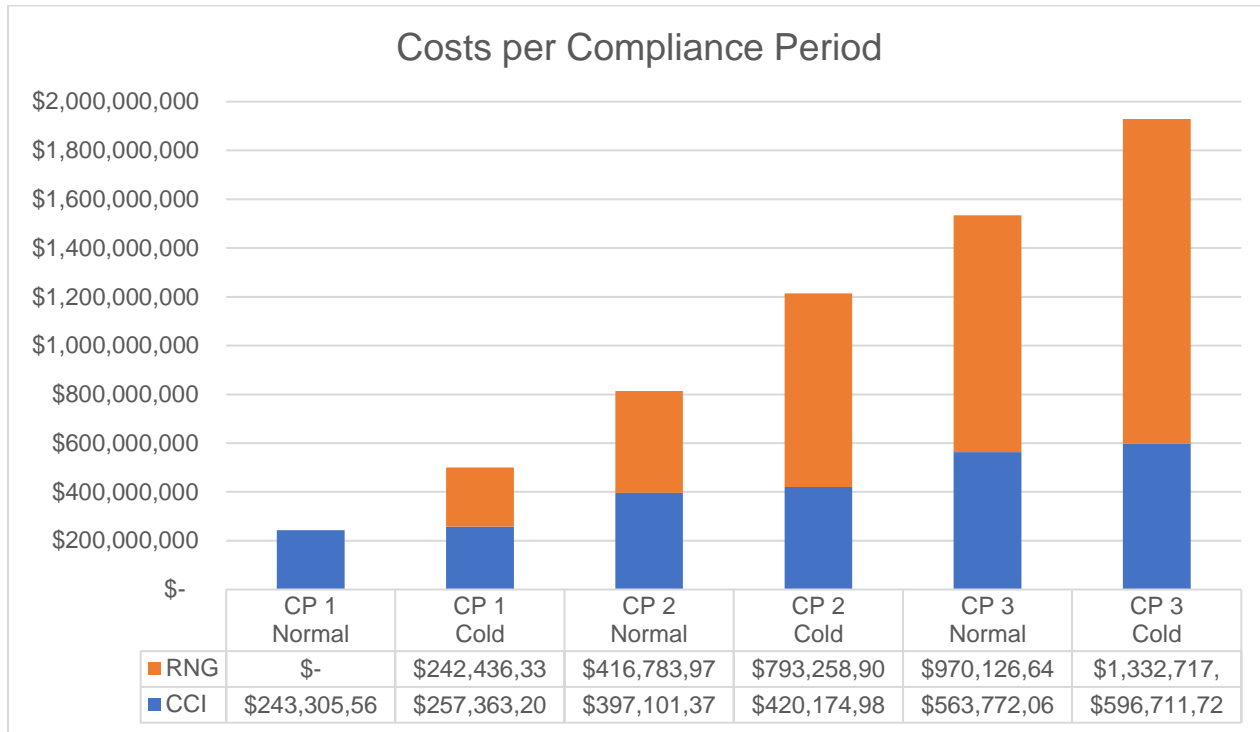
**Table 3: CPP Bill Impacts for Large Transport Customers Per Business Segment (Cold Weather)**

Customer Type	2023 Annual \$ Billing	CP1 Annual Compliance Cost	YR1 CPP Billing % Increase	CP2 Annual Compliance Cost	YR4 CPP Billing% Increase
<b>Higher Education</b>	\$373,552	\$1,130,604	303%	\$2,747,909	108%
<b>High Tech</b>	\$616,899	\$2,495,122	404%	\$6,064,341	115%
<b>Wholesale Nursery</b>	\$105,152	\$147,111	140%	\$357,551	83%
<b>Food Processing</b>	\$169,057	\$358,833	212%	\$872,136	97%

<b>Pulp &amp; Paper</b>	\$1,238,505	\$8,871,207	716%	\$21,561,282	126%
<b>Chemical</b>	\$336,272	\$1,993,089	593%	\$4,844,160	122%
<b>Primary Metals Manufacturer</b>	\$344,114	\$1,394,714	405%	\$3,389,823	115%
<b>Glass Stone Clay</b>	\$309,886	\$952,092	307%	\$2,314,040	108%
<b>Light Manufacturing</b>	\$240,516	\$842,574	350%	\$2,047,860	111%
<b>Natural Gas Vehicles</b>	\$144,182	\$265,877	184%	\$646,208	93%
<b>Asphalt</b>	\$141,653	\$266,705	188%	\$648,222	93%

Tables 2 and 3 include annual costs, that these businesses, schools and municipalities will be paying every year of each of the compliance periods. The CPP costs are in addition to their normal charges for the commodity or transportation fee. So, for instance this pulp & paper manufacturing facility would be paying almost \$9 million a year for just CPP compliance costs in compliance period 1 and \$21.5 million a year in compliance period 2.

These estimates are based on a compliance strategy that uses both CCI credits and RNG. The graph below shows the needed amount of each tool to comply with the emissions for the first three compliance periods under normal and cold weather scenarios. Because of the variability of weather that can cause a 20% change in natural gas consumption and the limited compliance tools under the CPP program, NW Natural will need to conservatively plan for compliance using cold weather scenarios. This means continuing to pursue RNG and other decarbonized fuels in addition to CCIs.



NW Natural welcomes the opportunity to share our calculation process and assumptions with additional members of the RAC and public. These cost estimates and a revised and robust fiscal impact statement are critical for all stakeholders to understand the impact that this rule will have on all Oregonians.

Thank you for considering our comments and data. We look forward to continuing our engagement in the upcoming rulemaking advisory committee meeting in June. If you have any questions, please reach out to me at [Mary.Moerlins@nwnatural.com](mailto:Mary.Moerlins@nwnatural.com).

Sincerely,

Mary Moerlins

Director of Environmental Policy  
 & Corporate Responsibility  
 NW Natural



**NW Natural**<sup>®</sup>  
*We grew up here.*



**Joint Comments of Avista Corporation,  
Cascade Natural Gas Corporation, and NW Natural**

**Re: Climate Protection Program 2024 Rulemaking Advisory Committee Meeting #2**

May 22, 2024

Oregon Department of Environmental Quality  
CPP.2024@deq.oregon.gov

Avista Corporation, Cascade Natural Gas Corporation, and NW Natural (collectively, “Utilities”) offer the following comments to the Oregon Department of Environmental Quality (“DEQ”) in response to the second Climate Protection Program (“CPP”) 2024 Rulemaking Advisory Committee (“RAC”).

The Utilities share the CPP’s goals of achieving emissions reductions in a cost-effective, equitable manner. In pursuit of this end, this letter focuses on (1) a cap specific to emissions-intensive, trade-exposed (“EITE”) industries; and (2) Community Climate Investments (“CCIs”) and offsets; and (3) the need for a comprehensive cost analysis of the program.

**EITE-Specific Cap**

The Utilities strongly support DEQ’s proposal to regulate EITE industries under their own emissions cap. This will result in a more predictable emissions reduction pathway for regulated entities and will be less administratively burdensome for DEQ to administer, in comparison to the BAER approach. The Utilities defer to EITE industries for input regarding what the appropriate cap decline should be for their sector.

Having a separate cap for EITE industries also would allow many of the Utilities’ transport customers to take control of their own emissions reduction efforts, as some transport customers will likely qualify as EITE entities. As discussed in our previous comments, the Utilities recommend that transport customers have their own compliance obligations under the cap that are separate from the compliance obligations of gas utilities. The Utilities do not control the carbon intensity of the gas that is transported for such customers, nor do we have access to information detailing the actual carbon intensity of the transported molecules. As such, transport customers are the appropriate entity to implement CPP requirements associated with the transported gas.

Finally, as noted during the recent RAC meeting discussion, the Utilities support establishing a separate cap decline rate for cost-sensitive industries that do not fall within the category of an EITE industry, such as hospitals and universities. By the nature of their services, these industries must be in the state, are necessary for the functioning of society, and are also cost-sensitive. For example, CPP compliance costs were scheduled to increase universities’ energy costs by **303%** in a single year. A separate cap decline is appropriate for these crucial sectors.



## Community Climate Investments

As a threshold matter, the Environmental Quality Commission (“EQC”) lacks statutory authority for the proposed CCI program. As DEQ itself has acknowledged, nothing in Oregon statute gives the EQC the power to sell greenhouse gas emission rights. DEQ has previously explained:

The EQC has authority, under ORS 468.065(2) to assess fees for permits, but that authority is limited to an amount of fees necessary to cover the costs to administer the permits. . . . **DEQ does not believe that the EQC has the authority to auction or otherwise sell rights to emit greenhouse gases.** A further complication is that DEQ has no authority to receive or spend auction proceeds. . . . Similarly, **DEQ believes that the EQC also lacks authority to distribute compliance instruments (rights to emit greenhouse gases) to a non-profit,** third-party, and then authorize or direct the third-party to sell the compliance instruments at auction, using the auction proceeds to fund greenhouse gas emissions reduction programs.<sup>1</sup>

The Utilities agree that DEQ’s powers are limited. ORS 468.065(2) states that permit fees for air contamination sources “shall be based upon the anticipated cost of filing and investigating the application, of carrying out applicable requirements of Title V, of issuing or denying the requested permit, and of an inspection program to determine compliance or noncompliance with the permit.” Nowhere in Oregon’s air permitting statutes is DEQ authorized to charge fees as a method of compliance with the air permit itself. By asserting complete control over the CCI program, including who can be a CCI entity, what CCI projects can be funded, and how much CCI credits cost for permit compliance, DEQ would violate the explicit prohibition on permit charges under ORS 468.065(2).

If DEQ cannot sell rights to emit greenhouse gases, or authorize a non-profit to sell such rights, then it cannot proceed with the CCI program. Although DEQ may contend that it is not directly selling such rights, as the regulated entities would give money to the CCI entity, and then DEQ would distribute CCI credits to the regulated entity based on that amount of money, DEQ nevertheless would be playing the central role in giving the CCI credit market value. And to be clear, the CCI credits must represent fees paid to reduce emissions—if they do not, then there is not even the appearance of a connection between the CCI program and the authorities granted by Chapter 468A. The EQC cannot do indirectly that which the law forbids it from doing directly.<sup>2</sup>

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<sup>1</sup> DEQ, *Program Options to Cap and Reduce Greenhouse Gas Emissions: Final Report*, 9 (June 2020) (emphasis added).

<sup>2</sup> See *City of La Grande v. Pub. Employes Ret. Bd.*, 281 Or. 137, 167, *on reh’g*, 284 Or. 173 (1978) (“Hence, what the legislature can not do directly it can not do through indirection.”) (quotation marks and citation omitted); see also *Hattrem-Nelson & Co. v. Salmon River-Grande Ronde Highway Imp. Dist.*, 132 Or. 297, 307 (1930) (“It is doing by indirection what the law forbids to be done directly, and the contract is void.”).

However, if DEQ does proceed to move forward with the CCI program regardless of these legal concerns, the Utilities propose the following recommendations to ensure the program maximizes greenhouse gas reductions in the most cost-effective and equitable manner:

- **Ensure CCI credits reduce emissions.** Because CCI credits purport to constitute an air permit compliance pathway to reduce emissions, DEQ must ensure CCI credits represent actual emission reductions (i.e., one metric ton of CO<sub>2</sub>e reduced for each CCI credit). Allowing the CCI credits to go towards anything else but emission reduction efforts would exceed DEQ's air permitting authority under Chapter 468A, whereby the permit requirements must reduce emissions. As such, whether CCI credits are reducing emissions must be transparent. If CCI credits are meant for purposes other than one-for-one emission reductions, it would not only violate DEQ's statutory authority, but also create confusion for regulated entities using CCI credits as a compliance mechanism. For example, compliance with the program currently depends on emissions reported to DEQ under the Reporting Rule. Thus, to count CCIs for compliance, Utilities would be forced to report CCIs as emission reductions, even if they have no means of verifying an emission reduction has occurred, which could result in a misleading and inaccurate emission reduction report. Similarly problematic, regulated entities would not be able to accurately claim that their CCI credit purchases reduced emissions in their sustainability reports, integrated resource plans, or federal greenhouse gas reporting, potentially forcing them to buy additional offsets with verifiable emission reductions outside of the CPP to meet their sustainability goals. The Utilities agree with the nonprofit RAC members that there is much to be done to ensure the state adequately funds a diverse variety of projects focused on increasing equity in Oregon, but the appropriate forum for such discussions is the legislature, which allocates funding for these types of projects, rather than in regulations deciding air permitting requirements.
- **Set CCI credit prices using other offset markets as a reference.** Using the social cost of carbon to set CCI credit prices lacks methodological soundness. The cost of reducing emissions is a fundamentally different question than the social cost of emissions. Currently, DEQ is proposing to set CCI credit prices at \$129 per credit in 2025. This is a significantly higher price than other instrument-based compliance programs, which may range from less than \$1 to more than \$50 per ton of emissions reduced, depending upon the type of project.<sup>3</sup> DEQ should look to offset markets to inform how CCI prices are set, since the prices are supposed to be based on what it costs to actually reduce emissions, rather than the social cost of *not* reducing emissions. Relatedly, how CCI credit prices are calculated, including what inputs DEQ uses to generate such prices, must be entirely transparent.
- **Create a separate CCI program for the gas utility sector.** As entities regulated by the Oregon Public Utility Commission, dollars spent by utilities on CCI credits must benefit customers, many of which are low-income. For this reason, the Utilities propose that DEQ create a separate CCI program for the gas sector, where credit prices are based upon what it takes to reduce emissions in this sector, and where all funds raised from these credits go

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<sup>3</sup> Second Nature, *Purchasing Carbon Offsets FAQs*, <https://secondnature.org/climate-action-guidance/purchasing-carbon-offsets-faqs> (last visited May 18, 2024).

towards reducing gas customers' emissions. The Utilities differ from other regulated entities, in that customer rates will increase because of CPP compliance costs. In line with the Commission's goal of protecting customers under ORS 756.040(1), a separate CCI program for gas customers will ensure that customers dollars spent on CCI compliance go towards benefitting the very customers who are spending these dollars. DEQ would still be able to pursue its equity goals, as it could direct emission reduction resources be focused first on the low-income customers the Utilities serve.

- **Allow covered fuel suppliers to partner with CCI program entities.** Regulated entities such as the Utilities should be allowed to partner with CCI program entities in reducing emissions. The Utilities already have experience administering energy efficiency and weatherization programs in collaboration with the Energy Trust of Oregon. It makes no sense to short-circuit emission reduction innovation pathways by not allowing public-private partnerships in this space.
- **Ensure CCI credit availability.** DEQ must make CCI credits available early in program to enable regulated entities to plan for this cost control option. Under the previous program, no CCI credits were ever made available. DEQ should reduce the uncertainty regarding the availability of CCI credits by creating a CCI market assurance fund that ensures the availability of verified CCI credits for covered fuel suppliers who choose to utilize them. Doing so would reduce the substantial uncertainty regarding the viability of the CCI program so that covered entities have the option to incorporate CCI credits into their long-term compliance plans. Instead of waiting for CCI entities to propose and then implement projects, covered fuel suppliers would pay DEQ or a single chosen third party directly for CCI credits, and then DEQ or the third party would keep the money in an account that DEQ then grants to CCI-approved projects. This approach would allow DEQ to issue CCI credits in years when not enough CCI projects may be available, and to save up money for more expensive CCI projects in later years. Such an approach also would provide much-needed certainty to CCI entities and environmental justice communities regarding the amount of funding that is available in any given year.
- **Distribute CCI funding equitably throughout the state.** If DEQ proceeds with the CCI program, the Utilities ask that DEQ include mechanisms in the program that ensure CCI project funding is equitably distributed across Oregon and includes rural, low-income, and Tribal communities. Because of their geographical diversity within the state, the gas utility specific CCI program is one example of such a mechanism.

### **Offset Program**

Whether in place of or in addition to the CCI program, the CPP should include an offset program. Offsets are an essential cost containment element in cap-and-reduce programs, including in the Washington and California programs.<sup>4</sup> Unlike with the CCI program, which would be

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<sup>4</sup> CARB, *Compliance Offset Program*, <https://ww2.arb.ca.gov/our-work/programs/compliance-offset-program> (last visited May 18 2024); Washington Department of Ecology, *Cap-and-invest*

significantly more administratively burdensome for DEQ to administer, DEQ could look to the offset programs that Washington and California already have adopted. Offsets present a well-established and cost-effective option to maximizing greenhouse gas emission reductions.

### **Cost Analysis**

Finally, the Utilities emphasize the need for DEQ to conduct an updated cost analysis regarding CPP compliance costs. This information will be crucial in informing the program design, as different program designs necessarily implicate different costs that could vary significantly.

The Utilities plan to submit additional comments before the next RAC meeting with cost information specific to the gas sector and encourages DEQ to reach out to other sectors for any information that would be helpful in informing the agency's cost analysis.

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The Utilities appreciate the opportunity to engage with DEQ and share their ideas for improving the CPP's next iteration. We look forward to the opportunity to improve upon the rule and help ensure that its design offers diverse and inclusive pathways to decarbonization that manage costs while resulting in emissions reductions for our customers. If you would like to further discuss this letter or have any questions, please reach out to Mary Moerlins (mary.moerlins@nwnatural.com), Shaun Jillions (shaun@jillionsgroup.com), and Abbie Krebsbach (abbie.krebsbach@mdu.com).

Sincerely,

s/ Mary Moerlins

Mary Moerlins  
Director of Environmental Policy &  
Corporate Responsibility  
NW Natural

s/ Shaun Jillions

Shaun Jillions  
On Behalf of Avista Corporation

s/ Abbie Krebsbach

Abbie Krebsbach  
Environmental Director  
Cascade Natural Gas Corporation

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*offsets*, <https://ecology.wa.gov/air-climate/climate-commitment-act/cap-and-invest/offsets> (last visited May 18, 2024).



Sent via email to [CPP.2024@deq.oregon.gov](mailto:CPP.2024@deq.oregon.gov)

May 22, 2024

Climate Protection Program; Rulemaking Advisory Committee  
Oregon Department of Environmental Quality  
700 NE Multnomah Street, Suite 600  
Portland, OR 97232-4100

Attn. Ms. Nicole Singh

The Department of Environmental Quality (Department or DEQ) has commenced a rulemaking to re-establish greenhouse gas emission reduction regulations in place of the December 2023 Oregon Court of Appeals decision that invalidated the Climate Protection Program. The May 14, 2024 meeting of the rulemaking Advisory Committee focused to a fair extent on how industrial sources should be addressed in this new rulemaking. The J.R. Simplot Company (Simplot) provided comments during the very brief public comment period of this rulemaking meeting. Simplot is a privately held, vertically integrated agribusiness company that currently has (and historically has had for decades) significant business operations in the State of Oregon. This includes potato processing, fertilizer warehousing and port facility, cattle, and retail fertilizer operations. Oregon Department of Environmental Quality. Simplot provided extensive comments on the original Climate Protection Program rulemaking and now provides these comments.

Although the operations and production described above occur in Oregon, the products produced (such as frozen potato products) compete in national and global marketplaces. Therefore, as the State of Oregon re-examines the regulations for the Climate Protection Program (CPP), Simplot strongly recommends that the Advisory Committee take a new approach to the regulation of greenhouse gas emissions associated with industry/manufacturing, especially for such operations that are energy intensive and trade exposed (EITE). There are multiple reasons for taking a new approach.

## **Emissions Should Be Regulated on the Basis of Best Available Technology and Not Arbitrary Timelines**

The original CPP regulation was focused on regulating the providers of the fossil fuel supplies in the State of Oregon. Thus, for a manufacturing facility, the provider of the energy (such as natural gas) was being regulated to reduce the use of this fuel in the State of Oregon and by extension reduce the use of these fossil fuels by industry.

For manufacturing facilities, Simplot recommends a different approach.

The regulation of industrial air emissions since the inception of the federal Clean Air Act (and the Oregon analog) has fundamentally been based on technology: what technology options exist, what level of “demonstration” of performance/reliability has been achieved, what are the costs, and what are the other environmental effects from the use of such technology (commonly – energy and water use, the generation of wastes, or environmental impacts, etc.). This approach, which has been in use for decades, has resulted in significant and dramatic decreases in air emissions from manufacturing/industrial facilities.

For some reason though, in relation to the control/reduction of greenhouse gas emissions, the regulatory structure has been focused instead on achieving specific emission reductions for a specific time period (usually three or four year periods). Such a structure does not reflect the availability of technology nor does it reflect the period of time that investment in industrial equipment that is needed to make such an investment worthwhile for future operational viability.

Simplot recommends that the CPP adopt a technology standard (such as Best Available Control Technology – BACT) or Best Available Emissions Reduction (BAER) assessments for the control of greenhouse gas emissions emitted from industrial sources. Such an approach would replace the existing framework in which the provider of the fossil fuel is responsible for carbon reductions for the fuel provided to such industrial facilities. As shown below, the definition of BACT (see OAR 340-200-0010-(018)) provides an existing proven regulatory mechanism that can be used for reducing greenhouse gases from industrial facilities.

"Best Available Control Technology" or "BACT" means an emission limitation, including, but not limited to, a visible emission standard, based on the maximum degree of reduction of each air contaminant subject to regulation under the FCAA which would be emitted from any proposed major source or major modification which, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, is achievable for such source or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such air contaminant. In no event may the application of

BACT result in emissions of any air contaminant that would exceed the emissions allowed by any applicable new source performance standard or any standard for hazardous air pollutant. If an emission limitation is not feasible, a design, equipment, work practice, or operational standard, or combination thereof, may be required. Such standard must, to the degree possible, set forth the emission reduction achievable and provide for compliance by prescribing appropriate permit conditions.

BAER has a similar technology approach that also would work.

Another reason for a site-specific technology evaluation is that for even the same industry, energy intensity levels, types of specific products, constraints, and practices can vary widely. Thus, a facility specific technology standard provides a workable, practicable method of providing a process to reduce greenhouse gas emissions at industrial facilities.

### **Carbon Reduction Technologies are Limited for Manufacturing**

An important reason for having a technology based GHG/carbon emission standard is that at this time, there are limited “decarbonization” technologies available for manufacturing facilities. Natural gas is the major source for most food processing facilities. For potato processing, more than 80% of the energy used comes from the combustion of natural gas.<sup>1</sup> Steam from the combustion of natural gas or direct natural gas use is common in potato processing:

- Peeling: typically done with steam.
- Blanching: hot water
- Frying: often uses direct natural gas combustion.
- Drying: can either use steam or direct natural gas combustion.
- Roasting: direct natural gas combustion.

For most of the unit operations, there are options for continuing to improve energy efficiency, but direct replacement of natural gas use are very limited. Such potential technologies such as microwave or infrared blanching are in development, but as of yet typically result in uneven product qualities (limited penetration depth, non-uniform heating, lack of precise temperature control, etc.). For such unit operations, *natural gas cannot be replaced*.

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<sup>1</sup> West, K.J, J.J. de Jonge, M van Hout. 2021. Decarbonisation Options for the Dutch Potato Processing Industry. PBL Netherlands Environmental Assessment Agency. p. 20.

One possible decarbonization option is the utilization of electric boilers. However, such a technology change often requires extensive upgrades of electrical equipment at the facility, requires a significant amount of electricity (which a local utility may not have available) and will likely result in a significant energy cost increase.<sup>2</sup> And such a technology change also limits the use of biofuels; for example at certain food processing plants biogas from the wastewater treatment process can be used to replace a portion of the natural gas used.

### **The CPP Regulation Needs to Accommodate Limitations in Electricity Supply**

CPP assumes that as restrictions are placed on the availability (and affordability) of fuels like gasoline and natural gas, that the electrical supply will be there to provide that energy source or other energy sources will be developed. However, this is a huge assumption. In the Northwest, electricity load demand is predicted to increase by almost 17% (see Figure 1) within the next decade.<sup>3</sup> The availability of electricity to support “decarbonization” may not be there. As described in recent Wall Street Journal articles, some utilities are increasing electrical generation from fossil fuels to keep up with this growing demand from the technology sector (i.e., data servers and related facilities). Changes in industrial processes to utilize more electricity instead of fossil fuels (like natural gas), to the extent that such changes are possible, will further increase demand for electricity.

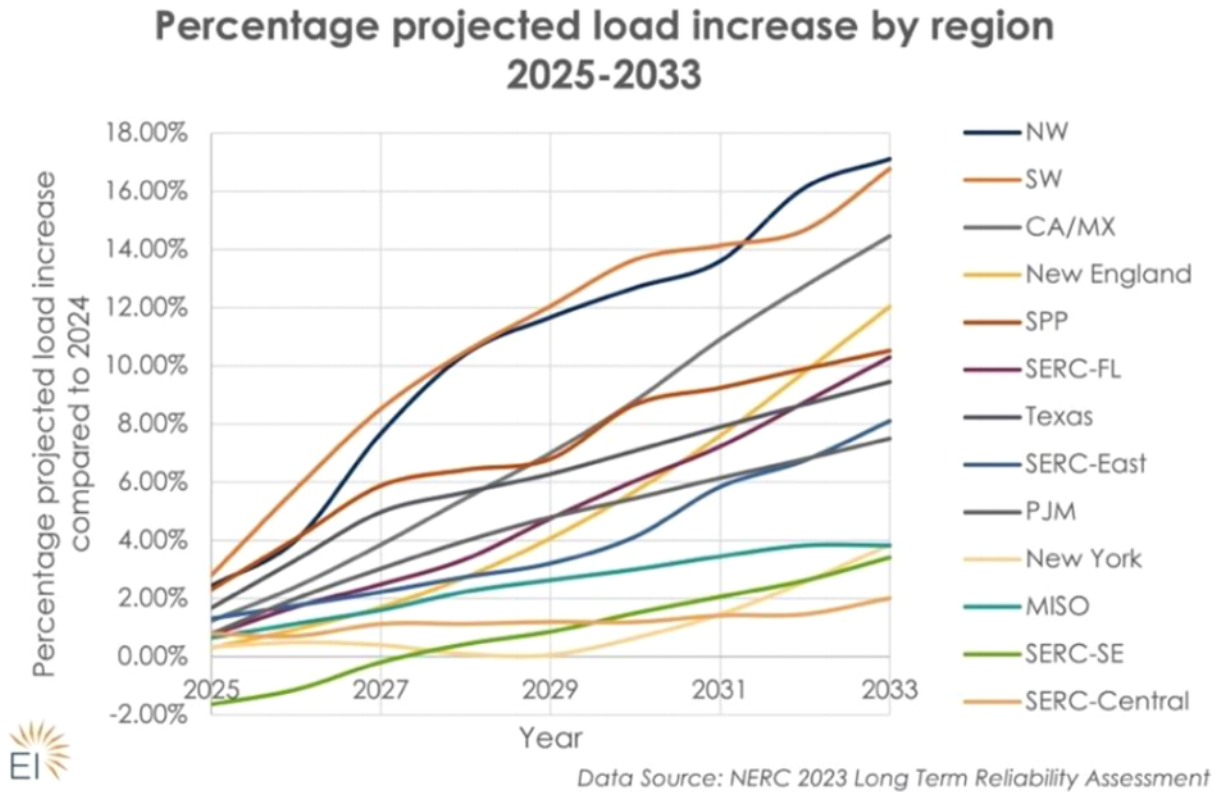
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<sup>2</sup> An analysis at a Simplot facility showed that replacing a natural gas boiler with an electric boiler would result in a 3-4 times increase in energy costs.

<sup>3</sup> Gimon, E., M.O’Boyle, and M. Solomon. 2024. Meeting Growing Electricity Demand Without Gas. Energy Innovation Policy and Technology, LLC.



**Figure 1**  
**Projected Electrical Increase by Region**



As discussed in a recent report by the North American Electricity Reliability Corporation (NAERC), for the Northwest grid (WECC-NW):<sup>4</sup>

“...dispatchable generation declines as generators retire starting in 2026. The resulting resource mix is more variable and has a risk of supply shortfalls during extreme summer conditions...”

NAERC predicts that planning reserve margins for electrical generation in the Northwest will fall significantly below the reference margin in 2032.<sup>5</sup> Current events are demonstrating the real-world practicalities of making such a major energy shift, especially as technology related electricity demand is dramatically increasing.<sup>6</sup>

<sup>4</sup> North American Electric Reliability Corporation. 2023. 2023 Long-Term Reliability Assessment. December.

<sup>5</sup> Ibid. page 117.

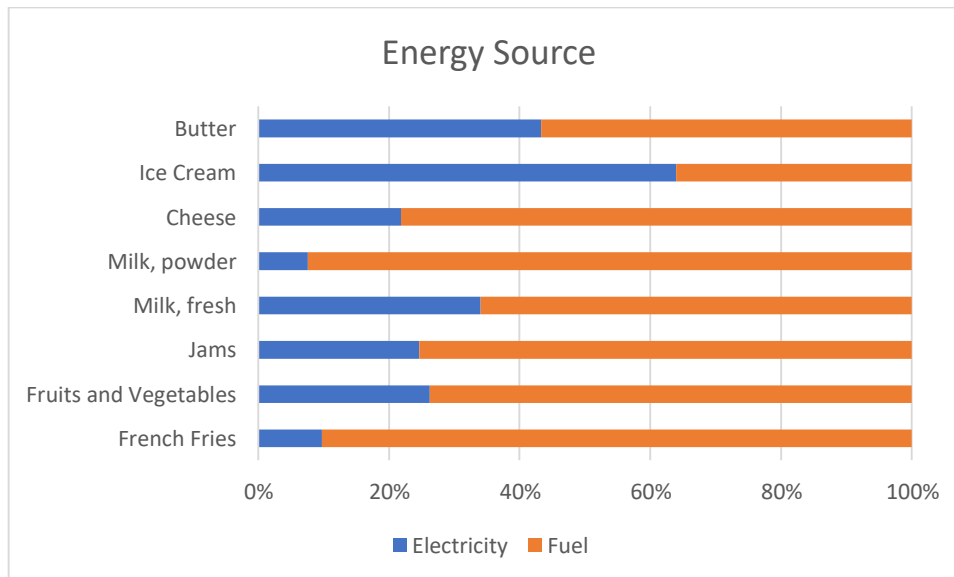
<sup>6</sup> See the following articles: Uberti, David. 2024. There’s Not Enough Power for America’s High-

### Manufacturing in Oregon Needs to Stay Competitive in a National and Global Marketplace.

As stated earlier, natural gas is a significant fuel for a number of processing units and auxiliary energy facilities in food processing, such as boilers for steam generation, combustion for heating systems, direct-fire dyers, and roasters. For most food processing, the major source of energy used is a fuel (as compared to electricity).<sup>7</sup> As shown in Figure 2, for a number of common food products made in Oregon, the vast majority use natural gas as the primary energy source. Thus, the price and availability of natural gas is a significant factor for food processors.

Assuming there is no change in the CPP framework, Cascade Natural Gas has recently predicted that for large volume natural gas users, the cost of that gas will increase by nearly 65% and the cost of transportation of that fuel will increase by 464%.<sup>8</sup>

**Figure 2**  
**Energy Source for Different Food Products<sup>9</sup>**



Tech Ambitions. Wall Street Journal. May 12. Matthews, C., C. Eaton and B. Faucon. 2021. Behind the Energy Crisis: Fossil Fuel Investment Drops, and Renewables Aren't Ready. Wall Street Journal. October 17.

<sup>7</sup> Ladha-Sabur, A. et al. 2019. Mapping Energy Consumption in Food Manufacturing. Trends in Food Science & Technology. 86, p.270.

<sup>8</sup> Cascade Natural Gas Corporation. 2024. March 28.

<sup>9</sup> Figure derived from Ladha-Sabur. et al. 2019.

The food industry is a major industrial sector in Oregon. In 2018, the net value of food products produced in Oregon was estimated at over \$9 billion.<sup>10</sup> Faced with sudden, substantial changes to their costs of operations, the food processors could limit operations, close or transfer production to other states with the effect that GHG emissions would change in Oregon but not globally, which would defeat the intent of the GHG emissions objective of the Governor's Executive Order.

### **Summary**

Energy intensive, trade exposed (EITE) industries, such as food processing and fertilizer manufacturing, need to be protected from economic disruption from the CPP. Oregon's "energy intensive" industries will face higher costs of production when energy prices increase due to energy providers' obligations under the CPP framework.

For industry, Simplot is recommending that the revised CPP regulation be changed to a technology evaluation instead of requiring fossil fuel reductions by the energy provider. This change is recommended for several reasons. As discussed in these comments, technologies are not available for industry to reduce the use of fossil fuels (like natural gas) for certain unit operations (i.e., industrial processes). The use of a facility specific technology standard enables the establishment of greenhouse gas reductions that are feasible (both technologically and economically). Such an approach would minimize the potential economic disruption from implementing CPP. The predicted cost increases for natural gas as under the previous CPP program will make it very difficult if not impossible for a number of industrial facilities in Oregon to continue to operate. As these comments point out, these industrial facilities operate in national and international markets. High production costs due to energy costs caused by the CPP will result in this manufacturing occurring in other states or nations. Finally, the CPP rules need the flexibility to allow for this major transition in energy generation.

This technology approach will enable most Oregon industrial facilities to continue to contribute to the Oregon economy and continue the process of reducing greenhouse gas emissions.

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<sup>10</sup> Compton, M., S. Willis, B. Rezaie, and K. Humes. 2018. Food Processing Industry Energy and Water Consumption in the Pacific Northwest. Innovative Food Science and Emerging Technologies. Volume 47, p. 371-383.

We would be glad to further discuss these concepts with the Advisory Committee and the Department.

Sincerely,



Alan L. Prouty  
Vice President, Environmental & Regulatory Affairs

C:  
Alliance of Western Energy Consumers  
Food Northwest



8113 W. GRANDRIDGE BLVD.,  
KENNEWICK, WASHINGTON 99336-7166  
TELEPHONE 509-734-4500 FACSIMILE 509-737-9803  
[www.cngc.com](http://www.cngc.com)

Submitted electronically via email to [CPP.2024@deq.oregon.gov](mailto:CPP.2024@deq.oregon.gov)

May 22, 2024

Oregon Department of Environmental Quality  
[CPP.2024@deq.oregon.gov](mailto:CPP.2024@deq.oregon.gov)

Cascade Natural Gas Corporation (“Cascade”) appreciates the opportunity to submit comments following the second Climate Protection Program (CPP) Rulemaking Advisory Committee (RAC) meeting which was held on May 14, 2024.

We recognize the important dialogue that continues to take place regarding reducing emissions cost-effectively, equitably, and ensuring transparency in accounting for emission reductions. Due to the significant projected impacts of the CPP to energy affordability and resource adequacy impacts that may result, it is essential all program components be addressed with nuance and transparency. In addition to the comments Cascade has submitted jointly with the other natural gas fuel suppliers, we emphasize and offer additional comments in this letter.

### **Transport Customer Point of Regulation/EITE-Specific Cap**

Cascade strongly supports DEQ’s proposal to regulate EITE industries under their own emissions cap. Having a separate cap for EITE industries would allow many of our transport customers to take control of their own emissions reduction efforts, as some transport customers will likely qualify as EITE entities. Cascade does not control the carbon intensity of the gas that is transported for such customers, nor do we have access to information detailing the actual carbon intensity of the transported molecules. It is sound policy for these customers to have their own compliance obligations under the cap that are separate from the compliance obligations of natural gas utilities.

Cascade understands that transport customers are individually unique in their need and use of energy, which supports the need to address their compliance requirements under a separate cap and with significant attention to how compliance costs impact each individual facility to minimize economic impacts and emissions leakage. Transport customers are the appropriate entity to implement CPP requirements associated with their gas. But, Cascade defers to EITE industries and transport customers for input regarding what the appropriate cap decline should be for their sector.

Cascade also supports establishing a separate cap decline rate for cost-sensitive industries that do not fall within the category of an EITE industry, such as hospitals and universities. By the nature of their services, these industries must be located in the state, are necessary for the functioning of society, and are also cost-sensitive. Cascade is looking at the cost impacts for these customer categories for future discussion in RAC 3. A separate cap decline is appropriate for these crucial sectors, as well.



8113 W. GRANDRIDGE BLVD.,  
KENNEWICK, WASHINGTON 99336-7166  
TELEPHONE 509-734-4500 FACSIMILE 509-737-9803  
www.cngc.com

## **Community Climate Investment Credits**

As a threshold matter, Cascade agrees that the EQC lacks statutory authority for the proposed Community Climate Investment credit (CCI) Program as laid out in our joint natural gas supplier comment letter. Nothing in Oregon statute gives EQC the power to sell greenhouse gas emission rights either directly or indirectly.

Setting the legal issues aside, if the DEQ continues to pursue a CCI Program, Cascade proposes the following improvements for the CCI Program: ensure quantifiable GHG emissions reductions; reflect offset markets when setting CCI credit prices; establish a separate CCI Program for natural gas suppliers; allow natural gas suppliers to partner with CCI entities; ensure availability of CCI credits at the outset of CPP Program; and distribute CCI Program funding equitably across the state.

### **Ensure CCI credits reduce emissions.**

CCI credits must demonstrate emissions reductions and be accounted for transparently. If CCI credits are meant for purposes other than one-for-one emission reductions, it would not only violate DEQ's statutory authority, but also create confusion for regulated entities using CCI credits as a compliance mechanism. For example, compliance with the program currently depends on emissions reported to DEQ under the Reporting Rule. Thus, to count CCIs for compliance, utilities would be forced to report CCIs as emission reductions, even if they have no means of verifying an emission reduction has occurred, which could result in a misleading and inaccurate emission reduction report.

Cascade agrees with the nonprofit RAC members that there is much to be done to ensure the state adequately funds a diverse variety of projects focused on increasing equity in Oregon, but the appropriate forum for such discussions is the legislature, which allocates funding for these types of projects, rather than in regulations deciding air permitting requirements.

### **Set CCI credit prices using other offset markets as a reference.**

Using the social cost of carbon to set CCI credit prices lacks methodological soundness. The cost of reducing emissions is a fundamentally different question than the social cost of emissions. Currently, DEQ is proposing to set CCI credit prices at \$129 per credit in 2025. This is a significantly higher price than other instrument-based compliance programs, which may range from less than \$1 to more than \$50 per ton of emissions reduced, depending upon the type of project.<sup>1</sup> DEQ should look to offset markets to inform how CCI prices are set, since the prices are supposed to be based on what it costs to actually reduce emissions, rather than the social cost of *not* reducing emissions. Managing these costs is essential to mitigating the energy burden for economically vulnerable Oregonians who

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<sup>1</sup> Second Nature, *Purchasing Carbon Offsets FAQs*, <https://secondnature.org/climate-action-guidance/purchasing-carbon-offsets-faqs> (last visited May 18, 2024).



8113 W. GRANDRIDGE BLVD.,  
KENNEWICK, WASHINGTON 99336-7166  
TELEPHONE 509-734-4500 FACSIMILE 509-737-9803  
[www.cngc.com](http://www.cngc.com)

will be forced to subsidize projects that could otherwise be delivered at a lower price and may not result in direct economic or energy savings benefits. Relatedly, how CCI credit prices are calculated, including what inputs DEQ uses to generate such prices, must be entirely transparent.

### **Create a separate CCI Program for the natural gas utility sector.**

As an energy provider regulated by the Oregon Public Utility Commission (Commission), Cascade's investments in CCI credits must benefit Cascade's customers, many of whom reside in areas identified economically burdened. Cascade proposes that DEQ create a separate CCI Program for the regulated natural gas sector, where credit prices are based upon what it takes to reduce local distribution company (LDC) emissions, and where all funds raised from these credits go towards reducing natural gas customers' emissions. Natural gas suppliers differ from other covered entities, in that customer rates will increase because of CPP compliance costs, and rate increases are reviewed for prudence through the Commission. Per the Commission's goal of protecting customers under ORS 756.040(1), a separate CCI Program for natural gas customers will ensure that customers dollars spent on CCI compliance go towards benefitting the very customers who are spending these dollars. DEQ would still be able to pursue its equity goals, as it could direct emission reduction resources be focused first on the low-income customers we serve.

### **Allow covered fuel suppliers to partner with CCI Program entities.**

Regulated entities such as Cascade should be allowed to partner with CCI Program entities in reducing emissions. Cascade already has experience administering energy efficiency and weatherization programs in collaboration with the Energy Trust of Oregon. It makes no sense to short-circuit emission reduction innovation pathways by not allowing public-private partnerships in this space.

### **Ensure CCI credit availability.**

DEQ must make CCI credits available early in the program to enable regulated entities to plan for this cost control option. Under the previous program, no CCI credits were ever made available.

Cascade believes a CCI market assurance fund would help guarantee the availability of CCI credits while incentivizing greater cumulative investments in emissions reduction projects. This would reduce substantial uncertainty regarding the viability of the CCI Program so that covered entities would have the option to incorporate CCI credits into their long-term compliance plans. Instead of waiting for CCI entities to propose and implement projects, covered fuel suppliers would pay DEQ or a chosen third party directly for CCI credits, and then DEQ or the third party would keep the money in an account that DEQ then grants to CCI-approved projects. This approach would allow DEQ to issue CCI credits in years when insufficient CCI projects are available, and to save money for more expensive CCI projects in later years. Such an approach also would provide much-needed certainty to CCI entities and environmental justice communities regarding the amount of funding that is available in any given year.



8113 W. GRANDRIDGE BLVD.,  
KENNEWICK, WASHINGTON 99336-7166  
TELEPHONE 509-734-4500 FACSIMILE 509-737-9803  
www.cngc.com

### **Distribute CCI funding equitably throughout the state.**

If DEQ proceeds with the CCI Program, Cascade requests that DEQ include mechanisms in the program that ensure CCI project funding is equitably distributed across Oregon and includes rural, low-income, and Tribal communities.

As mentioned during the second RAC meeting, Cascade remains concerned that the CCI Program as designed would result in rural and low-income customers in Cascade's Central and Eastern Oregon service areas subsidizing urban projects in Western Oregon and where more decarbonization resources are concentrated. DEQ should offer covered entities discretion to direct CCI monies in a manner that best serves their customers with oversight as appropriate from the Commission. Alternatively, because each utility serves a unique service territory, a natural gas supplier specific CCI Program, as proposed above, is an example of another mechanism that could help ensure funding is distributed equitably.

Additionally, Cascade interprets the intent of the CCI Program is to achieve GHG emissions reductions. We believe it is therefore important that DEQ require CCI entities to work with natural gas suppliers to ensure effective implementation of projects in the respective natural gas suppliers' service areas. This will ensure natural gas suppliers provide essential input on how monies from customers can directly benefit the communities we serve and minimize compliance costs. To this end, covered entities should be allowed to select the projects funded through compliance dollars. This will help support greater program accountability so that covered entities aren't forced to subsidize poor-performing projects with no direct benefits.

Further, Cascade believes that natural gas suppliers are well positioned to deliver their own CCI Programs or emissions reductions. Cascade has had over 16 years of experience delivering robust energy efficiency efforts in the state of Washington and should be allowed to leverage this experience and the Company's active pursuit of viable and economic decarbonization pathways.

### **Offset Program**

Whether it serves as a supplement or alternative to the CCI Program, the CPP should include an offset program. Offsets are an essential cost containment element in cap-and-reduce programs, including in the Washington and California programs.<sup>2</sup> Unlike the CCI program, which would be significantly more administratively burdensome for DEQ to administer, offsets present a well-established and cost-

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<sup>2</sup> CARB, *Compliance Offset Program*, <https://ww2.arb.ca.gov/our-work/programs/compliance-offset-program> (last visited May 18 2024); Washington Department of Ecology, *Cap-and-invest offsets*, <https://ecology.wa.gov/air-climate/climate-commitment-act/cap-and-invest/offsets> (last visited May 18, 2024).





8113 W. GRANDRIDGE BLVD.,  
KENNEWICK, WASHINGTON 99336-7166  
TELEPHONE 509-734-4500 FACSIMILE 509-737-9803  
www.cngc.com

effective option to maximizing greenhouse gas emission reductions. DEQ could look to the offset programs that Washington and California have already adopted as an additional compliance pathway.

There are multiple factors regulated entities will need to take into consideration in the selection of compliance projects, including overall viability, proven GHG emissions reductions, costs, and associated customer benefit. If CCIs prove to be cost-prohibitive and not in the best interests of Cascade ratepayers, investments in more cost-effective projects via offsets or other compliance tools will be critical to managing the energy burden for our customers. Providing CCIs as the sole alternative compliance mechanism available for covered entities therefore not only makes natural gas utilities like Cascade entirely dependent on a resource that may have inconsistent availability, but it also makes compliance more expensive and reduces available opportunities to achieve GHG emissions reductions.

Cascade plans to submit additional comments before the next RAC meeting with cost information specific to the gas sector and encourages DEQ to reach out to other sectors for any information that would be helpful in informing the agency's cost analysis.

### **Emissions Cap Adjustments and Cost Impacts and Analysis**

Cascade continues to review the emissions cap adjustment methodologies proposed in DEQ's RAC 2 briefs. Initially, Cascade does not foresee the cap adjustment methodologies DEQ proposed would alleviate cost impacts to customers that were presented and shared with DEQ after RAC 1. Cascade believes a more moderate decline in trajectory is needed to lessen cost impacts to our customers. Cascade will continue evaluating customer cost impacts as DEQ proposes changes to the draft CPP.

Cascade also notes a needed update to the joint utility comment letter for RAC 1. Cascade projected an approximate 27% emissions reduction at the outset of the program, considering the April proposed draft CPP rule, and an approximate 13% emissions reduction at the outset if the 2022 cap was substituted for the 2025 cap. Those percentages should be corrected to read as 22% and 11% respectively.

Finally, Cascade emphasizes the need for DEQ to conduct an updated cost analysis regarding CPP compliance costs. This information will be crucial in informing the program design, as different program designs will result in significantly varied costs.

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8113 W. GRANDRIDGE BLVD.,  
KENNEWICK, WASHINGTON 99336-7166  
TELEPHONE 509-734-4500 FACSIMILE 509-737-9803  
[www.cngc.com](http://www.cngc.com)

In closing, Cascade again appreciates the opportunity to engage in the RAC and share our comments on RAC 2 topics. We look forward to providing further input to DEQ in RAC 3. If you would like to further discuss this letter or have any questions, please reach out to me at (701) 222-7844 or [abbie.krebsbach@mdu.com](mailto:abbie.krebsbach@mdu.com).

Sincerely,

A handwritten signature in blue ink, appearing to read "Abbie Krebsbach", is written over a light blue horizontal line.

Abbie Krebsbach  
Director of Environmental

cc: Chris Robbins – Director, Gas Supply  
Chanda Marek – Director, Business Development  
Scott Madison – Executive VP, Business Development & Gas Supply  
Lori Blattner – Director, Regulatory Affairs  
Alyn Spector – Manager, External Affairs



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**NWPPA preliminary comments to DEQ on  
2024 Climate Protection Program Rule  
May 22, 2024**

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The Northwest Pulp & Paper Association (NWPPA) appreciates the opportunity to serve on the 2024 Climate Protection Program (CPP) rulemaking advisory committee (RAC). NWPPA is a 68 year-old regional non-profit trade association representing 11 member companies and 14 pulp and paper mills in Oregon, Washington and Idaho, five of which are located in Oregon. NWPPA member companies are in more rural parts of Oregon and are often the single largest employer and taxpayer, providing predominantly union-backed, family-wage jobs. Local taxes paid by NWPPA member mills provide funding and support for public schools, parks, law enforcement, fire departments, and hospitals. Oregon pulp and paper mills also provide a 3:1 job multiplier which is particularly important in these rural communities.

**Background**

NWPPA participated in the DEQ CPP RAC in 2021 and commented extensively on that proposed rule. Specifically, NWPPA advocated for the inclusion of policies to protect energy-intensive, trade-exposed (EITE) facilities with the primary goal of avoiding production shifts from Oregon to higher carbon emitting jurisdictions. With state-level carbon pricing programs, EITE policies attempt to retain economic competitiveness to avoid both greenhouse gas (GHG) and jobs leakage to jurisdictions with higher carbon emissions and fewer environmental regulatory policies. Failure to provide such protections for EITEs in Oregon will create a net increase of global GHG emissions. In response to Executive Order 20-04, DEQ's 2020 Report to the Governor cited recognition of the need to minimize shifting GHG emissions and leakage outside of Oregon which would undermine program goals.<sup>1</sup>

Other state and regional carbon pricing programs (e.g. Washington, California, Quebec and EU countries) recognize the importance of this issue and have protections for EITEs to try to avoid GHG leakage. Oregon's Carbon Policy Office recognized this in 2018 with the issuance of the Vivid Economics report.<sup>2</sup> Similarly, California has recognized this policy with its 2016 final report to the California Air Resources Board (CARB).<sup>3</sup>

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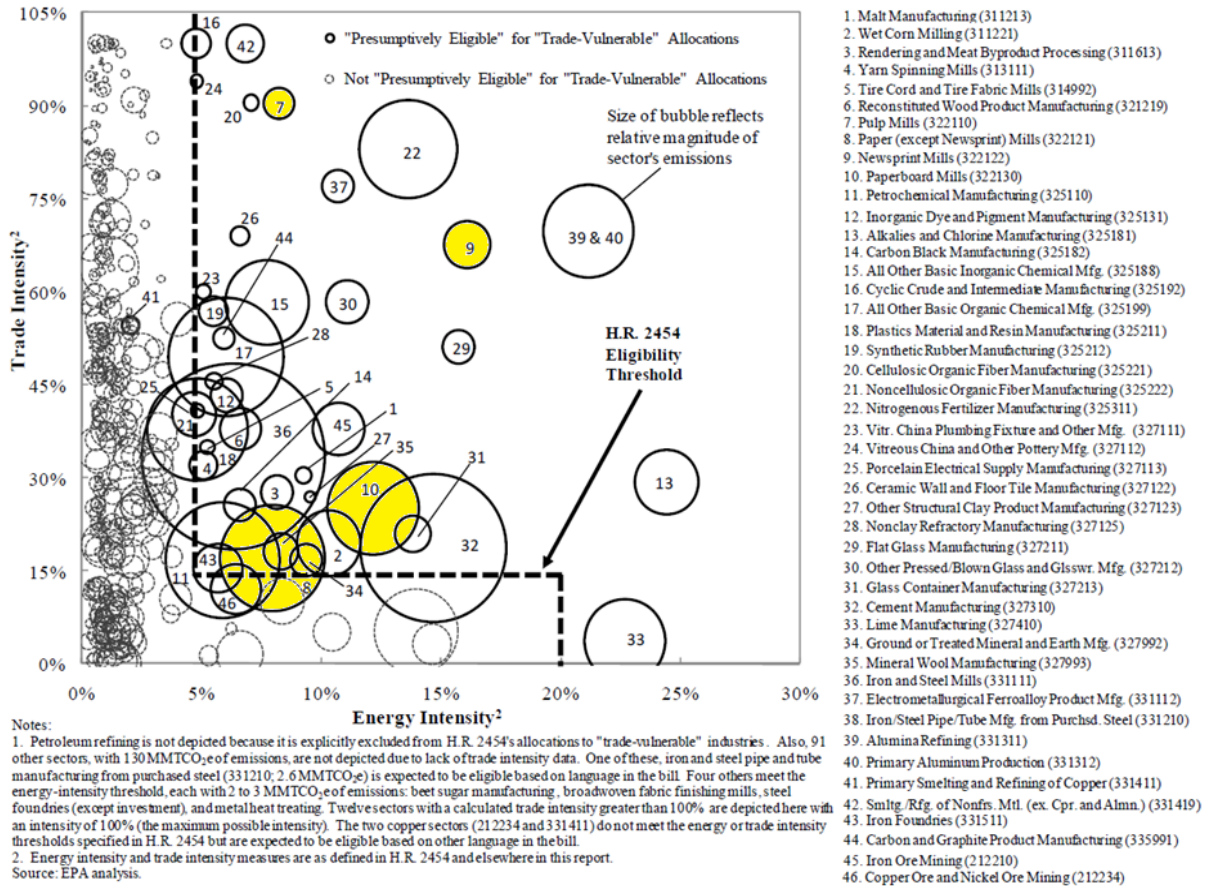
<sup>1</sup> [Program Options to Cap and Reduce Greenhouse Gas Emissions](#) (May 2020). Sec. 3.3.2, page 18. Oregon Dept. of Environmental Quality.

<sup>2</sup> Vivid Economics Final Report (December 2018). [Oregon Sectoral Competitiveness under Carbon Pricing](#); Prepared for the Oregon Carbon Policy Office.

<sup>3</sup> Gray, W., Linn, J., Morgenstern, R. (May 2016). [Resources for the Future - Employment and Output Leakage under California's Cap-and-Trade Program](#); Final Report to the California Air Resources Board.

The pulp and paper sector has been identified as high risk for GHG leakage by Congress (see Figure 2).<sup>4</sup>

Figure 2. Energy Intensity, Trade Intensity, and Emissions of U.S. Manufacturing Sectors at the Six-Digit NAICS Code Level<sup>1</sup>



For Oregon’s 2024 CPP rule to be successful and avoid a net increase of global GHG emissions, it must provide protections for EITEs like Oregon’s pulp and paper mills. Unfortunately, DEQ’s 2021 CPP rule provided no such protection.

### Goals and Principles

NWPPA is operating with the following goals and principles in this 2024 rulemaking, with which we hope DEQ agrees:

- Avoid production shifts out of Oregon resulting in both the leakage of GHG emissions and family-wage jobs to higher carbon emitting jurisdictions (both nationally and internationally), and correspondingly avoid a net increase of global GHG emissions.
- Don’t reinvent the wheel. Model EITE treatment in Oregon similarly to programs already established in other states.

<sup>4</sup> Waxman, Henry A. Rep. (CA), Markey, Edward J. Rep. (MA). H.R. 2454, *The American Clean Energy and Security Act of 2009 (ACES)*.

- Follow other program models (like Washington) to provide program certainty and predictability for regulated entities and the public, and ease of interpretation and implementation for DEQ agency staff.
- Recognize that pulp and paper manufacturing cannot electrify manufacturing processes and will need time to meet CPP program goals.

**Fiscal and economic impacts**

DEQ’s Climate Protection Program 2024 Rulemaking Advisory Charter references ORS 183.333 and requires DEQ to ask the RAC to consider fiscal impacts of the proposed rule. We agree.

Under the 2021 CPP rule, we do not believe fiscal impacts were appropriately measured.<sup>5</sup> According to Energy Strategies, Oregon’s pulp and paper sector anticipated the following negative economic impacts summarized as follows:

Net economic loss of sales, gross state product, income, and jobs	(13% – 24%)
Loss of sales due to only compliance cost payments for 2023-2050	(\$3 million to \$459 million)
Loss of gross state product for 2023 - 2050	(\$1 million to \$131 million)
Loss of income between 2025 – 2050	(\$2 million to \$63 million)
Direct jobs losses for 2023 – 2050	(5 to 671)

These figures were confirmed in late summer of 2023 by NW Natural when it forecast approximate compliance costs for NWPPA members as transport customers ranging between \$8 million -\$9 million per year. And these were just pass through compliance costs from NWPPA members which did not include the price of the purchased natural gas.

These CPP compliance costs will do nothing to reduce GHG emissions by pulp and paper mills. More precisely, this drain of capital directly competed and worked at cross-purposes with mill’s ability to invest in their own GHG reduction strategies.

**Specific Program Recommendations**

NWPPA prefers using the EITE compliance pathway(s) included in Washington’s 2021 Climate Commitment Act (cap-and-trade program)(Ch. 70A.65.110 RCW) as a model for the 2024 CPP rule.

1. Define EITE entity.
  - “EITE Entity” means a distribution service customer of a local distribution company that operates a trade or business in the state under the North American Industry Classification System (NAICS) codes *[add a new section with the specific NAICS references]*

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<sup>5</sup> Energy Strategies, LLC/Recon Insights, LLC (Oct. 14, 2021). [Macroeconomic Impact Analysis](#); Oregon Department of Environmental Quality’s Proposed Climate Protection Program Regulation.

- NWPPA Oregon EITE facilities and suppliers primary NAICS codes are:
  - 3221
  - 3222
  - 3211
  - 3212
  - 327993
  
- 2. No cost compliance instruments. As outlined in DEQ’s presentation to the RAC on May 14<sup>th</sup>, NWPPA prefers Example 2, Option 2 (pg. 33). Create a new section in OAR Sec. 340-271-0420 that would relate to EITE no-cost compliance instruments. This new section would provide a separate schedule of no-cost compliance instruments distributed to EITE entities that begins at 100% of the established carbon intensity benchmark and then is reduced in each subsequent compliance period by 3% relative to the previous compliance period, similar to Washington’s Climate Commitment Act.<sup>6</sup> This new section would assume the point of regulation is at the facility/stationary source level and not with the LDC.
  
- 3. Calculation of Baseline. A baseline carbon intensity value would be established for each facility by selecting the highest two-year average of actual carbon intensity values between 2019 and 2023.
  - For the first compliance period beginning on Jan. 1, 2025, the annual allocation of no cost compliance instruments for direct distribution to a facility identified as EITE must be equal to the facility's baseline carbon intensity established using data from 2019 through 2023, multiplied by the facility's actual production for each calendar year during the compliance period.
    - "Carbon intensity" means the amount of carbon dioxide equivalent emissions from natural gas combustion at a facility in metric tons divided by the facility specific measure of production including, but not limited to, units of product manufactured or sold, over the same time interval.
  - As defined in this manner, the carbon intensity calculation includes emissions only from the combustion of natural gas as is consistent with the nullified CPP regulation for most industrial emitters. It excludes emissions from industrial waste landfills which are covered under a separate DEQ regulation.
  
- 4. Creation of new compliance instruments. Should DEQ bring EITEs under the previous CPP program’s “cap” it must also include and create new compliance instruments for distribution to EITE facilities. EITEs should not be placed in the position of competing with and taking compliance instruments from non-EITEs. This could be analogous to the Washington CCA’s Allowance Price Containment Reserve (APCR).

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<sup>6</sup> See [RCW 70A.65.110\(3\)\(a\)\(b\)](#)

## **Conclusion**

NWPPA very much appreciates the opportunity to serve on the 2024 CPP RAC and fully intends to work cooperatively and in good faith with DEQ during this rulemaking process. That said, we continue to question the extent of DEQ's legal authority to adopt a revised CPP rule, in whole or in part, and reserve any and all remedies necessary to protect our industry's interests and needs in this matter.



May 23, 2024

Nicole Singh  
Oregon Department of Environmental Quality  
Climate Protection Program  
[CPP.2024@deq.oregon.gov](mailto:CPP.2024@deq.oregon.gov)

**RE: Food Northwest comments to DEQ on RAC #2 2024 Climate Protection Program Rule**

Dear Ms. Nicole Singh,

Food Northwest served on the 2021 CPP rulemaking advisory committee (RAC) and we appreciate the opportunity to participate again in CPP rulemaking by serving on the 2024 CPP RAC. We are submitting the following comments and recommendations in response to questions and issues raised at RAC meeting #2 on May 14, 2024.

Established in 1914, Food Northwest is a trade association of food processors with manufacturing facilities in Oregon, Washington, and Idaho. Several of our members have facilities in Oregon with emissions greater than 25,000 MTCO<sub>2</sub>e and would be directly regulated by the CPP. Many other members with facilities in Oregon will be financially impacted by the CPP compliance actions of their natural gas utilities and fuel suppliers.

**Emissions-Intense Trade-Exposed Industries (EITE)**

Food Northwest strongly supports DEQ's proposal to recognize Emissions Intensive, Trade Exposed (EITE) industries and to provide important policy protections to protect economic and emissions leakage from these businesses. Such protections were critical components to previous cap-and-trade policy proposals in Oregon (see HB 2020 (2020) and SB 1530 (2019)). They are also central to the California AB32 cap-and-trade program, as well as Washington state's Climate Commitment Act Program.



This risk of greenhouse gas emission and economic leakage is described in Oregon's own report titled "Oregon Sectoral Competitiveness under Carbon Pricing" authored by Vivid Economics in 2018. As stated in the report:

*Oregon has a competitive manufacturing and industrial sector, as evidenced from robust employment growth recently. The state is highly diversified with both high-tech and natural resource manufacturing in its top value-adding sectors.*

\*\*\*

*However, if the cap-and-trade is not designed to maintain industrial competitiveness, it can also lead to the risk of carbon leakage in covered emissions-intensive and trade-exposed (EITE) sectors.*

\*\*\*

*[R]isk of associated negative environmental, economic, and socio-political outcomes makes preventing carbon leakage central to any cap-and-trade mechanism design.*

*\*\*\*[W]hen implementing a carbon price, policymakers have been careful to ensure carbon leakage risk is addressed given it implies an increase in global emissions, in addition to economic activity and employment shifting to external jurisdictions.\*\*\**

*Vivid Economics, Oregon Sectoral Competitiveness under Carbon Pricing, December 2018, pp 3-4).*

## **Emissions-Intense Trade-Exposed Industries Identification**

Food Northwest agrees with DEQ's identification of EITEs by NAICS codes. All but one of the sectors on page 6 of DEQ's *Rulemaking Brief: Key Program Elements* were included in the Vivid Economics study and found to be EITEs. We recommend that the three-digit NAICS code 311 be used for food processing. For example, Washington [WAC 173-446A-030](#) identifies NAICS code 311 for Food Processing EITEs, which is a broader classification than DEQ's 3114 NAICS code for Fruit and Vegetable Preserving and Specialty Food Manufacturing. This three-digit code would cover other categories of food processors (dairy, poultry, seafood, etc.) that are below the threshold of 25,000 MTCO<sub>2</sub>e and may opt in to the CPP or may become a covered entity at some time in the future.

Language suggested:

**Facilities classified as emissions-intensive and trade-exposed.** Facilities engaged in one or more of the processes described by the industry descriptions

and codes in the North American Classification System (NAICS) in Table \_\_\_\_\_ are classified as emissions-intensive and trade-exposed (EITE).

**Point of Regulation of EITEs.** Food Northwest recommends that the point of regulation for EITEs be at the individual EITE entity and not at the local distribution company (LDC). The effect will be a deduction of EITE emissions from the LDC baselines. When costs are socialized at the LDC, EITEs will be subject to the compliance obligations of the utility. When they are directly regulated, they can realize the direct benefits of their individual carbon reductions. The EITEs know best when and how to reduce emissions at their facilities. This approach should incentivize GHG emissions reductions in this sector and have a positive impact on the CPP. Food Northwest suggests amending 340-271-0110(4) to exempt emissions from fuel delivered to an EITE and to section (5) to delete paragraphs (iv) and (vii).

DEQ proposed three example approaches to EITE regulation: 1. BAER for all EITE emissions; 2. Emissions cap for all EITE emissions; and 3. Emissions cap for natural gas and solid fuels, BAER for process emissions.

**Food Northwest strongly supports Example 3: Emissions cap for natural gas and solid fuels, and BAER for process emissions.** Because of the difference in the source and production of emissions between natural gas combustion and process emissions and the unique technology solutions and feasibility of reductions for process emissions, we believe process emissions should be addressed through BAER rather than under a cap. It may be that some facilities with process emissions would choose to include natural gas emissions within their BAER assessments as well, and we believe this should be an option. Food Northwest suggests adding the following to 340-271-0310(1)(a): Applies to process emissions at covered stationary sources. At the option of the owner or operator, emissions from the combustion of natural gas and solid fuel may be included in the BAER assessment and will be exempt from the requirements of 340-271-0420. This option should also be available to facilities with only combustion emissions should they choose to be regulated under BAER.

**Food Northwest supports creation of a new emissions cap specific for EITEs with a different rate of decline as described in DEQ's Example 2.** We urge adoption of a program similar to the CCA Program in Washington, which has a separate cap for each major covered sector. EITEs will have their own cap with a less steep rate of decline than for other covered sectors.

Food Northwest recommends the following as elements of the program:

**EITE Emissions Baseline Cap** set as the average emissions reported to DEQ by EITEs from combustion of natural gas and/or solid fuel for the years 2021-2023. We urge DEQ to use the most recent data. Using the original CPP baseline of 2017-2019, would mean using data for EITEs that is nearly a decade old.

**Individual Facility Baselines** for compliance and distribution of no-cost allowances/credits are established based on carbon intensity. The carbon intensity baseline is calculated by dividing the (2021-2023) average of covered emissions by the (2021-2023) average of total annual units of production. Washington's rule, [WAC 173-446-220](#), describes its baseline calculations and allocation of no-cost allowances. Washington requires EITEs to submit a proposed baseline to the Department of Ecology with supporting information. Ecology then reviews the submissions and approves facility baselines. Of critical importance to Food Northwest EITEs, and other EITEs as well, is that while emissions data is made public, production data is proprietary and must be confidential. When Food Northwest was collecting fuel use and production data to track progress toward our members' goal to reduce their energy intensity by 25% in 10 years, we had to sign a non-disclosure agreement with every member. This was because of the proprietary nature of production data.

**Compliance Periods** of at least three years. DEQ should not reduce the three-year compliance period of the original CPP. Any timeframe less than three years will impose a compliance hardship rather than flexibility for EITEs as well as other covered sectors. Emissions reduction projects, other than "low-hanging fruit" types, may take a significant amount of time, often several years, because they can require auditing, planning, budgeting and financing, approval, procurement, installation, and verification of emissions reductions to complete.

**Compliance Pathway** that provides for 3% emissions reductions per compliance period. Washington provides 3% emissions reductions per four-year compliance period, which is a less steep trajectory than a three-year compliance period as provided in the original CPP.

Distribution of no-cost compliance instruments under this pathway would be at 100% for the first compliance period beginning in 2025, 97% for the second period, 94% for the third, and 91% for the fourth period. A date could be set for program review and rulemaking to determine compliance obligations for 2037 – 2050.

We also recommend that adjustments up or down to the allocation baseline be made prior to the beginning of a new compliance period and effective at the beginning of that period where there are significant changes to emissions or production data. Adjustments should also be made when an EITE can demonstrate to DEQ that additional reductions in carbon intensity are not technically or economically feasible. WAC 173-444-220(2)(d)(ii) provides a process and criteria for this type of adjustment.

Food Northwest suggests amending 340-271-0420 to include two sections: (1) Distribution of Compliance Instruments to Covered Fuel Suppliers and (2) Distribution of Compliance Instruments to Emissions-Intensive Trade-Exposed Stationary Sources. Incorporate appropriate language from WAC 173-446-220 for determining carbon intensity baselines, adjustments, and distribution of no-cost allowances for EITEs.

**Community Climate Investment Credits should be available to EITEs** to purchase and use as a compliance instrument. When EITEs have a direct compliance obligation under the CPP, they must be able to purchase CCI credits as well.

**CCI funds should be directed towards decarbonization at EITE facilities.**

The European Union, Washington state, and California provide funding from their climate program investments to EITEs and other entities to reduce energy use and greenhouse gas emissions. Oregon EITEs compete with industrial facilities in the EU, Washington and California and are at a competitive disadvantage when they cannot access program investment funds. Food Northwest members have toured food processing facilities in the EU and have seen the efficiency improvements and technologies installed with EU carbon funds. Food Northwest recommends that at least 35% of CCI funds should be available to EITEs for programs, actions, and projects that meet CPP requirements. These funds could also be available to non-EITEs and EITEs who are not covered entities.

Washington's Climate Commitment Act allocates a minimum of not less than 35% and a goal of 40% of total investments to direct and meaningful benefits to vulnerable populations within the boundaries of overburdened communities Sec. 26(1)(a); and a minimum of not less than 10% of total investments to be used for programs, activities, or projects formally supported by a resolution of an Indian

tribe Sec 26(1)(b). The remainder of investments are directed to a multitude of emissions reduction and climate resiliency efforts. These efforts include programs, activities, or projects that increase the energy efficiency or reduce greenhouse gas emissions of industrial facilities Sec 29 (e).

California's SB 535 and AB 1550 require at least 35% of California Climate investments benefit "priority populations" (disadvantaged and low-income communities and individuals). The remaining funds are available for other purposes including industrial, transportation, and climate resiliency. There is a special fund available to all food processors, the [Food Production Investment Program](#). In 2022, a Food Northwest member with facilities in California received funds to implement boiler condensate recovery at two of its facilities. These projects reduced boiler fuel use, greenhouse gas emissions and other pollutant emissions, as well as reduced water use.

**Establish a CCI Funding Application Process for EITEs.** Food Northwest recommends that a process and guidelines for application by EITEs directly to the CCI Entity should be established. While the original CPP in 340-271-0900(2)(a)(C) provides that eligible projects include "an existing or new industrial process or structure", the CPP rule did not provide a process whereby an operator or owner of an industrial facility could apply for funding for such projects.

The original CPP's CCI project implementation appears to be done by the CCI entity and CCI entity subcontractors. We assume that subcontractors could also include environmental justice communities as well. EITEs will be implementing their own projects and may use contractors to assist in implementation. In this case, the EITE would be directly funded by the CCI entity. This would operate as most grants. We note that this is a different situation than the funding prohibition on covered entities in 340-271-0910(2).

## **Climate Commitment Investments (CCI)**

**Allowable Usage of CCI Credits.** Food Northwest supports increasing the percent allowable use of Climate Commitment Investments (CCI) to 15% or greater beginning in the first compliance period of the new program (2025 – 2027). Because there is no auction of allowances, formal trading market, or offsets in the CPP, fuel suppliers have limited access to alternative compliance instruments. Increased usage of CCI credits will provide additional flexibility for these covered entities.

**CCI Credit Contribution Amount.** The CCI credit contribution amount established in the original CPP was among the highest of carbon credit or allowance prices in the world. DEQ proposes to begin the 2025 program price at \$129 dollars. Current carbon prices per MTCO<sub>2e</sub> of Oregon's neighbor states and other carbon reduction programs are substantially below Oregon's price: Washington \$25.76 on March 13, 2024; California and Québec \$41.76 on February 14, 2024; Nova Scotia \$25.72 on August 23, 2023; United Kingdom \$40.17 on May 21, 2024; and European Union average of \$70.57 (2023). *International Carbon Action Partnership*, [Allowance Price Explorer](#). At \$93.35 on March 22, 2023, Switzerland's price was among the highest. However, the March 16, 2024, the price fell to \$60.06. [Swiss Emissions Trading Registry](#)

All the programs listed above administer and fund programs with revenues collected from the purchase of allowances. Food Northwest would like to understand why it is necessary that the price of credits in Oregon is three to five times higher than our neighbor states. Fuel suppliers pass through their cost of CPP compliance to their customers. The level of rate increases that are being proposed by the natural gas utilities to address the cost of purchase of CCI credits will impose hardships on many residential customers and impact the competitiveness of EITEs. A credit price that is aligned with these states will reduce the cost of compliance for fuel suppliers and natural gas utilities and moderate impacts to their customers.

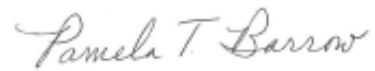
**CCI Entity Workplans Should be Subject to Public Review.** There appears to be no opportunity for public review of proposed projects or CCI entity workplans in the original CPP rule. Both Washington and [California](#) have public review processes for use of funds from cap-and-trade revenues. The covered entities that purchase CCI credits, and the public who will be impacted by the CCI credit expenditures of covered entities, expect that use of the funds will result in actual greenhouse gas emissions reductions, as well as other purposes of these investments. Support for the CPP will be promoted by transparency in how funds are used and when parties are held accountable for achieving desired outcomes.

## **Conclusion**

Food Northwest appreciates the opportunity to provide these comments to DEQ. We look forward to the next RAC meeting and to working with DEQ to develop a program that provides protections for food processing EITEs and other EITEs and

achieves meaningful reductions in greenhouse gas emissions. Please contact me if you have any questions on our comments or would like additional information.

Sincerely,

A handwritten signature in cursive script that reads "Pamela T. Barrow".

Pamela Barrow  
Vice President  
Food Northwest



Second Supplemental RAC Comments of the Alliance of Western Energy Consumers  
On the Oregon Department of Environmental Quality's Climate Protection Program 2024 Rulemaking

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Alliance of Western Energy Consumers (“AWEC”)<sup>1</sup> provides these second supplemental comments for the Rulemaking Advisory Committee (“RAC”) for the Climate Protection Program (“CPP”) 2024 rulemaking. AWEC appreciates the opportunity to participate in the RAC, and participated in the Department of Environmental Quality’s (“DEQ’s”) April 2 and May 14, 2024 RAC Meetings.

AWEC brings to this rulemaking process the concerns of natural gas consumers, including Energy Intensive, Trade Exposed Entities (EITEs),<sup>2</sup> which for the most part have no alternative to using natural gas in their manufacturing processes. Accordingly, a primary but non-exclusive focus of AWEC in this rulemaking process is to ensure that its EITE members have access to energy supplies at a reasonable cost while protecting the environment.

AWEC was encouraged by much of the discussion that took place at the May 14, 2024 RAC meeting, including the broad support for a separate compliance pathway for EITE Industries, recognizing the unique characteristics of such entities, and the need to prevent economic and emissions leakage.<sup>3</sup> Notwithstanding, there are many details that need to be addressed for an EITE program.

AWEC EITE Proposal

AWEC’s EITE proposal is described in detail in its comments that were submitted to DEQ on April 30, 2024. The foundation of AWEC’s EITE concept is for DEQ to create a new distinct schedule of no-cost instruments for EITE customers following a similar trajectory as the Washington Climate Commitment Act (“CCA”). See AWEC Comments dated April, 30, 2024, Exhibit A p. 5-6. AWEC recommends that the cap for EITE customers be established in a manner consistent with the CCA, which allowed for 3% reductions per compliance period, beginning in the second compliance period. No-cost instruments would be allocated to cover 100 percent of emissions at the end of first compliance period. No-cost allowances would be allocated to cover 97 percent of emissions at the end of the second compliance period and reduced by 3% in each of compliance periods three and four.

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<sup>1</sup> AWEC represents large energy consumers in the Pacific Northwest, including natural gas sales and transportation customers served by the three local distribution companies (“LDCs”) in the state—NW Natural, Avista and Cascade.

<sup>2</sup> An EITE Entity would be defined in the rule as a distribution service customer of a local distribution company that operates a trade or business in the state under the North American Industry Classification System (NAICS) codes, along with a new section with the specific NAICS references.

<sup>3</sup> The purpose of an EITE program is to address the widely accepted problem of carbon leakage. Most EITE businesses require natural gas in their operations, and currently no viable alternative source of energy exists. Adopting rules that will otherwise dramatically increase the cost of energy for EITE entities will harm their competitiveness in global markets and diminish their ability to make sales at economically viable prices. This in turn reduces output from entities in the State leading to a shift in production and energy consumption to regions with higher carbon footprints. Thus, imposing aggressive carbon costs on such entities can result in the counterproductive effect of increasing overall global carbon emissions. It also has negative impacts on the state economy, diminishing both employment and tax base. Simply stated, a greenhouse gas policy that functions by forcing EITE business out of the state is not viable; is bad for the Oregon economy; and will not produce positive impacts for the environment.





AWEC's EITE concept also proposes to: (a) establish EITE customers as a separate point of regulation; (b) Create a new Table 4B distributing no-cost instruments to EITE Entities based on stated percentages per compliance period (proposed Table 4B is shown in AWEC's April 30, 2024 Comments, Exhibit A p. 6); (c) use the first compliance period to measure EITE emissions and establish a baseline, which would be based on the highest two years of emissions in the first compliance period, normalizing the impact of abnormal plant outages or curtailment periods. Following the fourth compliance period, the EITE program would undergo a holistic review and percentage reductions are subject to review and discussion.

A critical part of AWEC's EITE concept is to create a distinct schedule of no cost allowances for EITE customers, separate from the Table 2 allowances available for other covered entities. AWEC acknowledges that its proposed program will result in a modest increase to the overall programmatic caps established in the CPP. It will still be necessary to adjust Table 2 and Table 4 to deduct EITE emissions from the state and LDC baselines. EITE emissions will be capped and will be subject to a schedule of reductions. Accordingly, the net effect of AWEC's proposal on the overall state targets will be relatively modest. There remain important issues that need to be resolved for an EITE program, and AWEC looks forward to working with DEQ on the detailed design of an EITE program.

#### Other Critical Concepts

AWEC's previous comments provided several additional concepts for consideration for a new climate program, besides its EITE proposal. Several of AWEC's other concepts have not yet been fully discussed or considered, including a cost cap to protect all customers, carbon offsets, and linking the price of Oregon's compliance instruments to the CARB/Québec market clearing prices. AWEC urges the DEQ to discuss, consider and incorporate these other concepts that will protect other non-EITE Oregon businesses, and the public from unreasonable and unsustainable compliance costs.

#### Cost Cap

AWEC proposes an annual cost cap for non EITE customers, similar to the cost cap provisions of HB 2021. It is important to consider the cost of compliance as part of an effective carbon reduction program so that customers can engage in cost effective conservation and other measures, and to prevent utility rate shock to Oregonians. Natural gas is an essential service providing heat and an efficient energy source and its price should not be artificially increased. Accordingly, AWEC recommends that a programmatic cost cap be established that will limit the annual rate impacts to distribution service customer rates to no more than 5% per year. Under the prior CPP rule, ratepayers were expecting to receive major rate increases, and while the rule had a requirement in OAR 340-271-8100 that it would undergo re-evaluation if the rate impacts were greater than in other states, that requirement lacked any material effect. AWEC's cost cap proposal is detailed in its April 30, 2024 comments, and is structured in a manner that respects the respective authorities of DEQ and the Oregon PUC.

#### Investment in Climate Innovation

Another concept advanced by AWEC is the establishment of a new compliance instrument that is designated specifically to fund climate innovation for all large volume customers of LDCs, not just EITEs. While AWEC appreciates the structure of the CCI program in the context of services provided to residential and small commercial customers, greater emphasis on technological and business innovation will be required to meet Oregon's GHG reduction targets. AWEC proposes a new type of compliance



instrument called an Innovation Climate Investment (“ICI”) credit. These instruments would be funded in a manner similar to the CCI program, with funds distributed to ICI entities.<sup>4</sup> Under AWEC’s proposal, the use of ICI credits as compliance instruments would be limited to carbon emissions attributable to EITE customers and large volume customers of a local distribution company (e.g. NW Natural Schedule 32), with no cap. A wide range of possible funding activities would be made available through the ICI program, ranging from simple solutions, such as fugitive emission audits, to more complicated infrastructure investments in developing on-site carbon capture equipment. AWEC’s proposal is detailed in its April 30, 2024 comments.

### Compliance Instruments

Another important element of AWEC’s proposal is to tie the cost of compliance instruments—both CCIs and ICIs—to the cost of allowances in regional carbon markets. Absent having a separate tradable market for compliance instruments in Oregon, AWEC recommends that the cost be tied to the CARB/Québec market clearing prices rather than imposing a non-market based price. AWEC recommends that a programmatic CCI cost cap be established, where the rate impacts of the CPP are reviewed on an annual basis, with the ability to petition the DEQ for new instruments, outside of the state-wide caps, if costs exceed the specified rate cap. This will provide ratepayers with assurance that the CPP objectives can be met without negatively impacting utility rates. This will also put Oregon customers on a level playing field with customers in other states. AWEC’s proposal is detailed in its April 30, 2024 comments.

At the May 14, 2024 RAC meeting DEQ staff provided brief a description of, but not a justification for, its CCI pricing proposal which is based on an abstract, easily manipulable and inflated ‘social cost of carbon’ concept. AWEC urges DEQ to reject that approach in favor of a real-world market based CCI pricing approach.

### Carbon Offsets

The breadth of available alternative compliance instruments will be critical to the ability of natural gas consumers to meet their regulatory obligations at a reasonable cost. Natural gas consumers should be allowed to meet their compliance obligations in a variety of ways so long as the alternative results in a greenhouse gas reduction or offset. Given the limited compliance alternatives available for the CPP, and the lack of a tradable market for instruments, AWEC believes that some level of carbon offsets should be allowed as a compliance instrument in the CPP. Based on existing technology, the local distribution companies realistically have only three available compliance alternatives under the proposed rule: (a) CCIs; (b) renewable natural gas, including renewable hydrogen; and (c) conservation. The CPP should be designed in a way that makes it possible to comply with the GHG reduction targets at a reasonable cost. Accordingly, AWEC recommends that the program be improved to allow for the use of offsets for up to 20% of covered emissions. Many programs in other states allow for the use of offsets to meet compliance obligations, and absent a liquid tradable market for CPP compliance instruments, AWEC believes that the ability to use offsets would be a major improvement to the program. AWEC’s proposal is detailed in its April 30, 2024 comments. To ensure that desired carbon reductions occur, and to overcome objections by some commenters, DEQ should allow a significant portion of the compliance obligations to be met by offsets that are verified by a credible third-party GHG registry.

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<sup>4</sup> These ICI entities would be non-profits focused on funding greenhouse gas reducing innovation for Oregon businesses. These entities would undergo an application and approval process in the same manner as CCI entities, and be required to be accountable for carbon reductions achieved through their activities.



### Update the Volume of Compliance Instruments

AWEC also recommends that a new rule update the volume of compliance instruments to be distributed based on more recent natural gas loads and carbon emissions data. Under AWEC's proposal, EITE customers have their own compliance pathway and should not be subject to the Table 2 program caps, requiring the existing caps to be reduced for the EITE emissions.

There is another significant issue related to the GHG reduction targets, and the how the baseline for those reductions will be established. It is AWEC's understanding that DEQ may use the GHG reduction targets from the prior rule. Considering the growth in natural gas demands that have occurred since the original CPP rules were enacted, maintaining the same GHG reduction targets as the prior rule will make compliance, particularly in the first compliance period, challenging and harmful to customers. AWEC urges DEQ to reconsider using the GHG reduction targets from the prior rule. The GHG reduction targets should be updated to reflect the increased use of natural gas since the 2017-2019 baseline from the prior rule, and DEQ should establish GHG reduction targets with a more realistic goal.

### Additional Issues

During discussion at the May 14, 202 RAC meeting, and in the discussion questions in DEQ's briefs for that meeting, the following additional issues arose upon which AWEC would like to comment:

CCI Monitoring and Verification. Current drafts of the CCP rule devote scant attention to ensuring that the CCI instruments actually result in reductions in carbon emissions. AWEC's members, who will be bearing a significant portion of the costs of CCI purchases, believe that monitoring and verification should be a key part of the program. To ensure public confidence, DEQ should consider utilizing a third party GHG registry or other entity to monitor the CCI program to ensure that its carbon reduction integrity is maintained. It is worrisome to see in the CPP draft rule that on average one ton of carbon will be reduced for each CCI purchased. This implies that some CCI's will not achieve that goal, and by definition, does not maximize carbon reduction for each dollar invested. AWEC would like to ensure that the CPP program is about carbon reduction. There should also be strict (and low) limits on utilization of CCI funds by nonprofit entities for administrative costs.

Higher CCI Utilization. There has also been discussion about allowing a higher percentage utilization of CCIs for compliance in the new CPP program. AWEC strongly supports this concept.

Biodiesel Impact on Emissions Profile. In RAC meeting discussions, we have learned that the introduction of biodiesel has altered the emissions profile of the baseline established in the original CPP. This is because biodiesel is a commercially available substitute for diesel. In contrast, natural gas does not have a commercially available substitute, and the closest substitute, renewable natural gas, is cost prohibitive for widespread use. If the baseline is not adjusted for current loads and growth, natural gas consumers will be forced to pay excessive compliance costs—especially in the first compliance period.



**AWEC**

Alliance of Western Energy Consumers ♦ 3519 NE 15<sup>th</sup> Ave, #249 ♦ Portland, OR 97212 ♦ [AWEC.solutions](http://AWEC.solutions)

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Summary

AWEC urges the DEQ to address these issues at the upcoming RAC meeting and in the draft rules. AWEC appreciates this opportunity to provide these comments before the final RAC meeting. We look forward to future participation and discussion in the CPP 2024 rulemaking process.

Sincerely,

William (Bill) A. Gaines  
Executive Director, AWEC



May 23, 2024

Dear Department of Environmental Quality,

We appreciate the opportunity to provide comments on the proposed rule amendments discussed in your May 14, 2024, rulemaking brief and public testimony on the Climate Protection Program (CPP).

Community Climate Investments (CCIs) benefit people and the environment. Among these co-benefits are economic opportunities—including an inclusive green economy via local job creation and wealth-building—as well as social benefits for communities, improved air quality, energy independence, and resilience. Furthermore, CCIs will facilitate the transition to clean energy and improve the safety and living conditions for all Oregonians while also making energy more affordable.

So we submit the below comments with the belief that Community Climate Investments (CCIs) are the only compliance mechanism designed with community input to ensure the delivery of the most benefits for all Oregonians:

- **CCI reporting will be transparent and accessible.**

In addition to the transparency ensured by reporting to the DEQ and meticulous work planning, it is reasonable to expect CCIs to establish publicly accessible dashboards.

There are many viable approaches and options that CCIs can draw from in sharing data. For example, the Portland Clean Energy Fund's (PCEF) in-development [dashboard](#); tools from [neighboring programs](#); and from statewide programs in [Washington](#) and [California](#), which demonstrate how such systems can be effectively integrated into a program like CCI. These examples highlight the feasibility and benefits of maintaining transparency and accountability statewide, providing near real-time insights into the impact of the program and the projects being funded.

As a best practice already in use in other jurisdictions, effective CCI entities can build project implementation mapping (geolocation, size of investment, and more), visualizations, and a searchable table of grants so that the public can be aware of where funds are allocated and the community benefits they provide.

- **Environmental justice and equity are centered in CPP through the work**

## of CCIEs.

As evidenced by some of the potential projects that we identified in our CCIE application, CCIs are the only investment option that reduces GHG emissions, are capable of reducing other air contaminants such as smog creating particulates, provide co-benefits to underinvested communities, and accelerate the transition to green energy. At the end of this document we list some projects across Oregon that are already operational, with a proven track record, and that are ready for additional funding.

- **CCI pricing has been carefully calculated to reflect the total costs and impacts on Oregonians and our environment.**

As a matter of methodology, CCIs will take a portfolio approach—across cost, sectors, scale, timing, and risk—to consistently achieve a reduction of one metric ton of CO<sub>2</sub>e per CCI credit while providing significant co-benefits to Oregon communities.

The social cost of carbon must be addressed. Operationalizing this program by utilizing transparent, community-centered best practices is an investment that should be included in the budget. CCI prices are not expensive or arbitrary.

- **Established best practices for monitoring and accounting for GHG reductions and community impacts are well-known, proven, and already in use by prospective grantees.**

In the process of funding essential projects and delivering co-benefits to communities, CCIs can use trusted, standard practices and protocols: industry-accepted methods for quantification wherever possible and robust, transparent processes when no existing methods are available. Regarding GHG emissions, our region provides a very strong community of practice. As just one example, the Regional Technical Forum provides widely-respected energy savings quantification and protocols on various efficiency technologies and methods (residential, commercial, and other technologies). This work is not reinventing the wheel; it follows in an established tradition of scientific and financial estimation and forecasting.

- **A few potential projects across Oregon that could be expanded as soon as CCI funding becomes available.**
  - **Net Zero Enhancements for New Construction Affordable Housing:** Deep energy efficiency and renewable enhancements in new affordable housing, including e-bikes and EV charging stations for residents. (Central Oregon, Deschutes County)
  - **Low-Income, Irrigation District, and COU Community Solar:** Community shared solar projects for low-income Oregonians,

- providing benefits to offsite customers, irrigation districts, and consumer-owned utilities. (Statewide, including Portland Metro, Salem, Medford, Klamath Falls)
- **Net Zero Energy Components of Warm Springs Commissary Project:** Transforms a historic Bureau of Indian Affairs building into a net-zero energy business incubator and community resiliency hub for the Warm Springs tribal community. (Warm Springs)
  - **Comprehensive Residential Energy Efficiency Retrofits for Low-Income Oregonians:** Provides deep Energy Efficiency retrofits for low-income families, reducing energy burdens and improving health and housing stability. (Statewide, initially targeting larger regional CAP agencies from Multnomah County to Eugene and Bend)
  - **Micro Hydro Installations for Rural Municipalities:** Utilizes energy recovery systems in water delivery pipes to produce renewable electricity, improving water affordability and reducing emissions. (Rural and tribal communities)
  - **Community Solar Projects Addressing Unique Partner Needs:** Provides solar and energy storage for nonprofits, food banks, community organizations, schools, and local governments, significantly reducing energy bills and providing emergency power. (Statewide)
  - **School Bus Fleet Electrification:** Provides funding to cash-strapped school districts to electrify their school bus fleets thus eliminating GHG and particulate emissions resulting in less smog in the local atmosphere and cleaner air that the children will breathe when going to and from school. (Statewide)

Given the urgency of the climate crisis and the magnitude of its potential impact, Seeding Justice remains committed to providing expertise to ensure that any Community Climate Investments (CCI) program is robust and addresses communities' urgent needs using participatory grantmaking best practices.

Please feel free to contact me if you have any questions.

Sincerely,

Se-ah-dom Edmo  
Executive Director  
Seeding Justice



The Nature Conservancy in Oregon  
821 SE 14th Avenue  
Portland, OR 97214-2537

tel 503 802-8100

fax 503 802-8199

[nature.org/oregon](https://www.nature.org/oregon)

May 23, 2024

Oregon Department of Environmental Quality  
Office of Greenhouse Gas Emissions

Public Comment: 2024 Climate Protection Program Rulemaking Advisory Committee Meeting #2

Submitted by Laura Tabor, Climate Action Director

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Thank you for the opportunity to provide comments on Department of Environmental Quality (DEQ)'s Climate Protection Program (CPP) rulemaking.

The Nature Conservancy in Oregon (TNC) is a science-based, non-partisan organization with 80,000 supporters and members in every county. Addressing the climate change crisis is a core component of TNC's work to create a world where people and nature can thrive, and we strongly believe that Oregonians have a responsibility to enact policies to reduce greenhouse gas emissions (GHG) and help our communities adapt to climate change. We support DEQ's efforts to cap and reduce GHG emissions from transportation fuels and natural gas used in Oregon and believe that the CPP is a crucial program for the state to achieve its climate goals.

We offer the following comments in response to the discussion at last week's Rulemaking Advisory Committee (RAC) Meeting:

- **Maintaining a science-based emissions cap.** It is vital that DEQ at least maintain the previously established declining cap on regulated emissions in line with the best available climate science. Recent modeling by the Oregon Climate Action Commission illustrated the outsize impact the CPP has on Oregon's ability to meet its statutory emissions reduction goals and continue on a trajectory consistent with limiting global temperature increase to 1.5C or less. Prior to the overturning of the CPP, regulated entities spoke frequently about their commitment and plans to meet CPP requirements, including through integrated resource planning and other climate policy conversations. This along with the extensive funding available to support emissions reduction investments through the Inflation Reduction Act, Bipartisan Infrastructure Law, and CHIPS & Science Act indicates there are viable paths to compliance with the original cap trajectory.
- **CCI pricing.** We were concerned to hear the discussion comparing the price of CCIs with carbon offset pricing in other jurisdictions. In states with cap-and-trade systems, regulated entities must purchase allowances for the majority of their covered emissions. Under the CPP in Oregon, DEQ allocates allowances up to the cap for free, meaning regulated entities only purchase CCI credits for emissions they are unable to abate above the cap. The federal social cost of carbon offers a reasonable and well-researched data point for setting the CCI price in this context and we support maintaining the previously determined CCI price approach.



- **Scope of rulemaking.** We encourage DEQ to maintain the established rulemaking timeline set out by the agency in order to ensure readoption of the CPP rules this calendar year. There was discussion raised at the meeting on expanding the scope of the rulemaking. TNC strongly supports maintaining the timeline and topics identified by agency staff without further delay.
- **Stationary sources.** It is important for the CPP to ensure science-based, sector-wide emissions reductions from large stationary sources in Oregon. TNC supports forthcoming comments on this issue from Oregon Environmental Council and partner environmental justice, business, climate, public health, and community-based organizations.



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## **Comments for Submission to the DEQ on behalf of the AWPPW Regarding the 2024 Climate Protection Program Rulemaking**

**Date:** May 24, 2024

**To:** Colin McConnaha and Nicole Singh, Oregon Department of Environmental Quality (DEQ)

**Subject:** Support for NWPPA Comments on the 2024 Oregon Climate Protection Program Rule

Dear Colin McConnaha and Nicole Singh,

The Association of Western Pulp and Paper Workers (AWPPW) appreciates the opportunity to provide comments on the 2024 Oregon Climate Protection Program (CPP) draft rule. Our association represents workers and their families across the pulp and paper industry in Oregon and beyond. We emphasize the importance of maintaining robust and sustainable local economies, which are directly tied to the well-being of our members and their communities.

We have reviewed the preliminary comments submitted by the Northwest Pulp & Paper Association (NWPPA) and fully support their detailed recommendations. The key points outlined in the NWPPA's comments resonate deeply with our concerns about the potential economic and environmental impacts of the proposed CPP rule.

### **Key Support Points**

#### **1. Protection of Energy-Intensive, Trade-Exposed (EITE) Facilities:**

- The AWPPW strongly supports the inclusion of policies to protect EITE facilities, such as Oregon's pulp and paper mills. These facilities are crucial to local economies, often being the largest employers and taxpayers in rural areas. The closure of these facilities would have devastating impacts on our members, their families, and the broader community. Protecting these facilities will help avoid production shifts to higher carbon-emitting jurisdictions, thereby preventing a net increase in global greenhouse gas (GHG) emissions and preserving union-backed, family-wage jobs that are vital for the economic health of these regions.

#### **2. Avoidance of Production Shifts and Job Losses:**

- It is essential to model Oregon's EITE treatment on established programs in other states, like Washington's Climate Commitment Act. Such models provide certainty and predictability for regulated entities and help avoid the economic and environmental pitfalls associated with job and production shifts out of Oregon. We cannot afford to see our industries and jobs moved to areas with less stringent environmental regulations, which would result in both job leakage and increased global GHG emissions. The loss of these jobs would not only impact the workers

directly but also the local businesses and services that depend on the economic activity generated by these mills.

### **3. Recognition of Sector-Specific Needs:**

- Pulp and paper manufacturing processes cannot be easily electrified. Thus, the CPP program goals must account for the unique challenges faced by this industry and allow sufficient time for compliance. Our mills need time and support to transition to more sustainable practices without jeopardizing the livelihoods of our workers. The failure to recognize these needs could lead to plant closures, massive job losses, and significant economic disruption in our communities.

### **4. Fiscal and Economic Impacts:**

- The AWPPW echoes NWPPA's concerns about the significant negative economic impacts anticipated under the 2021 CPP rule. The projected compliance costs will severely impact the pulp and paper sector's ability to invest in their own GHG reduction strategies, thereby undermining the overall goals of the CPP. We must ensure that the fiscal impacts are thoroughly evaluated and that the rule does not inadvertently harm the very communities it aims to protect. The potential loss of thousands of jobs and the economic downturn that would follow is a risk that cannot be overlooked.

### **5. Specific Program Recommendations:**

- We support NWPPA's recommendation to define EITE entities clearly and adopt a no-cost compliance instrument allocation similar to Washington's model. This approach will provide a fair and feasible pathway for EITE facilities to comply with the CPP while maintaining economic stability. It is imperative that DEQ includes protections that align with successful models in other regions to prevent job and GHG leakage. Furthermore, the allocation of no-cost compliance instruments is critical to ensure that our facilities can continue to operate without facing prohibitive costs that could lead to closures.

## **Conclusion**

The AWPPW stands with the NWPPA in advocating for a balanced and thoughtful approach to the 2024 CPP rule. The stakes are incredibly high for our members and their families. The inclusion of protective measures for EITE facilities is crucial for achieving the program's environmental goals without sacrificing the economic well-being of Oregon's rural communities. The closure of any facility not only affects the workers but also the entire ecosystem of local businesses and services that rely on the economic activity generated by these mills.

We are committed to engaging in meaningful policy creation that protects our climate and our planet while ensuring the preservation of strong, union-backed, family-wage jobs. The well-being of our communities depends on the success of both these endeavors. We urge DEQ to consider the comprehensive recommendations provided by NWPPA and to adopt measures that will safeguard both our environment and our economy.

We appreciate your consideration of these comments and look forward to continuing our collaboration to develop effective and sustainable environmental policies.

Sincerely,

A handwritten signature in blue ink that reads "Joshua Estes". The signature is written in a cursive, flowing style.

Joshua Estes, SHRM-CP  
Policy Advisor and Lobbyist OR/WA, AWPPW

**Cc:** Chris McCabe, Northwest Pulp & Paper Association (NWPPA); Scott Tift, President, Association of Western Pulp and Paper Workers Union (AWPPW)



Oregon Department of Environmental Quality  
Office of Greenhouse Gas Emissions

May 24, 2024

**RE: Climate Protection Program 2024 Rulemaking - RAC #2**

Dear DEQ Office of Greenhouse Gas Emissions::

The undersigned environmental justice, business, climate, public health, and community-based organizations from across Oregon applaud the commitment by Governor Kotek and the Department of Environmental Quality to reinstate Oregon’s Climate Protection Program without delay. Upholding and restoring these cornerstone climate and community protections by the end of 2024 is essential to prevent incalculable harm to Oregon families, workers, and local economies, now and in the future. We appreciate the opportunity to provide comments and feedback related to issues discussed at the second Rulemaking Advisory Committee (RAC #2) meeting of the Department of Environmental Quality’s (DEQ) 2024 Climate Protection Program rulemaking.

Prior to the Court of Appeals’ decision to invalidate the rules, the Climate Protection Program was projected to achieve nearly half of the state’s targeted 45 percent emissions reductions by 2035, and invest hundreds of millions of dollars annually in environmental justice and other communities across Oregon. As DEQ moves forward with its rulemaking process to reestablish the Climate Protection Program, we expect the agency to maintain the science-based and community-centered integrity of these rules to ensure Oregon stays on track to meet its climate goals and deliver benefits for Oregon communities.

It is therefore vital that DEQ maintains or strengthens the science-based emissions cap trajectory and an effective, independent Community Climate Investment program that is responsive to community needs. Building on these topline recommendations, we offer the following comments and feedback in response to issues raised at 2024 Climate Protection Program RAC #2 meeting and specifically urge DEQ to:

1. Adopt a science-based emissions cap that achieves at least the same level of cumulative emissions reductions by 2035 as the previously-adopted program and require immediate compliance;
2. Maintain a strong, effective, independent Community Climate Investment program that is responsive to and prioritizes environmental justice community needs and centers environmental justice communities in decision-making;
3. Hold large stationary source industrial polluters accountable to mandatory declining emissions targets under the cap;
4. Utilize accurate data and cost information, including the federal social cost of carbon, to calculate economic and cost-saving benefits of reducing emissions under the CPP; and
5. Uphold the established rulemaking timeline and commitment to readopting the rules this year.

Thank you in advance for your consideration.

- 1. Adopt a science-based emissions cap that achieves at least the same level of cumulative emissions reductions by 2035 as the previously-adopted program and require immediate compliance.**

The emission reduction targets and corresponding base emissions cap and trajectory are essential to the overall integrity of the Climate Protection Program and moving the needle on climate emission reductions in the regulated sectors. If DEQ truly seeks to uphold a Climate Protection Program that “achieves greenhouse gas emissions reduction targets without sacrificing equitable outcomes and while limiting costs to consumers,” it must establish emission reduction targets and a cap trajectory that reflect the best available science. The United Nations Intergovernmental Panel on Climate Change (IPCC) says we must cut our emissions in half by 2030 to stay below 1.5 degrees of warming.

The science-based cap and trajectory from the previously-adopted Climate Protection Program represent a bare minimum to ensure Oregon stays on track to achieve its climate goals. It is imperative that DEQ **maintain an emissions cap trajectory that achieves the same level of cumulative emission reductions as the previously adopted Climate Protection Program rules. Specifically, DEQ should adopt at minimum the previously-established cap level for 2025 to adhere as closely as possible to the original cap trajectory.**

We are very concerned about DEQ’s proposal to **increase the 2025 base cap** based on emissions reported during the years when the Climate Protection Program was in place. As outlined in the emissions cap brief, if DEQ uses verified 2022 and preliminary 2023 emissions, it would add roughly 4.2 million metric tons of emissions to the cap. Adding these emissions would mean regulated entities would hold more allowances; flooding the market with an oversupply of compliance instruments could in turn delay emissions reductions. While we continue to support strategies to incentivize *future* early emissions reductions achieved under the reinstated program, DEQ should not reward emissions reductions from the

intervening years when (1) the entities also received Clean Fuels Program credits, (2) the reductions resulted from customer demand, and (3) the regulated entities seeking credit for emissions reductions are doing so under a policy they fought to overturn. We are especially concerned about adding instruments into the regular compliance instrument distribution that could deter emissions reductions and delay investments in technologies or strategies to reduce emissions.

We look forward to continuing the discussion around other methods that DEQ could consider for rewarding or incentivizing early emissions reductions, including revising the formula to calculate compliance instrument distribution or allowing early actors to rely on a higher percentage of CCI credits for future compliance.

**Likewise, DEQ should require immediate compliance to make up for the three years already lost due to the oil and gas industry litigation, and the urgent need to protect communities already impacted by climate change. We urge DEQ to adopt a one year compliance period schedule for 2025.** Ensuring near-term emissions reductions is key to delivering public health benefits and alleviating burdens for impacted communities, by reducing harmful co-pollutants that disproportionately affect Black, Indigenous and People of Color communities, rural and low-income Oregonians.<sup>1</sup> Further, near-term reductions have the potential to provide significant economic benefits, by encouraging early investment in clean energy and other emissions-reducing technologies and innovations, providing immediate benefits for impacted communities, along with new opportunities and economic development across the state.

The majority of the regulated entities have been preparing for climate regulation that reins in their emissions for well over a decade,<sup>2</sup> and have been working to comply with their required emissions reductions under the previously-adopted Climate Protection Program rules. NW Natural, Cascade Natural Gas, Avista, BP, Shell, Chevron, Phillips 66, Marathon Fuels, HF Sinclair and others have already publicly pledged to reduce or eliminate their net emissions by 2050 or sooner. Not to mention, regulated gas utilities, transportation fuel suppliers, and large industrial facilities now have the opportunity to leverage billions of dollars in federal climate and clean energy investments under the Inflation Reduction Act, Bipartisan Infrastructure Law, and CHIPS & Science Act. With unprecedented funding available to support the transition to more efficient and electric homes and buildings, transportation systems, and industries, regulated entities have every means at their disposal to rapidly and affordably decarbonize and comply with greenhouse gas reduction targets in line with science.

The reported 2022-2023 emissions data further demonstrates the feasibility of reducing emissions under this program, and underscores that the previously-adopted baseline and cap should be strengthened to make up for the lost intervening years of emission reductions.

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<sup>1</sup> Oregon Health Authority's 2020 Climate and Health in Oregon report underscored that rapidly accelerating climate change is intensifying public health crises in Oregon, hurting communities of color and tribal communities first and worst, and that these health risks will only get worse with continued inaction.  
<https://www.oregon.gov/oha/PH/HEALTHYENVIRONMENTS/CLIMATECHANGE/Documents/2020/Climate%20and%20Health%20in%20Oregon%202020-%20Full%20Report.pdf>

<sup>2</sup> The 2007 legislature established and directed the Oregon Global Warming Commission to "examine greenhouse gas cap-and-trade systems, including a statewide and multistate carbon cap-and-trade system" (ORS 468A.205); the Commission produced a report in 2009 urging Oregon to adopt

**2. Maintain a strong, effective, independent Community Climate Investment program that is responsive to environmental justice community needs.**

The Community Climate Investment program was developed with extensive input from community members and environmental justice leaders to enable needed investments in community-led solutions to reduce our energy bills, make our homes safer, and make our air cleaner for generations to come. This critical component of the Climate Protection Program was on the cusp of being implemented when the court invalidated the program. Environmental justice and community-based organizations have already invested time and resources into developing potential projects and investment opportunities, and the reinstated rules must uphold the integrity of the CCI program that was designed and long-planned for Oregon communities.

We are therefore **opposed** to any proposals that would significantly undermine climate, cost saving, and environmental justice outcomes under the Community Climate Investment program, including:

- Adding compliance instruments to the initial 2025 emissions cap if those instruments represent emissions reductions under the invalidated rules;
- Allowing offsets as an additional alternative compliance mechanism; and
- Reducing the previously-established CCI credit price.

Injecting additional compliance instruments that don't represent currently existing emissions into *any* cap and trade market jeopardizes the success of the climate policy, and any responsible regulator must carefully evaluate the risks and benefits of doing so. The prospect of injecting compliance instruments earned under an *invalidated* previous program is monumentally more perilous. In short, introducing additional compliance instruments **risks undermining the Climate Protection Program's ability to deliver near-term climate, economic, and public health benefits for environmental justice communities across Oregon**. As an initial matter, it is imperative that the program signal the need to make emissions reductions quickly; any "extra" compliance instruments will only serve to avoid or delay compliance efforts and investments.

Perhaps more importantly, flooding the market with an oversupply of compliance instruments may have the secondary effect of diverting critical investments in emission reductions in Oregon, either by the regulated entity or from projects in the Community Climate Investment program. For environmental justice communities, the harm of current and past pollution from the intervening years cannot be undone. Community organizations will not be reimbursed for any time, effort, or funds that they invested in preparing projects under the CCI program. Retroactive and grandfathered credits would benefit fossil fuel companies, not the communities most impacted by greenhouse gas pollution. Doing this would perpetuate decades of harm and systemic injustices. It is therefore inequitable and unjust to allow for covered fuel suppliers to benefit from the ability to bank or trade compliance instruments from a program that no longer exists and which many of them fought to overturn.

We also strongly oppose adding offsets when the CPP already provides significant flexibility options, including an alternative compliance mechanism—CCIs—which is consistent with the Environmental Quality Commission's statutory obligations, helps contain costs for impacted communities that face



disproportionate energy burdens, and *prevents* fossil fuel greenhouse gas emissions. Offsets, which are investments in projects outside of the regulated economic sectors and able to be located far outside of Oregon, are not consistent with the Environmental Quality Commission's responsibility to "safeguard[] the air resources of the state" and "restore and maintain the air quality" of Oregon.<sup>3</sup> Enabling carbon offsets as a means of compliance will not deliver clean air, energy resilience and affordability, or economic vitality to Oregon communities. DEQ should continue its appropriate focus on furthering environmental and equity objectives, while achieving reductions in anthropogenic greenhouse gas emissions from fossil fuel combustion and associated co-pollutant emissions.

Many of our organizations actively support policies and investments to promote carbon sequestration on natural and working lands, and were pleased by action in the 2023 legislature to establish a new Natural and Working Lands Fund. This fund is now in the process of being administered, leveraging historic federal incentives and supporting Oregon landowners and managers to implement climate-smart land management practices on farms, forests, and wetlands across the state. However, that is a separate funding stream for carbon sequestration projects in Oregon and proposed offset credits do not align with the stated goals of the Climate Protection Program. Offsets do not support environmental justice communities in the transition to clean energy, do not prevent climate emissions or health-harmful co-pollutants, and do not deliver clean air benefits to local communities.

Even if performing exactly as intended, carbon offsets enable inertia by regulated entities who can continue to pollute in Oregon while paying for far-flung offset projects that provide no local benefits. It is becoming more and more clear that most cheap offset projects are not reducing emissions at all and may even make climate change worse.<sup>4</sup> Consistent with the best available science, the design of the Climate Protection Program must prioritize phasing out fossil fuels. While biogenic carbon offset credits allow fossil fuel emissions to continue unabated, CCIs serve the important role of easing the energy transition, reducing fossil fuel use, and, ideally, softening the impact of energy-related cost volatility. Indeed, even some RAC members from the regulated community commented on the need for investments to flow into their service territories. While we do not agree with a direct connection between a CCI credit and a specific regulated entity's service territory, it is clear that CCIs—and not offsets—offer the best opportunity to keep these investments at home.

Finally, it is vital that the reinstated program uphold the previously-established CCI price, which was fixed at an amount that would ensure that the CCI program not only supports emissions reductions in the regulated sectors, but also delivers public health, environmental, and economic benefits for environmental justice communities throughout Oregon. The previously-adopted rules provided assurances that these investments will achieve their stated climate and equity goals by requiring non-profits who oversee CCIs to partner with local and community-based organizations and pay for capacity-building in environmental justice communities. The previously-adopted price was set to ensure CCIs achieve emissions reductions

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<sup>3</sup> ORS 468.015; ORS 468A.010; ORS 468A.015.

<sup>4</sup> Patrick Greenfield, Revealed: more than 90% of rainforest carbon offsets by biggest certifier are worthless, analysis shows, The Guardian (Jan. 18, 2023), <https://www.theguardian.com/environment/2023/jan/18/revealed-forest-carbon-offsets-biggest-provider-worthless-v-erra-aoe> ("The forest carbon offsets approved by the world's leading certifier and used by Disney, Shell, Gucci and other big corporations are largely worthless and could make global heating worse, according to a new investigation.").

while supporting vital capacity-building activities in environmental justice communities across the state. The two purposes for the price are tied together—emissions reductions cannot happen successfully without appropriate community engagement and capacity-building.

Enshrining these key features of the CCI program and upholding the CCI price is vital to delivering tangible benefits to Oregon communities historically disenfranchised and disproportionately impacted by economic disinvestment, health challenges, and environmental harms. We are therefore strongly opposed to any proposals that would significantly undermine climate, cost saving, and environmental justice outcomes under the Community Climate Investment program by reducing the price of CCIs.

Criticism that the cost of CCIs is too expensive, compared to allowance or offset costs in other jurisdictions, misrepresents the actual cost of compliance in each jurisdiction. In Oregon, CCIs are available to regulated entities which have not directly reduced their emissions in the amount necessary to rely solely on the free allowances DEQ distributes to them. In other jurisdictions, regulated entities must purchase allowances for all or most of their total emissions. While technically a lower price for each allowance, the cost per allowance is applied to a much greater volume resulting in higher compliance costs. Regulated entities should, in fact, take some comfort from the fact that there is a price called out in the draft rules at all. A price captured in regulation offers transparency, consistency, and assurances for planning purposes.

Likewise, criticism that CCI investments result in uncertain emissions reductions that will take place in the near future overlooks the comparative benefits between a CCI investment and any alternative. The energy efficiency and fuel switching measures expected to be implemented with CCI funds have proven measurement and validation protocols, just like (for example) Renewable Thermal Certificates produced from biomethane projects. However, unlike RTCs from biomethane projects in other parts of the United States, CCIs generate year-after-year reductions well beyond their initial payback period. Therefore the cumulative emission reductions generated by CCIs will exceed those generated by annual purchases of RTCs.

In sum, the hours of work to discuss options, investigate alternatives, and craft rules that meet the purposes of the Climate Protection Program (equity, cost, and emissions reductions) resulted in a product that uniquely benefits Oregon communities. It should remain in the new rules just as it was initially envisioned.

### **3. Hold large stationary source industrial polluters accountable to mandatory declining emissions targets under the cap.**

As the only existing state regulation on major industrial emitters, **responsible for roughly 20% of our state's total GHG emissions**, it is vital that the Climate Protection Program works to ensure science-based, sector-wide emissions reductions from large stationary sources in Oregon. We are therefore encouraged by discussion at the second RAC meeting about directly regulating large industrial source greenhouse gas emissions under the CPP's declining cap.

If well designed and implemented, directly regulating large industrial facilities' fossil fuel use and process-based emissions under a declining emissions cap will help:

- Reduce administrative burden for DEQ;
- Provide regulatory certainty for Oregon-based industries;
- Increase liquidity in the market for all regulated entities;
- Deliver meaningful emissions reductions;
- Improve air quality and public health in impacted communities; and
- Ensure Oregon keeps pace with the global transition toward industrial decarbonization and innovation.

We are pleased that this is an area of alignment across RAC members, including large industrial facilities previously regulated under the Best Available Emissions Reduction approach. In general, **we support regulating all combustion and process-based emissions from large industrial facilities under a declining emissions cap covering both Emissions-Intensive, Trade-Exposed (EITE) industries and fuel suppliers. No matter how treatment of EITEs shake out under the cap, it's imperative to maintain the integrity and stringency of the overall cap decline to ensure meaningful emissions reductions under the program.**

While we are interested in future discussion of what special consideration for EITEs under the cap could look like under the new rules, we believe DEQ could provide special consideration by allowing EITE facilities to rely on CCIs as a higher percentage of their total compliance obligations.

As we have learned from other states and countries' experiences, a declining emissions limit on industry is what paves the way for upgrades like electrification and super efficient boilers, and for innovations in cleaner, less carbon intensive manufacturing. Covering large industrial source emissions under a declining cap is particularly timely given recent, historic federal investments in industrial decarbonization—including more than \$20 billion from the 2022 Inflation Reduction Act, an estimated \$67 billion from the 2022 CHIPS and Science Act, as well as future investments from the CPP's Community Climate Investment program. These investments will support industrial efficiency upgrades and other technological advancements to enable emissions reductions from EITE facilities, and help ensure Oregon is able to capitalize on unprecedented federal incentives for technological innovation and advancement.

While some RAC members questioned whether reducing industrial process emission is technologically feasible, there is a strong history and ongoing evidence demonstrating that process-based emissions reductions are not only possible but already underway. Intel, for example, has pledged to reduce its direct and indirect emissions to achieve net zero by 2040.<sup>5</sup>

- 4. Utilize accurate data and cost information, including the federal social cost of carbon, to calculate economic and cost-saving benefits of reducing emissions under the Climate Protection Program.**

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5

<https://www.intel.com/content/www/us/en/newsroom/news/net-zero-greenhouse-gas-emissions-operations.html#gs.934lxv>

The emissions reductions under the Climate Protection Program give Oregon the opportunity to spur job growth and technological innovation, improve public health, and create cleaner, cheaper, healthier energy and transportation options that will benefit Oregon jobs, families, and the economy.

A relatively straightforward analysis shows that **Oregon’s program is less expensive than others**. For example, in many likely scenarios, compliance under the Climate Protection Program is less expensive than the costs would be under Washington’s cap and trade program. This is because it costs less to buy a small quantity of credits at \$123 per ton than to buy a much larger quantity of credits at \$40 or \$50 or \$60 per ton.

The Fiscal Impact Statement adopted for the 2021 Climate Protection Program rules rightfully acknowledged that directly reducing emissions has the potential to benefit business for covered entities, as well as to benefit Oregon’s economy as a whole. This assessment is in line with economic analyses that have clearly shown that emissions reductions can serve to reboot our economy and set it up for long-term success. Recent Energy Innovation modeling found that—if well implemented—the Climate Protection Program, along with other recently-adopted Oregon climate policies, will add nearly 10,000 jobs and \$2.5 billion to Oregon’s GDP in 2050. Strong implementation will also avoid 600 asthma attacks and 40 premature deaths annually in 2050, with avoided deaths 40 to 90 percent greater for people of color. The modeling found that these health care benefits will amount to a cumulative \$49 billion in avoided health care costs through 2050.<sup>6</sup>

Renewable energy is not only cheaper overall, it does not suffer from wild price volatility like gas.<sup>7</sup> Therefore, emissions reductions under the Climate Protection Program will protect consumers from future price fluctuations. The more we can move toward electric vehicles and appliances, the less we have to worry about the price of oil and gas being determined half a world away. Electrification and cleaner ways of making those fuels exist right here in Oregon. This Climate Protection Program will help us deploy those technologies at scale, providing cost-savings, job creation, and healthier living environments for people and families across Oregon.

Given the decades of harm and misinformation that polluting industries have already inflicted on the public—not to mention the impacts to come as climate change worsens—it is unconscionable that fossil gas utilities and oil companies continue to promote misinformation about the costs of compliance and economic impacts under the Climate Protection Program.

As DEQ develops the fiscal and racial impact of the reinstated program, we urge you to remember that, while the economic impacts from Climate Protection Program compliance will likely be positive when aggregated across Oregon’s economy as a whole, the costs of inaction—the failure to achieve science-based emissions reductions—may be higher than the state’s economy can bear. Climate change is already producing devastating impacts for Oregon’s economy and frontline communities.

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6

<https://energyinnovation.org/2022/03/10/new-oregon-energy-policy-simulator-modelling-shows-major-benefits-of-accelerating-climate-policies/>

<sup>7</sup>[https://www.theguardian.com/business/2021/sep/21/government-should-have-moved-earlier-to-low-carbon-say-industry-experts?utm\\_campaign=C%26S%20Gas&utm\\_source=hs\\_email&utm\\_medium=email&\\_hsenc=p2ANqtz--7WcT24tGuVFNnu7cGmjQYu-rPiSluVCcdO02PIZCIJS7uDIkhE1\\_cusdAJwj7SvNmlEwR](https://www.theguardian.com/business/2021/sep/21/government-should-have-moved-earlier-to-low-carbon-say-industry-experts?utm_campaign=C%26S%20Gas&utm_source=hs_email&utm_medium=email&_hsenc=p2ANqtz--7WcT24tGuVFNnu7cGmjQYu-rPiSluVCcdO02PIZCIJS7uDIkhE1_cusdAJwj7SvNmlEwR).

As underscored by OHA’s 2023 Climate and Health in Oregon report, these climate hazards disproportionately harm the health and wellbeing of communities of color, Tribal communities, low-income, and other environmental justice communities more than other populations.<sup>8</sup> The destruction caused by recent climate-fueled weather events and natural disasters, such as wildfires, droughts, and unprecedented heat waves, have price tags in the billions of dollars. The 2023 Oregon Climate Change Research Institute’s Sixth Oregon Climate Assessment emphasized that “Oregon’s economy and gross domestic product (GDP) remain highly impacted” by climate change, threatening multiple sectors, industries, and communities across the state. These costs are projected to rise dramatically as the climate crisis worsens.

By reducing climate-change causing fossil fuel emissions, the Climate Protection Program will result in substantial benefits for our workers and our economy, including reduced health care costs, job loss prevention, avoided future business closures, and sustaining Oregon’s natural resource economy. In December 2023, U.S. Environmental Protection Agency economists updated the federal social cost of carbon, which estimates the economic impact of climate change.<sup>9</sup> The new estimate of the social cost of carbon calculates the harm to the economy caused by climate pollution as **\$190 per ton of carbon dioxide emissions**. As DEQ prepares its fiscal impact statement for the 2024 Climate Protection Program, we urge you to utilize the federally adopted social cost of carbon to adequately assess the economic benefits of reducing emissions under this program.

**5. Uphold the established rulemaking timeline and maintain commitment to readopting the rules this year.**

Every day that these landmark climate protections are delayed represents another day that justice is denied to Oregon communities— especially rural, low-income, and communities of color, who stand to benefit the most from emissions reductions and economic prosperity under the Climate Protection Program. **We therefore applaud DEQ’s commitment to a timeline that results in readoption of the Climate Protection Program rules this year.**

We are in the decisive decade for climate action. Without the Climate Protection Program, Oregon simply does not have an adequate or workable plan to achieve the state’s climate goals. Our state also misses out on the innovation, job creation, and energy cost savings that this program will drive, which are vital for our economy and “household budgets. It is imperative that the State hold firm in its progress toward growing clean energy industries that create local, high-quality jobs across Oregon.

Oregonians have long demanded that fossil fuel companies take responsibility for the devastating harm they cause to our lives, our families, and our communities. We cannot afford to continue jeopardizing the lives and livelihoods of our communities for the sake of preserving the status quo. Now, it is up to DEQ leadership to swiftly restore the protections we need to ensure a healthy climate future for all Oregon families.

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<sup>8</sup>

[https://www.oregon.gov/oha/PH/HEALTHYENVIRONMENTS/CLIMATECHANGE/Documents/le-105251\\_23.pdf](https://www.oregon.gov/oha/PH/HEALTHYENVIRONMENTS/CLIMATECHANGE/Documents/le-105251_23.pdf)

<sup>9</sup> <https://www.epa.gov/environmental-economics/scghg>.

We look forward to seeing this program reinstated before the end of 2024 so that we can get back to the urgent work of investing in low-income, rural and communities of color who have borne the brunt of climate and economic injustice for too long.

Sincerely,

Lisa Arkin  
*Executive Director*  
**Beyond Toxics**

Karen Harrington  
*Legislative Committee Chair*  
**Climate Reality Project Portland Chapter**

Meredith Connolly  
*Oregon Director*  
**Climate Solutions**

Audrey Leonard  
*Staff Attorney*  
**Columbia Riverkeeper**

Charity Fain  
*Executive Director*  
**Community Energy Project**

Stuart Liebowitz  
*Facilitator*  
**Douglas County Global Warming Coalition**

Molly Tack-Hooper  
*Supervising Senior Attorney, Northwest Office*  
**Earthjustice**

Brian Stewart  
*Co-Founder*  
**Electrify Now**

Jessica Nischik-Long  
*Program Manager, Climate Health & Equity Program*  
**Familias en Acción**

Nora Lehmann  
*Organizer*  
**Families for Climate**

Carra Sahler  
*Director and Staff Attorney*  
**Green Energy Institute at Lewis & Clark Law School**

Pat DeLaquil  
*Steering Committee*  
**Mobilizing Climate Action Together**

Nakisha Nathan & Mary Peveto  
*Co-Directors*  
**Neighbors for Clean Air**

Tim Miller  
*Director*  
**Oregon Business for Climate**

Nora Apter  
*Director of Programs*  
**Oregon Environmental Council**

Ana Molina  
*Advocacy and Systems Director*  
**Oregon Just Transition Alliance**

Lindsey Scholten  
*Executive Director*  
**Oregon League of Conservation Voters**

Lauren Anderson  
*Climate Forest Program Manager*  
**Oregon Wild**

Ira Cuello-Martinez  
*Policy and Advocacy Director*  
**PCUN**

Damon Motz-Storey  
*Chapter Director*  
**Sierra Club Oregon Chapter**

Alan Journet  
*Co-facilitator*  
**Southern Oregon Climate Action Now**

Kasey Hovik  
*Executive Director*  
**Umpqua Watersheds**

Xitlali Torres  
*Air Quality and Climate Program Coordinator*  
**Verde**

Janet Lorenzen  
*Member*  
**350 SalemOR**

Diane Hodiak  
*Executive Director*  
**350Deschutes**

Cherice Bock  
*Climate Policy Manager*  
**350PDX**



Oregon Department of Environmental Quality  
Office of Greenhouse Gas Emissions

May 24, 2024

**RE: Climate Protection Program 2024 - Rulemaking - RAC #2**

Dear DEQ Office of Greenhouse Gas Emissions:

The undersigned community-based environmental justice organizations of Oregon Just Transition Alliance (OJTA) support the commitment of Governor Kotek and the Department of Environmental Quality to reinstate Oregon's Climate Protection Program (CPP) without delay. OJTA and its organizations are a movement of communities facing environmental racism, climate change, and economic exploitation by and for people on the frontlines of injustice and on the frontlines of change. We unite organizations to move Oregon toward an economy rooted in our shared values, the principles of a Just Transition. We appreciate the opportunity to provide written comments for the Rulemaking Advisory Committee (RAC #2) meeting related to Community Climate Investments (CCI).

The Community Climate Investment program was developed with extensive input from community members and environmental justice leaders to enable needed investments in community-led solutions to reduce our energy bills, make our homes safer, and make our air cleaner for generations to come. As changes to the previously adopted rules are considered, we urge you not to lose sight of the multi-faceted goals of the original program, specifically: "to reduce greenhouse gas emissions from sources in Oregon, achieve co-benefits from reduced emissions of other air contaminants, and enhance public welfare for Oregon communities, particularly environmental justice communities disproportionately burdened by the effects of climate change and air contamination" (OAR 240-271-0010).

Over the last three years, we faced a worldwide pandemic, wildfires unlike anything we've seen before, and an unprecedented heat wave that took the lives of more than 100 people. The sooner emissions are reduced, the sooner we can reap the benefits of improving air quality and producing clean energy technologies necessary for public health and the economy. Greenhouse gas emissions are emissions that threaten human health. According to the U.S. Environmental Protection Agency's (EPA) Co-Benefits Risk Assessment tool,



health impacts from polluted air faced by Oregonians cost almost [\\$88 million annually](#). DEQ's analysis during the previous rulemaking found that there are significant savings to be had for Oregon communities on public health impacts with all iterations of the CPP program as it was previously written. The CPP is meant to reduce greenhouse gasses and other air contaminants while prioritizing benefits for environmental justice communities in Oregon through Community Climate Investments (CCIs).

If we continue to do business as usual, environmental justice communities in Oregon will continue to be disproportionately burdened by air pollution and the impacts of climate change. As organizations focused on environmental justice, we work directly with impacted communities and see disproportionate changes every day. For example, heat waves now happen more often and last longer. This directly impacts farmworkers, many of whom are Indigenous and migrant workers. Farmworkers are essential yet the nature of their work is dangerous where they are performing physically exerting work in extremely hot temperatures and exposure to wildfire smoke. In 2021, [Sebastian Francisco Perez](#), a 38 year old farmworker, husband, brother, and son lost his life from working during the extreme heatwave. We must ensure that this never happens again to anyone. According to the study from the University of Washington and Stanford University, published online in [Environmental Research Letters in 2020](#), the number of days that exceed heat safety standards for U.S. agricultural workers will double by 2050, putting these communities even more at risk. Adopting CPP and implementing the program will help reduce greenhouse gas emissions that affect farmworkers today and all Oregonians.

CCIs were on the cusp of being implemented when the court invalidated the program. We urge you to keep CCIs in the reinstated rules because environmental justice and community-based organizations have already invested time and resources into developing potential projects and investment opportunities. CCI funds will allow organizations to expand existing and working programs to serve more community members. These projects include energy efficiency retrofits that reduce co-pollutants through reduced use of gas, and air sealing. Other proposed projects expand on providing opportunities for disadvantaged communities to benefit from clean energy projects that they wouldn't have access to otherwise, such as community solar, and rooftop solar. These types of projects have an immediate and significant impact on Oregon families. We again maintain that the reinstated rules uphold the CCI in all of its original integrity.

We cannot put a price tag on the value of life. We must take action to address air pollution and reduce greenhouse gasses while making investments to support those most affected by climate change. Ensuring that environmental justice and community-based organizations are at the forefront of decision-making is of utmost importance, as these

organizations have ongoing relationships and trust with affected communities with lived experience needed to determine what will best fit their region.

We strongly urge the DEQ to prioritize the needs of environmental justice communities when considering any changes to the previously adopted rules and subsequent impacts that will compromise and severely delay critical investments in overburdened communities, perpetuating existing systemic injustices. The Climate Protection Program has the potential to create jobs, save money, improve public health, and boost Oregon's economy. It will empower our communities to lead the way to a cleaner, healthier, and more equitable future for all. Centering these direct benefits through CCIs for Oregonians is the most important aspect of the CPP, and straying from that is detrimental to achieving our climate goals. We hope to see a strong Community Climate Investment program that is responsive to environmental justice community needs.

Sincerely,

Ana Molina  
Advocacy & Systems Director  
**Oregon Just Transition Alliance**

Lisa Arkin  
Executive Director  
**Beyond Toxics**

Ira Cuello-Martinez  
Policy and Advocacy Director  
**PCUN, Oregon's Farmworker Union**

Xitlali Torres  
Air Quality and Climate Program  
Coordinator  
**Verde**

Sam Guthman  
Policy Manager  
**APANO CUF**

Kaleb Lay  
Director of Policy & Research  
**Oregon Rural Action**

Jess Grady-Benson  
Organizing Director  
**Rogue Climate**

Nakisha Nathan  
Mary Peveto  
Co-Directors  
**Neighbors for Clean Air**



OregonFuels.org ■ 503-779-3312 ■ OregonFuelsAssociation@gmail.com

May 24, 2024

Colin McConnaha  
Nicole Singh  
Office of Greenhouse Gas Programs  
Oregon Department of Environmental Quality  
Sent Via Email: [Colin.McConnaha@state.or.us](mailto:Colin.McConnaha@state.or.us); [Nicole.Singh@state.or.us](mailto:Nicole.Singh@state.or.us)

***RE: Oregon Fuels Association Comments to DEQ's CPP RAC#2***

Dear DEQ:

Thank you for the opportunity to comment on potential changes to a re-adopted Climate Protection Program (CPP). The Oregon Fuels Association (OFA) is the voice of Oregon's locally-owned fuel stations, fuel distributors and heating oil providers. OFA members are at the forefront of environmental stewardship within the industry and continue to make investments toward a cleaner, greener economy by investing in blending technologies designed to promote the use of lower carbon fuels and renewable fuels.

At a high-level, OFA believes re-establishing the CPP should keep consumers in mind, recognizing existing and growing pressures on family budgets from inflation. DEQ has an opportunity to re-establish a program that can meet Oregon's Greenhouse Gas (GHG) reduction goals without immediately shocking transportation fuel consumers with increased costs by recognizing and compensating transportation fuel companies that helped the state beat the GHG reduction goals from the previously adopted program.

As a leader in reducing the state's greenhouse gas emissions, please accept OFA's brief comments following CPP RAC Meeting #2:

- 1. The cap and baseline years should be consistent with the previous rulemaking or look to start over completely.**

We understand that DEQ is considering carrying forward both the statewide emissions reduction cap and emissions baseline from the originally Climate Protection Program adopted in 2021. Meaning, adopt a cap complete with the mandated GHG reductions that would have occurred between 2022-2024. OFA strongly believes that if DEQ decides to carry forward the same emissions cap as adopted in 2021 into 2025, it should also use the same 2017-2019 baseline. On

the other hand, if the agency determines it wants to adopt a new baseline, it should also adopt a new, higher GHG cap.

## **2. Regulated entities should be rewarded for reducing emissions during 2022-2024.**

OFA supports option #2 as presented by DEQ on slide 42 ([here](#)). As demonstrated by DEQ, the transportation fuel sector reduced emissions below the previously adopted regulatory cap. That means that some regulated parties were banking instruments for future compliance requirements. This has helped keep the costs of the program down for Oregonians, yet spurred GHG reductions. But those reductions came at a cost and took significant investments and commitment by fuel importers toward a cleaner economy. Those investments should be rewarded. Not only will allocating compliance instruments that would have occurred under the 2022-2024 cap continue to support future GHG reductions, it will also shield Oregonians from significant price spikes at the pump. OFA strongly encourages DEQ to consider allocating compliance instruments for reductions achieved in 2022-2024 and allowing fuel importers to freely use those instruments to protect consumers and clean fuels investments.

Moreover, all newly regulated entities will effectively be new market entrants under a newly adopted program. DEQ should afford all new regulated entities (presumably those reporting over 100,000 MtCO<sub>2e</sub>) the same benefits to ensure a smooth transition to a newly adopted cap.

## **3. Consumer impacts should be modeled and understood.**

DEQ should consider a new, revised cost impacts to regulated parties under a new rule. The analysis from 2020 and 2021 may no longer be relevant or accurate if additional sources are competing with limited compliance instruments under the program or if the available compliance pathways for regulated parties change. Please consider reinitiating new analysis to understand the cost impacts before the agency makes changes to the program, including compliance years of 2022-2024.

## **Conclusion**

OFA believes the strongest program will encourage importing renewable fuels, minimize cost impacts to consumers already struggling with inflation, and incentivize GHG reductions throughout our economy – not just overburdensome regulations on our essential transportation sector.

Sincerely,

Mike Freese  
OFA Lobbyist



May 24, 2024

Nicole Singh  
Department of Environmental Quality  
700 NE Multnomah Street  
Suite 600  
Portland OR 97232

Dear Ms. Singh:

Please accept Oregon Business & Industry's comments on the Department of Environmental Quality's (DEQ) Climate Protection Program (CPP) Rulemaking Advisory Committee (RAC) meeting 2 held on May 14, 2024. Oregon Business & Industry (OBI) is a statewide association representing businesses from a wide variety of industries and from each of Oregon's 36 counties. Our 1,600 member companies, more than 80% of which are small businesses and employ more than 250,000 Oregonians. Oregon's private sector businesses help drive a healthy, prosperous economy for the benefit of everyone.

OBI appreciates DEQ's work in framing potential rule changes that could provide adequate compliance pathways for all regulated entities as well as many in the manufacturing sector. We remain concerned that DEQ does not have statutory authority to implement the CPP and that legislation is the only avenue to provide that authority and as well as the tools needed to make the program function effectively.

While we understand that DEQ's role is to implement certain components of Executive Order 20-04 and legislation is not under its purview as a state agency, the fact is that a cap-and-trade bill could address almost all of the cost and effectiveness challenges associated with the CPP. A cap-and-trade program could be linked with carbon markets in California and Washington. Being part of a larger carbon market would help manage the costs of compliance due to the presence of more players and more allowances to distribute. We fear that the current rulemaking will not be effective in controlling regulatory costs or delivering GHG emissions objectives due to many of these limitations.

### **Calculating the Baseline**

Comments from other manufacturing sectors have suggested a few approaches for calculating the baseline. OBI's major concern is that the baseline be a fair representation of emissions that minimizes the impact of Covid on production or other factors affecting emissions. It's easy to forget the massive disruptions caused by the pandemic just four years ago but myriad issues resulted in lower emissions from many businesses during this timeframe.

*We are suggesting a calculation selecting the highest two-year average of actual carbon intensity values between 2019 and 2023 for the baseline, which could be non-consecutive.* For the compliance period beginning Jan. 1, 2025, the annual allocation of no cost compliance instruments for direct distribution to

a facility identified as EITE must be equal to the facility's baseline carbon intensity established using data from 2019 through 2023, multiplied by the facility's actual production for each calendar year during the compliance period.

### **Emissions/Energy-Intensive Trade-Exposed Treatment**

OBI supports the inclusion of language to protect emissions-intensive, trade-exposed (EITE) businesses. It is well-documented that EITEs are vulnerable under carbon reduction programs, since these businesses compete in markets that extend beyond Oregon's borders. Both GHG leakage and economic leakage are highly likely without mechanisms that create a level regulatory playing field for these businesses. Semiconductors, wood products, cement, metal, food products and many other goods will continue to be manufactured somewhere to meet national and global demands regardless of what DEQ does. However, there is no assurance that this production will remain in Oregon and so there is grave risk to Oregon's economic health, tax base and high-paying jobs if alternative treatment for EITEs is not included in the final rule. Failure to include EITE treatment also poses imprudent risks to GHG leakage since overly stringent, costly regulatory programs are highly likely to push manufacturing outside the state to jurisdictions that do not regulate GHG emissions. Oregon's GHG emissions do not exist in a bubble. Action to reduce emissions on a net, global basis will be hindered if a business determines that the only way to remain competitive is to shift manufacturing operations outside the state or shutter operations and allow jurisdictions outside Oregon to fill the market need.

OBI believes that an EITE-specific cap that includes compliance instruments as well as a price containment mechanism like Washington's Climate Commitment Act's (CCA) Allowance Price Containment Reserve (APCR) would create the safeguards necessary to protect manufacturers by providing a pool of credits dedicated to EITEs. While DEQ's proposal would apply only to EITEs emitting more than 25,000 MT CO<sub>2</sub>e, we believe EITEs with lower emissions should be (a) eligible to opt into EITE treatment or (b) provided another cost containment mechanism such as an annual cost cap (see cost containment for non-EITE customers).

*We must emphasize that adding a pool of instruments under a separate EITE cap should not impact the caps or reduction requirements for either the transportation fuel supplier sector or the natural gas/propane fuel supplier sector.*

DEQ posed questions regarding whether to place all EITEs under a cap, place all EITEs under BAER or a combination of the two. Some OBI members are finding it difficult to evaluate the best path forward since the devil is in the details and there is significant uncertainty around the cost of compliance under each scenario. *A meeting between EITEs and DEQ well before the final RAC would be helpful so that businesses can ask questions about each of these scenarios.*

These comments addressing the protections needed for EITE manufacturers underscore the complexity of the issue. *We fear that the short timeline allotted for this task will be inadequate and more time will be needed to create a regulatory structure that protects EITEs while still moving Oregon in the appropriate direction relative to GHG emissions. We urge DEQ to either slow down the rulemaking so*

*these issues can be thoughtfully addressed or establish a separate RAC to aid DEQ in formulating a workable EITE treatment that would prevent both carbon leakage and economic leakage.*

### **Containing Costs for Non-EITEs**

OBI recommends establishing an annual cost cap for non-EITE customers of 5%. DEQ has thus far declined to update its economic analyses showing CPP compliance costs based on the rule adopted in 2021. Economic analyses were conducted on the proposed CPP rules but were never conducted on the final CPP rules making it more challenging for businesses to calculate compliance costs to individual businesses. Energy customers should not be exposed to steep and sudden rate shocks and we believe the best way to protect non-EITE customers is to cap cost increases at 5% annually.

### **Additional Economic Analysis Necessary to Evaluating Costs**

As we raised in the previous paragraph, the absence of updated economic data also makes it difficult to accurately determine the program's costs since this would be needed to produce a *credible* fiscal impact statement as required by the Administrative Procedures Act (ORS 183.333(3)). Any regulatory program, but particularly one of this size and scope, must be informed by a fiscal impact analysis that allows policymakers to weigh the benefits of a regulation in the context of its cost. We are gravely concerned that waiting until the final meeting to discuss fiscal impacts, and particularly if the original economic analysis is not redone, will prevent DEQ and the RAC from engaging in an fact-based, robust discussion of the proposed rule's fiscal impacts.

### **Best Available Emissions Reduction**

Best Available Emissions Reduction (BAER) was included in the original rule to address facilities with direct connections to interstate pipelines and/or process emissions in excess of 25,000 MT CO<sub>2</sub>e. In the materials for meeting 1 on April 2, DEQ appeared to acknowledge the complexity of the BAER program created under the original CPP. The overall challenge with BAER in its current form is that there is tremendous uncertainty with respect to when BAER's requirements are considered satisfied. OBI advocated for a program more like best available control technology (BACT) in the original rulemaking. We are concerned that BAER will result in a protracted process resembling Cleaner Air Oregon in its early years of implementation that will require tremendous resources for both the agency and facilities. Simplifying BAER to function more like BACT may cause activists to raise concerns, but simplification does not automatically equate to a less stringent program. There should be more clarity in BAER about when the program requirements are considered satisfied and what is considered in determining BAER. For example, the *BAER rules should be revised to specifically consider the risk of leakage when establishing BAER.*

That said, *it is essential that DEQ understands the nature of process emissions and that facilities have extremely limited options to reduce these types of emissions.* No chemical substitutes currently exist that would change current process emission profiles. Moving facilities (with process emissions) out of BAER and placing them under the cap would almost certainly guarantee facility closures. Semiconductor and cement manufacturing are the most vulnerable due to their emission profiles. These businesses manufacture essential products that *will* be manufactured elsewhere if not inside the state. Further, Oregon has made major investments through the Oregon CHIPS Act (SB 4) in an effort to maximize

access to federal CHIPS Act funds. Oregon has demonstrated its commitment to growing the semiconductor sector through these extremely substantial investments. It is ironic that state policy is simultaneously encouraging *and* discouraging growth in this sector. Process emissions would result from semiconductor and cement manufacturing anywhere in the world and it makes little sense to impose punitive regulatory frameworks, such as placing these sectors under the cap, since we know there will be continued demand for these products.

### **Community Climate Investments**

OBI remains concerned about the Community Climate Investment (CCI) program as it is currently structured. While it is difficult to predict the precise amount of revenue that will be generated by the purchase of CCIs, the program conceivably could generate more than \$2 billion over the life of the program. Although DEQ has stated that a 1:1 reduction is *required* by the CPP (in other words the purchase of one CCI must result in the reduction of one ton of GHG emissions), the rules provide significant discretion to the CCI entity rather than employing recognized emissions accounting protocols. During the 2021 CPP rulemaking process, DEQ stated that a 1:1 reduction was a *goal* rather than a *requirement* and there are no mechanisms in current rule to enforce a 1:1 reduction. In the context of a DEQ-issued permit for a regulated entity, *a requirement is an enforceable provision of a permit* using metrics such as standards and limits. CCI projects should be subject to standardized emissions reduction accounting to ensure that the program is achieving its goals and prevent businesses with decarbonization goals from paying twice for emissions reductions under two different types of accounting structures (actual reductions versus CCI reductions).

Regulated entities must have all compliance options available to them, which means that *CCIs must be available for purchase on day one of the new program*. Without *all* compliance options available from the onset of the program, regulated entities will face many challenges including planning for decarbonization projects and providing clear information with respect to the size and frequency of rate increases for energy customers.

*At the last meeting, OBI requested the worksheet showing how the CCI price was calculated when the rules were adopted in 2021 and we reiterate that request here.* There was a significant difference between the CCI price in the proposed versus the final rules and we would appreciate understanding how the price was derived.

### **CCI Funds Should Be Used to Aid Businesses in Decarbonization and Clean Energy Development**

OBI believes that decarbonization efforts and the development of clean energy technologies would be bolstered if a portion of CCI funds could be directed to regulated entities and directly impacted businesses. Many businesses that rely on natural gas currently do not possess viable energy alternatives for operating their facilities. These businesses will likely find it financially challenging to *both* pay the compliance costs associated with the purchase of CCIs *and* make investments to reduce future emissions. Allowing regulated entities or businesses to access CCI funds would help accelerate decarbonization efforts and facilitate more rapid development of clean energy technologies. These outcomes would clearly benefit climate goals.



**Offsets**

OBI urges DEQ to include offsets as an additional compliance option since offsets are subject to recognized accounting protocols and are widely recognized as an effective method for reducing GHG emissions. The inclusion of offsets would also provide regulated entities a compliance option that results in real, verifiable GHG reductions, reduces cost and potentially obviates the need for maintaining two separate GHG reduction accounting protocols.

**Length of Compliance Periods**

The original CPP rules established compliance periods of three years. We do not believe compliance periods should be reduced to less than three years, since any reduction would impose untenable and unnecessary stringency. Compliance periods of three or more years would provide the flexibility necessary to plan, budget, procure, install and implement emission reduction activities. There would appear to be value in adopting four-year compliance periods consistent with Washington's program, since numerous entities will be regulated under both the Oregon and Washington programs.

Thank you for the opportunity to comment on the discussion questions from the May 14 CPP RAC meeting. We will follow up with DEQ staff to discuss our comments and answer any questions you may have.

Sincerely,



Sharla Moffett  
Senior Policy Director

**From:** [Jorge Macias via constituent@civiclick.com](mailto:Jorge Macias via constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 7:03:23 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

We lost power for 3 days because of fallen trees in our area. Luckily, we had heat from our gas fireplace. My daughter and her family came to stay with us because we had heat. I can't imagine what would have happened without it.

Sincerely,  
Jorge Macias  
3904 Wellington Pl  
West Linn , OR 97068  
[maciasj@man.com](mailto:maciasj@man.com)

**From:** [Dave McNeel via constituent@civiclick.com](mailto:Dave%20McNeel%20via%20constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 6:52:52 AM

---

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Dear Nicole Singh,

Click 'Customize Email' below, and type your email here. Having been trained as a fire fighter and an NWCG Logistics Section Chief I have managed numerous disaster in the Northwest. Me an my family are fully prepared for any disaster or civil uprising. Losing your utility electrical power puts you in a real disadvantage. I have several generators. My main backup power is a Natural Gas 25KW generator backed up with 500 gallons of onsite propane. PGE is clearly not prepared or cares about getting prepared to keep their ancient overhead system operational during natural disasters, civil unrest, or from terrorists. NW Natural is the only utility that has NEVER failed me in 50 years.

Sincerely,  
Dave McNeel  
15711 S. Henrici Rd.  
Oregon City, OR 97045  
davemcneel@msn.com

**From:** [Gregory Williams via constituent@civiclick.com](mailto:Gregory.Williams.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 7:06:30 AM

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Dear Nicole Singh,

Though we have a heat pump, during our severe Winter storm in January we relived on our natural gas backup furnace because we can run it with a modestly sized generator. As an architect, I support the push for electrification of buildings but I think there is an advantage of keeping natural gas as a backup and for non-essential uses like fireplaces and outdoor fire pits.

Sincerely,  
Gregory Williams  
2979 Upper Drive  
Lake Oswego, OR 97035  
[greg.a.williams@comcast.net](mailto:greg.a.williams@comcast.net)

**From:** [Dawneta Afman via constituent@civiclick.com](mailto:Dawneta Afman via constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 7:07:23 AM

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Dear Nicole Singh,

To make any attempts to limit the public's choice for energy to a product (electric) that is seriously subject to significant outages for multiple reasons including weather is another example of the many ways the state of Oregon continues to go down pathways that are making the state a terrible place to live. DO NOT force this unpopular policy on us forcing more people to leave the state to find affordable living with choices for their energy.

Sincerely,  
Dawneta Afman  
645 N HOLLAND ST  
PORTLAND, OR 97217  
dpuffin@comcast.net

**From:** [Barbara Baltz via constituent@civiclick.com](mailto:Barbara.Baltz.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 7:10:37 AM

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Dear Nicole Singh,

I am dismayed by the rush to regulate HVAC for new homes and renovations to existing homes. I prefer gas heating, etc. and have never been inconvenienced by a power outage like my friends who had no way to keep warm or cook during severe weather. I converted to gas many years ago and have never regretted it. My home has a gas stove, dryer, tankless water heater, and fireplace (which also burns wood). The government should crack down on industry, not homeowners/apartment dwellers. In addition, I recommend banning outdoor fires (including fire pits) that burn wood or other substances, polluting the air and inconveniencing people with allergies.

Thanks for listening.

Sincerely,  
Barbara Baltz  
24 N Buffalo St  
Portland, OR 97217  
[baltzifer@comcast.net](mailto:baltzifer@comcast.net)

**From:** [Diane DeNuccio via constituent@civiclick.com](mailto:Diane_DeNuccio_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 7:13:38 AM

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Dear Nicole Singh,

We need ALL ENERGY OPTIONS available to us, not just one. If it weren't for my gas water heater, I would've had no way to keep my aquatic turtle alive or my tropical fish alive during the electric outage. Of course their electric heating elements failed and I had to keep pouring hot water into their tanks to keep them alive during the outage. Thank goodness for natural gas. We need both sources, please don't limit life to just electricity. In my home, I use both. Gas for water, furnace and dryer; electricity for cooking and air cleaning.

Sincerely,  
Diane DeNuccio  
9770 SW Buckskin Ter  
Beaverton, OR 97008  
[Denuccio8@hotmail.com](mailto:Denuccio8@hotmail.com)

**From:** [Kevin Rasmussen via constituent@civiclick.com](mailto:Kevin.Rasmussen.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 7:19:27 AM

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Dear Nicole Singh,

Greetings. Over the past two winters when storms have rolled through, there were power outages, which is to be expected. However, our daughter and her family who live in Independence, OR. have all electric heat in their home. It was fifty three degrees in their home and dropping. All of them came to our home to spend a few nights because we have a gas fireplace that does not need electricity to operate. We also have a gas stove which enabled us to cook, and a gas water heater which enabled us to shower and clean. Without gas, all of us would have had to leave the outage area to seek heat, food, and showers at a hotel. There is no need for that if we keep our energy diversified. Let us use gas also.

Sincerely,  
Kevin Rasmussen  
7481 Feather CT SE  
Turner, OR 97392  
kevintr22@gmail.com



**From:** [Janeen Schreiber via constituent@civiclick.com](mailto:Janeen.Schreiber.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 7:20:36 AM

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Dear Nicole Singh,

During the power outage, we were able to use our gas fireplace to warm the living room/kitchen. We are able to switch to battery power to start it and were very thankful to have it. Our gas range was used, for brief stovetop cooking, by lighting it with a match. The gas on-demand water heater was used by plugging it into a power pack when needed. A noisy and smelly generator was never needed.

Sincerely,  
Janeen Schreiber  
1950 Myers Rd  
Eugene, OR 97401  
[janeendancer@gmail.com](mailto:janeendancer@gmail.com)

**From:** [andrew schink via constituent@civiclick.com](mailto:andrew.schink.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 7:21:16 AM

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Dear Nicole Singh,

without gas in the recent ice storm we would not have had heat or been able to have a hot meal

Sincerely,  
andrew schink  
1715 cameo dr  
eugene, OR 97405  
schink@q.com

**From:** [Curtis Merz via constituent@civiclick.com](mailto:Curtis_Merz_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Options about energy source  
**Date:** Saturday, April 27, 2024 7:21:42 AM

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Dear Nicole Singh,

Dear Sirs,

During the ice storm of 2024 we were able to keep the house warm and cook our food due to the availability of natural gas. Our home uses natural gas for heating, cooking and providing warm water. It is imperative that this energy option remain available at a reasonable price.

Sincerely,

Curtis Merz

1047 Tyler Ave

Cottage Grove, OR 97424

OtterRock@gmx.com

**From:** [Curtis Denos via constituent@civiclick.com](mailto:Curtis.Denos%20via%20constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 7:23:38 AM

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Dear Nicole Singh,

Stop reducing choice for Oregonian and making us all reliant on one system that isn't as reliable as natural gas. Some people had no power for weeks during the ice storm and relied on natural gas to heat and prepare food. Diversity of power and energy is important as Texas showed us, power grids will fail when we need them most, let people have some freedom and liberty.

Sincerely,  
Curtis Denos  
5741 Karen Lynn Loop S  
Salem, OR 97306  
[curtis.denos@protonmail.com](mailto:curtis.denos@protonmail.com)

**From:** [MELODY FOREMAN via constituent@civiclick.com](mailto:MELODY_FOREMAN_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 7:26:45 AM

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Dear Nicole Singh,

I am a senior who is aging in place in unincorporated Clackamas Co. When wind, ice and snow attack us in winter months, the ability to keep myself warm with natural gas saves me from fear, panic and searching for somewhere to go (since I can't drive in those conditions). The mix of electric and gas has kept us safe for generations and I implore you to continue to make natural gas available to all. Thank you.

Sincerely,  
MELODY FOREMAN  
13240 SE 127TH AVE  
Clackamas, OR 97015  
Melodynmi@aol.com

**From:** [Mike Hickey via constituent@civiclick.com](mailto:Mike Hickey via constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 7:28:16 AM

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Dear Nicole Singh,

When the power goes down I am able to run my gas furnace with a generator. There is no way the generator could give enough heat with an electric heater. My pipes would likely freeze since I can not run water when the well is down due to lack of power.

Sincerely,  
Mike Hickey  
15280 se 262nd ave  
Boring, OR 97009  
[waterboymike@gmail.com](mailto:waterboymike@gmail.com)

**From:** [Mary Cumins via constituent@civiclick.com](mailto:MaryCumins@constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 7:29:27 AM

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Dear Nicole Singh,

I believe both electric and natural gas is a necessity, not for the push on all electric which newer homes have only electric now. I have had both. I love natural gas the best of the two options. Reason is when we had our first ice storm in 2021, we were without power for 6 days, but we had gas and still could cook with on the stove, using a lighter to start the burner. Plus we could still take daily showers because we also have a gas water heater. My friend on the next block had all electric. She said it was a nightmare not being able to use anything in her house. This last ice storm in January (2024) never affected us at all.

So this email is short and simple, right to the point. Yes, please keep our natural gas. As customers/clients we all should have a choice what we want in our homes that is beneficial for our living needs.

Sincerely,  
Mary Cumins

Sincerely,  
Mary Cumins  
215 Ames Ct  
Silverton, OR 97381  
[mary.cumins@gmail.com](mailto:mary.cumins@gmail.com)

**From:** [Diana Miller via constituent@civiclick.com](mailto:Diana.Miller@constituent.civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 7:34:30 AM

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Dear Nicole Singh,

We own a home in Oregon and it's very important for our survival to have two forms of energy for heat. During the winter storms or other weather events when the electric power is down, it's important to have an alternative source of power like gas to heat our homes. It is not always possible to drive somewhere else due to downed power lines, trees or icy roads. Thank you for your consideration and I will be watching this issue closely.

Sincerely,  
Diana Miller  
11823 SW 128th Ave  
Tigard, OR 97223  
diamillery3s49@gmail.com



**From:** [Matthew Calderaz via constituent@civiclick.com](mailto:Matthew.Calderaz.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 7:36:33 AM

---

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Dear Nicole Singh,

We live in West Linn and were without power for almost 2 weeks in the dead of a winter ice storm several years ago. Thanks to Natural Gas we were able to utilize our fireplaces, water heater and stove to stay warm and cook. No house should be prohibited from having natural gas as an option for heat and cooking.

Sincerely,  
Matthew Calderaz  
19432 Wilderness Drive  
West Linn, OR 97068  
beeofdoom@yahoo.com

**From:** [Bruce Shriver via constituent@civiclick.com](mailto:Bruce%20Shriver%20via%20constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 7:38:48 AM

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Dear Nicole Singh,

We lost power during the January 2024 winter storm. Luckily we had a natural gas stove. to help keep the water pipes from freezing.

We need diversified base power to meet our current and future energy needs. Please act accordingly to preserve Oregon's diversified power needs.

Sincerely,  
Bruce Shriver  
PO Box 894  
Tualatin, OR 97062  
[bjshriver@gmail.com](mailto:bjshriver@gmail.com)

**From:** [Fred Wright via constituent@civiclick.com](mailto:Fred.Wright.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 7:41:48 AM

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Dear Nicole Singh,

During the severe winter ice storm this January 2024, we along with our neighborhood found ourselves without electric power. But thank God we had natural gas to our home! We kept cozy with our two gas fireplaces that continued to work without electricity. We could take hot showers because we have a gas water heater! And we were able to cook with our gas cook top. Thank goodness we have natural gas, it takes the worry out of winter! Please, Oregonians need the right to choose what choice of what energy source we desire.

Sincerely,  
Fred Wright  
1857 SE 106th Ave  
Portland, OR 97216  
[wright550@comcast.net](mailto:wright550@comcast.net)

**From:** [Linda Mills via constituent@civiclick.com](mailto:Linda.Mills.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 7:46:02 AM

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Dear Nicole Singh,

I am writing to request you rethink your decision to outlaw natural gas. I am disabled, I live alone, and I use natural gas by choice. I was raised with natural gas, and I have never suffered any kind of illness tied to the use of natural gas appliances. I have lived in my home for almost 14 years, and I have never had a gas outage, even in the most diverse situations. When the power has had outages all around me, I have still been able to heat my home. I rely on natural gas for my heat, my cooking needs, and my hot water. I cannot afford for you to make the choice to outlaw the use of natural gas. Simply put, not only does my wallet depend on the use of natural gas, my life does. Please reconsider, I am not the only one in this position. Thank you.

Sincerely,  
Linda Mills  
34774 Millard Rd Unit 10  
Warren, OR 97053  
[mills.monahan@gmail.com](mailto:mills.monahan@gmail.com)

**From:** [Douglas Detering via constituent@civiclick.com](mailto:Douglas.Detering.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 7:48:21 AM

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Dear Nicole Singh,

. Natural gas and propane are the only alternate sources of heat and food preparation in our home.

Sincerely,  
Douglas Detering  
2175 -15th Ave Nw  
Salem, OR 97304  
ddetering@aol.com

**From:** [Joseph Mitchell via constituent@civiclick.com](mailto:Joseph Mitchell via constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians demand a choice of energy options  
**Date:** Saturday, April 27, 2024 7:52:23 AM

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Dear Nicole Singh,

I'm writing to sat that I demand a choice when it comes to energy for my car, home heating and cooling, snd home appliances. I done need someone to tell me I am forced to use any specific energy source. Especially from someone who doesn't understand economics or that taking choice (freedom) away from someone else violates my rights as an American citizen. Stop caving to the very few people who think the world is going to end by showing you pictures of polar ice sheets that melt every summer.

Sincerely,  
Joseph Mitchell  
1785 ridgley  
Eugene, OR 97401  
[jamdeuce@gmail.com](mailto:jamdeuce@gmail.com)

**From:** [Katrina Knewtson via constituent@civiclick.com](mailto:Katrina.Knewtson.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians Should Have a Choice  
**Date:** Saturday, April 27, 2024 7:53:58 AM

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Dear Nicole Singh,

Oregonians should have the choice of gas. During the 2024 Wind and Ice storm we survived in place because we had gas. Our gas stove top allowed us to cook our food before it went bad without refrigeration. Which helped save our landfills from a lot of wasted food. Gas powered our water heater so we could take care of household needs. Our gas fireplace helped keep our house warm. Being able to stay in place during the storm prevented our water pipes from freezing which meant we didn't fill the landfills with material waste. We have adapted our gas furnace to run with a generator and will have heat for the next storm. It amazes me that there is even a movement to limit us to one energy source, especially expensive electricity which is so unreliable and has been so destructive with wildfires.

Sincerely,  
Katrina Knewtson  
3909 SW Lyle Ct  
Portland, OR 97221  
[kknewtso@yahoo.com](mailto:kknewtso@yahoo.com)

**From:** [Vie RADEK via constituent@civiclick.com](mailto:Vie RADEK via constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** I had to turn on my gas heater during the freezing spell  
**Date:** Saturday, April 27, 2024 7:54:20 AM

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Dear Nicole Singh,

After years of using a gas fireplace-style heater, we installed an electric heat pump, and we have been very pleased with it. However, during last winter's period of freezing weather, there simply was not enough heat in the air for the exchanger to work. So we fired up the gas heater, and were very grateful to have that second source of heat.

We also have a combo gas stovetop with electric oven. Our water heater is on-demand fueled by gas, and our outdoor BBQ is also fueled by natural gas.

We are very happy to have 2 power sources in our house, and think that choice should be available to all Oregonians.

Thank you.

Sincerely,  
Vie RADEK  
2025 GARFIELD ST  
EUGENE, OR 97405  
[jardindevie@yahoo.com](mailto:jardindevie@yahoo.com)



**From:** [Jill Hunter via constituent@civiclick.com](mailto:Jill.Hunter@constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 7:56:46 AM

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Dear Nicole Singh,

I so appreciate the safe, consistently delivered, power packed and affordable units of power we receive from natural gas.

to Click 'Customize Email' below, and type your email here.

Sincerely,  
Jill Hunter  
4498 Boston Ct. S  
Salem, OR 97302  
[Jillhunter5515@gmail.com](mailto:Jillhunter5515@gmail.com)

**From:** [Gordon Wuickstad via constituent@civiclick.com](mailto:Gordon.Wuickstad%20via%20constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 7:57:33 AM

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Dear Nicole Singh,

Oregon needs the diversity of different energy sources. Electrical systems are not robust enough to handle all the plans for them.

Sincerely,  
Gordon Wuickstad  
17755 NW Fall Ct  
Beaverton, OR 97006  
Ceeohtoo@gmail.com

**From:** [Janice Brown via constituent@civiclick.com](mailto:Janice.Brown.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 7:59:48 AM

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Dear Nicole Singh,

Click 'Customize Email' below, and type your email here.

Sincerely,  
Janice Brown  
2421 Portland st.  
Eugene, OR 97405  
[Artseetoo@yahoo.com](mailto:Artseetoo@yahoo.com)

**From:** [Chip Balough via constituent@civiclick.com](mailto:Chip Balough via constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 8:00:21 AM

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Dear Nicole Singh,

The idea that natural gas isn't needed is idiotic. With vast new demands for electricity from AI, bitcoin mining, streaming and every other new technology there won't be enough. Natural gas is highly efficient and readily available and perfect for heating. DEQ: spend your time holding back all the other demands.

Sincerely,  
Chip Balough  
420 Benton View Dr  
Philomath, OR 97370  
chipbalo@comcast.net

**From:** [Carl Mendenhall via constituent@civiclick.com](mailto:Carl.Mendenhall.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 8:00:35 AM

---

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Dear Nicole Singh,

We have a natural gas furnace to heat our home and LOVE it. It provides a much warmer heat than a heat pump and natural gas is plentiful and should be a big part of having a choice to heat a home and cooking. We need to keep gas fired power plants instead of having non 24/7 alternatives like solar and wind that are more expensive and undependable!

Sincerely,  
Carl Mendenhall  
5535 Mineral Springs Rd.  
Carlton, OR 97111  
[cfmendenhall@hotmail.com](mailto:cfmendenhall@hotmail.com)

**From:** [Arthur Bottomley via constituent@civiclick.com](mailto:Arthur.Bottomley.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 8:02:56 AM

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Dear Nicole Singh,

My wife and I are senior citizens, during the January 2024 storm we were without electricity for 50 hours. The ONLY thing that made our house habitable during that storm was the natural gas fireplace that kept us warm.

Sincerely,  
Arthur Bottomley  
3901 Summit Ridge Circle  
Depoe Bay, OR 97341  
[artbottomley@gmail.com](mailto:artbottomley@gmail.com)

**From:** [Lee Cordner via constituent@civiclick.com](mailto:Lee.Cordner.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 8:05:52 AM

---

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Dear Nicole Singh,

I'm a grid Power engineer with 40 years experience, the last 15 connecting wind, solar and batteries to the western grid. Renewables cannot power a reliable grid. Fossil fired generation will be necessary for our lifetime.

Because of my understanding of coming grid problems as we pursue renewables, I have a natural gas fired generator the runs my home. It will be our lifeline if current policies persist. Please don't shut off natural gas.

Sincerely,  
Lee Cordner  
487 Lanthorn Ln  
Gearhart, OR 97138  
[Lee.cordner@gmail.com](mailto:Lee.cordner@gmail.com)

**From:** [Barry Sandhorst via constituent@civiclick.com](mailto:Barry.Sandhorst.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 8:07:39 AM

---

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Dear Nicole Singh,

I lose power on average 1 to 2 times a year. With gas I maintain the ability to heat, cook and have hot water.

Sincerely,  
Barry Sandhorst  
23281 SW Bosky Dell Lane,  
West Linn, OR 97068  
[brsandhorst@gmail.com](mailto:brsandhorst@gmail.com)



**From:** [Larry Go Ducks Newby via constituent@civiclick.com](mailto:constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 8:12:36 AM

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Dear Nicole Singh,

Click 'Customize Email' below, and type your email here.

Sincerely,  
Larry Go Ducks Newby  
2258 Kelsy Lane  
EUGENE, OR 97402  
lvnewby1@msn.com

**From:** [Eric Terhaar via constituent@civiclick.com](mailto:Eric.Terhaar@constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 8:18:05 AM

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Dear Nicole Singh,

During the ice storm this past January we were very thankful to have natural gas as an additional source of energy for our home. Early on January 13th, the electricity went out in our neighborhood and, though we have a natural gas furnace, of course it didn't work due to the electrical forced air fan not functioning. Luckily, we had recently upgraded our fireplace to gas and so we were able to have some heat in our home. It proved vital to not only us but many of our neighbors who all lost heat and light. In fact were able to shelter four families, including our elderly next door neighbor who we placed closest to the fireplace. Additionally, because we have a gas cooktop, we were also able to cook a hot dinner for the entire group. It turned a potentially dangerous situation into a very memorable one for us and our neighbors.

Sincerely,  
Eric Terhaar  
237 NE 74th  
Portland , OR 97213  
[emterhaar@gmail.com](mailto:emterhaar@gmail.com)

**From:** [Chris Balm via constituent@civiclick.com](mailto:Chris Balm via constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 8:20:45 AM

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Dear Nicole Singh,

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Sincerely,  
Chris Balm  
939 S. 9th St.  
Harrisburg, OR 97446  
[cbalm6650@gmail.com](mailto:cbalm6650@gmail.com)

**From:** [Ramon Garcia via constituent@civiclick.com](mailto:Ramon.Garcia.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 8:25:37 AM

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Dear Nicole Singh,

I've lived in Portland since 2015. The home that I bought in Portland did not have central air which I immediately installed. It has two natural gas fireplaces and a natural gas heat stove in the lower level. I rarely use the fireplaces but depend on the heat stove to warm the lower level as the existing gas furnace is inadequate. Our home is in a wooded area and in a snow zone which makes it susceptible to power outages. I invested in a natural gas-powered whole house generator to ensure that my home remains comfortable when the grid fails us. It would have been more expensive to do that if my home was all electric as I would have required a propane fuel source for a whole house generator. A much more expensive option would be solar panels and a battery backup system to power the home during a grid failure. Natural gas is simply cheaper and more reliable.

Sincerely,  
Ramon Garcia  
811 SW Summit View Drive  
Portland, OR 97225  
[beppo.rag@gmail.com](mailto:beppo.rag@gmail.com)

**From:** [Steven Tucker via constituent@civiclick.com](mailto:Steven.Tucker.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 8:27:54 AM

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Dear Nicole Singh,

Click 'Customize Email' below, and type your email here.

Sincerely,  
Steven Tucker  
430 N DEERLANE DR  
Otis, OR 97368  
tucker3760@gmail.com

**From:** [jefferson.johnston via constituent@civiclick.com](mailto:jefferson.johnston%20via%20constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 8:30:36 AM

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Dear Nicole Singh,

Our natural gas billing is general our lowest utility bill. It is a safe and reliable heat source when the electricity goes out. We are able to stay warm and prepare food. Thank you for your dependable service. Good luck in your fight with our intrusive government. Land of the free, yeah sure.

Sincerely,  
jefferson johnston  
1366 ronelle st. so.  
Salem, OR 97306  
taztazdad53@gmail.com

**From:** [Greg Mulkey via constituent@civiclick.com](mailto:Greg.Mulkey.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 8:32:21 AM

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Dear Nicole Singh,

Please stop sending us down a road where we are reliant on one form of energy. Diverse energy is truly sustainable, don't be reactive and short sided with the reality of energy demand in our state. We need natural gas, electricity, and other forms of energy in the future!

Sincerely,  
Greg Mulkey  
17671 Sw Nels Dr  
Sherwood, OR 97140  
[gregmulkey@gmail.com](mailto:gregmulkey@gmail.com)

**From:** [Joel Bender via constituent@civiclick.com](mailto:Joel Bender via constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 8:32:30 AM

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Dear Nicole Singh,

As areas across our country turn from the use of natural gas, coal use is greatly increasing. I suspect wood burning for heat is increasing as well. While we all want to reduce and eliminate carbons, we're not there yet. Windmills are destroying wildlife and since we can't control the wind flow, often don't produce when the power is needed. Solar panels are inefficient and ridiculously expensive for a very short life span. Eliminating good sources of energy before we have equally reliable replacements is bad policy.

Sincerely,  
Joel Bender  
15835 S Lora Ct  
Oregon City, OR 97045  
[JoelBender@hushmail.com](mailto:JoelBender@hushmail.com)



**From:** [Ellen Johnson via constituent@civiclick.com](mailto:Ellen.Johnson.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Natural Gas + Electricity: energy options  
**Date:** Saturday, April 27, 2024 8:32:43 AM

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Dear Nicole Singh,

We very much appreciate having BOTH electricity and natural gas available to us all the time. But never more than during a storm! Please do not limit our choices.

Sincerely,  
Ellen Johnson  
7470 SW Lakeside Loop  
Wilsonville, OR 97070  
[ellenmariejohnson@gmail.com](mailto:ellenmariejohnson@gmail.com)

**From:** [David Pappel via constituent@civiclick.com](mailto:David.Pappel.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 8:33:00 AM

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Dear Nicole Singh,

No ban on natural gas. PERIOD!! The climate agenda in this country is insane!!  
Natural gas is cheap, plentiful, and very clean.

Sincerely,  
David Pappel  
5890 Avalon St  
Eugene, OR 97402  
[dwpappel@gmail.com](mailto:dwpappel@gmail.com)

**From:** [Mary Wheeler via constituent@civiclick.com](mailto:Mary.Wheeler.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 8:33:43 AM

---

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Dear Nicole Singh,

Click 'Customize Email' below, and type your email here.

Hello,

I have natural gas in my home and I love it! I have a Gas fire place, hot water heater, kitchen range and clothes dryer.

During this past winter freezing rain storm. I did not loose power. My heat pumps which I have awnings over to protect them from severe weather ran as well as they could in the very cold temperatures. But they could only put so much heat out of the air. My gas fire place which is on a thermostat ran quit a bit to keep the house warm.

Without both electric gas appliances in my home I'd have many more problems. Because I have a diverse utility system in my home I can cope with a wide range of outages.

I am a single 64 year old woman and I support my-self through a home based business. am a massage therapist- I need reliable heating and cooling to maintain a comfortable environment for my clients to receive a massage.

Thank you  
Mary Wheeler

Sincerely,  
Mary Wheeler  
67 N Polk  
Eugene , OR 97402  
[Maryashur@aol.com](mailto:Maryashur@aol.com)

**From:** [Stephen Kassis via constituent@civiclick.com](mailto:Stephen.Kassis.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 8:47:30 AM

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Dear Nicole Singh,

Natural gas is a low cost and plentiful resource that is vital for our homes and businesses. Removing this energy source from Oregon would be wrong on many levels. We don't have enough electric energy to power our state as it is. We should not be removing this vital energy source. Electric energy is more expensive and not as efficient. Don't mess with natural gas!

Sincerely,  
Stephen Kassis  
525 E Ash St  
Lebanon, OR 97355  
[sk@fillingstation.com](mailto:sk@fillingstation.com)

**From:** [Ian Shelley via constituent@civiclick.com](mailto:constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 8:50:42 AM

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Dear Nicole Singh,

Click 'Customize Email' below, and type your email here.

Sincerely,  
Ian Shelley  
50 SW 97th Ave  
Portland, OR 97225  
[ianjs@comcast.net](mailto:ianjs@comcast.net)

**From:** [David Osborne via constituent@civiclick.com](mailto:David%20Osborne%20via%20constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 8:55:31 AM

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Dear Nicole Singh,

To whom it may concern.

Last January the electricity in my neighborhood was off for 4 days. I was fortunate to have a generator, at my house, that runs on natural gas. It powers my whole house when the electricity is off. I was able to stay warm and comfortable during the outage. My son, his wife and my grandson came to stay with me because their power was off for 5 days, and they were unable to stay there with no heat. Their house is all electric. I am thankful that I could help keep them safe and warm during this crisis. We all were glad that I had my natural gas generator. It was a life saver. I also use gas for cooking and heating, as well as hot water. I want to keep natural gas and don't want to switch to all electric.

Respectfully Yours,  
David Osborne

Sincerely,  
David Osborne  
9455 SW 20th Pl  
Portland, OR 97219  
[marshallparker@duck.com](mailto:marshallparker@duck.com)

**From:** [David Osborne via constituent@civiclick.com](mailto:David%20Osborne%20via%20constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 8:55:38 AM

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Dear Nicole Singh,

To whom it may concern.

Last January the electricity in my neighborhood was off for 4 days. I was fortunate to have a generator, at my house, that runs on natural gas. It powers my whole house when the electricity is off. I was able to stay warm and comfortable during the outage. My son, his wife and my grandson came to stay with me because their power was off for 5 days, and they were unable to stay there with no heat. Their house is all electric. I am thankful that I could help keep them safe and warm during this crisis. We all were glad that I had my natural gas generator. It was a life saver. I also use gas for cooking and heating, as well as hot water. I want to keep natural gas and don't want to switch to all electric.

Respectfully Yours,  
David Osborne

Sincerely,  
David Osborne  
9455 SW 20th Pl  
Portland, OR 97219  
[marshallparker@duck.com](mailto:marshallparker@duck.com)

**From:** [Jim Johnston via constituent@civiclick.com](mailto:Jim.Johnston.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 8:56:34 AM

---

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Dear Nicole Singh,

The January snow/cold event experience only strengthened the continued need for natural gas for home heating when our power was out!!

Sincerely,  
Jim Johnston  
10932 SW Chateau Ln  
Tigard, OR 97224  
[Engrjim@comcast.net](mailto:Engrjim@comcast.net)



**From:** [Holly Rudie via constituent@civiclick.com](mailto:Holly.Rudie.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 8:57:16 AM

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Dear Nicole Singh,

During the most recent power outage and looking back to the ice storm a few years ago that took power out for a week, having natural gas available was critical to our family. We were able to continue to heat water on our gas stove and to keep warm near our gas fireplace as frigid temperatures created a situation where even being indoors was uncomfortable. Having options available is always a benefit but even more so when it comes to natural gas and electricity.

Please keep this in mind as you make decisions that will impact Oregon families.

Sincerely,  
Holly Rudie  
13430 Squire Drive  
Oregon City, OR 97045  
[hrrudie82@aol.com](mailto:hrrudie82@aol.com)

**From:** [Derek Willis via constituent@civiclick.com](mailto:Derek.Willis@constituent.civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 8:58:32 AM

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Dear Nicole Singh,

During the snow storm this winter we got stuck in Depoe Bay for an extended weekend due to road closure and no electricity, all we had at the resort was natural gas fireplace and BBQ with our 7 small grandkids. We were very thankful for natural gas for warmth and cooking our food. Please keep this in mind, as natural disasters happen and we need another alternative for heat and cooking needs.

Sincerely,  
Derek Willis  
1232 SE 13th place  
Canby, OR 97013  
[Derekawillis@gmail.com](mailto:Derekawillis@gmail.com)

**From:** [John Altshuler via constituent@civiclick.com](mailto:John.Altshuler.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 8:59:27 AM

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Dear Nicole Singh,

Everything else being said, environmentally inclusive, putting all ones eggs in one basket rates very simply as FOLLY. Imagine an ALL ELECTRIC city, state or nation. And imagine the grid being compromised by weather, fire, sabotage. Imagine this happens on the dead of winter...s very severe winter. WHAT WILL YOU DO? WHAT WILL EVERYONE DO?

Sincerely,  
John Altshuler  
2910 Grand Cayman Dr  
Eugene, OR 97408  
tomailakai@gmail.com

**From:** [John Altshuler via constituent@civiclick.com](mailto:John.Altshuler@constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 8:59:30 AM

---

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Dear Nicole Singh,

Everything else being said, environmentally inclusive, putting all ones eggs in one basket rates very simply as FOLLY. Imagine an ALL ELECTRIC city, state or nation. And imagine the grid being compromised by weather, fire, sabotage. Imagine this happens on the dead of winter...s very severe winter. WHAT WILL YOU DO? WHAT WILL EVERYONE DO?

Sincerely,  
John Altshuler  
2910 Grand Cayman Dr  
Eugene, OR 97408  
tomailakai@gmail.com

**From:** [Michael Wach via constituent@civiclick.com](mailto:Michael.Wach.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 8:59:40 AM

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Dear Nicole Singh,

For reasons like ice storms and sub-station failures, my neighborhood is subject to electrical power outages on a regular basis, some lasting up to 3 days. I am fortunate to have both a gas furnace and water heater, so that through these outages, my home remains livable, something that my neighbors with all-electric homes cannot say. Forcing people to switch from gas to electric power is forcing people to have to go to warming shelters when the electric power fails--which it will.

Sincerely,  
Michael Wach  
695 Foxglove St SE  
Salem, OR 97306  
woxobox@outlook.com

**From:** [Eric Olson via constituent@civiclick.com](mailto:Eric%20Olson%20via%20constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 9:02:42 AM

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Dear Nicole Singh,

We have frequent power outages here and my only source of heat, hot water and cooking is through natural gas. Please don't mess up a good thing!

Sincerely,  
Eric Olson  
80582 Polo Ridge Rd  
Warrenton, OR 97146  
[deadreckon1039@gmail.com](mailto:deadreckon1039@gmail.com)

**From:** [Cheryl Brown via constituent@civiclick.com](mailto:Cheryl.Brown.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 9:05:46 AM

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Dear Nicole Singh,

We need to have Natural Gas as an alternative. I can rely on my ability to have heat, hot water and the ability to cook meals during inclement weather becuz I chose natural gas appliances for my home!

Sincerely,  
Cheryl Brown  
1338 sw Blankenship  
West Linn, OR 97068  
exhmic@ymail.com

**From:** [Jane DeMarco via constituent@civiclick.com](mailto:Jane_DeMarco_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 9:13:01 AM

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Dear Nicole Singh,

Friends at DEQ- during the awful ice and snow storms this year, we survived thanks to two gas fireplaces and a gas stovetop. We took in a family with children, whose all electric home was without power for 10 days, then more for resulting broken water pipes. An all electric Oregon will not work until we have underground electric cables everywhere. Until then we need choice and diversity. Thank you

Sincerely,  
Jane DeMarco  
8304 SW 64th Avenue,  
Portland , OR 97219  
[janedemarco@comcast.net](mailto:janedemarco@comcast.net)



**From:** [Janet Yee via constituent@civiclick.com](mailto:Janet.Yee.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 9:21:05 AM

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Dear Nicole Singh,

During our last winter storm my household lost electricity like many others. Thankfully we have gas service in our home. We were able to use our gas fireplace to keep an area downstairs warm enough for us to remain in our home. In addition, we were able to use our gas cooktop to prepare hot food, which provided us an additional method of staying warmer. By the time the electricity service was restored to us by PGE, our home inside temperature had dropped down into the forties. We were very grateful we had gas service during this time. Please consider how important it is to have diversified sources of energy, now and in the future.

Sincerely,  
Janet Yee  
10400 SW KIOWA ST  
Tualatin, OR 97062  
[jdyee@comcast.net](mailto:jdyee@comcast.net)

**From:** [Dale Rembold via constituent@civiclick.com](mailto:DaleRembold@constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 9:30:09 AM

---

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Dear Nicole Singh,

Thank God for 'Natural Energy' provided by Northwest Natural Gas for natural clean energy to get me through otherwise failing artificial electric power. Do NOT make stupid laws against using Natural Gas.

Sincerely,  
Dale Rembold  
21370 SE Foster Rd  
Damascus, OR 97089  
[mdrembold@comcast.net](mailto:mdrembold@comcast.net)

**From:** [Teresa Toren via constituent@civiclick.com](mailto:Teresa.Toren.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 9:32:57 AM

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Dear Nicole Singh,

I can't believe our state is asking why we need an alternative power source besides electricity but here we are and responding to this request! It seems obvious to most of us. During outages that last for weeks for some now, with natural gas, you can still cook and warm your home with a gas fireplace. You can still heat a baby bottle and food. Our electric sources are nowhere near ready to handle charging cars if everyone and everything was electric. Cyber attacks on our electrical grids have happened and unfortunately are likely to continue. If years of drought should ensue here, much of our electric power comes from the dams and water. It's a no brainer having multiple sources of everything, food sources, power sources, just everything. PGE and the Biden admin, all of Oregon's politics, need to hire someone with some sense. I want to build or buy a new home in the near future, and if it can't have a gas stove and fireplace I will leave this crazy state.....

Sincerely,  
Teresa Toren  
24285 SE Strawberry Dr  
Damascus, OR 97089  
[teresatoren@gmail.com](mailto:teresatoren@gmail.com)

**From:** [Patrick Hess via constituent@civiclick.com](mailto:Patrick.Hess.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 9:37:00 AM

---

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Dear Nicole Singh,

I have lost electricity at my home many times. I have never lost my natural gas service. Having that energy source available to me is invaluable.

Sincerely,  
Patrick Hess  
1240 Goff Rd  
Forest Grove, OR 97116  
[patrickshess@gmail.com](mailto:patrickshess@gmail.com)

**From:** [Ron Wright via constituent@civiclick.com](mailto:Ron.Wright.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 9:40:45 AM

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Dear Nicole Singh,

During the January ice storm that hit Gresham, trees snapped and blocked our roads, the power went out and stayed out for several days. Our heater works on electric power to start and uses electricity for the blower resulting in no heat. Our Natural Gas, however, worked fine for the duration and was our only heat source. We were able to cook using our gas stove and we are older and our kids that live locally had no heat as they are all electric, they had to come to our place to keep warmer and to eat. Had it not been for our gas fire places and gas stove we would have frozen and not been able to eat. We need to keep the natural gas as an energy option.

Sincerely,  
Ron Wright  
2730 SW Butler Rd  
Gresham, OR 97080  
[rswright08@gmail.com](mailto:rswright08@gmail.com)

**From:** [carol chapman via constituent@civiclick.com](mailto:carol_chapman_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 9:40:50 AM

---

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Dear Nicole Singh,

when we had the ice storm in January 2024, our gas fireplace saved us. It was our only source of heat during our power loss.

Sincerely,  
carol chapman  
1513 Larkspur Avenue  
eugene, OR 97401  
[carol-gary@comcast.net](mailto:carol-gary@comcast.net)

**From:** [Duane Delesha via constituent@civiclick.com](mailto:Duane.Delesha%20via%20constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 9:46:10 AM

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Dear Nicole Singh,

Click 'Customize Email' below, and type your email here.

Sincerely,  
Duane Delesha  
711 Van Buren Dr  
Salem , OR 97305  
Dsnj50@gmail.com

**From:** [Anne Rooney via constituent@civiclick.com](mailto:Anne.Rooney.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 9:47:16 AM

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Dear Nicole Singh,

During the recent power outage that lasted 4 days in my area I still had natural gas. That meant I could take a hot shower and cook meals. I have lived in the pacific NW all my life and would choose a natural gas home over electric any time.

We want a choice!

Sincerely,  
Anne Rooney  
4625 Sussex Ct  
Depoe Bay, OR 97341  
anne97341@gmail.com



**From:** [Edmund Clark via constituent@civiclick.com](mailto:Edmund.Clark.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 9:49:45 AM

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Dear Nicole Singh,

We are a society that cannot rely on a single energy source. During the January power outage this past winter, we were without electricity for three days, then it came on briefly, went out, then out again for a few hours. Some of our neighbors homes are all electric and did not have a way to cook or heat their homes and had to go out to eat. But we didn't have that problem, having a hybrid home with electric and gas: our fireplace is gas to help keep us warm, water heater was gas, our stove is gas so we could still prepare meals.

Electric energy maybe cleaner but the delivery system needs to be redesigned to provide uninterrupted service thru any type of weather, natural disaster short of an earthquake.

If you are for 100% electric power, please rethink your position. We, as consumers, are not ready to just "Jump In" yet.

"Logic is always getting in the way of Common Sense. Try to think about it Objectively." - E.C.

Sincerely,  
Edmund Clark  
171 Nesting Glade  
Depoe Bay, OR 97341  
[eclark099@gmail.com](mailto:eclark099@gmail.com)

**From:** [Jonathan Gilbert via constituent@civiclick.com](mailto:Jonathan.Gilbert.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 9:50:44 AM

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Dear Nicole Singh,

My solar panels supply most of my electricity but I require gas for heating, hot water and cooking.

Don't make us put all our eggs in one disaster-prone basket.

Sincerely,  
Jonathan Gilbert  
685 NW Persimmon Pl  
Beaverton, OR 97006  
[jonathan260@frontier.com](mailto:jonathan260@frontier.com)

**From:** [Sheri MacDowell via constituent@civiclick.com](mailto:Sheri MacDowell via constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 9:56:59 AM

---

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Dear Nicole Singh,

Click 'Customize Email' below, and type your email here.

Sincerely,  
Sheri MacDowell  
62 Touchstone  
Lake Oswego, OR 97035  
[sherim@macguard.com](mailto:sherim@macguard.com)

**From:** [Marsha Tobey via constituent@civiclick.com](mailto:Marsha.Tobey.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 9:58:35 AM

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Dear Nicole Singh,

I have lived in my home for about 30 years with a gas furnace, water heater, stove and fireplace. When there is a PGE outage, i can use my stove and fireplace. When the ice storms hit our area and the lines go down, citizens with natural Gas are warm, and fed. It is stupidity to limit US Citizens to one souce of energy . This year that souce of energy increase it's cost to us 18% and plans to increase more.

Sincerely,  
Marsha Tobey  
9335 SW Lehman St  
Tigard, OR 97223  
[mltobey@comcast.net](mailto:mltobey@comcast.net)

**From:** [Marc Howell via constituent@civiclick.com](mailto:Marc.Howell.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 10:02:33 AM

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Dear Nicole Singh,

Click 'Customize Email' below, and type your email here.

Sincerely,  
Marc Howell  
2124 Grace Ave NW  
Albany, OR, OR 97321  
[sitemail.marc@gmail.com](mailto:sitemail.marc@gmail.com)

**From:** [Walt Ryder via constituent@civiclick.com](mailto:Walt.Ryder.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 10:05:00 AM

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Dear Nicole Singh,

Having gas heat and stove allows us to stay warm and cook. Also, we don't have to go out which can be dangerous and possibly interfere with crews trying to alleviate the situation.

Sincerely,  
Walt Ryder  
5426 Summerlake St SE  
Salem , OR 97306  
walt\_ryder@yahoo.com

**From:** [Bruce Wood via constituent@civiclick.com](mailto:Bruce.Wood.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 10:19:52 AM

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Dear Nicole Singh,

My Salem neighborhood electrical grid goes down during higher winds and ice storms. We are very dependent on our free-standing gas stove and gas water heater. We have electric stove/oven which are useless in power outages. Do not limit homeowners choices or remove energy options, which will create total dependence on electrical grids.

Sincerely,  
Bruce Wood  
544 Joseph St SE  
Salem, OR 97302  
navyret89@gmail.com

**From:** [James Harding via constituent@civiclick.com](mailto:James.Harding@constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 10:28:30 AM

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Dear Nicole Singh,

Click 'Customize Email' below, and type your email here.

Sincerely,  
James Harding  
2829 sw 33rd  
Gresham, OR 97080  
[jamesg4170@frontier.com](mailto:jamesg4170@frontier.com)



**From:** [Suzie Budeau via constituent@civiclick.com](mailto:Suzie Budeau via constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 10:35:31 AM

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Dear Nicole Singh,

Don't take away my clean reliable natural gas. That was my only source of heat and meals (gas fireplace) when the power went out a few months ago. There aren't enough sources of electricity to power all that's assigned to it.

Sincerely,  
Suzie Budeau  
1644 SE Harney St  
Portland, OR 97202  
[suzbud@q.com](mailto:suzbud@q.com)

**From:** [Roberta Powell via constituent@civiclick.com](mailto:Roberta.Powell.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 10:50:00 AM

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Dear Nicole Singh,

Click 'Customize Email' below, and type your email here. During the recent ice and snow storm we saw how devastating it can be to rely only on electric power for heating and other needs. Many people suffered for days without power but those who had other energy sources such as natural gas or oil were able to heat their homes and have hot water. We need to ensure that we have safe clean energy from a variety of sources to avoid the devastating consequences that can come with relying only on one energy source.

Sincerely,  
Roberta Powell  
12490 SW 27th St.  
Beaverton, OR 97008  
[msropow@aol.com](mailto:msropow@aol.com)

**From:** [Brian Kern via constituent@civiclick.com](mailto:Brian.Kern.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 10:55:53 AM

---

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Dear Nicole Singh,

We rely on NW Natural supplied gas to heat our home, water and cook during electric power outages.

Sincerely,  
Brian Kern  
395 Walnut Ln  
Eugene , OR 97401  
[Brian@kern-family.prg](mailto:Brian@kern-family.prg)

**From:** [Mark Phillips via constituent@civiclick.com](mailto:Mark.Phillips.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 11:08:35 AM

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Dear Nicole Singh,

Forcing Oregonians to be solely dependent on electricity for heating and lighting--in order to eliminate the cleanest fossil fuel--is insane. I will vote against any politician who supports a policy of taking away my access to natural gas.

Sincerely,  
Mark Phillips  
32495 NW Beach Rd  
Hillsboro, OR 97124  
[phillips@alumni.caltech.edu](mailto:phillips@alumni.caltech.edu)

**From:** [Dan Bott via constituent@civiclick.com](mailto:Dan_Bott_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 11:08:41 AM

---

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Dear Nicole Singh,

Dear ODEQ,

All energy systems have their challenges and diversification is essential in the energy we use for our homes as well in investing. Natural gas is so much more reliable in adverse weather, which is why the ODEQ needs to consider it as a good alternate to electrical power. One would have to believe that the ODEQ would be working against the public trust if they were to limit this alternative to public consumers. I don't see very large state buildings or institutions changing their energy equipment to all electric, and the public knows that electrical power is mostly derived from fossil fuels anyway. Once Oregon removes all its dams, the state will be reliant on fossil fuels, because we know that there isn't any technology that can compete at this point in time. So therefore the general public of this state should be given alternatives or we are not a free state!

Sincerely,  
Dan Bott  
381 Pintail Ct. SE  
Salem, OR 97306  
[bottoregon@outlook.com](mailto:bottoregon@outlook.com)

**From:** [Lance Berkey via constituent@civiclick.com](mailto:Lance_Berkey_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 11:09:21 AM

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Dear Nicole Singh,

Hello, I wanted to let you know how critical having natural gas as an energy source is. I have older parents and their home only has electricity for heat, cooking & hot water. When they lost power they almost froze to death. I came over to visit them & they were trying to heat their home with a fireplace as it was 40 degrees in their home. Unfortunately their fireplace chimney was blocked causing massive smoke & carbon monoxide poisoning to them & their dog - their dog ended up dying from the poisoning and they were on their way also as they just wanted to go to sleep and I basically had to carry them out of the house. We brought them over to our house that has natural gas and had heat from our gas fireplace, cooking from our gas stove and hot water for hot showers. It would be a disaster for natural gas to be taken away or penalties placed on users of natural gas. Hopefully people will listen to this story as I know there are many more like this - thanks.

Sincerely,  
Lance Berkey  
2491 Tracy Lane  
Woodburn, OR 97071  
[lberkey@hubbardchevrolet.com](mailto:lberkey@hubbardchevrolet.com)

**From:** [gordon.moritz.via.constituent@civiclick.com](mailto:gordon.moritz.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 11:18:43 AM

---

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Dear Nicole Singh,

We were only out of electricity a few hours in our town, but natural gas was very important for most, especially old people for heat, cooking. Banning gas in future, especially new developments, is totally insane.

Sincerely,  
gordon moritz  
945 Sommerville Loop  
Harrisburg , OR 97446  
[grmoritz@gmail.com](mailto:grmoritz@gmail.com)

**From:** [Henry Sminia via constituent@civiclick.com](mailto:Henry.Sminia.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 11:35:39 AM

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Dear Nicole Singh,

Click 'Customize Email' below, and type your email here.

Sincerely,  
Henry Sminia  
6098 SE Lois St.  
Hillsboro, OR 97123  
tomsmينيا@gmail.com



**From:** [Malcolm Bentz via constituent@civiclick.com](mailto:Malcolm Bentz via constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 11:40:43 AM

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Dear Nicole Singh,

Dear Sir/Ma'am:

Our family uses PGE for some of our electrical needs. We also rely heavily on NW Natural for our gas appliances. During the severe snow & ice storm this January, we experienced no interruption of our electric or gas service. However, in the past, when our electricity went out, we were still able to use our gas appliances (Hot Water Heater, Furnace, Dryer & Range [we vented the house]). That said, we would be quite disappointed if we only relied on electricity. Please change your long-term objective of having everyone rely only on electricity. It would seriously overburden our electric grid. I remember the serious complications/power outages in February 2021.

I would appreciate your response to this e-mail.

Sincerely,  
Malcolm Bentz  
10981 Main Street Northeast  
Donald, OR 97020  
[mbentz@centurytel.net](mailto:mbentz@centurytel.net)

**From:** [Cliff Stephens via constituent@civiclick.com](mailto:Cliff_Stephens_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 11:47:23 AM

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Dear Nicole Singh,

During the winter storm of January 2024 I was without power for 47 hours. My only source of heat was my natural gas fireplace and natural gas stove. The streets were impassable with sheet ice and I was shut in with no electricity and frozen pipes. Without my natural gas appliances to provide heat I might have froze to death. Energy choices and diversify are life saving. Do not put unproven ideologies ahead of human thriving by removing lifesaving energy choices by making idiotic administrative decisions or laws that restrict common sense human survival choices.

Sincerely,  
Cliff Stephens

Sincerely,  
Cliff Stephens  
333 SE 65th Ave  
Portland, OR 97215  
[czrs@comcast.net](mailto:czrs@comcast.net)

**From:** [Laurel Christianson via constituent@civiclick.com](mailto:Laurel.Christianson.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 11:48:11 AM

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Dear Nicole Singh,

To our city council members:

During the ice storm this winter, one of our relatives living in the Springfield area experienced loss of power for seven days. Her house temp was in the 30's and she had no ability to cook, bathe, or stay warm. Our home has a natural gas fireplace and she lived with us for that whole week so she would not experience the cold indoor temperatures. This is a very clear warning that depending only on electricity is a serious mistake! It is also foolish with this big push for electric vehicles, which were reduced to doorstops during that time. Wind and solar are not going to get the job done either- consider our stagnant air days and drought seasons. To do away with natural gas is to uncaringly subject the people you are serving to downright dangerous conditions. Please think again!

Sincerely,  
Laurel Christianson  
3872 Shenstone Drive  
Eugene, OR 97404  
[laurie.m.christianson@gmail.com](mailto:laurie.m.christianson@gmail.com)

**From:** [Dan Boettcher via constituent@civiclick.com](mailto:Dan_Boettcher_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 11:53:32 AM

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Dear Nicole Singh,

The availability of Natural Gas should be a non-negotiable issue. Natural Gas is a vital and necessary fuel source. On more than one occasion I have experienced the extreme discomfort of power outages. Your house quite quickly becomes a hostile environment. That is why I installed a Natural Gas backup Generac generator. It provides the safety and security my family relies upon in the event of a power outage. As a senior citizen, it is a life saver.

Sincerely,  
Dan Boettcher  
14692 SW Scarlett Drive  
Tigard, OR 97224  
danboettcher923@gmail.com

**From:** [Jeff Hawkins via constituent@civiclick.com](mailto:Jeff.Hawkins.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 11:56:04 AM

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Dear Nicole Singh,

I strongly support effort to wean our society off fossil fuels, including natural gas, with all possible haste. To anyone following the signs, the news and the science it is abundantly clear that we've waited too long already. Please pursue policies that restrict natural gas usage and promote switching to non greenhouse gas emitting energy sources.

Sincerely,  
Jeff Hawkins  
2604 NE Flanders St  
Portland, OR 97232  
[jeff.hawkins.pdx@gmail.com](mailto:jeff.hawkins.pdx@gmail.com)

**From:** [William Schellenberg via constituent@civiclick.com](mailto:William_Schellenberg_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 12:10:45 PM

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Dear Nicole Singh,

Dear Officials, We cannot rely on any one source of energy, such as electricity. When the electricity goes out, I can still make a cup of soup using my gas grill and even cook a meal on my natural gas barbeque. If i were to rely on electricity, what would I do? Outages are often in conjunction with ice storms, which means the roads are not safe to drive on. As a senior citizen do not take my ability to survive during power outages away.

Sincerely,  
William Schellenberg  
672 Hazeltine Ave SE  
Salem, OR 97306  
lyleschell@comcast.net

**From:** [John Dunn via constituent@civiclick.com](mailto:John.Dunn.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 12:26:42 PM

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Dear Nicole Singh,

We are a free society. Please keep it free.  
During the last ice storm we were able to cook our meals and use our gas fireplace to stay warm. I want a choice in what energy I use. Thank you.

Sincerely,  
John Dunn  
11639 SW 33rd Place  
Portland, OR 97219  
[johntdunnjr@gmail.com](mailto:johntdunnjr@gmail.com)

**From:** [Denise Hershey via constituent@civiclick.com](mailto:Denise.Hershey.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 12:52:27 PM

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Dear Nicole Singh,

My family lives in a neighborhood with underground utilities. We did not lose power and we were safe and warm.

One family member in Tigard, who has solar panels and all electric appliances lost power for more than a day and they had to seek shelter in a hotel.

Another family member in Springfield lost power for a week, but was able to stay reasonably warm using a gas-powered generator.

Another family member in rural Springfield lost power for 9 days. They stayed home using a woodstove. They took showers with nearby friends who had power.

In an emergency situation, diversity helps the population. Neighbors who are not affected can help those who were. Removing diversity is an insane idea. People should be able to choose their appliances and lifestyle without governmental interference.

P.S. There is no climate emergency. Carbon is the backbone of life. Animals, including humans, as well as plants need carbon. Carbon Dioxide is not causing the climate to change. Carbon Dioxide is only .004% of the entire atmospheric gasses. Even if it doubled or tripled, it will not matter. See: <https://www.sciencealert.com/co2-is-only-a-tiny-part-of-our-atmosphere-but-it-has-a-huge-influence-here-s-why>

The climate emergency is a hoax.

Sincerely,  
Denise Hershey  
16515 SW Copper Creek Dr  
Tigard, OR 97224  
[Denise.C.Hershey@gmail.com](mailto:Denise.C.Hershey@gmail.com)



**From:** [RODNEY STRAND via constituent@civiclick.com](mailto:RODNEY_STRAND_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 1:02:45 PM

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Dear Nicole Singh,

It would have been MORE of a disaster without natural gas during our winter freeze this year. Getting rid of natural gas makes no short term or long term sense at all and simply talking about it negatively impacts the quality of life, as opposed to USING it while making progress toward a more economical and effective solution for utility applications.

Sincerely,  
RODNEY STRAND  
11402 Se Flavel St  
Portland, OR 97266  
Rod@rodstrand.com

**From:** [Randall Brewer via constituent@civiclick.com](mailto:Randall.Brewer.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 1:04:41 PM

---

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Dear Nicole Singh,

During this winter's ice storm in Lincoln County we lost electric power. This isn't unusual as power at the coast is not reliable. Fortunately we have a natural gas water heater, stove and fireplace along with a natural gas furnace. The fireplace kept us and our home warm and hot water allowed us to take hot showers. The stove allowed us to cook warm meals. All this despite no electricity. We also have a natural gas powered generator that allowed us to keep our refrigerator running so we didn't lose our fresh food. Natural gas is critical for our survival. We can depend on it. Electricity is unreliable. We need to maintain and increase natural gas usage not cut back on it.

Sincerely,  
Randall Brewer  
2577 NE 55th Pl  
Lincoln City, OR 97367  
[rbrewer26@charter.net](mailto:rbrewer26@charter.net)

**From:** [Marilyn Gladwell via constituent@civiclick.com](mailto:Marilyn.Gladwell.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 1:08:22 PM

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Dear Nicole Singh,

I have 2 heat sources in my condo. One is wall mounted heat pump/ac unit. The other is natural gas fire stove. I don't use the heat pump for heat, The gas stove is much more effective, especially during this past winter. It has worked consistently in the 22 years I've had it. Even if electric outage occurs, it has a circuit that maintains the pilot lite & will function without electricity. There's no fear of power stations getting vandalized, ice heavy trees taking power poles down, etc. I believe we need several source of energy including gas, electric, solar & wind. In my opinion, natural gas is the most dependable heat source & NW Natural maintains our equipment annually in the fall at no charge.

Sincerely,  
Marilyn Gladwell  
240 Lone Pine LN Unit 1  
The Dalles, OR 97058  
[meilanm@hotmail.com](mailto:meilanm@hotmail.com)

**From:** [Marilyn Gladwell via constituent@civiclick.com](mailto:Marilyn.Gladwell.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 1:08:48 PM

---

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Dear Nicole Singh,

I have 2 heat sources in my condo. One is wall mounted heat pump/ac unit. The other is natural gas fire stove. I don't use the heat pump for heat, The gas stove is much more effective, especially during this past winter. It has worked consistently in the 22 years I've had it. Even if electric outage occurs, it has a circuit that maintains the pilot lite & will function without electricity. There's no fear of power stations getting vandalized, ice heavy trees taking power poles down, etc. I believe we need several source of energy including gas, electric, solar & wind. In my opinion, natural gas is the most dependable heat source & NW Natural maintains our equipment annually in the fall at no charge.

Sincerely,  
Marilyn Gladwell  
240 Lone Pine LN Unit 1  
The Dalles, OR 97058  
[meilanm@hotmail.com](mailto:meilanm@hotmail.com)

**From:** [Terry Harris via constituent@civiclick.com](mailto:Terry.Harris.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 1:14:57 PM

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Dear Nicole Singh,

We use natural gas as our main heat source, cooking stove and dryer. We spend way less on gas than electricity and DEFINITELY want to keep our natural gas. When the electricity is out we still have heat and can cook, don't ever try to take our gas away! We are in a rural area and need natural gas.

Sincerely,  
Terry Harris  
1668 19th St  
Myrtle Point, OR 97458  
[Shopmygutsout@outlook.com](mailto:Shopmygutsout@outlook.com)

**From:** [ROGER PLANT via constituent@civiclick.com](mailto:ROGER_PLANT_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 1:30:46 PM

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Dear Nicole Singh,

Click 'Customize Email' below, and type your email here.

Sincerely,  
ROGER PLANT  
514 Honeysuckle Lane  
Eugene, OR 97401  
rogerplant8@yahoo.com

**From:** [Mike Sloan via constituent@civiclick.com](mailto:Mike.Sloan.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 1:34:02 PM

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Dear Nicole Singh,

Click 'Customize Email' below, and type your email here.

Last winter the temperature was below freezing for several days. I know people who lost power for several days and had pipes freeze. If they had gas appliances in their home they could have easily kept it from freezing. I have a gas fireplace and stove I can use if the power goes out. Everyone should have that option.

Sincerely,  
Mike Sloan  
6218 SE Woodward St  
Portland, OR 97206  
hmagic2@aol.com

**From:** [Charlie Rouse via constituent@civiclick.com](mailto:Charlie.Rouse.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 1:35:56 PM

---

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Dear Nicole Singh,

Click 'Customize Email' below, and type your email here.

Sincerely,  
Charlie Rouse  
17684 SW Frederick Ln.  
Sherwood, OR 97140  
[charlie\\_rouse@hotmail.com](mailto:charlie_rouse@hotmail.com)



**From:** [Linda Van Mierlo via constituent@civiclick.com](mailto:Linda.Van.Mierlo.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 1:47:37 PM

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Dear Nicole Singh,

During the recent Ice Storm, I was without electricity for days. I depended on my Natural Gas.

Natural Gas is more reliable and more efficient than electricity.

Sincerely,  
Linda Van Mierlo  
2709 Sorrel Way  
Eugene, OR 97401  
[lvanlo@ymail.com](mailto:lvanlo@ymail.com)

**From:** [Dana Ramer via constituent@civiclick.com](mailto:Dana.Ramer.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 1:48:30 PM

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Dear Nicole Singh,

Dear public officials, all of you,

We need you to support our natural gas providers. They provide us with a reasonably priced affordable alternative to electricity. This is clean energy source. Please help promote this energy source! It must not be overlooked. I'm watching you. I look forward to your positive response to this message.

Sincerely,

Dana Ramer

11360 SW Cottonwood Ln

Tigard, OR 97223

Dpramer@gmail.com

**From:** [Lee Richey via constituent@civiclick.com](mailto:Lee Richey via constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 2:22:59 PM

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Dear Nicole Singh,

During the recent storm that everyone is talking about we were fortunate enough to have a natural gas furnace and water heater. We were also fortunate and smart enough to purchase a small gasoline powered generator. The generator kept us in touch with the news media and entertainment during our outage, and the heat and hot water helped keep us warm and comfortable. As a retired 77 year old with a 70 year old wife, staying comfortable during a power outage is a huge priority to us. Without natural gas we would have problems staying warm. Please do not limit or prohibit the use of this valuable source of energy for the future.

Sincerely,  
Lee Richey  
17911 SW 105th Court  
Tualatin, OR 97062  
[richeycom@gmail.com](mailto:richeycom@gmail.com)

**From:** [Arun Yerram via constituent@civiclick.com](mailto:Arun.Yerram.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 2:34:11 PM

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Dear Nicole Singh,

Had there not been natural gas from NW Natural, we would have frozen to death this winter in January 2024 where we lost power for 3 consecutive days during the peak. We are so thankful that this natural gas utility still exists and keeps us survive.

Sincerely,  
Arun Yerram  
2539 NW Byrne Ter  
Portland, OR 97229  
[arun.yerram@gmail.com](mailto:arun.yerram@gmail.com)

**From:** [David Buck via constituent@civiclick.com](mailto:David.Buck.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 2:51:21 PM

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Dear Nicole Singh,

As a Oregonian living in an area prone to electrical power outages, having a reliable natural gas supply during a major storm event is critical to my family. I desire a choice in utility options, and I oppose attempts to limit the options of current and future Oregon residents to a one size fits all solution to our energy needs.

Sincerely,  
David Buck  
510 NW 341st Ave  
Hillsboro, OR 97124  
buckd96@yahoo.com

**From:** [Christopher Alsop via constituent@civiclick.com](mailto:Christopher.Alsop.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 3:33:04 PM

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Dear Nicole Singh,

Click 'Customize Email' below, and type your email here.

Sincerely,  
Christopher Alsop  
1550 Mountain View Dr Apt G  
Enumclaw, WA 98022  
Calsop24@gmail.com

**From:** [John Quirk via constituent@civiclick.com](mailto:John.Quirk.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** choice of energy options  
**Date:** Saturday, April 27, 2024 3:34:00 PM

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Dear Nicole Singh,

During the storm in January, electricity in my neighborhood unreliable for 3 days. My gas powered fireplace kept the house and occupants from freezing. Don't take away our natural gas option.

Sincerely,  
John Quirk  
1280 SW Orinda Way  
Portland, OR 97225  
[pdxquirk@yahoo.com](mailto:pdxquirk@yahoo.com)

**From:** [Ben Manny via constituent@civiclick.com](mailto:Ben_Manny_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 3:34:10 PM

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Dear Nicole Singh,

We were without power for five and a half days during January's storm. Outside temperatures were in the teens for 3 days. Fortunately we had two gas inserts, hot water, and a gas range top that enable us and our pet parrot to stay in the hours to monitor our plumbing. On day 5 when things warmed up outside a pipe did break in the garage, We were able to address the issue since we were . While our gas inserts are designed to work with blowers, they were still able to keep the kitchen area at 50 when closing off the rest of the house. We were able to use our closed off family room as a refrigerator as it was below 40 degrees. Attic was below freezing so we kept water dripping in the closed off bathrooms. We would not have been able to stay and monitor our house if we did not have the natural gas back-up. We did struggle to keep our devices charged, even with our backup batteries. A thoughtful friend about a mile away help us be recharging these backups when needed. Since then I have purchased a 768 Wh battery that can be recharged using a 100W portable solar pane. I am considering a small natural gas generator as a further backup to keep our freezer and house gas furnace operational in case this happens again.

Sincerely,  
Ben Manny  
2060 NW 135th AVE  
PORTLAND, OR 97229  
[bmanny@frontier.com](mailto:bmanny@frontier.com)



**From:** [Kathy Call via constituent@civiclick.com](mailto:Kathy.Call.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 3:47:33 PM

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Dear Nicole Singh,

I would like you to know that having our heating (water and home) along with our stove top cooking source being gas prevented any inconvenience or loss of heat during the January 2024 storm. We could cook our food on our gas stove top and have our heat from our fireplace.

I don't understand the reasoning of relying on one source of power. When has our country ever encouraged the elimination of options in any area of commerce? It is universally known that we have multiple electrical outages at various times of the year; what would be a valid reason to think we would want to fully rely on only electricity? There is plenty of evidence showing this is not a good option. Let's think clearly!

Sincerely,  
Kathy Call  
18860 Deer Ln  
Oregon City, OR 97045  
kcmatthew1128@gmail.com

**From:** [Tim Thompson via constituent@civiclick.com](mailto:Tim.Thompson.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 3:49:14 PM

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Dear Nicole Singh,

Oregonians should have a choice of critical energy for today & tomorrow.  
Natural gas has TWICE the energy per volume (than wind or solar), readily available in ALL weather conditions (especially overcast and cold winter seasons), is already established in infrastructure and CHEAPER!  
Natural gas is NATURAL, ORGANIC, and just common sense.

Sincerely,  
Tim Thompson  
694 Trinity St NE  
Albany , OR 97322  
Timt26@comcast.net

**From:** [Kevin Bradley via constituent@civiclick.com](mailto:Kevin%20Bradley%20via%20constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 3:53:01 PM

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Dear Nicole Singh,

Please support diverse energy options for homeowners and for the region in general, especially natural gas. I have lived in the PDX area for my whole life (60 years) and cannot remember experiencing one natural gas outage. However, many of those years included an electricity outage of one length or another. Recently we have experienced an electrical outage during a winter storm that would have left us without heat and a way to cook if it were not for our gas range and our wood stove. Please to not put us in the position of being without heat and warm food by narrowing our energy options to electricity only.

Sincerely,  
Kevin Bradley  
17718 SE Rose Street  
Milwaukie, OR 97267  
kevinb763@gmail.com

**From:** [Paul Masulis via constituent@civiclick.com](mailto:Paul.Masulis@constituent.civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 4:01:57 PM

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Dear Nicole Singh,

We lost power twice in January - once for 4 hours and once for 6 hours. Without a natural gas fireplace to heat our home, we would have frozen (since our roads were icy and impassable).

Sincerely,  
Paul Masulis  
373 SW 37th Cir  
Gresham, OR 97080  
[pmasulis@gmail.com](mailto:pmasulis@gmail.com)

**From:** [Amy Sherwood via constituent@civiclick.com](mailto:Amy.Sherwood.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 5:27:18 PM

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Dear Nicole Singh,

The January winter storm highlights the need for more natural gas energy alternatives. Our electricity was out for about 30 hours and the temp in the house was 38F when the electricity came back on. We were the lucky ones though. I can't imagine being without power for the weeks some people were. There were no updates to know whether we should try to find a hotel (if we could get there) or just try to heat with the inefficient fireplace. I'm thinking we need a natural gas generator for next year. Limiting Oregonians to electricity just doesn't make sense in our climate.

Sincerely,  
Amy Sherwood  
1144 NW 120th Pl  
Portland, OR 97229  
[sherwood.amy@comcast.net](mailto:sherwood.amy@comcast.net)

**From:** [Carl Christoferson via constituent@civiclick.com](mailto:Carl.Christoferson.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 5:44:46 PM

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Dear Nicole Singh,

Click 'Customize Email' below, and type your email here.

Sincerely,  
Carl Christoferson  
168 Pine Valley Rd  
Lake Oswego, OR 97034  
[carl@oregoninvest.net](mailto:carl@oregoninvest.net)

**From:** [Gary Denison via constituent@civiclick.com](mailto:Gary.Denison.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 5:49:18 PM

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Dear Nicole Singh,

Having lost electrical power several times over the decade, I depend on natural gas as an alternate heating and cooking energy source. My medically fragile in-laws would have suffered without natural gas. It provided essential heat and food.

Redundancy, in energy sources, is a necessity. Electricity is the most vulnerable to natural disasters and sabotage. Decision makers, that have surrendered their common sense, don't deserve their positions. I would vote them out, in a heartbeat.

Sincerely,  
Gary Denison  
14920 SW Woodhue St.  
Tigard, OR 97224  
[punman@msn.com](mailto:punman@msn.com)

**From:** [Carl Christoferson via constituent@civiclick.com](mailto:Carl.Christoferson.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 5:49:36 PM

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Dear Nicole Singh,

During the storms of early 2024 many neighbors used our home for work (traveling was tough - the roads were trecherous), for warmth and as their home base because we have a generac generator powered by natural gas. Green energy is unreliable and expensive - natural gas, provided by the exceptional company NW Natural is inexpensive, abundant and reliable. We must have reliable energy as a society and to do so wind and solar only serve as a supplement. Keep gas, oil, and clean coal so we can keep our society safe and operational.

Sincerely,  
Carl Christoferson  
168 Pine Valley Rd  
Lake Oswego, OR 97034  
[carl@oregoninvest.net](mailto:carl@oregoninvest.net)



**From:** [RICHARD Block via constituent@civiclick.com](mailto:RICHARD.Block.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 6:01:38 PM

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Dear Nicole Singh,

We do remember power outages last winter, fortunately we had uninterrupted natural gas to heat our fireplace and cook our meals. Also, I invested in a 4000 watt gasoline generator, so we did not lose valuable food in freezer and refrigerator.

Just to let you know, while designing our home, we spec'd all available gas appliances.

That was a good move as now the greenies want to destroy our reliance on gas, hydro, nuclear and coal generated electricity. We live in a blue state forever!

Sincerely,  
RICHARD Block  
23175 Northeast Sunnycrest Road  
Newberg, OR 97132  
[rchr.block@gmail.com](mailto:rchr.block@gmail.com)

**From:** [Lynette Wong via constituent@civiclick.com](mailto:Lynette.Wong.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 6:07:08 PM

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Dear Nicole Singh,

Please reconsider an all electric future. During power outages in extreme cold, gas appliances are a virtual lifesaver. Our gas fireplaces warm the house. Our gas stove ensures a hot meal and our gas water heater allows us to take a warm shower. Natural gas appliances in conjunction with electric appliances offer more flexibility for basic survival during extreme weather. It is smart and makes sense to have options especially for those who can't afford to stay in a hotel or have a relative/friend they can stay with. Think of all the seniors who may not have friends/family nearby who can help them survive the event. Even if those unfortunate to have an all electric home survive, the physical suffering and emotional distress is inhumane.

Sincerely,  
Lynette Wong  
16447 SW snowy owl lane  
Beaverton , OR 97007  
Marlyn92129@yahoo.com

**From:** [Roger Arnell via constituent@civiclick.com](mailto:Roger.Arnell.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 6:32:27 PM

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Dear Nicole Singh,

It is crazy to think that we can rely completely on wind and solar. We need to take advantage of all kinds of energy, including coal, natural gas, nuclear, and any other energy invention that makes sense financially. Solar and Wind do not without radical subsidies. Let's take advantage of technology instead of moving towards going back to the dark ages.

Sincerely,  
Roger Arnell  
1570 SE Paloma Ct.  
GRESHAM, OR 97080  
[roger@arnellfam.com](mailto:roger@arnellfam.com)

**From:** [Ronald Sloan via constituent@civiclick.com](mailto:Ronald.Sloan.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 6:33:45 PM

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Dear Nicole Singh,

I want to say. This is free country and if I can afford it, I should have the right to choose. Natural gas is only thing that saved us from starving or freezing. Plus there is no way of communicating, when electricity goes out.

Sincerely,  
Ronald Sloan  
4401 SW Vesta St  
Portland , OR 97219  
firsttech2002@yahoo.com

**From:** [Paul Woods via constituent@civiclick.com](mailto:Paul%20Woods%20via%20constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Hands off natural gas!  
**Date:** Saturday, April 27, 2024 6:36:01 PM

---

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Dear Nicole Singh,

I want natural gas. Please stop with the attacks on everything that is not electricity.

Sincerely,  
Paul Woods  
3781 NW Tyler Place  
Corvallis, OR 97330  
[paul\\_woods@ieee.org](mailto:paul_woods@ieee.org)

**From:** [Jim Muir via constituent@civiclick.com](mailto:Jim.Muir.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 6:42:12 PM

---

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Dear Nicole Singh,

Oregonians should have a choice of energy mix. We have a very large solar panel installation, a new heat pump, but our backup heat is natural gas and we prefer natural gas for water heating, cooking, and as a fuel for a back up generator. The government should not unilaterally decide how we choose our energy mix, we are not droids nor incapable of making decisions and do not need government to mandate choices; this is a republic not a socialist country!

Sincerely,  
Jim Muir  
9850 SW Avery St  
Tualatin, OR 97062  
[Jimandkaren@frontier.com](mailto:Jimandkaren@frontier.com)

**From:** [Ann Reece via constituent@civiclick.com](mailto:Ann_Reece_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 7:04:15 PM

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Dear Nicole Singh,

Because I have a gas heater and hot water in my house, I am able to stay warm and clean during extended electrical power outages. I can also offer my home to family members and friends that have no heat source in their homes. It is irresponsible to depend only on electricity for heating homes. This should be seen as common sense! It would be wrong to take away our choice of energy for safety and redundancy. Cities always have redundancy in municipal water sources, and so it should be that Oregonians have redundancy in energy sources! Please, don't cripple out diverse energy profile!

Sincerely,  
Ann Reece  
480 Salem Heights Ave S  
Salem, OR 97302  
[dashnt@gmail.com](mailto:dashnt@gmail.com)

**From:** [Don Perepchuk via constituent@civiclick.com](mailto:Don.Perepchuk.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 7:58:34 PM

---

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Dear Nicole Singh,

There is no emergency climate changes, this is a hoax, we need NG to live, heat homes, cook etc. electric cannot cut it, not reliable like gas. Are you trying to destroy America by taking gas from us  
Perep@aol.com

Sincerely,  
Don Perepchuk  
2575 meridian ct  
Woodburn, OR 97071  
Perep@aol.com



**From:** [Andrew W via constituent@civiclick.com](mailto:Andrew.W.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 8:40:43 PM

---

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Dear Nicole Singh,

Click 'Customize Email' below, and type your email here.

Sincerely,  
Andrew W  
PO Box 1257  
SCAPPOOSE, OR 97056  
[1976deutsche@gmail.com](mailto:1976deutsche@gmail.com)

**From:** [Karen Haley via constituent@civiclick.com](mailto:Karen_Haley_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, April 27, 2024 9:40:06 PM

---

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Dear Nicole Singh,

If there was one important thing the terrible winter storm last January should teach us all, the s the importance of having multiple energy sources! My household had gas power and we had no problems. Please stop being stupid and narrowminded - only electric power Would be devastating .

Sincerely,  
Karen Haley  
15890 SW Bridle Hills Dr  
Beaverton, OR 97007  
karenhaley5@gmail.com

**From:** [Kathi Faber via constituent@civiclick.com](mailto:Kathi.Faber.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, April 28, 2024 12:07:48 AM

---

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Dear Nicole Singh,

At the end of Jan. and the beginning of Feb. 2024, the temperature was so cold that had we not have a natural gas furnace, we would have been freezing inside. We also had 2 young people that we rescued off the streets so we had more bodies to keep warm and to be able to cook as well.

Pls. reconsider going to electricity for everything! We need both gas & electric; however, with the cost of electricity skyrocketing, I opt for natural gas.

Sincerely,  
Kathi Faber  
2445 Hyde St SE  
Salem , OR 97301  
[kkfaber@comcast.net](mailto:kkfaber@comcast.net)

**From:** [John Godaert via constituent@civiclick.com](mailto:John.Godaert.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, April 28, 2024 12:45:12 AM

---

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Dear Nicole Singh,

During the recent winter storm we had a series of electrical power outages due to trees falling or being blown over and taking the electric power lines with them.

Our house has a natural gas fireplace and water heater that still worked despite the electricity being out.

We have an 83 year old neighbor that has only electric power at her house. She was able to walk over to our house to warm up several times during the long outage. Her house was cold enough that her cat's food froze in the dish. Without a near, accessible, place with an alternate energy source she (and we!) may not have survived the outage as well as we did.

Our recent experience underscores the fact that we need multiple energy options.

Sincerely,  
John Godaert  
6623 SW Kingsview Court  
Tigard, OR 97223  
[john@responsiveco.com](mailto:john@responsiveco.com)

**From:** [Mark Kruger via constituent@civiclick.com](mailto:Mark Kruger via constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, April 28, 2024 7:26:07 AM

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Dear Nicole Singh,

During the January 2024 ice/snow storm my home lost electric power for 5 days. I have a natural gas powered backup generator installed at my home and the generator kept my home powered during the storm and ensured that my family was safe and comfortable during this severe storm. Any suggestion that natural gas should be eliminated is ridiculous. Our electric grid is far too susceptible to interruption and is headed toward shortages due to massive demand and reduced generation capacity. Limiting or eliminating natural gas will only harm Oregonians through the loss of an important and cost effective source of energy, and subject everyone to unacceptable shortages of electricity. Leave natural gas alone.

Sincerely,  
Mark Kruger  
12955 NW Filbert Street  
Portland, OR 97229  
[krugerpdx@yahoo.com](mailto:krugerpdx@yahoo.com)

**From:** [Bradley Vandehey via constituent@civiclick.com](mailto:Bradley.Vandehey.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, April 28, 2024 7:31:56 AM

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Dear Nicole Singh,

Please keep Natural Gas along with electricity for me and all my neighbors who will benefit during challenging power outages whether it be winter or summer. I benefit greatly from having natural gas available to me during the 14 degree weather we had last winter. I was able to have hot water and run my fire place to keep the house reasonably tolerable. This is a safety item for us being in our 70's and a money saver to keep the house pipes from freezing.

Sincerely,  
Bradley Vandehey  
5348 Amberwood Ct  
Lake Oswego, OR 97035  
[bjvandehey@gmail.com](mailto:bjvandehey@gmail.com)

**From:** [Eugene Brown via constituent@civiclick.com](mailto:Eugene.Brown.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, April 28, 2024 7:32:32 AM

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Dear Nicole Singh,

I was an information officer for two big energy companies for ten years, oil and the nuclear. The legislation being passed to address climate change is idiotic from an engineering standpoint. My gas furnace is 90%+ efficient. If you outlaw gas heat in homes that gas will be burnt in electrical generation plants at about 38% efficiency. During the ice storm several years ago my house was without power for five days. I ran the gas insert in my fireplace continuously. It kept me alive and my pipes from freezing.

Sincerely,  
Eugene Brown  
6646 Doral Dr SE  
Salem, OR 97306  
[ecbat60@comcast.net](mailto:ecbat60@comcast.net)

**From:** [DENNIS SCOTT via constituent@civiclick.com](mailto:DENNIS SCOTT via constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, April 28, 2024 7:34:56 AM

---

Dear Nicole Singh,

Click 'Customize Email' below, and type your email here.

Sincerely,  
DENNIS SCOTT  
39333 Gross St  
Lebanon, OR 97355  
[dennisscott47@hotmail.com](mailto:dennisscott47@hotmail.com)



**From:** [Bertram Busby via constituent@civiclick.com](mailto:Bertram Busby via constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, April 28, 2024 8:23:59 AM

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Dear Nicole Singh,

Hi there in the energy department,

I would like to add my opinion regarding any Oregon plans on restricting Natural gas equipment and use:

Don't do it. Without the option of natural gas too much reliance will be placed on the electrical power grid.

At my duplex apartment I have a gas furnace, for example, that I can plug into a solar generator power bank and heat the apartment if there is a power grid failure.

Let us have our options.

Thank you,

Bert Busby

Sincerely,

Bertram Busby

2860 SW 209th Ave. Apt. 2

Beaverton , OR 97003

[bertb32003@gmail.com](mailto:bertb32003@gmail.com)

**From:** [Dan Giarrusso via constituent@civiclick.com](mailto:Dan_Giarrusso_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, April 28, 2024 10:49:02 AM

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Dear Nicole Singh,

Natural gas needs to remain as an alternative fuel source for our region during the storm even though I did not have electricity. I had hot water and I was able to run my gas furnace off of a portable generator, preventing house from freezing.

Sincerely,  
Dan Giarrusso  
2856 Tulip St  
Eugene , OR 97408  
[Dan@marshallsinc.com](mailto:Dan@marshallsinc.com)

**From:** [Roger Holloway via constituent@civiclick.com](mailto:Roger.Holloway.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, April 28, 2024 11:21:58 AM

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Dear Nicole Singh,

Take it from an 76 year old man.

Two years ago a neighbor lost a tree during an ice storm. The tree came down across electrical wires and ripped the power line and reception box from the side of our house, flinging it 20 feet away. This left the entire neighborhood powerless.

The storm was extensive and our home was without power for 11 days total, before we could get a new (and to code) receiving box mounted and attached to the exterior wall.

It was fortunate we had NATURAL GAS to continue heating the home with our gas fireplace. As well, we were able to cook on our gas stove, and take nice warm showers from hot water provided by our gas water heater! It SAVED our lives, frankly. We would have frozen to death.

I have been compromised from having a heart attack, previously, and do not need this drama in my life at all, nor does my Bride!

Government is here to serve the people, so serve them right, by leaving us alone! Leave natural gas alone to continue being able to provide with the means to warm home, cook our meals and shower with warm water in our retirement days. Thank you!

Sincerely,  
Roger Holloway  
6431 GLEN ECHO AVE  
GLADSTONE, OR 97027  
[rohoduck@aol.com](mailto:rohoduck@aol.com)

**From:** [Sam Louke via constituent@civiclick.com](mailto:Sam Louke via constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, April 28, 2024 12:16:47 PM

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Dear Nicole Singh,

Last winter I was reminded why having natural gas in our home was very important. We had several power outages during that week-long period of freezing weather and storms. They lasted from several hours to an entire day and overnight. During that time, we heated our home with our gas fireplace. While having a robust and reliable electrical system is critical, having a backup system (gas) is also very important. If our electrical system continues to be unreliable as the climate changes, I might consider installing a natural gas backup generator.

Sincerely,  
Sam Louke  
5627 SW Miles Ct  
Portland, OR 97219  
[sam.louke@gmail.com](mailto:sam.louke@gmail.com)

**From:** [Rene Wahl via constituent@civiclick.com](mailto:Rene.Wahl.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, April 28, 2024 1:02:02 PM

---

Dear Nicole Singh,

Click 'Customize Email' below, and type your email here.

Sincerely,  
Rene Wahl  
4676 Commercial St SE #36  
Salem, OR 97302  
[reneostro@duck.com](mailto:reneostro@duck.com)

**From:** [Frank Gecina via constituent@civiclick.com](mailto:Frank.Gecina.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, April 28, 2024 1:22:27 PM

---

Dear Nicole Singh,

Click 'Customize Email' below, and type your email here.

Sincerely,  
Frank Gecina  
1305 NW 11Th St  
Corvallis, OR 97330  
[frankgecina@gmail.com](mailto:frankgecina@gmail.com)

**From:** [Jerry Kryszek via constituent@civiclick.com](mailto:Jerry.Kryszek.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Please allow me to continue having a choice of energy options  
**Date:** Sunday, April 28, 2024 1:30:08 PM

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Dear Nicole Singh,

Greetings,

I am very concerned about proposals to have us depending only on electricity for heating our homes. During last winter's storms, I was able to keep the pipes in my house from freezing because I had natural gas heat and a small gasoline powered generator with a proper transfer switch that could safely run the furnace. Also, because of natural gas service to my home, I continued to have hot water available.

If I didn't have the natural gas system and gasoline backup electricity for my home, the potential for many thousands of dollars of damage due to frozen pipes during last winter's storm was very real. Just look at what happened to many of the Portland Public Schools facilities where pipes froze! If we were on electricity only, that could have happened to my home as well.

I strongly disagree with removing the choice to use natural gas safely. Natural gas is a clean and safe source of energy. Please continue to give me that option. Freedom of choice is a very American value.

Sincerely,  
Jerry Kryszek  
5716 SW Brugger St  
Portland, OR 97219  
[jerry.kryszek@gmail.com](mailto:jerry.kryszek@gmail.com)

**From:** [Chrystele Luneau via constituent@civiclick.com](mailto:Chrystele Luneau via constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, April 28, 2024 2:12:41 PM

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Dear Nicole Singh,

Thank goodness for gas: with our gas stove and gas water heater, we were able to make it through 4 days of no electricity during the storm in January. I'm so glad we had these resources! We clearly can't rely on only one source of energy in the coming years.

Sincerely,  
Chrystele Luneau  
3105 SW GARDEN VIEW AVE  
PORTLAND, OR 97225  
[tlhutchinson@yahoo.com](mailto:tlhutchinson@yahoo.com)



**From:** [Gordon Neumann via constituent@civiclick.com](mailto:Gordon_Neumann_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, April 28, 2024 2:12:46 PM

---

Dear Nicole Singh,

This last January 2024 storm is a prime example of why we need more than one energy source to live our lives. My mother thought me to never put all of your eggs in one basket. Very sound advice.

Sincerely,  
Gordon Neumann  
PO Box 681  
Beavercteeek, OR 97004  
[Gordonjr@bctonline.com](mailto:Gordonjr@bctonline.com)

**From:** [Diane Zadow via constituent@civiclick.com](mailto:Diane.Zadow.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, April 28, 2024 5:56:24 PM

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Dear Nicole Singh,

We converted to gas. The people who think they know best for all should not be making decisions that cause others to change for any reason. We have a right to choose what is best for our own use.

Sincerely,  
Diane Zadow  
9205 SW View Terrace  
Tigard, OR 97234  
[DianeZadow15@Comcast.net](mailto:DianeZadow15@Comcast.net)

**From:** [Katharine Campbell via constituent@civiclick.com](mailto:Katharine.Campbell.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, April 28, 2024 6:23:27 PM

---

Dear Nicole Singh,

In the past storm I had Covid and was stuck in bed at home. We had one pipe freeze that we were able to thaw by running our gas fireplace at home. Has we not had gas during that storm, I am convinced we would have had damage to our home. Plus the convenience of keeping our home slightly heated I was able to stay home and recover and not inconvenience others or get anyone sick. I am opposed to eliminating gas to homes.

Sincerely,  
Katharine Campbell  
11646 NW Kearney St  
Portland, OR 97229  
[Ksirlin@hotmail.com](mailto:Ksirlin@hotmail.com)

**From:** [Carl Nelson via constituent@civiclick.com](mailto:Carl.Nelson.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, April 28, 2024 7:30:18 PM

---

Dear Nicole Singh,

I fully support cleaner air but feel that natural gas should remain an option in Oregon until there are more sustainable and reliable energy options. Natural gas is more economical and efficient. It also seems more reliable especially after the winter outages.

Sincerely,  
Carl Nelson  
1460 NW 123rd Ave  
Portland, OR 97229  
[nelsoncd@me.com](mailto:nelsoncd@me.com)

**From:** [Shayla Logue via constituent@civiclick.com](mailto:Shayla_Logue_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, April 28, 2024 10:08:02 PM

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Dear Nicole Singh,

I support responsible choices in energy and think a blended choice may be best. During the horrible winter storm in Jan 2024, I housed 3 families and two dogs that had no electricity. We too lost our electricity for a shorter period of time but because we had a natural gas fireplace with battery back-up starter and fan (ran off D batteries), we were able to keep heat in the main living area of our house when it was 14 degrees outside. It was NATURAL GAS that was more consistent than the electrical grid and I am skeptical of any plans to due away with a multi-modal energy supply.

Sincerely,  
Shayla Logue  
11265 SW 79th Ave  
Tigard, OR 97223  
[shayla.m.ebner@pfizer.com](mailto:shayla.m.ebner@pfizer.com)

**From:** [Cary Smith via constituent@civildick.com](mailto:Cary.Smith.via.constituent@civildick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, April 28, 2024 10:26:10 PM

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Dear Nicole Singh,

Please refrain from the madness of moving Oregon and Oregonians off of natural gas and other so-called fossil fuels at an unrealistic and unreasonable pace. Natural gas is affordable and reliable and is part of ensuring a stable economy and decent quality of life for my family.

Sincerely,  
Cary Smith  
875 Ree Del Ct Ne  
Salem, OR 97301  
[crblacksmith@yahoo.com](mailto:crblacksmith@yahoo.com)

**From:** [Vic Hariton via constituent@civiclick.com](mailto:Vic.Hariton.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Monday, April 29, 2024 7:41:43 AM

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Dear Nicole Singh,

Being without electric power for a week at a time would be unbearable and inhumane in winter. This has occurred multiple times at my home. If natural gas is eliminated, I will be forced to convert my fireplace to wood burning. The expense of changing other appliances would be a financial burden as well.

We are not ready for electric only!

Sincerely,  
Vic Hariton  
400 Fulvue Drive  
Eugene, OR 97405  
[Vhariton@outlook.com](mailto:Vhariton@outlook.com)

**From:** [Donna Loux via constituent@civiclick.com](mailto:Donna.Loux.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Monday, April 29, 2024 8:00:46 AM

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Dear Nicole Singh,

I am 73 years old and just lost my husband of 55 years the end of November. The last storm I was alone, adjusting to taking care of my house without any advice or help. I lost power and had no heat. The Gorge wind blew the chimney cap off my fireplace and I lost a giant tree limb after losing several limbs crashing around my house. I resorted to using my gas fireplace for heat and was grateful I had that option. I was also able to cook by lighting my gas stove manually. When electricity goes out for long periods of time, elderly need options for heat and cooking. I can do without light, but not heat or the ability to heat food.

Sincerely,  
Donna Loux  
1200 SW Autumn Way  
Troutdale, OR 97060  
[loux2275@comcast.net](mailto:loux2275@comcast.net)



**From:** [Royce Hermens via constituent@civiclick.com](mailto:Royce.Hermens.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Monday, April 29, 2024 8:34:50 AM

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Dear Nicole Singh,

As a matter of practical circumstances, I believe it best to have the dual availability we have today in power choices to continue. For this reason I support an increasingly stronger electrical power grid along with continued availability of natural gas in Oregon.

Sincerely,  
Royce Hermens  
8280 SW Peters Road  
Tigard, OR 97224  
[hermensroyce@gmail.com](mailto:hermensroyce@gmail.com)

**From:** [Sue Cook via constituent@civiclick.com](mailto:Sue_Cook_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Monday, April 29, 2024 8:53:17 AM

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Dear Nicole Singh,

In these days of huge demand on both the electrical systems and natural gas systems it seems like exceedingly poor planning to shift to all electric power options before the electric system is ready to take on the challenge. Rolling brown outs are predicted at the same time the government wants us to stop using natural gas and go all electric, that does not make any sense. We opened our home to friends during last winter's ice storm as they had no electricity and now way to either heat their home or heat food because theirs is an all-electric home. They were at our house for 5 days waiting for their power to come back. They work from home and also lost that ability. Will employers be expected to give paid time off to their work at home staff that can't work because the power is off, and our government has overtaxed the electrical grid?

Sincerely,  
Sue Cook  
9685 SW Serena Way  
Tigard, OR 97224  
[sue\\_garycook@yahoo.com](mailto:sue_garycook@yahoo.com)

**From:** [Craig Shelby via constituent@civiclick.com](mailto:Craig%20Shelby%20via%20constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Monday, April 29, 2024 9:07:02 AM

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Dear Nicole Singh,

During the recent winter storms, we experienced events that overwhelmed both emergency services, and our infrastructure. We are an elderly couple that live in a rural setting. Our area was inaccessible and without power for an extended period of time. Because our home uses natural gas, we were able to keep warm, and sustain ourselves. We had heat, hot water, and could cook. Light was provided by battery operated lanterns. We also were in a position to provide assistance to our neighbors. Without natural gas we would have sustained injury. Both of us are retired from emergency services, both law enforcement and fire/EMS. During our careers we witnessed firsthand death and injury from natural disasters. It is disturbing to see officials making decision, such as limiting energy choices, that will result in increased deaths, or injury during these events.

Sincerely,  
Craig Shelby  
PO Box 50304  
Eugene, OR 97405  
shelbycj@aol.com

**From:** [brian.gordon.via.constituent@civiclick.com](mailto:brian.gordon.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Monday, April 29, 2024 9:34:53 AM

---

Dear Nicole Singh,

State Legislative, not only from recent storms but from many storms in the past my neighbors and I felt blessed to have had alternate sources of energy during power outages. Many of my elder neighbors were also very fortunate during power outages to keep their homes warm. One of my neighbors that had a gas stove was able to cook for some of our elderly neighbors that had nothing to cook on. WE NEED TO KEEP DIVERFIED ENERGY OPTIONS!

Many Gas furnaces can be run on generators.

Sincerely,  
brian gordon  
16210 SE Sterling circle  
Milwaukie , OR 97267  
[brian@oakgrovelbr.com](mailto:brian@oakgrovelbr.com)

**From:** [Penny Krueger via constituent@civiclick.com](mailto:Penny.Krueger.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Support access to natural gas  
**Date:** Monday, April 29, 2024 10:08:28 AM

---

Dear Nicole Singh,

My husband is 80 and I am 78 years old. During the January 2024 cold spell, we relied on our gas fireplace when the power went out. We were able to keep the living room area at 67 degrees with our gas fireplace alone. We live on a butte which in ice and snow makes it impossible for us to leave. We would have been in trouble and in need of rescue if we had not had our gas fireplace. In fact, after this experience I plan to install a gas stove. To cook I used propane camping stove on our deck. With a gas stove I could stay in the house to cook. Also, since we have a gas hot water tank, we were able to wash in comfort. Please, please, please continue public access to natural gas.

Sincerely,  
Penny Krueger  
1380 SW 33 St  
Gresham, OR 97080  
[pkruieger@hotmail.com](mailto:pkruieger@hotmail.com)

**From:** [Ron Friedman via constituent@civiclick.com](mailto:Ron.Friedman.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Monday, April 29, 2024 10:17:45 AM

---

Dear Nicole Singh,

Without my natural gas fireplace I have no heat during electric outage. I would then have to find another place to live

Sincerely,  
Ron Friedman  
316 Quail Run Cir  
Woodburn, OR 97071  
[rj.freed7@frontier.com](mailto:rj.freed7@frontier.com)

**From:** [Dave McAllister via constituent@civiclick.com](mailto:Dave McAllister via constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Monday, April 29, 2024 10:25:12 AM

---

Dear Nicole Singh,

Please stop increasing energy rates and crippling natural gas by pursuing the green energy scam which makes no difference to global CO2 levels.

Sincerely,  
Dave McAllister  
44 Eagle Crest Drive  
Lake Oswego, OR 97035  
[Dmcallister@nunm.edu](mailto:Dmcallister@nunm.edu)

**From:** [Susie Schriever via constituent@civiclick.com](mailto:Susie.Schriever.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Monday, April 29, 2024 11:57:39 AM

---

Dear Nicole Singh,

To whom it may concern,  
During a recent ice storm we were out of power for 14 days. Had it not been for Natural Gas we would not had been able to cook or run a natural gas generator.  
Please consider Natural Gas as an essential energy source.

Best regards,  
Susie Schriever

Sincerely,  
Susie Schriever  
9096 S Schneider Rd  
Molalla , OR 97038  
[Susieschriever@gmail.com](mailto:Susieschriever@gmail.com)



**From:** [DOUG PERLE via constituent@civiclick.com](mailto:DOUG PERLE via constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Monday, April 29, 2024 1:19:38 PM

---

Dear Nicole Singh,

The false science of the climate change that Co2 is the issue are and that need to be removed from the thought process. Without Co2 this earth will be a planet without life period. Our natural choice for all live is to leave the nature to nature and balance our known bi-lateral support of electric and natural gasses. Unless we support these two products the political industry and the public will both fail. Again, showing the earths nature will win in the end. As mankind will have destroyed itself, proving nature has it purpose in producing products that mankind should and needs to continue to use to exist in this world. We, as the people, must have a choice not the politicians who are not for the truth and the science that hasn't been truthful.

Sincerely,  
DOUG PERLE  
1945 BERRY ST SE ,SALEM, OR  
Salem, OR 97302  
[perle37@msn.com](mailto:perle37@msn.com)

**From:** [Maarten deVriend via constituent@civiclick.com](mailto:Maarten.deVriend.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Monday, April 29, 2024 1:40:19 PM

---

Dear Nicole Singh,

We live in Albany's Monteith district, an older community of houses. Many of these properties were designed or retrofitted to be heated by oil or more recently natural gas. Natural gas is the most cost effective heating solution for our home, and many others in our area.

During the recent winter storm, many homes in our neighborhood were without power for the day, although ours was unaffected. We still rely on the grid for our furnace to operate. If we had no power, we would have no heat, simply put. I think energy diversification is really important for situations like this. If I had a furnace that could safely operate when the power is out, I would.

Please consider this as you inform policy for the companies we rely on, such as NW Natural. Thank you for your time.

Sincerely,  
Maarten deVriend  
321 12th Ave SW  
Albany, OR 97321  
[mdevriend123@gmail.com](mailto:mdevriend123@gmail.com)

**From:** [william.park.via.constituent@civiclick.com](mailto:william.park.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Monday, April 29, 2024 2:12:57 PM

---

Dear Nicole Singh,

Hello, 3 days without power in January of 2024, then 4 days later, another 24 hour electrical outage. Natural Gas kept my family warm during the just below freezing temperatures for the 4 days we were without power. Oregonians should have a choice of their energy sourcers. Thank you, William Park.

Sincerely,  
william park  
20744 NE Wistful Vista Drive  
Fairview, OR 97024  
wpark65@gmail.com

**From:** [Scott Mayer via constituent@civiclick.com](mailto:Scott.Mayer.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians must have a choice of energy options  
**Date:** Monday, April 29, 2024 2:37:51 PM

---

Dear Nicole Singh,

My electric power was out for nearly a week this past January. The temperature in my house dropped to 36 degrees. I bought a portable generator to run the fan in my natural gas furnace. I was able to cook on the stovetop and my gas grill. Gas is more reliable than electricity and having both, having a diversity of energy sources, gives us the security that we need. Please allow Oregonians to have a choice in their energy supplies.

Sincerely,  
Scott Mayer  
16764 Alder Circle  
Lake Oswego, OR 97034  
[scottmayer@stanfordalumni.org](mailto:scottmayer@stanfordalumni.org)

**From:** [Claudia Buttolph via constituent@civiclick.com](mailto:Claudia_Buttolph_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Monday, April 29, 2024 3:19:23 PM

---

Dear Nicole Singh,

I want to make my case heard and I strongly believe that people in the state of Oregon should have a choice on what type of energy choices they want in their houses. I was very thankful that I had gas in my house during the bad weather we had in January. We had a gas stove to keep the house warm and we had gas hot water so we could take showers. I even invited others over to our house to share those amenities. Those that just had electric had nothing for any kind of back up to even help a little to be able to stay home. The energy choice should be left to the people of the state to decide not the government.

Sincerely,  
Claudia Buttolph  
21650 S Lee Dr  
Oregon City , OR 97045  
Cashew4me@aol.com

**From:** [Karleen Simpson via constituent@civiclick.com](mailto:Karleen.Simpson.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Monday, April 29, 2024 3:44:10 PM

---

Dear Nicole Singh,

I rely on gas during winter to be able to cook and take showers. The price of gas has already risen too much. I barely turn on my heat these days. My woodshed is kept full in case of extended power outage.

Sincerely,  
Karleen Simpson  
21581 S. Crestview Drive  
Oregon City, OR 97045  
[penny@ssgrp.com](mailto:penny@ssgrp.com)

**From:** [Kim Knudson via constituent@civiclick.com](mailto:Kim.Knudson.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Monday, April 29, 2024 4:22:44 PM

---

Dear Nicole Singh,

I was so grateful for diversification energy sources in my home. When went out was able to continue to use my gas range and my fireplace. Another citizen supporting diversity of energy sources.

Sincerely,  
Kim Knudson  
13125 SW Bull Mountain Rd  
Tigard, OR 97224  
[mkrp3@msn.com](mailto:mkrp3@msn.com)

**From:** [William Romanelli via constituent@civiclick.com](mailto:William.Romanelli.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Monday, April 29, 2024 5:23:40 PM

---

Dear Nicole Singh,

I have owned my home for 37 years. during that time, electrical service has not been reasonably reliable, even though I live in Portland. I believe it is because PGE has not taken my complaints seriously. I can manage to keep my home partially warmed with my gas appliances, and have done so when the power is off for multiple days. We need options on energy sources.

Sincerely,  
William Romanelli  
4318 SW CONDOR AVE  
PORTLAND, OR 97239  
[wromanelli@comcast.net](mailto:wromanelli@comcast.net)



**From:** [Randy Zmrhal via constituent@civiclick.com](mailto:Randy.Zmrhal.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Monday, April 29, 2024 5:50:05 PM

---

Dear Nicole Singh,

It seems obvious that diversification for low cost energy options is the way to go. My electric bills have only gone one way since I moved to oregon, the latest increase last year was 20%!!

When our power goes out in the winter storms, we relay on out gas fireplace for heat in our home.

Going only electric is not a reliable low cost strategy.

Also, i just listened to a Columbia River Gorge webinar on the incredible harm the Gorge windmills are doing to bald eagles and golden eagles, killing many of them. This also does not make much sense. It seems that to supposed strategies to protect the environment also serve to destroy the environment; the best case in point is the devastation to the salmon populations in the PNW due to the all the dams (renewable energy) built on the Columbia river.

So, a more honest evaluation to the use of alternate sources of energy is in order as well.

Sincerely,  
Randy Zmrhal  
968 Lake Shore Rd  
Lake Oswego, OR 97034  
[randy.zmrhal@gmail.com](mailto:randy.zmrhal@gmail.com)

**From:** [Thomas Buxton via constituent@civiclick.com](mailto:Thomas Buxton via constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Monday, April 29, 2024 7:07:11 PM

---

Dear Nicole Singh,

During this winter's snow and ice storm, we lost our electricity for several hours. As temperatures dropped into the single digits, the threat to frozen water lines could have been disastrous, not to mention our own physical health as both my wife and I are in our 60s. The good news is that we stayed warm with our gas heat, plus we had hot running water and a gas range for cooking. With a few candles and lanterns we got through the power outages without any problems.

Please don't be naive enough to think that electricity is the sole answer to our power needs. Get real, open your eyes to facts, seek truth and stop this outrageously insane idea that we can run this state solely on electric power.

Sincerely,  
Thomas Buxton  
2503 SE Elliott Dr  
Gresham, OR 97080  
[thomas.buxton3@frontier.com](mailto:thomas.buxton3@frontier.com)

**From:** [Peter LaRocca via constituent@civiclick.com](mailto:Peter.LaRocca.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Monday, April 29, 2024 9:03:50 PM

---

Dear Nicole Singh,

Dear Oregon Department of Environmental Quality,

We need a diversified energy system, a dual system. We need both electric and natural gas systems.

As an example, if I lose electric power in the winter, I can still heat my house with my gas fireplace.

Also, I have a gas range I could use and a gas hot water heater.

During the recent winter storm we had in January, more than a half million people lost their electric power.

Please keep the dual power systems in place.

Sincerely,

Peter LaRocca

Sincerely,  
Peter LaRocca  
14900 SW Michael Ct  
Sherwood, OR 97140  
[petelarocca@yahoo.com](mailto:petelarocca@yahoo.com)

**From:** [Marlene Perling via constituent@civiclick.com](mailto:Marlene.Perling.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Monday, April 29, 2024 11:19:19 PM

---

Dear Nicole Singh,

If I was not able to use my gas fireplace insert during the ice storm in Eugene, my sister may have died. I had to pick her up from the hospital because the hospital was overloaded but she was still sick with a very bad cough. If we didn't have any heat at all it would have been fatal I'm sure, but thankfully we huddled around my fireplace and made it through. Please don't take away our rights to use gas in our homes.

Sincerely,  
Marlene Perling  
797 Ascot Drive  
Eugene, OR 97401  
[mperling@centurylink.net](mailto:mperling@centurylink.net)

**From:** [David Kost via constituent@civiclick.com](mailto:David.Kost.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Tuesday, April 30, 2024 3:43:51 PM

---

Dear Nicole Singh,

We currently enjoy having natural gas power our furnace & water heater. Natural gas is clean-burning and affordable. It is also reliable, especially in the winter. Even when the electric supply is disrupted, we know we will always at least have hot water, and a small generator will allow our furnace to keep us warm. Consumers should have the choice of natural gas if they prefer!

Sincerely,  
David Kost  
20150 SW Sandra Ct.  
Aloha, OR 97003  
[dave.kost@comcast.net](mailto:dave.kost@comcast.net)

**From:** [Julia Frederick via constituent@civiclick.com](mailto:Julia.Frederick.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Friday, May 3, 2024 10:19:53 AM

---

Dear Nicole Singh,

Diversification is merely common sense. Every energy system has positives and negatives. As in most things, it is good to have more than one method of meeting needs. Click 'Customize Email' below, and type your email here.

Sincerely,  
Julia Frederick  
Julia K Frederick  
Eugene, OR 97408  
[juliafreder@gmail.com](mailto:juliafreder@gmail.com)

**From:** [Julia Frederick via constituent@civiclick.com](mailto:Julia.Frederick.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Friday, May 3, 2024 10:22:46 AM

---

Dear Nicole Singh,

Diversification ability is only common sense. All energy systems have their positive and negative aspects. To limit energy generation to one major source is foolishness.

Sincerely,  
Julia Frederick  
Julia K Frederick  
Eugene, OR 97408  
[juliafreder@gmail.com](mailto:juliafreder@gmail.com)

**From:** [Dave Beatty via constituent@civiclick.com](mailto:Dave Beatty via constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 6:46:04 AM

---

Dear Nicole Singh,

If it had not been for my gas fireplace we would have to had left our home and moved into a hotel perhaps out of state. Natural gas is essential.

Sincerely,  
Dave Beatty  
300 McLaughlin Dr  
Woodburn, OR 97071  
[banzai\\_beagle@yahoo.com](mailto:banzai_beagle@yahoo.com)



**From:** [Thomas Reuss via constituent@civiclick.com](mailto:Thomas.Reuss@constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 6:52:46 AM

---

Dear Nicole Singh,

I have both natural gas & solar as energy resources. During the ice storm of 2021, the only power source available at my home was natural gas. I have already set-up the installation of my gas generator as a backup to my main power grid. I don't want one or the other, I want both sources of power to ensure that my home is outfitted for the future.

Sincerely,  
Thomas Reuss  
5340 Summit Street  
WEST LINN, OR 97068  
[tfreuss64@gmail.com](mailto:tfreuss64@gmail.com)

**From:** [Jonathan Cutting via constituent@civiclick.com](mailto:Jonathan.Cutting.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 6:54:42 AM

---

Dear Nicole Singh,

I would like to take this opportunity to make some common sense arguments for continuing the present utilization of natural gas as a major supplier of energy in the Pacific Northwest. Many are touting the idea that eliminating the use of carbon-based energy sources should be the highest priority. While concern for the environment is laudible, there must be a consideration of the economic and social consequences of eliminating access to natural gas at a rate that is faster than alternative energy sources can be RELIABLY instituted. During the January 2024 power outages, when above-ground electrical sources were put out of commission for extended periods, I and many of my neighbors continued to enjoy hot water, and for some, even heat (depending on the style of heating system). This was crucial for many, especially the elderly and infirm. But communities w/o access to natural gas, such as some of those areas in the state where natural gas plumbing is now prohibited by law, suffered in the extreme, and will suffer in the future during upcoming inclement weather. Please consider carefully whether elimination of access to natural gas sources is truly a good choice for Pacific Northwest communities when alternative RELIABLE and PROVEN sources of energy are not ALREADY in place. Thank you,

Sincerely,  
Jonathan Cutting  
1465 Bair Rd NE  
Keizer, OR 97303  
[cuttingjon@gmail.com](mailto:cuttingjon@gmail.com)

**From:** [RHONDA SEWELL via constituent@civiclick.com](mailto:RHONDA_SEWELL_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 7:00:55 AM

---

Dear Nicole Singh,

Natural Gas is best. During any kind of power outage, with natural gas, I still have hot water and I can still cook on my gas stove. My daughter has only electric heat and had to come to our house, as she was freezing. Do Not restrict natural gas. It's the best.

Sincerely,  
RHONDA SEWELL  
609 SW Cedar Ave.  
WARRENTON, OR 97146  
[llama765@yahoo.com](mailto:llama765@yahoo.com)

**From:** [Ladd McKittrick via constituent@civiclick.com](mailto:Ladd%20McKittrick%20via%20constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 7:01:48 AM

---

Dear Nicole Singh,

Natural gas has been the most reliable energy source to my homes as long as I have lived in Oregon over the past 50+ years. Reducing our region's use of Natural gas makes Oregonians more susceptible to energy outages.

Sincerely,  
Ladd McKittrick  
9487 SW Inez St  
Tigard, OR 97224  
[ladd.mckittrick@gmail.com](mailto:ladd.mckittrick@gmail.com)

**From:** [ERICK Van Abkoude via constituent@civiclick.com](mailto:ERICK Van Abkoude via constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 7:07:44 AM

---

Dear Nicole Singh,

We appreciate and depend upon natural gas, and respect the high service level provided by NW Natural.

Sincerely,  
ERICK Van Abkoude  
3975 NW ELIZABETH PL  
Corvallis, OR 97330  
[rvanabkoude@comcast.net](mailto:rvanabkoude@comcast.net)

**From:** [Jennifer Branson via constituent@civiclick.com](mailto:Jennifer.Branson.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 7:18:13 AM

---

Dear Nicole Singh,

Like with investments energy sources need to be diversified.

Sincerely,  
Jennifer Branson  
545 Se Lilly Ave  
Corvallis, OR 97333  
[bransonj.omnigen@gmail.com](mailto:bransonj.omnigen@gmail.com)

**From:** [Suzy Brander via constituent@civiclick.com](mailto:Suzy Brander via constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 7:18:34 AM

---

Dear Nicole Singh,

OR DEQ - Continuation of gas is, in my opinion, critical. It is an important part of our power supply. Power supply is necessary for survival. We should not be so short sighted as to deny ourselves a key piece of the system. Even if one is a true believer in all electric, which our basic infrastructure cannot handle, it's not smart to leave ourselves without a backup or fall back position. Power does equal survival.

Sincerely,  
Suzy Brander  
8437 SW 4th Ave  
Portland, OR 97219  
[suzysmail@comcast.net](mailto:suzysmail@comcast.net)

**From:** [Lee Cordner via constituent@civiclick.com](mailto:Lee.Cordner.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 7:18:44 AM

---

Dear Nicole Singh,

The political destruction of the reliable power grid should concern every Oregonian. It is clear that Oregon will follow California's suicidal leadership toward expensive, unreliable power while our president plans to invoke emergency powers to shut down America's energy industry and make showering a criminal offense.

In times like these our very lives may depend on a reliable supply of natural gas for heating, cooking and home power generation. Please adopt policies that do not threaten energy security or disrupt the supply of natural gas.

Sincerely,  
Lee Cordner  
487 Lanthorn Ln  
Gearhart, OR 97138  
[Lee.cordner@gmail.com](mailto:Lee.cordner@gmail.com)



**From:** [Jason Young via constituent@civiclick.com](mailto:Jason.Young.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 7:32:44 AM

---

Dear Nicole Singh,

Click 'Customize Email' below, and type your email here.

Sincerely,  
Jason Young  
344 W MYRTLEWOOD St  
Newberg, OR 97132  
[Youngjjason@gmail.com](mailto:Youngjjason@gmail.com)

**From:** [Randy Springer via constituent@civiclick.com](mailto:Randy_Springer_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 7:40:05 AM

---

Dear Nicole Singh,

Natural gas is a resource we need to balance our energy options and provide affordable energy for Oregon households

Sincerely,  
Randy Springer  
2928 Heron Loop SE  
Albany, OR 97322  
[randy.springer@comcast.net](mailto:randy.springer@comcast.net)

**From:** [Alice Jacobs via constituent@civiclick.com](mailto:Alice.Jacobs.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 7:41:27 AM

---

Dear Nicole Singh,

I lost power for 4 days and my inside home temperature was jsut above freezing. Having a as stove saved me so I could cook. And having a gas water heater helped for hit showers to stay warm and fill up a hot water bottle to put in my bed.

Sincerely,  
Alice Jacobs  
3205 Edgemont Road  
Lake Oswego, OR 97035  
[aquayellow@gmail.com](mailto:aquayellow@gmail.com)

**From:** [Eric Johnson via constituent@civiclick.com](mailto:Eric.Johnson.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 7:45:01 AM

---

Dear Nicole Singh,

Click 'Customize Email' below, and type your email here.  
Natural gas is important

Sincerely,  
Eric Johnson  
5907 Adler Ave  
Woodland Hills, CA 91367  
[rericjohnson1982@gmail.com](mailto:rericjohnson1982@gmail.com)

**From:** [Margaret Hiatt via constituent@civiclick.com](mailto:Margaret.Hiatt.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 7:47:32 AM

---

Dear Nicole Singh,

Going to an all electric grid created a system with no resiliency. During the ice storm we kept warm with a gas fireplace and cooked food on our gas stove. Depending upon a single source of energy means that there is a single point of failure.

Don't mandate a system that will not meet the needs of the public.

Sincerely,  
Margaret Hiatt  
11411 SW 51st Ave  
Portland , OR 97219  
[peggy.hiatt@gmail.com](mailto:peggy.hiatt@gmail.com)

**From:** [Tracie Fickling via constituent@civiclick.com](mailto:Tracie.Fickling.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 7:54:14 AM

---

Dear Nicole Singh,

I support taking care of our planet. My husband and I have changed many of our own habits, such as purchasing a hybrid vehicle for in town errands, using fewer disposable plastics in our home, planting more trees on our property, etc. Even paying a higher rate to PGE for renewable sources of electricity.

However, our electric power in the county with only 35 homes in our neighborhood is often a last priority when power goes out. I am about to retire and we can not afford to replace our Natural gas appliances. When the power goes out we need our generator to keeping water flowing in our home, and to keep electrical medical equipment working, especially during ice storms when we cannot travel on our hill.

While we understand the longer term goal of reducing emissions, replacing our fireplace, stove, water heater, and furnace would not be affordable on our retired fixed income. However, taking away our emergency source of power during ice storms and other PGE outages puts our family at risk.

Thank you for your consideration of these impacts.

Sincerely,  
Tracie Fickling  
9002 SE Wooded Hills Ct  
Damascus , OR 97089  
[tlbrow1@gmail.com](mailto:tlbrow1@gmail.com)

**From:** [David Bowman via constituent@civiclick.com](mailto:David.Bowman.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 7:57:45 AM

---

Dear Nicole Singh,

When the power goes out during winter storms, we have natural gas to heat our home. This should continue to be an option for heating. Just remember what happened to Texas when ice storms took out their power grid. Please consider diversification of our energy supply!!!

Sincerely,  
David Bowman  
7840 Liberty Rd S  
Salem, OR 97306  
[crazyfishfinder@gmail.com](mailto:crazyfishfinder@gmail.com)

**From:** [Daniel Doerflinger via constituent@civiclick.com](mailto:Daniel.Doerflinger.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 7:58:26 AM

---

Dear Nicole Singh,

Dear Representatives,

Sole electricity dependency will not meet the needs of Oregonians. The infrastructure in place cannot sustain (as proven twice in the last 6 years) harsh weather events. With natural gas I was able to heat my home and cook hot food during the 7 days electricity was not available. Without this option, I would have needed to relocate impacting my family, job, finances, and overall livelihood.

Sincerely,  
Daniel Doerflinger  
2290 Ibsen Ave  
Cottage Grove, OR 97424  
[danielmx5@gmail.com](mailto:danielmx5@gmail.com)



**From:** [Sean Nygaard via constituent@civiclick.com](mailto:Sean.Nygaard.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Natural gas is a lifesaver  
**Date:** Saturday, May 4, 2024 8:05:34 AM

---

Dear Nicole Singh,

During the January storm this year, natural gas helped keep homes warm when the power was out. This saved lives and kept pipes from freezing. Oregon DEQ must ensure natural gas stays available to Oregonians.

Sincerely,  
Sean Nygaard  
11850 SW 12th ST  
Beaverton, OR 97005  
[seannygaard@gmail.com](mailto:seannygaard@gmail.com)

**From:** [M.Colehour via constituent@civicklick.com](mailto:M.Colehour%20via%20constituent@civicklick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 8:09:42 AM

---

Dear Nicole Singh,

Click 'Customize Email' below, and type your email here.

Sincerely,  
M Colehour  
464 Spring Creek Dr  
Eugene, OR 97404  
[mikecolehour@gmail.com](mailto:mikecolehour@gmail.com)

**From:** [Steven Blake via constituent@civiclick.com](mailto:Steven.Blake.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 8:10:30 AM

---

Dear Nicole Singh,

In our recent experience during winter storms, our electricity has failed several times. During the HUGE 2021 ice storm our electricity was out for 11 days however our natural gas supply has never been interrupted! This has occurred several times during the 29 years we have lived in our home. We have relied on natural gas for heat, hot water and cooking during these extended electric outages.

Until the electric power grid becomes much more reliable it would be irresponsible to have only one source energy.

Thank you for your time,  
Steven and Julie Blake

Sincerely,  
Steven Blake  
4400 Mapleton Dr.  
West Linn, OR 97068  
[noelblake@comcast.net](mailto:noelblake@comcast.net)

**From:** [Laurence Hoye via constituent@civicklick.com](mailto:Laurence Hoye via constituent@civicklick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 8:15:09 AM

---

Dear Nicole Singh,

Click 'Customize Email' below, and type your email here.

Sincerely,  
Laurence Hoye  
1201 Columbia St  
Hood River, OR 97031  
AHoye@aol.com

**From:** [Susan Harris via constituent@civiclick.com](mailto:Susan.Harris.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 8:16:20 AM

---

Dear Nicole Singh,

Click 'Customize Email' below, and type your email here.

Sincerely,  
Susan Harris  
8185 SW Landau St, Portland, OR 97223  
Portland, OR 97223  
[harrissu.or@gmail.com](mailto:harrissu.or@gmail.com)

**From:** [JoAnn Pesterfield via constituent@civiclick.com](mailto:JoAnn.Pesterfield.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 8:18:02 AM

---

Dear Nicole Singh,

Click 'Customize Email' below, and type your email here. [jodoninwilla@yahoo.com](mailto:jodoninwilla@yahoo.com)

Sincerely,  
JoAnn Pesterfield  
395 SW Walnut St  
Willamina, OR 97396  
[jodoninwilla@yahoo.com](mailto:jodoninwilla@yahoo.com)

**From:** [Jack Jenni;ngs via constituent@civiclick.com](mailto:Jack.Jenni;ngs%20via%20constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 8:25:53 AM

---

Dear Nicole Singh,

This past year due to weather conditions our electricity was out for a few days. I don't recall the exact # of days. We are senior citizens and without natural gas to provide heating and cooking in our home we would be in big trouble. Thanks to having natural gas we were able to eat and stay warm during this difficult time. Please consider this when making any decisions concerning natural gas. I would like to add that the efficiency of our heating system has greatly increase over the years. Thank you, Jack Jennings.

Sincerely,  
Jack Jenni;ngs  
2624 Cheryl St  
Eugene, OR 97408  
[jack891945@yahoo.com](mailto:jack891945@yahoo.com)

**From:** [Judith Cramton via constituent@civiclick.com](mailto:Judith.Cramton.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 8:26:10 AM

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Dear Nicole Singh,

I am a very happy almost entire lifetime user of Natural Gas for heat and hot water. My home already had an electric stove in the kitchen when I bought my home in 1980. Prior to that I had an apartment with electric heat and gas is so much better especially during winter storms when we lose electricity! I love always having hot water and at those times wish I had a gas cook stove as well. I have my equipment cleaned and checked annually as my parents did when I was a child in the Woodstock area of the two types of heating and water heaters give me natural gas always please! Having lived with both I prefer gas, it is safe, constant no matter what the weather brings. Electric outages sometimes can be for lengthy periods while lines are repaired. I always have my natural gas. I am now 81 years old and have lived most of those years in the Portland metro area, most with natural gas but several with electric, I will repeat I prefer gas!

Sincerely,  
Judith Cramton  
16250 SE Sterling Circle  
Portland, OR 97267  
[judicramton@gmail.com](mailto:judicramton@gmail.com)



**From:** [Michael Holloway via constituent@civiclick.com](mailto:Michael.Holloway.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 8:32:06 AM

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Dear Nicole Singh,

I live in West Linn Oregon, a few years back when we had the ice storm, my family lost power for a week. We had just moved here and had no where to go and no working fireplaces. Even if we had a place to go, our vehicles could not make it down the hill and power lines were blocking the roads for miles. Temperatures inside our home dropped below freezing and we huddled under layers of blankets to stay warm. I promised myself that I would never put my family in that situation again. I immediately went to the NW Natural show room and order a gas fire place, I have never regretted this decision knowing that we will have heat in any future storm. I later converted a second wood fireplace to gas as well. I've since informed my neighbors that they are welcome to our home if they find themselves without heat.

Sincerely,  
Michael Holloway  
19442 Wilderness Drive  
West Linn, OR 97068  
[mwholloway76@gmail.com](mailto:mwholloway76@gmail.com)

**From:** [Jeffrey Baker via constituent@civiclick.com](mailto:Jeffrey.Baker.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 8:38:38 AM

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Dear Nicole Singh,

I want to chime into the debate over natural gas as I believe it is being driven by too few people with a too narrow objective. Consumers must continue to have the choice of natural gas and / or electricity in their homes. To obey this push to all- electric homes when our state and national electric grid is outdated and fragile is to court disaster from natural events, cyber attacks, or physical attacks on infrastructure. It is irresponsible to place all our energy eggs in one basket to placate a small constituency.

Sincerely,  
Jeffrey Baker  
14765 SW Topaz Ct  
Beaverton, OR 97007  
[Jackpnw@gmail.com](mailto:Jackpnw@gmail.com)

**From:** [Eric Halberg via constituent@civiclick.com](mailto:Eric.Halberg.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 8:38:48 AM

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Dear Nicole Singh,

Please let us keep nat gas appliances. We have a new HP with electric back up furnace and they 100% could not keep up with the cold snap. We absolutely had to run our Nat Gas fireplace to keep the house warm. Also during power outages I am easily able to power multiple appliance in the house, including the nat gas tankless wter heater, with my nat gas back up generator. We can also cook on a nat gas grill on our covered pato. Do not eliminate nat gas.

Sincerely,  
Eric Halberg  
Po Box 673  
Scappoose, OR 97056  
[Erichalberg@gmail.com](mailto:Erichalberg@gmail.com)

**From:** [Tim Tovar via constituent@civiclick.com](mailto:Tim.Tovar.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Leaders Should Help Make the Right Energy Options  
**Date:** Saturday, May 4, 2024 8:39:44 AM

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Dear Nicole Singh,

Global warming is the most important issue in our lifetime and we have failed to respond for the last 30+ years. We need to incentivize people to move away from carbon producing energy sources and use efficient, climate-friendly sources. Nuclear power, solar, geothermal. The most effective method, I believe, to have an impact is to institute a carbon tax where people who use gas, oil, coal, etc. are taxed to a significant degree and those funds are used to build nuclear plants, improve efficiency, etc. Because we have dragged our feet we need to make drastic and significant changes in how we live. People will not do so without strong leaders making the right choices.

Sincerely,  
Tim Tovar  
6130 NW Happy Valley Dr.  
Corvallis, OR 97330  
[tim.tovar@gmail.com](mailto:tim.tovar@gmail.com)

**From:** [Teresa Yost via constituent@civiclick.com](mailto:Teresa.Yost.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 8:43:39 AM

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Dear Nicole Singh,

Dear Sirs,

Please do not take our natural gas system away. We rely on our gas as a productive and protective means of energy. During the last ice storm we could still cook, have hot water and even get heat from our gas fireplace. We didn't have to leave our home at all during the power outages. Many of our friends on all electric power had to leave their homes, they had no choice they couldn't stay and remain healthy. We need our gas energy supplies. We need a choice when things get ugly.

Sincerely,

Teresa Yost

1224 SE 16th Ave

Canby, OR 97013

[terryyost56@yahoo.com](mailto:terryyost56@yahoo.com)

**From:** [David Yarber via constituent@civiclick.com](mailto:David.Yarber@constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** The necessity of natural gas  
**Date:** Saturday, May 4, 2024 9:00:50 AM

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Dear Nicole Singh,

During the three or four day power outage natural gas was critical to our survival.

Sincerely,  
David Yarber  
2165 Cedar St.  
Sweet Home, OR 97386  
[dwizofid@yahoo.com](mailto:dwizofid@yahoo.com)

**From:** [Nancy Hassebroek via constituent@civicklick.com](mailto:Nancy.Hassebroek.via.constituent@civicklick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 9:22:24 AM

---

Dear Nicole Singh,

We cannot rely completely on electricity to power our future. There are far more power outages than gas outages and we need options. Plus electric costs are increasing far faster than gas.

Sincerely,  
Nancy Hassebroek  
1932 NE 226 Ave  
Fairview, OR 97024  
[nancyeh0306@frontier.com](mailto:nancyeh0306@frontier.com)

**From:** [Ester Lofland via constituent@civiclick.com](mailto:Ester.Lofland.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 9:37:35 AM

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Dear Nicole Singh,

When my newborn was born our HVAC system broke and we only had the gas fireplace for heat in the winter. We contacted and financed replacing the HVAC right away but every installer in the area was booked for 3 to 4 weeks out so we used our gas fireplace to survive the winter. It's important to have at least two different heating options in every home specially for the elderly and vulnerable.

Sincerely,  
Ester Lofland  
15721 se Summit Rock Way  
Damascus , OR 97089  
[Esterlofland@gmail.com](mailto:Esterlofland@gmail.com)



**From:** [John Pigott via constituent@civiclick.com](mailto:John.Pigott.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 9:40:18 AM

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Dear Nicole Singh,

It is critical that we as retired Oregonians always have a reliable energy source like natural gas in the mix as we slowly reduce carbon emissions. Electric companies already rely on natural gas 24/7 during cold weather and very hot days to provide us with power. Do not remove the main way we get electricity--natural gas. During a power outage what will have otherwise?

Sincerely,  
John Pigott  
539 S Ponerosa St  
Canby, OR 97013  
[johnny5@canby.com](mailto:johnny5@canby.com)

**From:** [Jeff Woodford via constituent@civiclick.com](mailto:Jeff.Woodford.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 9:49:39 AM

---

Dear Nicole Singh,

Click 'Customize Email' below, and type your email here.

Sincerely,  
Jeff Woodford  
1690 S Edgewood St  
Seaside, OR 97138  
[jeffedgewood57@gmail.com](mailto:jeffedgewood57@gmail.com)

**From:** [Andres Del Razo via constituent@civiclick.com](mailto:Andres.Del.Razo.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 10:03:39 AM

---

Dear Nicole Singh,

We cook with gas, we heat our home with gas, even barbecue with gas, food taste better, heat feel more comfortable, more real, and I believed charcoal is harder the produce.

Sincerely,  
Andres Del Razo  
1140 w Ida st.  
Stayton, OR 97383  
[andresdelrazo@aol.com](mailto:andresdelrazo@aol.com)

**From:** [Scott Zoelk via constituent@civiclick.com](mailto:Scott.Zoelk.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 10:17:51 AM

---

Dear Nicole Singh,

During power outages, our gas fireplace was still available to heat our home. Without gas we would not have a reliable source for heating. In addition our gas stove was still usable for cooking when we have power outages.

Sincerely,  
Scott Zoelk  
2052 McKinley St  
North Bend, OR 97459  
[sueandscott@gmail.com](mailto:sueandscott@gmail.com)

**From:** [Rudy Vanderzanden via constituent@civiclick.com](mailto:Rudy.Vanderzanden.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 10:17:55 AM

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Dear Nicole Singh,

We were fortunate to not loose either our natural gas supply nor our electric power during the January storm. We are so thankful to have a diversity of power available. The idea of eliminating natural gas and relying on just renewable electric power is not a logical obtainable plan. Please discard this insidious plan.

Regards, Rudy and Jackie.

Sincerely,  
Rudy Vanderzanden  
482 SE 26th Ave  
Hillsboro, OR 97123  
[Rj.vander@frontier.com](mailto:Rj.vander@frontier.com)

**From:** [Michelle Detwiler via constituent@civiclick.com](mailto:Michelle.Detwiler.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 10:39:16 AM

---

Dear Nicole Singh,

It is, and always has been, clear that the energy system needs electrons as well as molecules. We need to have a regulatory system that enables and facilitates a transition from fossil based energy molecules to renewable based energy molecules, not eliminate those very necessary molecules. Climate policy and regulation needs to do more to increase the supply of RNG in Oregon to enable NWN to displace fossil methane for space and water heating, and also facilitate the blending of renewable hydrogen, particularly for industrial uses.

Sincerely,  
Michelle Detwiler  
2513 NE Dunckley Street  
Portland, OR 97212  
[fshrgrl@gmail.com](mailto:fshrgrl@gmail.com)

**From:** [Mollie Hunt via constituent@civicklick.com](mailto:Mollie.Hunt.via.constituent@civicklick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 10:56:58 AM

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Dear Nicole Singh,

There are many reasons we shouldn't rely on electricity alone for our power and utilities, the main one being that electricity goes down regularly, and we need to have a backup.

Sincerely,  
Mollie Hunt  
1022 SE 45th Ave  
Portland, OR 97215  
[molliehuntcatwriter@gmail.com](mailto:molliehuntcatwriter@gmail.com)

**From:** [Brian Baertlein via constituent@civiclick.com](mailto:Brian.Baertlein@constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 11:03:37 AM

---

Dear Nicole Singh,

Click 'Customize Email' below, and type your email here.

Sincerely,  
Brian Baertlein  
337 SE Spruce Ave.  
Gresham, OR 97080  
[Powerlifter\\_63@yahoo.com](mailto:Powerlifter_63@yahoo.com)



**From:** [Doug Dunford via constituent@civiclick.com](mailto:Doug.Dunford.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 11:45:28 AM

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Dear Nicole Singh,

I built my home in 1990 installing eight high efficiency gas appliances, we have 3700 sq ft living space and our average monthly bill was \$50 dollars. We have four adults living here today and our bill has doubled in thirty four years.

Natural gas is two thirds hydrogen one of the cleanest elements available, and is universally used to produce electricity throughout the world, but is much more efficiently if used at the end appliance (equipment).

Don't forget that it's competition that drive prices down for the end user.

Sincerely,  
Doug Dunford  
4003 Sw 22 dr  
Gresham, OR 97080  
Dwdd44@gmail.com

**From:** [Erven Kincaid 641 via constituent@civiclick.com](mailto:Erven_Kincaid_641_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 11:50:24 AM

---

Dear Nicole Singh,

During the past ice storm, when we had no electricity, we could cook and had heat from our gas stove top and gas fireplace. We're in our 80's and would have been miserable without the gas appliances.

Sincerely,  
Erven Kincaid 641  
955 Oakway Road  
Eugene , OR 97401  
[Elkincaid@gmail.com](mailto:Elkincaid@gmail.com)

**From:** [Dennis Creel via constituent@civiclick.com](mailto:Dennis.Creel.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 11:59:11 AM

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Dear Nicole Singh,

Getting rid of natural gas in the energy mix is economic suicide. It's clean energy. From where is the energy going to come? China and India continue building coal plants. Why? Because we demand them too. We buy their products. How hypocritical. We think we are so climate friendly by our energy policies but quietly buy their coal fired products!!! Stop buying from China if you really care about climate!!!! Ban Chinese products!!!! Until you do, leave our clean gas alone. Couldn't have survived last cold snap without.

We need dams, gas, clean coal, wind, solar and nuclear. All of them. We need to make things here and export. Real wealth is created by making things here and exporting. Agriculture forestry and mining are the basis creates real wealth. Reliable cheap energy is the backbone for this process to work.

Sincerely,  
Dennis Creel  
1268 29th CT NW  
Salem, OR 97304  
[dennis.creel@comcast.net](mailto:dennis.creel@comcast.net)

**From:** [Linda Wanless via constituent@civiclick.com](mailto:Linda.Wanless.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 12:13:50 PM

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Dear Nicole Singh,

After having spent over 40 years in Oregon and endured numerous power outages during that time, I must say that I want another option besides electricity to light and heat my home. After the last ice storm, during which I was without power (electricity) for 3 days, I had a gas range installed. I was thankful for my gas fireplace since homes around me without an alternative heat source noted temperatures INSIDE of 40 degrees or less. I was comfortable at 68 degrees. Until we have a power source that is not so fallible during bad weather, I want to have gas so I can keep warm and cook hot food. I am just short of 80 years old and keeping warm and dry is very important to me.

Sincerely,  
Linda Wanless  
8130 SW Woodbridge Ct.  
Wilsonville, OR 97070  
[l.wanless@comcast.net](mailto:l.wanless@comcast.net)

**From:** [Pradip Shah via constituent@civiclick.com](mailto:Pradip.Shah.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 12:45:01 PM

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Dear Nicole Singh,

In my home I have gas stove and fireplace that we love having, when the power goes out. It is much wiser to have some gas option than all house holds having power generators that will use gas all the other resources for very limited use. Gas is lot cleaner than coal. I do save power by having solar panels. IN the NW USA we are using all the Hydro power we can use.

Sincerely,  
Pradip Shah  
12877 SE 136th Drive  
HAPPY VALLEY, OR 97086  
pssone7@gmail.com

**From:** [Gayle Collins via constituent@civiclick.com](mailto:Gayle.Collins.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 12:52:22 PM

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Dear Nicole Singh,

Diversification is the key to safety in any type of system, especially with an above-ground electrical system that is vulnerable to sabotage from a variety of sources.

Sincerely,  
Gayle Collins  
13191 Gaffney Lane  
Oregon City, OR 97045  
[gayle.collins418@yahoo.com](mailto:gayle.collins418@yahoo.com)

**From:** [Maria Abarca Roberts via constituent@civiclick.com](mailto:Maria.Abarca.Roberts@constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 1:42:34 PM

---

Dear Nicole Singh,

We the consumer should have a choice on on using Gas. In my opinion Gas is my first choice because if the power goes out we are left with no power and in Oregon it's the best option.

Sincerely,  
Maria Abarca Roberts  
589 Wimbledon Ct  
Eugene, OR 97401  
[maria@abarcaroberts.com](mailto:maria@abarcaroberts.com)

**From:** [Michael Sanders via constituent@civiclick.com](mailto:Michael.Sanders.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 1:47:54 PM

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Dear Nicole Singh,

Natural Gas is a wonderful resource for people to use to both heat their homes and cook with. It is reliable and relatively inexpensive compared with other forms of fuels. Please make sure that there will always be the option for people to use natural gas in their homes. Thank you.

Sincerely,  
Michael Sanders  
5491 Lardon Rd NE  
Salem, OR 97305  
[michaelandkaris@gmail.com](mailto:michaelandkaris@gmail.com)



**From:** [Martin Robbins via constituent@civiclick.com](mailto:Martin.Robbins.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 2:24:29 PM

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Dear Nicole Singh,

I would like to first say that my wife and I were not significantly affected by January's winter storm, although we have been affected at other times. I do commend NW Natural for keeping their service available through these trying situations. I would like to point out, however, that their claim of the need for a balanced energy plan is rather self-serving, and is in my view intended to counter the current trend away from the burning of fossil fuels. Drilling for methane often involves fracking, which has its own set of negative consequences. Generation of gas through bio-digestion is laudable, but still culminates in a product that must be burned, with the accompanying emissions. I feel that the ultimate goal of state leaders should be to reduce, and ultimately eliminate, energy generation through the combustion of fuels, and that also includes in the generation of electricity. This is a difficult long term goal, but the future of the planet depends on it, if climate science is to be believed. This is the most important goal, not just the continued existence and relevance of NW Natural.

Sincerely,  
Martin Robbins  
36373 River Point Drive  
Astoria, OR 97103  
[mrobbins72@gmail.com](mailto:mrobbins72@gmail.com)

**From:** [Kamil Elias via constituent@civiclick.com](mailto:Kamil.Elias.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 2:40:45 PM

---

Dear Nicole Singh,

Without natural gas furnace, hot water heater, and gas cook top, my family would not have been able to endure a 24-hour electricity outage that affected our neighborhood in January 2024 during a bout of severe freezing weather.

Please keep natural gas, a robust and reliable energy source, available as an option to Oregonians.

Sincerely,  
Kamil Elias  
13440 SE Meadowpark Dr  
Happy Valley, OR 97086  
[altria@gmail.com](mailto:altria@gmail.com)

**From:** [Catherine Holder via constituent@civicklick.com](mailto:Catherine.Holder.via.constituent@civicklick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 4:23:16 PM

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Dear Nicole Singh,

I am writing to tell you that it has been very important for me to have gas cooking appliances during the last few years as power outages have become more frequent. Even when the power is out I can still boil water, make a warm meal and remain relatively comfortable. I will not switch to electric only appliances for this very reason. PGE service is too unreliable during severe weather events.

Sincerely,  
Catherine Holder  
217 S Pendleton St.  
Portland, OR 97239  
[catherine.s.holder@gmail.com](mailto:catherine.s.holder@gmail.com)

**From:** [Stephanie Hemmerich via constituent@civiclick.com](mailto:Stephanie.Hemmerich@constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 4:23:56 PM

---

Dear Nicole Singh,

Dear DEQ,

We lost power for 10 days during Lane County's ice storm. We were very fortunate to have alternative energy sources (natural gas and a wood stove) which allowed us to cook and to stay warm.

We had many neighbor's and friends who were nearly freezing in their houses and had to eat cold non-perishable foods. Many went a week or more without a shower. Because of our natural gas, we were able to not only cook food, but also to have access to hot water for cleaning and personal hygiene. Because we have a tankless hot water heater, all it took was a little electrical spark (when the generator was on) to then have plenty of warm water without using any fuel, due to our natural gas powered hot water heater. We were safe and comfortable because we had OTHER choices for energy during this difficult week.

It does not seem wise to force citizens to use only one source of energy. The ice storm certainly showed we need to have options and diversification of energy sources, NOT the opposite.

We rely on natural gas each and every day and are so thankful we have access to more than 1 energy source.

Please protect those options for our citizens.

Respectfully,  
Stephanie Hemmerich

Sincerely,  
Stephanie Hemmerich  
5655 Mt Vernon Rd  
Springfield, OR 97478  
[stephaniehemmerich@gmail.com](mailto:stephaniehemmerich@gmail.com)

**From:** [Kevin Martinez via constituent@civiclick.com](mailto:Kevin.Martinez.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 4:27:29 PM

---

Dear Nicole Singh,

- 1 No choice means higher cost.
- 2 Fixed incomes will suffer the most.
3. Summer and Winter will become a strain on the electric grid.
4. Already hear of blackouts and brownouts.

Sincerely,  
Kevin Martinez  
1011 NE 162nd Ave  
Portland, OR 97230  
[kwsok39@gmail.com](mailto:kwsok39@gmail.com)

**From:** [Stephen Sasser via constituent@civiclick.com](mailto:Stephen_Sasser_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 5:33:32 PM

---

Dear Nicole Singh,

We've been NW Natural customers for over 50 years and they've always been reliable providers.

Sincerely,  
Stephen Sasser  
4642 SE Division Street  
Portland, OR 97206  
[stephensasser@gmail.com](mailto:stephensasser@gmail.com)

**From:** [John Carlson via constituent@civiclick.com](mailto:John_Carlson_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 7:07:06 PM

---

Dear Nicole Singh,

We have enough experience with wind and solar power to know what should have already been understood. These sources of power are unreliable. If the wind does not blow at night they produce no electricity. How are we to heat our homes? Those with EV's can't charge them. You can't rely on wind or solar so they are completely redundant if we don't want blackouts. By being redundant it means wind and solar only adds to cost of electricity. It is completely impractical to have a huge industrial battery storage yard. We need to be able to have reliable power. Wind and solar are not it, period; neither are they green by any means.

Sincerely,  
John Carlson  
7105 SW 175th Ave  
Beaverton, OR 97007  
[jrc.tiger@frontier.com](mailto:jrc.tiger@frontier.com)

**From:** [David Brezinski via constituent@civiclick.com](mailto:David.Brezinski.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 7:51:15 PM

---

Dear Nicole Singh,

Gas provide clean reliable energy. Solar and wind do not.

Sincerely,  
David Brezinski  
1915 Palisades Terrace Drive  
Lake Oswego, OR 97034  
[dbrezinski@comcast.net](mailto:dbrezinski@comcast.net)



**From:** [Brian Whitacre via constituent@civiclick.com](mailto:Brian.Whitacre.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Saturday, May 4, 2024 8:17:34 PM

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Dear Nicole Singh,

I am writing to express my concerns regarding the proposed policies advocating for the exclusive use of electric energy while phasing out other sources, particularly natural gas.

During a recent winter storm where power was out for four days and temperatures dropped significantly, my family and I relied on our gas fireplace and stove for heating and cooking. Without access to natural gas, we would have faced significant challenges and discomfort. This experience underscores the importance of maintaining diverse energy options to ensure resilience in the face of unexpected events.

Furthermore, I am concerned about the financial implications of these proposed policies. It's evident that the transition to exclusive electric energy is resulting in increased electric and gas rates, putting a strain on households already grappling with economic challenges. Access to affordable energy is vital for the well-being and prosperity of our communities.

Thank you for considering my perspective on this matter.

Sincerely,  
Brian Whitacre  
4216 SW Binford Ave  
Gresham, OR 97080  
[Bwhitacre@gmail.com](mailto:Bwhitacre@gmail.com)

**From:** [Ronda Blehm via constituent@civiclick.com](mailto:Ronda.Blehm%20via%20constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, May 5, 2024 2:18:13 AM

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Dear Nicole Singh,

I think it's a huge mistake to try and change to an all electric system for heating homes. I was so glad that I had a gas furnace to rely on and a gas fireplace for additional heat during the winter storms. To change to reliance on only one system is to invite trouble. The kind where everyone has a system that could fail. Diversity is what makes our systems good.

Sincerely,  
Ronda Blehm  
2560 NW 2nd Ter  
Gresham, OR 97030  
[rkblehm@gmail.com](mailto:rkblehm@gmail.com)

**From:** [Lynne Page via constituent@civiclick.com](mailto:Lynne Page via constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, May 5, 2024 8:30:35 AM

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Dear Nicole Singh,

As a natural gas home we were a shelter for friends and family. My 84 year old mother with dementia is in a community its who lost power. The temp in her apartment was 54 degrees. We used our gas fireplace to keep our home warm and reduce the electric drain of using our furnace.

We ended up with 10 additional people in our home from age 84 to age 2.

Balance is the solution to our energy issues. Created dependence on one form of energy is not in our best interest.

Sincerely,  
Lynne Page  
20705 ne shore dr  
Fairview , OR 97024  
Mslpage@gmail.com

**From:** [Aaron Bean via constituent@civiclick.com](mailto:Aaron.Bean.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, May 5, 2024 9:03:56 AM

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Dear Nicole Singh,

Thank you for your service and ongoing efforts to make Oregon a great place for all citizens who live here.

I'm writing regarding the importance of diversification in our state's energy system. I'm a financial advisor by trade, and diversification is a basic underlying principle in managing investment portfolios. Diversification, or investing in different asset types and investment vehicles, reduces risk as compared to investing in a single asset type. The same is true for our state's energy system. Reliance on a single source of energy exposes citizens to an increased level of risk in the event that energy source is damaged or otherwise interrupted.

During the ice storm of January/February 2021 powerlines and transformers around my home were damaged. In addition to this, the tree in my front yard fell and crippled the power line from the main line to my house. As a result of those events, my family and I were without power for close to a week. Thankfully, we have a natural gas furnace which allowed us to maintain heat in our house during that extremely cold period of time. Without this diversified source of energy, our situation would have been more difficult.

Individual choice is a critical principle of everyday living, and it's my belief that the role of government is to enable its citizens to make choices (within appropriate moral bounds), that allow them to live how they desire. By limiting the availability of energy sources to citizens, their choice becomes limited.

Please choose to allow others to choose and help them reduce their exposure by not driving reliance on a single source of energy.

Sincerely,  
Aaron Bean  
640 N Ivy St  
Canby, OR 97013  
[aarongbean@gmail.com](mailto:aarongbean@gmail.com)

**From:** [ANCUTA BEC via constituent@civiclick.com](mailto:ANCUTA.BEC.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, May 5, 2024 9:04:00 AM

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Dear Nicole Singh,

Proposals intended to drive reliance on one, above ground electric system more susceptible to weather and wildfire risks – to serve all energy needs for homes, businesses, and passenger vehicles – create unprecedented reliability and resiliency risks. We believe there's a better path forward. Working together on a variety of solutions will produce better results – faster and more affordably.

Sincerely,  
ANCUTA BEC  
2229 SE 113TH AVE  
Portland, OR 97216  
[ancutabec@yahoo.com](mailto:ancutabec@yahoo.com)

**From:** [Devi Petersen via constituent@civiclick.com](mailto:Devi.Petersen.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, May 5, 2024 10:53:58 AM

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Dear Nicole Singh,

Click 'Customize Email' below, and type your email here.

Sincerely,  
Devi Petersen  
18722 SE RICHEY RD  
GRESHAM, OR 97080  
[devipetersen@yahoo.com](mailto:devipetersen@yahoo.com)

**From:** [Barbara Epidendio via constituent@civiclick.com](mailto:Barbara.Epidendio.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, May 5, 2024 4:21:01 PM

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Dear Nicole Singh,

I'm at a loss to understand how starting to prohibit the use of natural gas is going to help with our energy needs.

Having my gas furnace, gas stove, gas water heater, gas fireplace made it possible for me to stay warm, cook during January's miserable weather.

We don't even have the capacity to electrify everything, plus needing 30% more capacity in the next 10 years. Not to mention the horrendous cost that'll burden the citizens with.

PLEASE, ignore the loud, strident voices who don't/won't look at the real world.

Sincerely,

Barbara Epidendio

11520 SE Stanley Ave. Milwaukie OR. 97222

Portland, OR 97222

bepidendio@msn.com

**From:** [Mark Tarter via constituent@civiclick.com](mailto:Mark.Tarter.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, May 5, 2024 5:51:55 PM

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Dear Nicole Singh,

During this past winter I was fortunate enough not to have lost power but I had family and friends who did loose electrical power multiple times and for long periods of time. I'm thankful for having a natural gas line for my house to maintain reliable heat and hot water through the severest of storms. I'm a strong supporter of maintaining natural gas as one of the primary sources of energy for homes.

Sincerely,  
Mark Tarter  
910 NW 16th CT  
Battle Ground, WA 98604  
[tartermark@gmail.com](mailto:tartermark@gmail.com)



**From:** [Ronald Warnecke via constituent@civiclick.com](mailto:Ronald.Warnecke.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, May 5, 2024 6:32:25 PM

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Dear Nicole Singh,

I am disgusted with the lack of progress that PGE has made to insure reliable power during major storm events. In the decades that we have lived in our home in Milwaukie, Clackamas County, we have had several multi-day electrical power losses during major winter storm events. Some of our friends have lost power up to ten days.

Guess what? We have never lost our natural gas supply. When your house temperature drops to the mid 40-degree range, it is really great to be able to take a hot shower powered by a natural gas water heater, then retreat to the one room in the house that has a natural gas-powered fireplace to stay warm. In addition, I can cook my dinner on my natural gas BBQ. How are all the electric car owners going to charge their batteries?

After the last major outage in 2021 (4 days without power), I had a natural gas-powered generator installed for my home. No more long-term power outages!

I have traveled extensively in Europe and have observed that most powerlines are underground and not subject to wind and winter snow/ice damage. I realize that converting the existing overhead powerlines to underground is expensive and will take decades to accomplish. Where have PGE and state regulators been during the last 5 decades. Let's get with the program to improve the reliability of the electrical grid. Develop a plan and get moving.

For state regulators to displace the most reliable power source (Natural Gas) with the least reliable (PGE Electrical) without a viable plan to improve the reliability and capacity of the grid borders on ridiculous.

I do not want the readers of this letter to think I am against the greening of our power supply, but it must be done in a more thoughtful way. Natural gas is a very reliable and abundant power source. My last words are, keep the energy supply balanced, affordable, and reliable.

Regards,  
Ron Warnecke

Sincerely,  
Ronald Warnecke  
13980 SE Ash Ave  
Milwaukie, OR 97267  
[rwarnecke@msn.com](mailto:rwarnecke@msn.com)

**From:** [Patricia Sampson via constituent@civiclick.com](mailto:Patricia.Sampson.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, May 5, 2024 8:05:27 PM

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Dear Nicole Singh,

In early 2021 we experienced an ice storm which shut off electric power for four days. I had my mother, who was 99 year old, living with me and my family. Thankfully, we have a gas stove, gas water heater and a fireplace. We stayed warm and I did not have to move my mother, who had mobility issues, from my home. Please do not limit the use of natural gas as an energy source.

Sincerely,  
Patricia Sampson  
1732 N 6th Ave  
Stayton, OR 97383  
[pattismpsn@gmail.com](mailto:pattismpsn@gmail.com)

**From:** [Ken Beko via constituent@civiclick.com](mailto:Ken_Beko_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Sunday, May 5, 2024 9:37:39 PM

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Dear Nicole Singh,

We must maintain an alternative energy source other than electricity and People should have a choice in these matters. Our home has both electricity and gas and I would not want to oly have one choice

Sincerely,  
Ken Beko  
19270 S. Sunnyridge Ct.  
Oregon City, OR 97045  
[beko741@gmail.com](mailto:beko741@gmail.com)

**From:** [Adan Cardenas via constituent@civiclick.com](mailto:Adan.Cardenas.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Monday, May 6, 2024 8:22:40 AM

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Dear Nicole Singh,

During the lengthy cold weather event we experienced in January, our family was thankful to have Natural Gas as heat source. With power being out for multiple days in my area we were lucky enough to be safe and warm during the event. Additionally, we invited friends and family who do not have natural gas as a heat source to stay with us for the duration. It was tight quarters for all but the fact of the matter was, without natural gas, things would definitely been much worse for everyone.

Sincerely,  
Adan Cardenas  
9620 sw 90th ave  
Portland, OR 97223  
[adan.cardenas@nwnatural.com](mailto:adan.cardenas@nwnatural.com)

**From:** [Kris Kelly via constituent@civiclick.com](mailto:Kris Kelly via constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Monday, May 6, 2024 8:38:50 AM

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Dear Nicole Singh,

I believe it's critical to continue to have multiple forms of energy (electricity and gas) to power homes and businesses into the future. Natural gas kept our house warm during the winter storm and has proven to be a very reliable utility for us.

Sincerely,  
Kris Kelly  
2025 NW Sulphur Springs Rd  
Corvallis, OR 97330  
[kelly52119@gmail.com](mailto:kelly52119@gmail.com)

**From:** [Jeffrey Carlson via constituent@civiclick.com](mailto:Jeffrey_Carlson_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Monday, May 6, 2024 11:51:37 AM

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Dear Nicole Singh,

We cannot let Oregon's energy security degrade to that of a third-world country. We need diversified, always-on energy sources to heat our homes and power our future. Natural gas is an important source of energy for residents that can withstand disruptions better than other alternatives. Please do not let brownouts and blackouts become a regular feature in Oregonian's lives.

Sincerely,  
Jeffrey Carlson  
12154 SW WESTBURY Ter  
PORTLAND, OR 97223  
JEFE.CARLSON@GMAIL.COM

**From:** [Vickie Petsch via constituent@civiclick.com](mailto:Vickie.Petsch%20via%20constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Monday, May 6, 2024 2:22:05 PM

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Dear Nicole Singh,

We recently went through the severe ice storms in January. We were without electricity for eight days. Because we had natural gas, we were able to cook, have heat through our gas fireplace and hot water through our hot water heater. I agree that we should be looking for ways to keep our planet healthy, but at the same time we need to use some common sense. One source of power is not enough, at least until it is able to function consistently. We would have had no power for eight days leaving us no choice but to tough it out or go to a hotel or a friends' house. At the beginning of the ice storm we couldn't leave our home safely. The effectiveness of all electric has been proven to not be a reliable source of energy; think of Texas and California and their problems in the past. We do not want Oregon to make the same mistakes. There is no reason why we cannot use multiple sources of energy safely and effectively.

Sincerely,  
Vickie Petsch  
906 Mint Meadow Way  
Springfield, OR 97477  
12luray52@comcast.net

**From:** [Janet Chambers via constituent@civiclick.com](mailto:Janet_Chambers_via_constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Monday, May 6, 2024 2:39:02 PM

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Dear Nicole Singh,

Our electric heat went out early Saturday and we had our 3 year old grandson. If it wasn't for our gas stove, we would've had to go to a shelter. We felt lucky having both electric and gas.

Sincerely,  
Janet Chambers  
410 Cliff Street  
Depoe Bay, OR 97341  
JERKCHAMBERS@COMCAST.NET



**From:** [Michael Connell via constituent@civiclick.com](mailto:Michael.Connell.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Monday, May 6, 2024 4:23:16 PM

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Dear Nicole Singh,

I personally did not lose power but my sister did and she was grateful she had a gas fireplace. I am glad I have gas for heating, it gives me peace of mind in case I have a power outage.

Sincerely,  
Michael Connell  
1719 SE 12th Ave  
Portland, OR 97214  
[connellvikings@gmail.com](mailto:connellvikings@gmail.com)

**From:** [Craig Arnold via constituent@civiclick.com](mailto:Craig.Arnold.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should use all energy options  
**Date:** Monday, May 6, 2024 7:42:14 PM

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Dear Nicole Singh,

During the power outages, our power was out for a long time in freezing temperatures. The only thing that saved us was out natural gas fireplace. Gas is reliable and cheap and will work without electricity. Renewables are nice when they work, but they cannot replace natural gas or propane as an efficient, cheap, and reliable source of energy.

Sincerely,  
Craig Arnold  
224 NW 117th Loop  
Portland, OR 97229  
[pimpride86@yahoo.com](mailto:pimpride86@yahoo.com)

**From:** [Ralph Cuppoletti via constituent@civiclick.com](mailto:Ralph.Cuppoletti@constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Tuesday, May 7, 2024 12:00:11 AM

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Dear Nicole Singh,

Click 'Customize Email' below, and type your email here. [Otsralph@aol.com](mailto:Otsralph@aol.com)

Sincerely,  
Ralph Cuppoletti  
31380 Sw parkway ave  
Wilsonville, OR 97070  
[OTS Ralph@aol.com](mailto:OTS.Ralph@aol.com)

**From:** [Robin Kilpatrick via constituent@civiclick.com](mailto:Robin.Kilpatrick.via.constituent@civiclick.com)  
**To:** [2024 CPP \\* DEQ](#)  
**Subject:** Oregonians should have a choice of energy options  
**Date:** Tuesday, May 7, 2024 12:17:19 PM

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Dear Nicole Singh,

When we moved into our home back in the late 80's it was equipped with gas heat, an obvious boon since natural gas is so much less expensive than electricity. Since then we have converted to gas cooking, a much better cooking experience and the stove top is useful for cooking even during power outages! This January storm time as well as many others we have been able to cook and even help others because of our natural gas appliance. Probably the most noticeable and useful changeover we did was from electric water heat to natural gas, so much more affordable and like this past January and many other electrical outages, we still had hot water! Our only real change ups were using the wood stove for heat and oil lamps for light. I absolutely LOVE my natural gas appliances all the time but their help and availability during electrical outages when others are freezing and hungry, we are able to help. Electricity keeps getting more and more expensive, being used for everything from cooking to cars, it's production from wind and solar are far too expensive and hard on the environment. We absolutely should have all of our energy options open to us and be able to make our own choices.

Sincerely,  
Robin Kilpatrick  
17750 SE Beebee CT  
Sandy, OR 97055  
[7greenmoose@gmail.com](mailto:7greenmoose@gmail.com)