

Oct 22, 2021

Alliance for Community Engagement SWWA (ACE)
Vancouver WA

Clark Public Utilities Commission
Clark Public Utilities
P.O. Box 8900
Vancouver WA 98668

Dear Commissioners and Staff of Clark Public Utilities:

We are grateful to have a public utility which offers reliability, good low-income programs and high customer satisfaction. We appreciate the work you do to achieve these outcomes. As customers and stakeholders, we want our PUD to be fiscally and environmentally responsible, and to act with our children's and our planet's future in mind.

We are writing to ask Clark Public Utilities to take concrete, significant actions to reduce greenhouse gas (GHG) emissions. We encourage CPU to become a responsive and productive partner with the City of Vancouver, as the City develops plans to reduce emissions in agreement with our state's updated emission goals per [HB 2311](#)¹, to reduce GHG emissions 45% by 2030, and 95% by 2050 ([RCW 70A.45.020](#))².

The Clean Energy Transformation Act ([CETA](#))³ commits Washington utilities to supply renewable energy to meet 80% of retail load by 2030 and 100% by 2045. Importantly, CETA also requires each utility to first undertake all energy efficiency and demand response measures to reduce load and costs to customers.

We urge CPU to develop a strong Clean Energy Implementation Plan (CEIP) that articulates how CPU will meet clean energy standards and support the City of Vancouver's goals for clean and equitable climate action.

The two CEIPs that are required between now and 2030 should clearly show how CPU will:

- Increase conservation and energy efficiency measures;
- Reduce peak demands with demand response measures;
- Transition to new renewable energy sources in a timely way; and
- Phase out the River Road gas generating plan earlier than CETA requires, to reduce GHG emissions and help Vancouver meet its GHG emission goals. The River Road generating plant is one of the ten largest emitters of greenhouse gas in Washington. It would be ideal to get the River Road plant off grid as a base load plant, but keep it as emergency support.

We need CPU to prepare for the needs of EVs, including buses and fleets of delivery trucks.

In order to reduce GHG emissions, CPU should also encourage and incentivize electrification in buildings, as this [study](#)⁴ supports. There is no prohibition of subsidizing all-electric new buildings in [Article 8, Section 10](#)⁵ of the Washington Constitution, as is summarized [here](#)⁶. CPU should be encouraging electric heat pump use in new buildings. Electric heat pumps are much more efficient than fossil fuel options, and eliminate on-site fossil fuel combustion. New research shows that combustion of gas indoors is a safety and health hazard, as this [report](#)⁷ discusses.

CPU should play a leading role in stopping our reliance on “natural” or fracked gas. We are experiencing first-hand the harmful environmental and health consequences of fracked methane gas, as this summer’s heat dome showed us, and as this [report](#)⁸ documents. False solutions offered by NW Natural, like Renewable Natural Gas, will do nothing to reduce emissions, and only prolong our transition to actual renewable energy like wind and solar. Nor do we want to see small-scale nuclear used to fill Vancouver’s energy needs. Vancouver is in a liquefaction zone and overdue for a huge earthquake. The high costs and multiplying risks of small-scale nuclear would also delay the transition to truly clean and safe energy, as this [article](#)⁹ makes clear, and this [report](#)¹⁰ on NuScale’s problematic history reveals.

On your website, questions submitted by the public in the “[Integrated Resource Plan \(IRP\) and CETA FAQ](#)”¹¹ make clear: your customers want to move more quickly to 100% clean energy. We also want a greater commitment to use local energy sources, like renewables, batteries and conservation. It’s been six years since CPU’s last solar project, and our community wants more. Localized energy production will make our system more reliable and resilient.

The costs of wind and solar have dropped significantly. The cost-effective, forward-looking choice is to start implementing clean energy in Vancouver now. Our CPU needs to plan for a clean and healthy future.

Sincerely,

Alliance for Community Engagement SWWA (ACE)
Climate Action SWWA
Columbia Riverkeeper
Friends of Clark County
Friends of the Columbia Gorge
Great Old Broads for Wilderness
Loo Wit Sierra Club
Sunrise Movement SWWA
Vancouver Audubon
Washington Environmental Council
Washington Physicians for Social Responsibility



**Friends of
Clark
County**



**SIERRA
CLUB**



Vancouver Audubon Society



**WASHINGTON PHYSICIANS
FOR SOCIAL RESPONSIBILITY**

ENDNOTES

- 1 “Lawfilesext.leg.wa.gov - /Biennium/2019-20/.” n.d. Lawfilesext.leg.wa.gov. Accessed October 11, 2021. <https://lawfilesext.leg.wa.gov/biennium/2019-20/Pdf/Bill%20Reports/House/2311-S2.E%20HBR%20FBR%2020.pdf?q=20211009201551>
- 2 “Chapter 70A.45 RCW: LIMITING GREENHOUSE GAS EMISSIONS.” n.d. App.leg.wa.gov. Accessed October 11, 2021. <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.45&full=true>
- 3 “Clean Energy Transformation Act (CETA) - Washington State Department of Commerce.” 2019. Washington State Department of Commerce. 2019. <https://www.commerce.wa.gov/growing-the-economy/energy/ceta/>
- 4 Anderson, Megan, Mark Lebel, and Max Dupuy. n.d. “Under Pressure: Gas Utility Regulation for a Time of Transition.” Accessed October 11, 2021. <https://www.raponline.org/wp-content/uploads/2021/05/rap-anderson-lebel-dupuy-under-pressure-gas-utility-regulation-time-transition-2021-may.pdf>
- 5 “Code Reviser Washington State Constitution.” n.d. Leg.wa.gov. Accessed October 11, 2021. https://leg.wa.gov/CodeReviser/Pages/WAConstitution.aspx#ARTICLE_VIII
- 6 “State Policies and Rules to Enable Beneficial Electrification in Buildings through Fuel Switching.” 2020. American Council for an Energy Efficient Economy. https://www.aceee.org/sites/default/files/pdfs/fuel_switch_revised_5-14-20.pdf
- 7 “Gas Stoves: Health and Air Quality Impacts and Solutions.” n.d. Rocky Mountain Institute. <https://rmi.org/insight/gas-stoves-pollution-health>
- 8 Caleb, et al. “Methane Gas: Health, Safety and Decarbonization.” August 2021. Power Past Fracked Gas. Accessed October 11, 2021. <https://powerpastfrackedgas.org/wp-content/uploads/2021/08/Methane-Gas-Health-Safety-and-Decarbonization.pdf>.
- 9 ‘Low-Carbon’ Misses the Point: Arguments Favoring Nuclear Power as a Climate ‘Solution’ Are Fundamentally Misframed.” 2021. CounterPunch.org. October 6, 2021. <https://www.counterpunch.org/2021/10/06/low-carbon-misses-the-point-arguments-favoring-nuclear-power-as-a-climate-solution-are-fundamentally-misframed/>
- 10 Ramana, M. August 2020. “Eyes Wide Shut: Problems with the Utah Associated Municipal Power Systems Proposal to Construct NuScale Small Modular Nuclear Reactors.” Accessed October 11, 2021. https://d3n8a8pro7vnmx.cloudfront.net/oregonpsrorg/pages/21/attachments/original/1600287829/EyesWideShutReport_Final-30August2020.pdf?1600287829
- 11 “IRP and CETA FAQ & Submitted Comments.” n.d. Clark Public Utilities. Accessed October 11, 2021. <https://www.clarkpublicutilities.com/about-cpu/public-documents/integrated-resource-plan/faq-submitted-comments/>