

March 6, 2022

Heidi Cody  
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Washington Utilities and Trade Commission

Dear WUTC Commission:

My name is Heidi Cody and I live in Vancouver, Washington. I would like to register my concerns about Northwest Natural's (NWN) Renewable Natural Gas (RNG) Tariff program. This program actively threatens meaningful climate action in SW Washington, where a move away from gas, including building electrification, is under consideration. Vancouver is developing a Climate Action Plan (CAP), and RNG is an option in our draft CAP's "Home Electrification" and "Commercial Building Electrification" sections.

E3SHB 1257 requires that utilities offer an RNG Tariff program, which limits WUTC's leverage. However, the WUTC certainly has the authority and responsibility to require more transparency and accountability than it currently is, from NWN. Until the Alliance for Community Engagement SWWA (ACE), Washington Environmental Council and Columbia Riverkeeper raised concerns and met with WUTC and NWN about the RNG Tariff program, there was no way to know that NWN's Washington Smart Energy program is sourced in Utah. Information submitted by NWN in [UTC Advice 21-10 Attachment A](#) remains heavily redacted, even after NWN's contract with Wasatch Resource Recovery has been signed. WUTC should require that NWN be clear where the project is sourced, that it is located out of state, that customers will not actually receive RNG in their pipes, and that the offsets aren't physically connected to the NWN system. All of this information should be available to NWN's customers. Washington state has set ambitious GHG reduction targets that may be undermined by RNG projects. The public also deserves transparency.

Full disclosure about this project is important, because buildings account for nearly 30% of Washington's GHG emissions. The fastest route to decarbonization is building electrification. NWN's Washington Smart Energy program delays building electrification, and locks customers into gas use for the foreseeable future. A solicitation letter sent by NWN to its Vancouver customers in Spring 2021 spooked customers baselessly about a "gas ban." This letter (pp. 3-4 of this pdf) states,

"NWN's system is uniquely positioned to convert waste into homegrown energy with new advancements like renewable natural gas and hydrogen. These breakthroughs in renewable energy are newer than wind and solar and offer similar climate benefits."

Utah RNG is not "homegrown," if you live in Washington. And, RNG does not offer "similar climate benefits to wind and solar energy." This misrepresentation about the cleanliness of RNG gives customers the false impression that they will be meaningfully reducing local GHG emissions by paying \$8 a month for the Smart Energy program.

If only 1-4% of RNG methane is in a pipe that contains 96-99% fracked methane, as Attachment A states, this RNG program does very little to reduce GHG emissions, compared to 100% fracked methane. Further, NWN is implying that RNG will be physically piped to customers, when instead the Washington Smart Energy program is a combination of methane offsets and RNG offsets. And, those offsets are remotely sourced in Utah. The NWN letter goes on to state:

“By using the natural gas infrastructure currently in place – one of the tightest, newest pipeline networks in the nation – we can help reach climate goals more affordably, without sacrificing reliability.”

This marketing is deceptive. WUTC can and should regulate NWN’s messaging, to protect Washington customers.

I would also like to point out concerns about M-RETS as a third-party verification system of RECs and RTCs. As [this article](#) relates, RNG suppliers need only register once with M-RETS rather than annually, which could lead to a misrepresentation of benefits if project features change over time; there is a lack of “granular” data on project facility specifics like the type of anaerobic digestion used, which could affect the calculation of carbon benefits; and on-site visits may be spotty, which leaves fraud a possibility.

Chairman Danner of WUTC himself has said, [RNG is “not ready for prime time.”](#) Capturing RNG is useful as a site-specific methane pollution-reduction strategy for certain industries. But RNG is not a large-scale solution. Capturing methane should not be used to continually justify more fracking and distribution of methane. Marketing RNG as a green solution is misleading, when the preponderance of our gas supply will remain fracked.

WUTC should protect the people of Washington, as its mission states, by more actively regulating NWN’s RNG Tariff program. Since NWN did not include full disclosure in its original Tariff program submission, WUTC should require NWN to resubmit its application, with full project details, before deciding whether to approve the program. Project details should include location, timeline, an honest description of what NWN customers are getting for \$8 per month, environmental attributes of the RNG, and a clear description of verifiable oversight of the Smart Energy RNG project. This is important for public transparency, and for the accountability of both the RNG Tariff program and WUTC’s regulatory role.

Thank you to WUTC staff for coordinating the enlightening meeting with NWN. I appreciate the opportunity to express how decisions made by the state legislature and WUTC are imperiling climate progress in Vancouver, and potentially throughout Washington.

Sincerely,



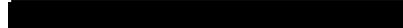
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Spring 2021

Service Address:



To Our Valued Vancouver Customers:

It's always been clear to me that part of my job is to make sure our customers are informed about matters that concern them, which is why I'm writing to you today. **See the back side to find out how to make your voice heard.**

The Vancouver City Council is hearing from some groups that want to ban natural gas for new homes and businesses.

Establishing local climate goals that are more aggressive than statewide targets means that Vancouver residents and businesses will be asked to pay more than their neighbors for a clean energy transition. Before decisions are made, we believe the City of Vancouver and its consultants should conduct thorough research to determine the likely impacts on carbon emissions and costs for both electric and natural gas customers now and in the longer term.

Gas bans that mandate electric equipment are an ineffective and expensive way to combat climate change. Here's why:

- ❶ **Families and businesses should have a choice of energy options to meet their needs.**  
This is not a decision that should be mandated by city council.
- ❷ **Communities with natural gas have greater energy reliability.** We need a dual energy system to prepare for what we know is our future during climate change — more extreme weather events. Homes and businesses with natural gas service can have energy even when the power is out.
- ❸ **All forms of renewable energy are needed in a balanced, low-carbon future.** NW Natural is committed to renewable natural gas and our vision of a carbon-neutral pipeline by 2050.

NW Natural's system is uniquely positioned to convert waste into homegrown energy with new advancements like renewable natural gas and renewable hydrogen. These breakthroughs in renewable energy are newer than wind and solar and offer similar climate benefits.

Adding renewables into our pipeline, combined with energy efficiency and wide adoption of our →

Tell us what's important to you by taking a short survey. Sign-up today so your ideas are taken into consideration for public policy decisions: [nwnatural.com/register](http://nwnatural.com/register).

Smart Energy carbon offset program, is a fast and effective way to reduce carbon emissions. By using the natural gas infrastructure already in place — one of the tightest, newest pipeline networks in the region — we can help reach climate goals more affordably, without sacrificing reliability.

Even the lack of housing affordability coupled with devastating COVID-19 economic impacts, I hope Vancouver's elected leaders will seek options that enable our renewable energy future without undermining long-term affordability, reliability and choice. Working together, we know the right balance can be achieved.

Consultants are now working with City Councilors and Staff to create the Vancouver Climate Roadmap. As a natural gas customer, I encourage you to share your thoughts with me and sign-up for receiving updates as more information becomes available.

Sincerely,



David H. Anderson  
President & CEO

**MAKE YOUR VOICE HEARD**

**Our Low Carbon Pathway**

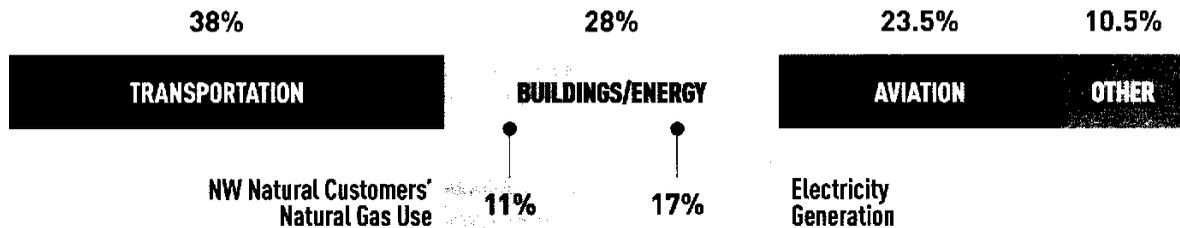
We believe NW Natural has an important role to play in helping our region move to a low-carbon, renewable-energy future. It's why we've developed our Low Carbon Pathway, and it's why we invite you to join us.

Today, natural gas is the cleanest energy option to reliably meet our region's biggest energy needs. But, still, we know we can do better. By using our existing pipeline system in new ways, we can help drive down emissions — and do it cost-effectively.

We'd like to hear from you and we know your time is valuable.

Tell us what's most important to you as a natural gas customer by taking a short survey. Sign-up today so your ideas are taken into consideration for public policy decisions: [nwnatural.com/register](http://nwnatural.com/register).

**VANCOUVER GREENHOUSE GAS EMISSIONS**



Tell us what's important to you by taking a short survey. Sign-up today so your ideas are taken into consideration for public policy decisions: [nwnatural.com/register](http://nwnatural.com/register).

Source: City of Vancouver Climate Strategy, Greenhouse Gas Emissions Forecast & Target Setting according to scadia Consulting Group (pages 18, 20; Nov. 23, 2020). Note: these emissions estimates are still pending review.