



Oregon Citizens' Utility Board

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August 26, 2026

To: Chair Jessica Vega Pederson, Commissioner Meghan Moyer, Commissioner Shannon Singleton, Commissioner Julia Brim-Edwards, and Commissioner Vince Jones-Dixon

From: Jennifer Hill-Hart, Policy & Program Director, Oregon Citizens' Utility Board

Re: CUB Supports the Multnomah County Climate Justice Plan

Dear Multnomah County Board of Commissioners:

The [Oregon Citizens' Utility Board](http://www.oregoncub.org) (CUB) represents the interests of residential utility customers, with a primary focus on the for-profit utilities regulated by the Oregon Public Utility Commission (PUC). For over 40 years, CUB has been the statewide advocacy group successfully fighting for affordable, accessible, reliable, and clean utilities in Oregon. To date, we have saved households over \$10 billion dollars. Thank you for the opportunity to provide comments in support of the Multnomah County Climate Justice Plan.

In order to mitigate the impacts of rising gas and electric utility rates, it is critical that decisionmakers prioritize more climate resilient homes and energy strategies. A significant portion of CUB's advocacy is centered on prioritizing energy efficiency, weatherization, and home repairs to make households more resilient to weather and extreme weather events, while reducing their utility bills. In our work we have made the following determinations:

- Energy inefficient homes are more likely to have evictions and foreclosures.
- Housing infrastructure and income determines a family's energy behaviors.
- Families who cannot afford energy bills have been forced to prioritize housing costs, food, healthcare costs..
- Sacrificing energy means sacrificing safe and comfortable indoor temperatures, and risking health & safety of our neighbors.

CUB has greatly appreciated Multnomah County's involvement in PUC proceedings, including its advocacy for environmental justice communities who have been historically harmed by energy decision-making. This local government perspective has brought unique insight, including into how energy affordability directly impacts households and housing stability, including keeping people in safe and healthy homes..

CUB supports the Multnomah County Climate Justice Plan as it is informed by a wealth of data-informed research and best practices already considered by energy experts, in Oregon and all over the world, that finds we must decarbonize our energy system, and should decrease our reliance on fossil fuels for household energy. The Plan also acknowledges that climate change harms all of us, but particularly those who cannot afford¹ to adapt to our changing climate and increasing extreme weather incidents.² And finally, it is centered in community needs and the values of Multnomah County residents.

I. Oregon has amassed a wealth of knowledge of decarbonization strategies and best practices which show that a just energy transition is imperative to adapt to the climate and weather realities caused by climate change.

A. Oregon has led the nation in developing policies that help us transition away from fossil fuels, which have been informed by market-, economic-, and science-based data, as well as robust public engagement, including with utilities, at the national, state, and local levels.

Electric investor-owned utilities, including Pacific Power and Portland General Electric, were significantly involved in the development of HB 2021, and actively engaged in its implementation at the PUC. Gas investor-owned utilities were heavily involved in the development of SB 98, Oregon's renewable natural gas pilot program law. They have also been very engaged in the implementation of Oregon Executive Order 20-04, which directs Oregon to reduce its gas emissions, developed and implemented through the Climate Protection Program at the Oregon Department of Environmental Quality. All Oregon's for-profit utilities have had many rate cases before the PU and have been engaged in implementation of Oregon energy laws at state administrative agencies. Not to mention participation in statewide forums like the Oregon Energy Strategy Advisory Group.³ Energy industry representatives, as well as CUB, clean energy advocates, and organizations representing low-income and environmental justice communities, have provided data and other information to inform policy recommendations and implementation of strategies to address climate change here in Oregon. Multnomah County has taken advantage of this foundational work, like the Oregon Energy Strategy, in developing its Climate Justice Plan.

B. Growing the gas system by adding new residential customers increases costs to existing customers.

Limiting investment in growing the natural gas system will save gas customers money. For example, NW Natural assigns a 58-year useful life to the pipe which connects a home to the gas system and the cost of that connection is spread over 58 years. This means that a new home added to the gas system today will be a cost through 2080. And if that customer converts to an

electric heat pump before 2080, the remaining gas customers will have to pay those stranded costs on the system, a cost that a utility would seek to recover even though it is no longer productive. And based on customer preference and market trends, as households transition away from gas, those that remain will be left paying all those stranded costs. This could create a significant problem for the customers who are left – customers who cannot afford a heat pump, or do not control the heating equipment in their building but are now asked to pay for, not just the high cost of compliance with the CPP, but the stranded costs associated with customers who left the system.

The PUC has also found that natural gas utilities’ proposals for using alternative fuels have not yet shown to be cost-effective energy strategies.⁴ In fact, PUC Staff once recommended that NW Natural’s RNG acquisition not be acknowledged given its significant risk and cost.⁵ The PUC has asked for companies to conduct market-based analyses of its proposed action to expand gas service, including with methane gas (also known as alternative or renewable natural gas), as well as energy burden assessments to show current and projected impacts of the utilities’ operations on their customers.⁶ The PUC has specifically directed NW Natural to analyze non-pipe alternatives (NPA) stating, “[f]uture distribution system planning should include a cost benefit analysis for [NPA] that reflects an avoided [greenhouse gas] compliance cost element consistent with a high-cost estimate of future alternative fuels prices.”⁷ We note that the MCCJP includes a strategy to better understand this potential fuel source.

Climate change requires a reduction in the combustion of fossil fuels, including natural gas. The state’s Climate Protection Program requires that gas utilities reduce their GHG emissions by 50% by 2035. It is important to recognize that this 50% reduction is from a historic baseline. From this baseline, NW Natural must reduce its emissions by 1.03 million metric tons (see Figure 1 below).⁸ However, if NW Natural continues to add customers to its system, it will have to reduce emissions by 1.42 million metric tons. Instead of a 50% reduction in Natural will require a 69% reduction in baseline emissions, which will significantly increase the cost of compliance.

Figure 1

Emission Reductions (metric tons)	
Baseline residential emissions	2,050,672
Reduction required	1,025,336
Percent reduction required	50%
Emissions associated with growth	394,590
Reduction required with growth	1,419,926
Percent reduction required	69%

The MCCJP rightfully acknowledges that its strategies align with regional and state precedents limiting gas system expansion. For years, CUB has expressed concern that continuing to grow

the natural gas system will harm the current and future customers of natural gas utilities in Oregon. CUB's economic analyses have shown that growing the gas system—particularly for residential customers—will harm the current and future customers of NW Natural.⁹ Adding gas service to new buildings increases the cost of service to existing customers and adds additional risk to customers.¹⁰ Those who cannot afford to eventually electrify their homes will be left with all of the costs of supporting the natural gas system as those costs will be spread to fewer and fewer households.¹¹ Strategies to support electrification, for example, making critical home repairs coupled with energy efficiency, creates more resilient homes and lower utility bills. For example, replacing residences that rely on resistance heating with energy efficient heat pumps, reduces utility bills significantly and frees up capacity on the grid.

II. Oregon, and the Pacific Northwest, can meet future electrification needs affordably, and with clean energy.

CUB, like many others, is concerned about the grid's ability to meet Oregon's future electrification needs, and this is something we seriously consider in our advocacy in many statewide forums, including the PUC and the Oregon Legislature. And there are ways to do this affordably without expanding the use of fossil fuel energy.

A. The POWER Act requires data centers to pay for the costs of their energy needs.

In 2025, CUB led the effort to successfully pass the Protecting Oregonians With Energy Responsibility (POWER) Act (HB 3546).¹² In order to address the impact of data centers on the grid, this new law creates a data center rate class which will require data centers to pay their own way to connect to the grid, i.e., pay for the infrastructure investments and energy needs of those extremely large energy users. Most of PGE's load growth in the last 10 years has come from data centers.¹³ PGE has incurred \$210 million in local transmission upgrades to serve data center load — costs that were shared by all customers. As a result, households were paying twice as much for energy use than data centers, despite the costs of the significant growth being for data centers.¹⁴ And while residential customers have been added to the system, those costs have been wholly offset by energy efficiency investments¹⁵ which are mostly funded by residential ratepayers.¹⁶ In fact, without the addition of the new large load, PGE's overall load would have shrunk.¹⁷

When the PUC implemented this law and approved a tariff for PGE's data center customers, the result was a *29% rate increase for data centers and decrease in residential customer rates*.¹⁸ The PUC will review proposals for Pacific Power's data center tariffs next.

B. Future energy needs can be met with clean energy, energy efficiency, and demand response.

While natural gas is an option for developing future electricity capacity, as discussed above lower-emissions fossil fuels have not proven to be an effective strategy for serving residential customers, and expanding the household gas system is too financially risky for Oregonians.

Sylvan Energy Analytics, independent energy expert firm, issued a report that reviewed the 2025 E3 Resource Adequacy Study (which was sponsored by utilities). It found that the Northwest needs near-term actions to meet grid needs before new infrastructure can come online. The report recommends strategies to do this with large load flexibility which can mitigate most if not all near-term energy needs for winter peak needs, that sustained development of clean resources is well-suited to meeting non-data center load growth and that using existing capacity in other states like California to help meet peak winter demand. While these strategies require careful planning, they can support community electrification and can do so affordably.¹⁹

In the PUC's PGE data center order, the PUC adopted a policy that data centers requiring a load of 100 MW or larger must invest in an "energy fund non-cost-effective EE, critical home repairs (also called "enabling repairs"), or distributed energy resources (DER) to insulate energy burdened customers, is a reasonable means of mitigating some of that impact and helping mitigate cost shifting to residential customers."²⁰ Based upon CUB's economic analyses, investing in reducing energy needs of households living with energy insecurity from inefficient homes by intentionally targeting and serving low income households who need critical repairs and weatherization, is a near-term strategy with significant benefits to household resilience, energy affordability, and freeing up grid capacity..²¹ These investments keep people housed, healthy and safe in their homes, keep energy costs down—for everyone, and increase grid capacity and reliability.²² As the MCCJP acknowledges, investing in making homes more efficient, for the families who can least afford it, is an investment in resiliency for all of us.²³

Notably, while data centers are still expected to strain the grid, the data center industry has confirmed it is able to curtail energy use at times of peak demand, without relying on gas.²⁴

III. Last but certainly not least, the Multnomah County Climate Justice Plan is informed by and centers the wants and needs of Multnomah County residents.

For 25+ years, Multnomah County has developed community-informed policies and practices to support a transition away from fossil fuel energy. During that time, other local governments have adopted similar clean energy strategies in response to climate change. Oregon legislative, executive, and regulatory policies have led the nation in clean, affordable energy policy, including setting emissions-reduction standards,²⁵ prioritizing energy efficiency and energy

assistance for low-income families,²⁶ supporting alternative fuel technology,²⁷ and centering equity in energy decision-making.²⁸ Oregonians have made it clear they want to live in communities that are free from pollutive fossil fuels, and with affordable energy.

The Multnomah County Climate Justice Plan prioritizes energy affordability strategies that align with clean energy and safe, comfortable homes, with viable and necessary strategies to achieve a just energy transition. The plan builds upon existing knowledge and research but also indicates areas where more information is needed and provides a pathway to get there.

CUB greatly appreciates all the hard work that was put into developing this community-centered plan and urges the Commission to adopt the Multnomah County Climate Justice plan.

Respectfully,,



Jennifer Hill-Hart
Policy & Program Director
Oregon Citizens' Utility Board
jennifer@oregoncub.org

¹ MCCJP, [Clean Energy Goal & Strategies](#).

² MCCJP, [Extreme Weather Goal & Strategies](#).

³ See <https://www.oregon.gov/energy/data-and-reports/Documents/OES-Advisory-Group-Members.pdf>.

⁴ See UG 520/CUB/100/Jenks/9; and CUB blog: [NW Natural Has Not Shown it Can Meet Climate Regulations](#).

⁵ In the Matter of Northwest Natural Gas Company, 2022 Integrated Resource Plan, Docket No. LC 79, [Staff Final Comments](#), 66

⁶ See Oregon Public Utility Commission: [UM 2178 - Natural Gas Fact Finding Report](#) (January 2023); LC 86 – [Order No. 26-150](#).

⁷ In the Matter of Northwest Natural Gas Company, 2022 Integrated Resource Plan, Docket No. LC 79, [Order No. 23-281](#), 16, and Appendix A at 14-15 (“Future IRPs should strive to reduce risk to customers associated with clean fuel costs by considering proactive strategies to minimize growth related investments in the distribution system. Specifically, the Company should use a high-cost estimate of future alternative fuel prices when considering the avoided GHG compliance costs associated with non-pipe alternatives.”)

⁸ Customer growth projections are from NW Natural’s filing in Oregon Public Utility Commission (OPUC) Docket 2178, Natural Gas Fact Finding.

⁹ See CUB blogs: [What is Renewable Natural Gas?](#);

¹⁰ See [UG 520 - CUB’s Opening Testimony, UG 520/CUB/100/Jenks/23-24](#) (Apr. 2, 2025)..

¹¹ See LC 83 - In the Matter of CASCADE NATURAL GAS CORPORATION’S, 2023 Integrated Resource Plan. [CUB’s Opening Comments](#); and LC 86 - In the Matter of NORTHWEST NATURAL GAS COMPANY, dba NW NATURAL, 2025 Integrated Resource Plan, CUB’s Opening Comments and CUB’s Round 2 Comments, available

at: <https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=24590>. See also Oregon Public Utility Commission, Docket No. UM 2178, [CUB's Comments](#).

¹² See Oregon House Passes POWER Act With Strong Bipartisan Support (<https://oregoncub.org/news/blog/oregon-house-passes-power-act-with-strong-bipartisan-support/3160/>); Oregon Legislature passes 'POWER Act,' targeting industrial energy users like data centers, (<https://www.opb.org/article/2025/06/05/oregon-data-centers-cryptocurrency-business-environment-power-electricity/>) and HB 3546 (2025) (<https://olis.oregonlegislature.gov/liz/2025r1/Measures/Overview/HB3546>).

¹³ See UM 2377 - CUB's Opening Testimony and Exhibits of Bob Jenks, UM 2377/CUB/100/Jenks/4-9 (Aug. 12, 2025) (<https://edocs.puc.state.or.us/efdocs/HTB/um2377htb339004027.pdf>).

¹⁴ See CUB HB 3546 Presentation to the Oregon Senate Committee on Energy & Environment (Apr. 30, 2025) (<https://olis.oregonlegislature.gov/liz/2025r1/Downloads/CommitteeMeetingDocument/303776>).

¹⁵ CUB's Opening Testimony and Exhibits of Bob Jenks, UM 2377/CUB/100/Jenks/4-6.

¹⁶ It is worth noting that non-residential customers have a statutory cap on how much they have to contribute to energy efficiency. See HB 3141 (2021) (<https://olis.oregonlegislature.gov/liz/2021r1/Measures/Overview/HB3141>).

¹⁷ *Id.*

¹⁸ Portland General Electric to increase data center rates by 29%, cut residential rates by 1.3% (<https://olis.oregonlegislature.gov/liz/2025r1/Downloads/CommitteeMeetingDocument/293640>); see also UM 2377 - Order No. 26-154 (June 9, 2026) (<https://apps.puc.state.or.us/orders/2026ords/26-154.pdf>).

¹⁹ Near-term winter resource adequacy challenges in the Pacific Northwest (January 2026) (https://static1.squarespace.com/static/6845e0b28d4b961235e936aa/t/696505de2177f361c8dc9143/1768228319023/NW_RA_Study_Review_Final.pdf).

²⁰ UM 2377 - Order No. 26-145 at 13.

²¹ See *Home Cooling & Heat Resilience - Sarah Wochele (presentation)*, CUB's presentation to the Oregon House Interim Committee on Housing and Homelessness (June 16, 2026) (<https://olis.oregonlegislature.gov/liz/2025I1/Downloads/CommitteeMeetingDocument/316972>).

²² *Id.*

²³ See [Housing Goal & Strategies](#), Goal: Every community member has safe, healthy and affordable housing.

²⁴ “[W]hen the grid is under stress Verrus facilities can shift or curtail load in response to grid conditions without compromising reliability to computing customers.” UM 2377 - Verrus' Rebuttal Testimony and Exhibits of Jeff Bladen, Verrus/100/Bladen/8 (Nov. 7, 2025) (<https://edocs.puc.state.or.us/efdocs/HTB/um2377htb341538115.pdf>).

²⁵ HB 2021 (2021) (<https://olis.oregonlegislature.gov/liz/2021r1/Downloads/MeasureDocument/HB2021/Enrolled>); Executive Order No.20-04 (https://www.oregon.gov/gov/eo/eo_20-24.pdf); and Climate Protection Program (<https://www.oregon.gov/deq/ghgp/cpp/pages/default.aspx>).

²⁶ Oregon Energy Assistance Program (<https://www.oregon.gov/ohcs/energy-weatherization/pages/utility-bill-payment-assistance.aspx>); ORS 757.054 (https://oregon.public.law/statutes/ors_757.054); and HB 2475 (2021) (<https://olis.oregonlegislature.gov/liz/2021r1/Measures/Overview/HB2475>).

²⁷ SB 98 (2019) (<https://olis.oregonlegislature.gov/liz/2019R1/Downloads/MeasureDocument/SB98/B-Engrossed>).

²⁸ HB 2475 (2021); HB 3179 (2025) (<https://olis.oregonlegislature.gov/liz/2025R1/Measures/Overview/HB3179>); HB 3546 (2025) (<https://olis.oregonlegislature.gov/liz/2025R1/Measures/Overview/HB3546>); and SB 688 (2025) (<https://olis.oregonlegislature.gov/liz/2025R1/Measures/Overview/SB688>).



August 26, 2026

Multnomah County Office of Sustainability
501 SE Hawthorne Blvd.
Portland, OR 97214

Submitted via email

Dear Chair Jessica Vega Pederson and Commissioners Moyer, Singleton, Brim-Edwards, and Jones-Dixon,

The Oregon Chapter Sierra Club has over 55,000 members and supporters in Oregon including nearly 7,000 members in Multnomah County who are active on environmental and climate issues. This letter comments on [Multnomah County's Climate Justice Plan](#).

We are in strong support of the County's Climate Justice Plan, and throughout the process we have been thoroughly impressed with the broad and the inclusive effort to collaboratively create this plan. The Office of Sustainability moved this project forward while ensuring it was informed by the best available climate science and the expertise of community members who experience climate impacts firsthand and lack adequate resources to address them.

The plan focuses on many important issues; for example, it:

- **Centers Frontline & Marginalized Communities:** It was designed from the ground up to prioritize those who bear the brunt of climate change, ensuring solutions are equitable. Hundreds of community members and more than 15 climate, justice, and environmental organizations including the Sierra Club Oregon Chapter have publicly testified or written in support of the plan. We support its intersectional approach, because climate justice is racial justice, economic justice, and health justice. Given that the Climate Justice Plan demonstrates that these issues are interconnected, the plan gives us direction on how to tackle it.

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- **Public Health & Environmental Safeguards:** It prioritizes cleaner air and water, expansion of green canopy/shade to combat extreme heat, and protecting residents from fossil fuel hazards.
- **Housing & Energy Equity:** The plan aims to ensure access to affordable clean energy, energy-efficient housing, and protection against utility burdens and weather extremes.
- **Green Economy & Workforce Development:** It creates pathways to sustainable, local green jobs and wealth-building opportunities for community members. The Climate Justice Plan lays out a bold vision for the future. It projects a future that we *do* want to live in instead of merely what we want to avoid. This focus is essential, because human beings are inspired and motivated by visions of a positive future.
- **Resilient Transit & Infrastructure:** It supports expanding reliable, low-emission public transit, walking, and biking infrastructure, as well as increasing access to parks and natural spaces.
- **Community-Driven Governance:** The plan shifts away from top-down policy by empowering community leadership and setting clear, accountable metrics to track long-term progress. The Climate Justice Plan is specific and broad-ranging in its recommendations for action at the County level and among neighboring government jurisdictions and community-based organizations. This comprehensive analysis is important to all of us who focus on environmental justice and climate action.

On the other hand, the federal government denies climate science, attacking renewable energy projects and propping up the dying coal, oil, and gas industries. Meanwhile, the tech industry is undermining our goals with energy-hungry data centers. This is a good time to define our region's approach to slowing the climate crisis and keeping families safe as we experience and adjust to this changing world.

Multnomah County's Climate Justice Plan may stand as one of the best government documents on climate action, and we enthusiastically recommend its adoption. We thank the County's Office of Sustainability for collaborating on this plan with community-based organizations, and appreciate the opportunity to comment.

Respectfully submitted by

The Conservation Committee
Oregon Chapter, Sierra Club

ConservationCommittee@oregon.sierraclub.org

SierraClub.org/Oregon

August 27, 2026

Multnomah County Board of Commissioners
501 SE Hawthorne Blvd.
Portland, OR 97214

RE: NW Natural's 8/27 Comments on the Proposed Multnomah County Climate Justice Plan

Dear Chair Vega Pederson and Commissioners Brim-Edwards, Jones-Dixon, Moyer, Singleton,

Thank you for the opportunity to submit information on Agenda Item R4, the Multnomah County Draft Climate Justice Plan (the “Plan”).

NW Natural appreciates receiving the letter from the Chair’s office dated August 11, 2026 (see attached PDF pages 19-20). However, the response unfortunately did not address the technical concerns previously raised, nor did it accurately address our multiple records requests.

Before the Commission can make an informed decision regarding adoption of the Plan, outstanding concerns regarding technical evaluation of proposed strategies, transparency, and public access to information should be addressed.

1. Lack of Response to Technical and Economic Comments Raised Regarding the

Plan: In 2026 alone, NW Natural has submitted two letters of concern on both the draft Plan’s process and substance (see attached PDF pages 1-14).

- In 2025, the County publicly shared work that staff and consultants had been developing since 2023 and released it for public review as the draft Climate Justice Plan. NW Natural participated extensively in the Plan’s review process through community policy forums, a brief utility roundtable (with no follow up from County staff), written comments, technical submissions, and testimony before the Board. Through that engagement, NW Natural identified specific concerns regarding the Plan’s analytical foundation and assumptions concerning energy resource adequacy, infrastructure

requirements, implementation feasibility, and potential cost and affordability implications for households and businesses. We have also identified additional statements and assumptions that we believe are factually incomplete or incorrect. Despite raising these concerns through multiple channels, NW Natural has not received a substantive response addressing the issues identified in our comments.

- The Chair’s letter states that “Office of Sustainability staff have continued to participate in community meetings, met with state agencies, organized public events, and attended events sponsored by County commissioners, all in an effort to solicit as much feedback as possible.” While stakeholder engagement is important, engagement activities alone cannot substitute for rigorous technical and economic analysis supporting the Plan's recommendations. Missing, in particular, is an assessment of the specific energy systems that would be affected and a meaningful response to factual information submitted by the utilities that operate those systems. Nor does the distinction between “County strategies” and broader strategies resolve our concerns. Board adoption of the draft Plan would lend the County's endorsement to the entire document, including proposals intended to influence decisions by other jurisdictions and state policymakers. **NW Natural has yet to receive a meaningful response from the Chair’s office or the Office of Sustainability on the specific comments we have submitted.**

2. Public Records Request Remains Unfulfilled: NW Natural’s public records request remains unfulfilled, and the Chair’s letter does not accurately address the history or status of the request (see attached PDF pages 6-8 for detail).

- **June 2025** - NW Natural submitted its initial public records request.¹

¹ Language from NW Natural June 2025 Public Records Request: *“I respectfully request copies of all public records in the County's possession related to the development of the 2025 Draft Climate Justice Plan. This request is inteded [sic] to be comprehensive, and includes, but is not limited to, the following categories of documents: 1. Steering Committee Materials—All meeting agendas, minutes, notes, and materials presented or discussed by the steering committee; any documentation of promotion, outreach, or facilitation for public workshops related to the Plan; any copies of a public engagement strategy or plan used to guide the community engagement process. 2. Technical and Informational Materials—Any information (including*

- **August 2025** – the County requested a payment of \$17,500, its message stating: *“before the County will begin processing this request... If you would like to narrow the request you submitted that could reduce the estimated cost.”*
- **October 2025: NW Natural submitted the narrowed request to the County**, focused specifically on *“all public records in the County’s possession related to the engagement process with external stakeholders in the development of the 2025 Draft Climate Justice Plan. After several conversations with County staff and confirmation from the Board of Commissioners, it is clear there was an extensive engagement process between Multnomah County and members of the Steering Committee as well as specific members of the public invited to the engagement processes’ public meetings...”*^{2 3}

technical documents, data, memos, or summaries) shared with the steering committee by Multnomah County staff or consultants. 3. Government Stakeholder Engagement—Documentation identifying which individuals or departments from each “Government Organization” listed in the Targeted Strategies section (pages 33-87) were consulted; all feedback or input provided by these organizations, including dates and formats of feedback (written, verbal, and/or meeting-based). 4. Review and Analysis Methodology—Records describing the County’s process for evaluating proposals including in the Targeted Strategies, such as: economic feasibility analysis, cost-benefit or trade-offs analysis, equity assessments and/or reliability considerations.”

² While the County did eventually publish links to some Steering Committee agendas and notes in October of 2025 and also posted survey results and other public comment information from the Spring of 2025 engagement process, NW Natural’s narrowed records request regarding events and meetings from 2023 through 2025 during the content creation phase of the Plan remains unfulfilled.

³ The second part of that narrowed request includes additional detail: *“...This engagement process (as outlined from pages 21-25 of the draft Plan and specifically highlighted on page 13 of the September 18, 2025 Commission presentation) was not shared transparently with the broader public at the time it was happening, and newly engaged stakeholders need to have the same information to appropriately engage with the next part of the process. Therefore, we would expect that documentation from a public engagement process will now be made available to stakeholders and interested members of the public alike at no cost. Again, we are specifically requesting those items employed in the engagement process, including but not limited to: all information provided by the County and resulting from “workshops, webinars, open houses, informational meetings” like meeting agendas, meeting notes, public surveys/survey results, visuals and technical information provided during past public meetings/open houses, and documentation of the promotion of*

We made this narrower request to enable our subject-matter experts and the public to understand the information presented at “workshops,” “collaborative gatherings”, and “open houses” ⁴ that *informed* the draft Plan. Given the significance of these meetings, it is both reasonable and appropriate to seek information regarding what was shared during these sessions and the aggregated feedback received from participating stakeholders.

- **Multiple Follow-Ups:** We have followed up multiple times on the already-narrowed request to no avail. **NW Natural requests that the County fulfill our narrowed public records request.**

SUMMARY

NW Natural supports effective and durable emissions-reduction policies. To be successful, those policies must be supported by sound analysis, transparent evaluation of costs and tradeoffs, an open and inclusive development process, and meaningful consideration of information provided by organizations responsible for operating the systems affected by proposed changes.

The draft Climate Justice Plan falls short of those standards. Significant technical and affordability concerns remain unresolved, and the County has not fulfilled NW Natural's narrowed public records request regarding the stakeholder engagement process that informed the Plan.

To our knowledge, the County has not publicly responded to the more than one hundred constituents who submitted a letter dated July 20, 2026 (see attached PDF pages 15-18).

public meetings.”

⁴ 2025 Climate Justice Plan Draft, page 25

For these reasons, we respectfully urge the Commission to defer adoption of the draft Plan until the outstanding technical concerns have been addressed and the County has fulfilled the pending public records request.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in dark ink, appearing to read "Amy Rathfelder".

Amy Rathfelder
Government and Community Affairs,
Multnomah County
NW Natural

A handwritten signature in dark ink, appearing to read "Jennifer Yocom".

Jennifer Yocom
Local Government Affairs Director
NW Natural

ATTACHMENT: NWN_CJP_2026_Attachments.PDF