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October 31, 2022

Oregon Department of Environmental Quality

ATTN: Nicole Singh (via email)
700 NE Multnomah St., Room 600
Portland, OR 97232-4100

RE: Temporary Rulemaking: Climate Protection Program 2022 (OAR 340-271-0110)

The NWGA is a bi-national trade organization of the Pacific Northwest natural gas industry. Our members deliver dependable and affordable energy to 2.5 million residents and almost 100,000 businesses, institutions and industries in Oregon through 30,000 miles of safe and reliable infrastructure.

NWGA members are fully committed to Oregon's transition to a low-carbon, renewable energy future, and are implementing strategies that will materially contribute to achieving our state's decarbonization targets. Safe, dependable and affordable solutions are critical to ensure that the transition is sustainable and retains public support.

A broad array of technologies and innovations will be required to achieve our collective decarbonization ambitions, including the capture and sequestration of carbon (CCS) through a variety of existing and developing processes. Now is the time to be expansive, not restrictive where capturing carbon emissions is concerned.

Unfortunately, the proposed rule as drafted introduces uncertainty rather than the clarity it seeks to achieve by mandating that CCS may be exempted from emissions only if the carbon is sequestered "within a product." In order to ensure that all forms of CCS are encouraged, the NWGA respectfully requests that the phrase "within a product" be removed from the language of the rule. Alternatively, the rule should include language that clarifies that captured carbon is itself a product.

Thank you for giving our comments careful consideration. If you have any additional questions about NWGA's stance on this issue, please don't hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "Dan S. Kirschner". The signature is fluid and cursive, with a long horizontal stroke at the end.

DAN S. KIRSCHNER

Executive Director