



NW Energy Coalition
for a clean and affordable energy future

February 14, 2024

Via Electronic Filing
puc.filingcenter@puc.oregon.gov

Oregon Public Utility Commission
201 High St. SE, Suite 100
Salem, OR 97301-3398

RE: Docket LC 83 Cascade Natural Gas 2023 Integrated Resource Plan (IRP)
Comments from Northwest Energy Coalition (NVEC) on Staff's Final Comments
of December 22, 2023

Dear Chair Decker, Commissioner Tawney, and Staff of the OPUC,

Thank you for the opportunity to provide the below comments on Staff's final recommendations and expectations for Cascade's 2023 IRP. We appreciate Staff's straightforward comments that made it easy to engage in feedback.

First and foremost, NVEC strongly advocates for gas utilities to incorporate decarbonization pathways into all planning and to identify the lowest reasonable cost path to decarbonize the overall energy system, including the gas system. To do this promptly, we agree with Staff comments that Cascade should continue planning as if the Climate Protection Program (CPP) is still in effect and encourage Cascade to consider a diverse set of decarbonization programs and measures that are available and accessible to customers, especially for low-income households, renters, industrial customers and small businesses.

NVEC agrees with Staff and Climate Advocates' comments that Cascade should look into more demand-side resources outside of traditional energy efficiency programs from the Energy Trust of Oregon, such as the electrification, interruptible rates, and demand response. NVEC believes that electrification has a role in decarbonizing the natural gas system, and we support Staff's recommendation on this topic.

We also understand the importance of non-pipeline alternatives (NPAs) as a decarbonization strategy and to fully paint the picture of the importance and benefits of NPA investments. We agree with Staff's expectation for Cascade to analyze NPAs in the next IRP with the well-rounded framework provided by Staff, which includes electrification, targeted energy efficiency, targeted demand response measures, and avoided costs related to compliance with GHG regulations and the broader non-energy impacts in the cost-benefit analysis of NPAs.

In a couple of Staff's expectations, they suggest Cascade working with TAG in regards to electrification strategy, therefore, improving and monitoring engagement in TAG will be essential for the success of reaching those goals. It is imperative to capture who participates, how many people and organizations engage, and how ideas and feedback are considered (or not) to ensure this group serves its purpose in impacting Cascade's IRP implementation. NWECC has appreciated these workshops so far and we value the support Cascade staff has offered to participants in these spaces.

We look forward to continuing engaging in Cascade's future IRP processes, including participating in the TAG workshops, to help craft thoughtful solutions that recognize the complexities of decarbonizing while addressing the urgency of the climate crisis and those it impacts most.

Sincerely,

/s/ Alessandra de la Torre

Policy Associate

Northwest Energy Coalition