

**Oregon Public Utility Commission
Public Hearing
LC 66 Portland General Electric Company's 2016
Integrated Resource Plan (IRP)**

August 4, 2017

Founded in 1968, the Oregon Environmental Council (OEC) is a nonprofit, nonpartisan, membership-based organization. We advance innovative, collaborative and equitable solutions to Oregon's environmental challenges for today and future generations.

Dear Chair and Commissioners:

I greatly appreciate the opportunity to provide public comment on PGE's latest IRP. My organization works on practical solutions to climate change and, as such, strongly supports a transition away from fossil fuels towards a more efficient and low-carbon utility system.

Earlier this week, two different studies published in the peer-reviewed journal, *Nature Climate Change*, concluded that global temperatures by the end of the century could well surpass 2 degrees C of warming on our current trajectory, with the following consequences:

If we surpass that mark, it has been estimated by scientists that life on our planet will change as we know it. Rising seas, mass extinctions, super droughts, increased wildfires, intense hurricanes, decreased crops and fresh water and the melting of the Arctic are expected.

The impact on human health would be profound. Rising temperatures and shifts in weather would lead to reduced air quality, food and water contamination, more infections carried by mosquitoes and ticks and stress on mental health, according to a recent report from the [Medical Society Consortium on Climate and Health](#). Currently, the [World Health Organization estimates](#) that 12.6 million people die globally due to pollution, extreme weather and climate-related disease. Climate change between 2030 and 2050 is expected to cause 250,000 additional global deaths, according to the [WHO](#).¹

This week, extreme heat impacted much of Oregon. Global warming presents threats to our electricity sector, including increased air conditioning demand during heat waves, which stresses our grid. According to the Sabin Center at Columbia Law School:

As heat waves become more frequent and intense the reliability and efficiency of the electricity system is threatened. Increased temperatures have adverse effects on electricity generation, transmission, distribution and demand. The high

¹ For a distillation of these reports, see <http://www.cnn.com/2017/07/31/health/climate-change-two-degrees-studies/index.html>

temperatures cause intentional or unintentional brownouts and blackouts, which come at high costs for people and economies.²

In addition, climate variability creates other complications: the unusual ice storms earlier this year cause downed power lines and outages, and higher heat is dangerous for outdoor workers, such as utility line workers.

It is within this context that **we urge consideration of and support for PGE's proposal for acquisition of new renewable energy resources.** While we appreciate the arguments proposed in the response back to PGE, we also see risk in not acting and taking advantage of expiring federal incentives.

Without the Commission's full acknowledgement of PGE's IRP, the company's flexibility for acquisition becomes constrained. The company has identified and expressed its desire to take advantage of procuring renewable energy sites with

We sympathize with the sentiments that the world is changing and there are many unknowns. We certainly expect that technological progress will continue to revolutionize renewables and energy storage. But we expect that there will be future energy needs—growing population, data center expansion, and the evolving “electrify everything” movement—that must also be met, and those innovations will help fulfill that future need. We are experiencing accelerated climate impacts and a decade-long delay in renewable energy investment is deeply concerning.

In our policy advocacy work, we have supported efforts that encourage early action on renewables and achievement of Oregon's long-term climate goals. The policy we support should be seen as a backstop, not a ceiling on action. From a climate perspective, accelerating renewable energy deployment is beneficial. In addition, it sends a signal our region is open for business and committed to low-carbon development. Renewables provide benefits beyond simple RPS compliance—they also provide capacity and energy needs. In addition, they have additional societal benefits, such as reducing or eliminating water use for cooling, avoiding emission of other air pollutants, and we are going to need more to hit our climate commitments.

If this current proposal does not move forward, we strongly encourage engagement with PGE on developing a renewables-focused plan that can garner support. We do not support long-term investment in additional fossil fuel resources.

Thank you for your consideration.

Sincerely,



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² Available at: <http://columbiaclimatelaw.com/files/2016/06/Aivalioti-2015-01-Electricity-Sector-Adaptation-to-Heat-Waves.pdf>