

February 8, 2022

Portland Public School Board
501 N Dixon Street
Portland, Oregon 97227

RE: Portland Public School Climate Crisis Response Policy

Chair DePass and school board members,

NW Natural appreciates the opportunity to provide comments on Portland Public Schools' climate crisis response policy. NW Natural is a local distribution company (LDC) that provides conventionally sourced and renewable natural gas directly to end users in Oregon and Washington and has been operating in Oregon since 1859. It currently provides natural gas to over 750,000 customers in the region, with a large percentage of those customers residing in Multnomah County. We recognize along with the school board, that there is a climate imperative, and that we must work together to address this future, and it is in this light that NW Natural submits these comments to the record, which are supported by our company Vision 2050, the outline of NW Natural's plan to become the first carbon neutral utility by 2050.

In light of this commitment, we enter in to the record this following:

NW Natural supports:

1. Portland Public Schools' proactive work to combat climate change, protect frontline communities, focus on community resiliency and climate adaptation
2. Decarbonizing the energy system economy wide from wires to pipes, to drive down emissions safely, financially responsibly and reliably
3. Investing in the most efficient and effective equipment using renewable energy

NW Natural has:

1. Protected the integrity of the energy grid, especially when stressed by weather, fires, and/or natural disasters providing a reliable source of energy to our communities contributing to a more resilient energy system for the communities we serve, especially for institutions that need reliable back up resources for emergencies
2. Used bold conservation strategies to reduce natural gas utilization over the past years – our customers are using less year over year
3. One of the most modern pipeline systems in the US with extremely low system loss or risk
4. Sourced and procured natural gas from natural gas providers with the lowest fugitive emissions and that follow scientific best practices [ONE Future - Working to Reduce Methane Emissions](#)

NW Natural is:

1. Currently delivering Renewable Natural Gas (RNG) directly to our customers with larger percentages being added every day, for those organizations and businesses who want to farther, faster, we are pursuing options for these entities to increase the amount of RNG they can purchase to achieve deeper emissions reductions
2. Actively developing innovative hydrogen solutions to minimize CO2 emissions and provide long-term reliable low carbon energy solutions to the energy grid in Oregon, as we are currently testing 5% hydrogen blend at our Sherwood Facility

3. Pursuing federal policy to accelerate decarbonization of the natural gas system
4. Complying with the Governor's Climate Protection Plan under which we will reduce our customers greenhouse gas emissions from the use of our product by 50% by 2035 and 90% by 2050 or NW Natural's more aggressive Vision 2050. [VISION 2050 Destination Zero - NW Natural](#)
5. Investing in carbon capture pilot projects for institutional customers to reduce carbon emissions from boilers

In accepting these facts, we ask that Portland Public Schools consider the following document that we submitted last December (attached below) that the committee may not have had the time to consider in their draft Climate Crisis Response Policy. We look forward to working with the policy committee in the next several weeks on this important policy.

We are proud to be a company headquartered in Multnomah County and look forward to meeting the district's renewable energy needs for the next 162 years and partnering with Portland Public Schools to ensure environmentally sustainable, affordable, safe, and resilient communities for all students, staff, and residents.

Sincerely,

Nina Carlson, NW Natural, Government Affairs

Proposals for Portland Public Schools Draft Climate Action Plan

Pillar 1, Goal 1.1, Item 2:

Original:

Prohibit the installation of fossil fuel infrastructure (gas-fired equipment) in all new buildings and major modernizations from here on out. Phase out fossil fuel infrastructure (gas-fired equipment) in all existing buildings by 2050.

Proposed:

Couple the installation of renewable fuel appliances in all new buildings and major modernizations from here on out with appropriate emissions reductions – energy efficiency measures, offsets, green fuel tariffs, carbon capture, etc. Establish and follow an emissions reduction plan for all energy sources serving PPS buildings. -Achieve net zero direct and indirect GHG emissions in all existing buildings by 2050.

Reasoning:

NW Natural has worked with PPS to convert boilers from fuel oil to natural gas at 16 schools in the last 10 years, driving down fuel costs and emissions for the District. We'd like to continue to be a positive partner in that effort. Decarbonization and greenhouse gas emissions reductions are the goals, both short and long term. There are many pathways to achieve this cost-effectively. Allow flexibility to choose the energy solution that provides the least carbon intensity, with the most affordable cost for the needed application, while preserving resilience and reliability.

Pillar 1, Goal 1.1, Item 3:

Original:

Increase energy efficiency and minimize the indirect use of fossil fuels.

Proposed:

Increase energy efficiency to minimize the direct and indirect use of fossil fuels, with the focus of relying more exclusively on renewable energy - reducing economy-wide emissions. Develop a renewable fuels portfolio for all energy consumption and emissions reduction plans using efficiency, green tariffs, carbon capture, and new technologies.

Reasoning:

Efficiency is a primary cornerstone of addressing climate concerns, as you don't have to decarbonize the energy you don't use. Sourcing renewable fuels are also a key instrument. is. Renewable energy sources should be relied upon for energy needs in increasing amounts.

Pillar 1, Goal 1.1, Item 4:

Original:

Limit the quantity of refrigerants used.

Proposed:

For existing equipment, actively address refrigerant leaks; phase out refrigerants with global warming potential (GWP) > 1 by 20?? Ensure that refrigerants are appropriately disposed of. For new equipment, source with lower GWP refrigerants or those with GWP = 1 (or less).

Reasoning:

Refrigerants are among the most potent and persistent greenhouse gases. HFCs spare the ozone layer but have 1,000 to 9,000 times greater capacity to warm the atmosphere than carbon dioxide. Project Drawdown puts both [Refrigerant Management](#) and [Alternative Refrigerants](#) in the top 10 most important solutions to address the climate imperative.

Pillar 1, Goal 1.1, Item 6 and 7

Original:

6. Design buildings to recover quickly from climate impacts (fires, floods, landslides, heat).

7. Design, renovate, and construct new facilities to maximize resiliency to heat, smoke, flooding, and storms to protect district assets and provide community respite during climate related emergencies.

Proposed:

Design buildings to recover quickly from climate impacts (fires, floods, landslides, extreme heat, and cold weather events).

Design, renovate, and construct new facilities to maximize resiliency to extreme heat and cold weather events, smoke, flooding, and storms to protect district assets and provide community respite during climate related emergencies.

Reasoning:

As the world adapts to climate change and extreme weather events, resiliency to high and low temperatures will be important. As this past year has shown, improper resiliency planning for extreme weather events can have deadly consequences.

Pillar 1, Goal 1.5, Item 1:

Original:

Where feasible, divest banking investments from fossil fuel industries.

Proposed:

Where feasible, divest banking investments from fossil fuel industries, and invest in emissions-reducing projects such as solar, wind, renewable natural gas, hydrogen, carbon capture and new technologies.

Reasoning:

Help advance the clean energy revolution. The Intergovernmental Panel on Climate Change advises that we need zero-emission energy sources PLUS carbon removal to address global warming.

Pillar 3, Goal 3.1, Item 1 and Goal 3.4, Item 5

Original:

Goal 3.1, Item 1: Identify and monitor climate trends and impacts on district families, especially groups vulnerable to impacts of extreme heat and poor air quality.

Goal 3.4, Item 5: Update school emergency response plans to address climate-related hazards, including flood, extreme heat, landslides, and wildfire. Plans should emphasize protecting and serving low-income populations, communities of color, and people with disabilities.

Proposed:

Goal 3.1, Item 1: Identify and monitor climate trends and impacts on district families, especially groups vulnerable to impacts of extreme heat or cold and poor air quality.

Goal 3.4, Item 5: Update school emergency response plans to address climate-related hazards, including flood, extreme heat, extreme cold, landslides, and wildfire. Plans should emphasize protecting and serving low-income populations, communities of color, and people with disabilities.

Reasoning:

As stated above, resiliency and emergency response planning should incorporate both extreme heat and extreme cold weather events for the safety of students and the community.