



October 28, 2020

Garrett Martin
Commission Policy Advisor
Oregon Public Utility Commission
Email: Garrett.Martin@puc.state.or.us
(971) 208-1521

**Subject: Port of Portland Comments Regarding Oregon Public Utility Commission
Executive Order 20-04 Work Plans**

Dear Garrett,

Climate change is one of the most important challenges of our time. According to the Intergovernmental Panel on Climate Change (IPCC), unprecedented reductions in greenhouse gases are needed to avoid catastrophic climate impacts, requiring rapid and far reaching transitions in energy, transportation and industry.

Oregon is recognized as a leader in environmental and climate change initiatives. The Port plays a leadership role in regional transportation, which by nature is resource intensive due to its reliance on fossil fuel combustion which produces greenhouse gases (GHGs) and other air pollutants. Though the Port's direct contributions to air emissions are relatively small, the Port recognizes that it has a role in broader discussions about the effects of transportation-related air emissions. The Port's Air Quality Administrative Policy calls for the Port to go beyond what the law requires and actively seek opportunities to reduce emissions from its direct operations and to support efforts to reduce emissions from marine and aviation transportation sources.

7200 NE Airport Way Portland OR 97218
Box 3529 Portland OR 97208
(503) 415-6000

The Port has established carbon reduction targets for Port operations, that include reducing carbon in our energy use through investments in energy efficiency and renewable energy. To date, we have made significant investments in reducing GHG emissions from Port and non-Port operations, including repowering the Dredge Oregon, providing ground power at all jet bridges, which allows aircraft to shut down their engines, converting our shuttle bus fleet to cleaner fuels, installing electric vehicle charging stations for PDX travelers and employees, and using renewable diesel for PDX airport operations. We are currently investigating strategies for on-site and off-site renewable energy to directly lower the carbon in the energy we consume.

Meeting the state's carbon reduction goals will require massive investments in renewable energy. This will require transformative policies that enable large-scale on-site renewables and create affordable options to purchase off-site renewables. To this end, we offer the following recommendations;

- The Port supports the PUC's goals to establish community-wide green tariffs targeted toward reducing utilities' GHG emissions and exceeding the Renewable Portfolio Standard.
- The Port additionally would like to see ideas proposed in the Work Plans which would enable large-scale on-site renewable energy development by individual customer-generators. On-site renewable energy is an important strategy in helping organizations like the Port meet the state's GHG goals. Dated rules, such as ORS 757.300(8), must be revisited, or pathways to pursue waivers must be streamlined, to ensure there are not barriers to enabling greater amounts of local renewable energy development. Interest from large utility customers in larger scale (> 2MW solar installations, for example), customer-developed renewable energy projects are now driven by goals to quickly reduce carbon emissions as well as invest in energy resilience. These are drivers that are much different than those of just a few years ago.
- We believe Oregon's utilities need to offer options to purchase 100 percent clean energy for minimal cost above standard energy rates.
- In addition to clean power for Port facilities, we support a community-wide green tariff option to enable greater access to renewable power to our surrounding community members and partners.

October 28, 2020

Page 3

As we move quickly to mitigate climate change and adapt to those changes we are already seeing, flexibility is needed in PUC rules for individual utility customers to meet their decarbonizations plans. We look forward to hearing more about the Work Plans and support the PUC in their response to the Governor's Executive Order on Climate Action.

Sincerely

Port of Portland

A handwritten signature in black ink that reads "David J Breen". The signature is written in a cursive style with a large, stylized "J" and "B".

David Breen

Manager, Air Quality and Energy

c. Ivo Trummer, Port of Portland

Jenn Bies, Port of Portland

7200 NE Airport Way Portland OR 97218

Box 3529 Portland OR 97208

(503) 415-6000