



July 20<sup>th</sup>, 2023

Public Utility Commission of Oregon  
cc: Charles Lockwood, PUC Staff  
201 High St. SE #100  
Salem, OR 97301

Regarding: ADV 1502/ Advice 23-04, NW Natural revising Smart Energy to include Renewable Natural Gas

Dear Commissioners,

My name is Preston Korst and I'm the Director of Government Affairs at the Home Building Association of Greater Portland. The HBA is dedicated to maximizing housing choice for all who reside in our region by shaping an environment in which industry professionals can effectively meet the diversified needs of all communities. Together, our 1,400 members work across the Portland region in 6 counties, 40 cities, and in many more service and utility districts.

Our members have deep experience in bringing energy efficiency and sustainable design to the homes they help build, remodel or upgrade. Given the region's severe housing supply shortage, governments should nurture more cost-effective and diverse energy options that help bring new homes to market while making older homes healthier and more efficient. The combined effect of this approach is greater affordability and more choice for working families and first-time homebuyers. Therefore, we implore policymakers of all stripes to view policies (both new and existing) in light of a vastly undersupplied housing stock—we're roughly 60,000 housing units short in the Portland Region.

We are writing in support of a motion filed by NW Natural to modify the Smart Energy program to make it more effective and adaptable in addressing utility companies' energy efficiency goals. The reasonable modification requested will allow integration of additional renewable gas into the residential program while allowing large commercial customers the option to secure a bilateral contract with a combination of Renewable Natural Gas (RNG) and offsets in the Smart Energy Program.

More specifically, this modification to the Smart Energy tariff will:

- Expand the program and help support more NW Natural Commercial customers who desire to mitigate greenhouse gas emissions associated with their company's energy use;
- Help households who wish to and are able to invest more in renewable energy;

- Create an additional opportunity for communities and jurisdictions who are focused on climate action planning at the local level to have another opt-in option to promote to businesses and residents that will further collective climate goals.

This increased flexibility will enable businesses (large and small) and residential customers more incentive to meet our collective climate goals. Additionally, it provides individual jurisdictions with the needed flexibility to meet climate objectives, thereby making it more likely that the state, cities, businesses and individual customers alike are able to do their part.

Please adopt this proposal from NW Natural. We are certain that this policy change will result in a more sustainable future and reduced impacts on our environment.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read "Preston Korst", with a long horizontal flourish extending to the right.

**Preston Korst**

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