

VANCOUVER AUDUBON SOCIETY

P.O. Box 1966 Vancouver, WA 98668-1966
www.vancouveraudubon.org



State Of WASH.
UTIL. AND TRANSP.
COMMISSION

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October 23, 2021

Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Re: Consideration of whether to continue to use the Perpetual Net Present Value Methodology to calculate natural gas line extension allowances, Docket UG-210729

Dear Executive Director and Secretary Amanda Maxwell:

Thank you for the opportunity to comment on the proposal to change natural gas line extension allowances.

Birds are telling us that it is time to take action on climate change. The National Audubon Society has used the latest climate models and more than 140 million bird records to assemble “Survival by Degrees: 389 Bird Species on the Brink,” a ground-breaking report forecasting the survival of North American birds through the end of the century in extraordinary detail.

Our science shows that 65 percent of North American bird species are at risk of extinction from climate change. We must take actions now that can reduce the effects of climate change. The use of fossil gas in buildings is Washington’s fastest growing source of greenhouse gas emissions, which pose a significant threat to our climate.

Given changes in state policy and our better understanding of climate science, it is no longer reasonable for gas utilities to incentivize new customers to connect to gas pipelines. Washington’s emission reduction targets were updated in 2020; state law mandates that we must reduce greenhouse gas emissions to 95 percent below 1990 levels, and achieve net-zero emissions, by 2050. According to the 2021 State Energy Strategy, we cannot meet our greenhouse gas emissions limits while continuing our current uses of fossil natural gas. As a state, we need to remove existing incentives for new gas use and new gas lines in order to better enable a transition away from the combustion of fossil fuels in buildings.

The 2021 Climate Commitment Act will allocate free allowances to current gas customers, but not to new customers connecting to the system. This burdens existing customers with the costs and risks associated with line extensions provided to new customers and increases the risk of stranded assets. Existing customers should not subsidize new customers and lock us into more greenhouse gas emissions in the future.

Vancouver Audubon Society encourages the Commission to order Washington’s investor-owned gas utilities to end all line extension allowances. Alongside the termination of these gas incentives, we

also encourage the Commission to evaluate whether electric line allowances should be modified to provide greater incentives for building electrification.

Sincerely,

A handwritten signature in cursive script that reads "Susan M. Saul". The signature is written in black ink and is positioned above the printed name and title.

Susan Saul
Conservation Chair