

**From:** [Diane](#)  
**To:** [UTC DL Records Center](#)  
**Subject:** Regarding UE-160918 and UG-160919  
**Date:** Thursday, February 15, 2018 12:59:19 PM

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Dear Commissioners,

It appears that PSE has based all of its cost of carbon analyses on just the direct carbon dioxide (CO<sub>2</sub>) contribution from natural gas, **rather than on its full carbon dioxide equivalence (CO<sub>2</sub>eq). The later includes the attendant methane emissions from production, transmission, distribution, and use of natural gas.** I cannot speak to the details of the CPP, but leading candidate proposals for federal carbon tax legislation as well as carbon tax bills that were introduced in 115th United States Congress in 2017 correctly use CO<sub>2</sub>eq as the basis for taxation.”’ **Using CO<sub>2</sub> rather than CO<sub>2</sub>eq is entirely untenable** under a social cost of carbon framework, which I and others believe better serves the public interest than using cost of carbon. Nevertheless, **the correct basis for carbon pricing analyses is CO<sub>2</sub>eq; using anything less is an error that needs to be corrected.**

Recent studies utilizing improved measurement methods show much higher rates of methane leakage than have been assumed in the past, particularly for natural gas produced using hydraulic fracturing.

Lastly, Oregon and California are including many more renewables in their energy mix since this will soon be the cheapest cost of power. Its unfair to expect Ratepayers to pay for more volatile energies that are likely to cost more in the future.

Sincerely,

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