Public Comment for docket LC 66, PGE IRP **12 May 2017**

The NW Climate Methane Task Force has previously filed with the Oregon Public Utility Commission our analysis of the current PGE IRP.

1. OPUC evaluation criteria for an IRP require consideration of life-cycle externalities, and supply chain methane carbon impact externalities have not been acknowledged.
2. Our analysis of the methane releases upstream from the proposed generating stations, where no accurate measurements have been taken, verified and published by the extraction and gas transport industries, indicates that the carbon pollution from natural gas exceeds that of coal fuel.
3. Our recommendation is that an administrative decision from the OPUC is precluded by the failure of the IRP to consider the Free Clean Fuel Option noted in the following Fuel Options table, having excluded from consideration the likely need for grid storage.

	Fuel Options		
Pollution	**Coal**	**Natural Gas**	**Renewable Alternatives**
Coal Dust Particulates Heavy Metals	Worst	None	None
CO2 plus CO2e	Bad	Worst	None
Other Deciding Factors			
Cost of Fuel	Increasing	Variable	Free
SB 1547 decides against Coal	Not Oregon	Oregon	Oregon
Free Clean Fuel Option	None	None	Economically Competitive. Free Fuel Option derated by PGE, might need grid storage*

* Ruling out the Free Clean Fuel Option, without a definitive analysis of the extent that grid storage would be required for a range of demand scenarios, is to foreclose prematurely on a promising alternative without due diligence. Note that California State Authority has directed the fielding of grid storage to exclude reliance on natural gas and its proven pollution penalties. At a minimum, if grid storage capacity is delayed for business or technical reasons, Carty Unit 1 must be evaluated as a peak load compensation resource while renewable energy with no fuel costs can be brought on line. Committing Oregon rate-payers to carry the life-cycle cost burden of expanded natural gas generation in the out-years cannot be justified without accurately identifying the required grid storage requirements necessary to escape onerous future fuel costs.