



The League of Women Voters of Oregon is a 101-year-old grassroots nonpartisan political organization that encourages informed and active participation in government. We envision informed Oregonians participating in a fully accessible, responsive, and transparent government to achieve the common good. LWVOR Legislative Action is based on advocacy positions formed through studies and member consensus. The League never supports or opposes any candidate or political party.

January 19, 2021

To: Department of Environmental Quality
Colin McConaha, Manager, Greenhouse Gas Program
GHGCR2021@deq.state.or.us

Re: Climate Protection Program RAC Meeting 1

Because the League of Women Voters of Oregon believes that climate change is a serious threat facing our nation and planet, LWVOR supports climate goals and policies that are consistent with the best available climate science and that will ensure a stable climate system for future generations.

We are presenting here our major concerns about the Climate Protection Program; we are not yet ready to take positions on the specific components of the Program.

Among our major concerns is that the EO is not being taken seriously. It not only has the 2035 and 2050 goals relative to 1990, specified as at least 45% and 80%, respectively, but applies them individually in Sections 4. C. (1), (2), and (3) to each of the sectors: large stationary sources, transportation fuels, and all other liquid and gaseous fuels including natural gas, respectively. We do agree that landfills should be treated separately, since they are explicitly mentioned in Sections 4. D.

We are concerned about the amount of new information included in the presentation that was not in the pre-meeting materials. The inclusion of the "Potentially Covered Entities" list in the Charter was especially confusing. One example is that the list in the Charter allows regulation of imported electricity while DEQ claims it does not have authorization to do so. We discovered this list actually contains the Potentially Covered Entities from SB 1530 (2020), so regulation of imported electricity would have been authorized by passage of the bill.

In addition, the Modeling Policy Scenario proposals were not included in the briefing material. Because of the importance of the model for program development, it would have been useful for the RAC members to have had the information earlier.

Electricity

We object to the elimination of electricity just because of the legislative limitation on regulating imported electricity. We acknowledge that PGE is the only entity covered and thus might change its source to another state. But it should also be considered that if Oregon-generated electricity is unregulated, states with restrictions might change to using our electricity.

In the DEQ Sector-based GHG Emissions, which are consistent with the 1990 total emissions in the graphs being used to show the effect of the EO, electricity emissions are assigned to the user of electricity, not in a separate category. So even if electricity is excluded from the Climate Protection Program, both Oregon-generated and imported electricity would be included in the measurement determining if we are meeting the goals.

Natural Gas and Stationary Sources

It was difficult to determine from the briefing materials and the presentation whether DEQ has a “leaning” toward the regulation of natural gas combusted by stationary sources. In the Charter list, combustion of natural gas is allocated to the stationary source. Slide 43 implies that the decision as to whether it is regulated at the supplier or the stationary source is not decided. However, in all of the scenarios it is allocated to the supplier and two of the scenarios exclude stationary sources entirely.

We believe that large stationary sources should be regulated for both their on-site combustion of natural gas and their emissions generated by their industrial processes. We compared the facilities in the Charter list with the facilities potentially being called in by the Cleaner Air Oregon program, which has indices for both harm and demographics. The listing in the Charter separately lists the emissions from burning natural gas and those generated by the industrial processes. We discovered that the ones with all their emissions from burning natural gas were usually as harmful as those with significant industrial processes.

Equity

This ties into one of our other major concerns. Although Equity is given a vertex in the Emissions/Cost/Equity pyramid, it has not really been incorporated in the program. We agree that Alternative Compliance Options could provide one way to incorporate Equity. We suggest that limitations be put on the use of flexibility options by stationary sources causing the most harm in vulnerable areas.

Thank you for the opportunity to discuss this Program.



Rebecca Gladstone
LWVOR President



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LWVOR Climate Emergency Portfolio

