Outlook

Carbon Dioxide Monetary Offset Rate

From Paul Rodriguez <rich1rodriguez@icloud.com>
Date Sat 8/8/2026 8:45 AM
To tom.jackman@energy.oregon.gov <tom.jackman@energy.oregon.gov>

You don't often get email from rich1rodriguez@icloud.com. Learn why this is important

Thank you for opportunity to comment on this proposed rule.

I support the offset rate from $6.40 to $9.60.

I am 70 years old, and in my lifetime CO2 in the atmosphere has increased 37% … from the burning fossil fuels.

For far too long for profit entities have treated the atmosphere like an open sewer for this orderless, colorless, tasteless pollutant.

I have witnessed the cost of this pollution; the massive wildfires Oregon experienced in 2020, the 1+ million acres on fire **NOW**, the floods experienced in north Central Oregon this year. And I could go on and on. These are all exacerbated by the burning of fossil fules.

Given the Social Cost of Carbon: Economic models estimate the broader long-term damage of carbon emissions to be well **over $100 per metric ton**. So $9.60 is letting the utilities off the hook, it should be much, much more.

After this increase, others should follow on a regular annual esclatory basis until all fossil fuel burning for electric generation is GONE.

Proceeds from the offset should be invested in Energy Efficiency & Renewables.

And please remember; **The energy transition is the largest economic development opportunity in 100 years. <=== Read Again**

I support the offset rate from $6.40 to $9.60.

Rich Rodriguez, MBA, DFCP
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Outlook

Compliance Rulemaking: EFSC Carbon Price Comments

From Alex Houston <ahouston@lclark.edu>
Date Wed 9/23/2026 11:28 AM
To tom.jackman@energy.oregon.gov <tom.jackman@energy.oregon.gov>

1 attachment (285 KB)
GEI EFSC Carbon Price Comments.pdf;

You don't often get email from ahouston@lclark.edu. Learn why this is important

Hi Tom,

Please find attached my comments on behalf of the Green Energy Institute at Lewis & Clark Law School (GEI) regarding the Compliance Rulemaking for EFSC's Carbon Pricing adjustment.

Thank you, let me know if you need anything else on my end.
Alex

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Alex Houston, Staff Attorney | Green Energy Institute | Lewis & Clark Law School |
https://law.lclark.edu/centers/green_energy_institute/



GREEN ENERGY INSTITUTE
Lewis & Clark Law School

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September 23, 2026

RE: 2026 Carbon Dioxide Emissions Offset Rate Rulemaking

The Green Energy Institute at Lewis & Clark Law School (GEI) supports the Energy Facility Siting Council's (EFSC) proposed amendment to OAR 345-024-0580 increasing the carbon dioxide monetary offset rate from $6.40 to $9.60 per ton.

The proposed increase is both legally sound and well-supported by the available evidence, even if comparatively low. Oregon law requires the carbon monetary offset rate to be based on empirical evidence regarding the cost of carbon offsets and limits any increase or decrease to fifty percent in a two-year period.[1] EFSC's proposed fifty percent increase therefore represents the maximum adjustment the Council can make under current law. Additionally, ODOE Staff conclude in its report that the increase is supported by current carbon-market evidence and remains economically achievable for natural gas-fired power plants.[2]

ODOE Staff's analysis appropriately considers a range of evidence regarding carbon prices. While prices from cap-and invest-programs in Washington and California are not directly equivalent to Oregon's monetary offset rate, ODOE correctly identifies that they provide useful evidence of reasonable carbon prices in existing markets. Recent allowance auction prices in those programs have been substantially higher than Oregon's proposed new $9.60 rate with Washington's cap-and-invest auction reaching $65.26 per allowance in March 2026,[3] while California and Québec's February 2026 joint auction cleared at $27.94.[4] Despite far-exceeding Oregon's rate, even these figures are likely a significant undercounting of carbon's true social costs, as a recent economic analysis suggests that the social cost of carbon is more than $1,200 per ton.[5]

This comparison is important because Oregon should not allow its carbon valuation to fall further behind the prices reflected in other established carbon markets. A carbon price that more

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[1] ORS 469.503(2)(c)(C).
[2] EFSC Staff, *2026 Carbon Dioxide Emissions Offset Rate Rulemaking for the June 26, 2026 EFSC Meetin*g, ODOE, 2–3 (June 12, 2026), https://www.oregon.gov/energy/facilities/Council%20Meetings/2026-08-20-21-EFSC-Item-D-Staff-Report-Carbon-Offset-Public-Hearing-Staff-Report-Att1-Prior-Report.pdf.
[3] *Id.*
[4] *Id.*
[5] Adrien Bilal & Diego R. Kanzig, "The Macroeconomic Impact of Climate Change: Global vs. Local Temperature," National Bureau of Economic Research Working Paper 32450 (2024), https://doi.org/10.3386/w32450.

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accurately reflects the cost of emissions provides a stronger incentive to avoid, reduce, and mitigate carbon dioxide emissions while ensuring that the monetary compliance pathway reflects the actual environmental costs of those emissions.

GEI therefore urges EFSC to adopt the proposed $9.60 per-ton rate in full. Doing so is directly within the statutory authority provided by the Oregon Legislature at ORS 469.503(2)(c)(C) and will make a much-needed step towards aligning Oregon's carbon pricing with that of other states. In order to ensure the monetary offset rate in Oregon continues to reflect the costs of carbon emissions and keep pace with other jurisdictions, GEI urges ODOE and EFSC to continue updating the rate the maximum amount permitted by law as additional empirical evidence supports further increases every two years.

Thank you for your consideration,

/s/ Alex Houston
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