

October 5, 2022

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

Submitted to: puc.publiccomment@puc.oregon.gov

Re: Straw Proposal for Treatment of Fossil Fuel Resources, Docket UM 2225

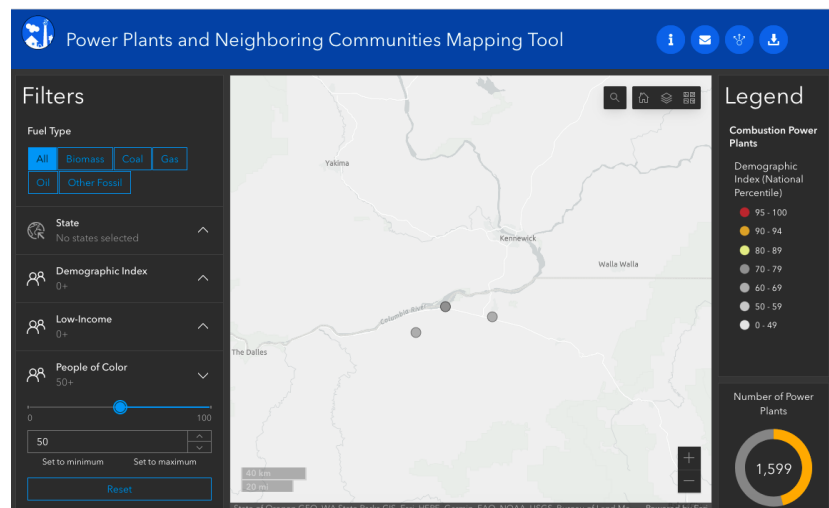
Dear Public Utility Commissioners and Staff:

Columbia Riverkeeper appreciates the opportunity to comment on the straw proposal regarding how the Oregon Public Utility Commission (PUC) will treat fossil fuel resources under the implementation of HB 2021 and its consideration of utilities' upcoming Clean Energy Plans (CEPs), Docket UM 2225.

We strongly support the concept of using Community Benefits & Impacts (CBIs) as metrics to evaluate utility actions. Staff are recommending a set of interim community impacts and benefits metrics that are developed in coordination with communities impacted by the plan, including environmental justice communities. This aspect of developing CEPs is particularly important because environmental justice communities continue to face impacts from fossil fuel power plants.

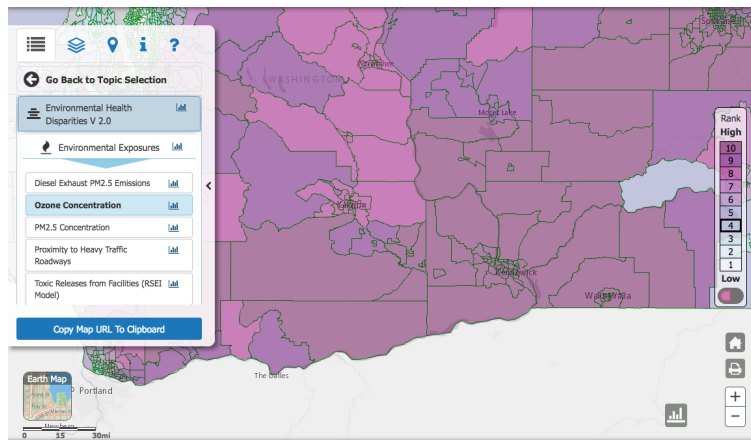
The PUC should consider the public interest implications of fossil fuel-fired power plants that emit pollution in communities close to the plants, an aspect of HB 2021 that does not appear to be thoroughly addressed in the straw proposal. Although staff have noted the public interest requirement for acknowledging CEPs, the straw proposal should go further in explicitly requiring utilities to address the harms caused by fracked gas-fired power plants.

Fossil fuel power plants impact communities throughout the Columbia Basin, as well as in other areas of Oregon, such as Klamath Falls. EPA's Power Plants and Neighboring Communities Mapping Tool shows the presence of multiple operating fracked



gas-fired power plants in close proximity to Hermiston, for example.¹ The map included here shows power plants operating in areas where the population is more than 50% people of color. EPA data show that air pollution in the area will impact people with lower incomes, Tribal people, and Latino people, for instance.

Additionally, the Washington Department of Health's Environmental Health Disparities Map offers data from Washington communities immediately across the Columbia River, information demonstrating that air pollution, such as low-level ozone, contribute to environmental health disparities in the region.²



Oregon does not produce a similar map to Washington's Environmental Health Disparities Map. However, DEQ and Washington Department of Ecology are studying ozone pollution in the Columbia Basin and understand that large point sources of NOx and VOC likely make a contribution to ozone formation. The PUC should consider these impacts as part of its public interest analysis when it considers issues related to thermal plants in acknowledging CEPs.

The potential for fossil fuel power plants to harm Oregon communities remains a concern because Oregon DEQ exempted gas plants from the Climate Protection Program (CPP), entirely. Throughout the development of the CPP, DEQ insisted that the PUC's implementation of HB 2021 would address impacts from power plants. However, the straw proposal does not include adequate discussion of the problems created by ongoing and prolonged gas-fired power plant operations. The PUC cannot acknowledge a CEP that conflicts with the public interest. To make a reasonable, non-arbitrary judgment about whether to acknowledge a CEP, the PUC must consider co-pollutants generated from the combustion of fracked gas in gas-fired power plants and their impacts on the public interest.

¹ U.S. EPA. Power Plants and Neighboring Communities Mapping Tool. Accessed October 1, 2022. <https://experience.arcgis.com/experience/2e3610d731cb4cfbccec9e2dcb83fc94>

² Washington Department of Health. Washington Environmental Health Disparities Map. Accessed October 1, 2022. <https://doh.wa.gov/data-and-statistical-reports/washington-tracking-network-wtn/washington-environmental-health-disparities-map>

In evaluating CEPs, the PUC should consider the potential harm caused by out-of-state fossil fuel power sales from Oregon-based fracked gas-fired power plants. As noted by other commenters to the PUC, gas-fired power plants in Oregon may continue to emit health-harming pollution in environmental justice communities for the purpose of selling power out-of-state. What is the public interest—to Oregonians—in allowing health and environmental impacts so that fracked gas-based power producers can prolong the operation of their polluting facilities by selling power out of state?

When evaluating retirements versus options that prolong the operation of gas plants in environmental justice communities, the PUC must consider the environmental and public health impacts of proposed actions under CEPs. Utilities may propose operational changes in CEPs that allow fossil fuel power plants to continue operating, and changes to gas-fired power plants have the potential to increase health-harming and smog-inducing co-pollutants. For example, Oregon DEQ recently authorized a major increase in volatile organic compound (VOC) emissions for the Carty Gas Plant allowing PGE to emit 195 tons of VOCs per year when the original expectation for the plant had been 24 tons/year—an increase primarily related to the Carty Generating Station’s startups and shutdowns. If fossil fuel power plants transition from baseload to peak generation, the changes could alter and potentially increase health-harming pollution. As the PUC weighs shutdowns, operational changes, and facility conversions in CEPs, we urge the PUC to evaluate the potential impacts to communities that will experience the impacts of co-pollutants of fossil fuel power plants.

In conclusion, we appreciate the opportunity to comment on the straw proposal, and we encourage the PUC to consider public interest factors, including the potential health and environmental harms caused by fracked gas power plants, when evaluating how to treat thermal plants in upcoming CEPs.

Thank you,

Dan Serres
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Columbia Riverkeeper