

From: [Doyle, Samantha \(UTC\)](#)
To: [UTC DL Records Center](#)
Subject: FW: Additional Comments to the UTC re: the Washington Natural Gas Decarbonization Survey U-210553
Date: Monday, December 19, 2022 2:19:16 PM

Hi there,

Please add the email below to docket U-210553.

Thank you!
Sam

From: Cathryn Chudy <chudyca@gmail.com>
Sent: Friday, December 16, 2022 3:16 AM
To: Doyle, Samantha (UTC) <samantha.doyle@utc.wa.gov>
Subject: Additional Comments to the UTC re: the Washington Natural Gas Decarbonization Survey

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12/19/22 14:40:59

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Hi Samantha,

Thank you for providing a way to add additional comments to the Washington Natural Gas Decarbonization Survey.

***Please add these additional comments (based on the survey questions) to your report:**

The survey presents two decarbonization pathways and the way the questions are framed presents two pathways as though there is a choice to be made between one pathway versus the other.

Climate and air pollution concerns are best addressed primarily through energy efficiency and electrification, but in a transition from fossil fuels there are some sectors that are hard to electrify and the transition will need to utilize alternative fuels. This means a hybrid pathway with primary focus on electrification where possible, feasible and cost-effective, and alternative fuel options for wherever electrification is not possible.

What do you like about the electrification actions in the list above?

I support electrification as the most cost-effective and equitable pathway to meet our local and state-wide climate goals, while lowering or eliminating health-harming pollution that affects our indoor spaces, particularly among the most vulnerable and overburdened in our community. This is consistent with the Department of Commerce's determination of electrification along with energy efficiency as the most cost-effective way to lower emissions in our building sector.

Most home builders in Washington are already constructing new homes to be all-electric, and the challenge of electrifying our existing buildings should be met by providing funds for frontline communities to retrofit their homes and buildings.

What concerns you about the electrification actions in the list above?

Certain sectors like high-heat industrial processes and long-haul transportation cannot be realistically electrified (not currently realistic or technically feasible)

A **hybrid pathway** that allows alternative fuels to be used for these purposes is necessary. We should be wary of alternative fuels that pose as "clean" but that can be expensive, toxic or health-harming in their properties, production and/or delivery.

We want to get to full electrification, but we may need alternative fuels to help us in the transition.

What do you like about the alternative fuel actions in the list above?

Decarbonization will need to use alternative fuels as part of our transition from fossil fuels , but should **not** lead to expanding fossil gas infrastructure like pipelines or increasing customer base.

We only have limited quantities of these alternative fuels like clean hydrogen and RNG , so we should prioritize and save them for these specific hard-to-decarbonize sectors like high-heat industrial processes and some long-haul transportation uses.

We can't realistically or equitably meet our climate goals and reduce air pollution through a pathway that relies solely on alternative fuels.

What concerns you about the alternative fuel actions in the list above?

A pathway that relies primarily or solely on alternative fuels is not realistic, cost-effective, feasible or equitable, so should not be under consideration as the primary pathway.

Because electrification is the most cost-effective and feasible strategy for the building sector, ***alternative fuels should not be used to heat and cool residential and commercial buildings, or to power most vehicles.***

Because RNG is chemically the same as fossil gas, combusting RNG still contributes to both indoor and air pollution. RNG should **not** be used in homes and commercial buildings.

We can't achieve our climate goals and do so in a cost-effective, feasible, timely and equitable way without without electrification.

How do you think the actions described in this survey could affect you and others in the community?

My Vancouver community has taken a leading edge approach to addressing the climate disruptions

we have been experiencing, and this survey and the legislative and regulatory outcomes based on this survey have relevance to the work that we have just accomplished in setting aggressive goals to reduce climate and health-harming emissions as well as improve the resilience of our city and community.

Continuing to use gas deepens our reliance on fossil fuels and does little to curb the climate crisis, which has already contributed to higher summer temperatures, decreased snow-melt, increased wildfires and smoke, sea level rise, and more in Washington. In Vancouver we have experienced a life-threatening heat dome, toxic air filled with wildfire smoke, a destructive ice storm, and excessive heat/summer drought. Our Vancouver City Council just passed an updated ordinance prohibiting new or expansions of fossil fuel facilities, and a Climate Action Framework (CAF) with aggressive goals to lower emissions and do so in an equitable way. Our CAF focuses on electrification for new and existing buildings and it will be important to follow the SBCC's updated building codes and emphasize electrification as the primary way to transition our community away from fossil fuels in our buildings

Using gas in buildings and vehicles creates outdoor air pollution: Washington's buildings currently emit more nitrogen oxide (NOx) outdoors than all of the state's power plants combined. The gas lobby (Northwest Natural here in SW WA) has opposed the electrification focus and would like to continue expanding its customer base and pipeline infrastructure. Their messaging to customers and the Smart Energy Program pushing renewable natural gas is deceptive and misleading, assuring customers that they can offset their gas use in their homes and that "renewable natural gas is on its way to their homes/businesses" (which does **not** lower climate or health-harming emissions in Vancouver, and will not be cost-effective or feasible over time). The UTC can and must take this into consideration as it looks at the role of natural gas in lowering emissions.

Vancouver now has the most aggressive climate action goals in the state to reduce emissions, and we cannot achieve them with continuing to use fossil gas in our building sector and allowing the gas utility to deceive customers into continuing to use fossil gas as their appliances age out. This is a climate, public health and an equity issue - we have high ratings on the Washington Health Disparities Map, and our CAF Actions that lower emissions while protecting public health and future viability depend on the clear transition away from reliance on fossil fuels.

Our census tracts in Clark County rate the highest numbers on the Washington Health Disparities Map and a child growing up in a home with gas cooking is 42% more likely to develop asthma symptoms because of indoor air pollution. Continuing to build new homes with gas, or not transition (with assistance for those with fewest resources) to electric in homes and businesses, will continue to contribute to these health disparities. And it will make meeting our climate goals much more difficult.

For our community safety, gas piped into our buildings and homes puts us at risk of gas leaks and fires, especially in an area like SW Washington where we have a lot of seismic activity

Electric heat pumps are not only clean and effective: they also provide heating and cooling together, protecting us during heat waves and wildfire smokes.

Wide-scale electrification will put downward pressure on electric rates for all customers.

Electrification will also create good, local clean energy jobs in Clark County, SW Washington and all of Washington state.

Is there anything else you would like to share

Please consider **hybrid** pathways instead of solely a full electrification pathway versus an alternative fuels pathway. A hybrid pathway would include electrification of most buildings and vehicles, but the use of alternative fuels for certain niche, hard-to-electrify uses.

The UTC should use this survey not just to inform the legislature's actions, but to strengthen the UTC's own regulatory policies and actions. Beware of fossil fuel industry "greenwashing" meant to further the business bottom line versus the health, safety, and sustainability of our energy systems. Our local gas utility in Vancouver is Northwest Natural, and their "Vision 2050" decarbonization plan is actually a marketing plan that is based on unrealistic assumptions and meant to ensure business growth rather than meet genuine decarbonization goals that are healthy and viable for our future sustainability and well-being.

The UTC needs to ensure that as utilities decarbonize, they do not leave frontline communities on the hook for expensive changes and retrofits. Also to recognize the way in which the objective of utilities may be to "greenwash" their decarbonization "plans" as a marketing strategy to continue expansion of infrastructure and increasing customer base, rather than to contribute meaningfully and realistically to the state's direction of emissions reduction, and transition away from fossil fuels in the most cost-effective and equitable way possible.

I really appreciate the survey and this opportunity to add additional comments/feedback.

Thank you,

Cathryn Chudy

Vancouver, WA 98663