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Joint Task Force on Resilient Efficient Buildings

Public Comment on August 23 Task Force Meeting

Submitted by Laura Tabor, Climate Action Director

Co-Chairs Marsh and Lieber and Members of the Task Force:

We write to ask you to include additional policy options and consider the interactions and overlap between options as you continue the Task Force' work to analyze ways to decarbonize and increase the resilience of Oregon's buildings.

The Nature Conservancy in Oregon (TNC) is a science-based, non-partisan organization with 80,000 supporters and members in every county. Based in communities around the state, we manage lands and waters in varied ecosystems and partner with tribes, ranchers, farmers, fishers, timber, and environmental interests on some of the most challenging conservation issues facing people and nature. Addressing the climate change crisis is a core component of TNC's work to create a world where people and nature can thrive, and we strongly believe that Oregonians have a responsibility to enact policies to reduce greenhouse gas emissions and help our communities adapt to climate change.

Oregon has long been a leader in energy efficiency. Utility and state agency-funded programs have served customers and residents for decades and significantly reduced electricity and gas demand. Program administrators around the state, including the Energy Trust of Oregon (ETO) and Northwest Energy Efficiency Alliance, have developed robust contractor networks and a keen understanding of what moves people and markets to more efficient options. We have the opportunity to harness this capacity not just to reduce energy consumption, but to move homes and businesses to the least-cost decarbonization options in alignment with climate goals. It will take many policy elements to drive towards this vision, underscoring the importance of a holistic approach to this Task Force' policy analysis that keeps additional options in the mix.

Specifically, we strongly encourage you to expand your highest level of analysis to include the promotion, incentivization, or subsidization of heat pumps and modification of ETO's mission to lead with greenhouse gas emissions reductions and equity. Analysis of energy efficiency and heating and cooling efficiency increases that does not include electric heat pumps—the most efficient heating and cooling option on the market—would be incomplete, and any discussion of aligning energy efficiency programs with state climate goals should include ETO. Not only do these policies have well-documented potential to contribute to decarbonization, we have observed strong support for them among Task Force members and other energy, environmental, and climate experts.

Thank you for the opportunity to submit comments.