



LYNN FINDLEY
SENATE DISTRICT 30

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September 27, 2022

Co-Chairs Lieber, Marsh and members of the Joint Task Force on Resilient Efficient Buildings,

Thank you for the opportunity to provide some initial comments and observations after the first meeting with the consulting firm, Sustainable Solutions Group and their planned approach to modeling the solutions that have been suggested by taskforce members.

Some of the items below represent observations, concerns, and suggestions for regarding the analysis in process with this consultant. The list is not comprehensive but a starting place for discussion.

The primary concern to communicate is concern about the fit of the methodology to the function of the taskforce. The team at SSG is clearly making an effort to put forth their best product and their willingness to engage with the taskforce was appreciated. However, it appears that methodology used by SSG may fall short of addressing capacity needs and electric infrastructure constraints for generation, transmission, or distribution, nor does it appear that the framework addresses issues of peak energy load delivery. We are also very concerned that SSG has been set up to fail. They have been tasked with modeling a scope too narrow to produce any meaningful results that can be relied on by the task force and asked to do so in an unrealistic and compressed timeline. These needless and arbitrary constraints will almost certainly lead to bad or unreliable data and could lead policy decisions that actually leave us farther from our goal of reducing GHG emissions in buildings.

We know that SSG is recently very active in the NW region. The firm is doing work for multiple projects at the OR and WA state level as well as a number of local climate action plans. While we recognize the appeal of economies of scale there is risk to the objectivity of the model. We hope to encourage that the modeling remains objective and independent work for other efforts and municipalities.

We heard in our last meeting the emphatic message that peak energy demand must be considered to understand cost implications of resource needs. As a heating fuel, gas has a larger impact on peak energy than the electric system. Utility commissions require utilities to conduct detailed system peak planning in their integrated resource plans to ensure that the required energy is available under extreme conditions. Using average energy use to model the building solutions is not in alignment with the requirements of the energy systems that serve those buildings.

The full costs to homeowners and businesses must be clearly and comprehensively understood in modeling to inform the taskforce to ensure that members are recommending actions that serve Oregonians. This includes home conversion costs, new equipment costs, supply side resource costs, transmission and distribution costs, etc. The model, as explained in the last meeting, does not include all the costs to end users.

Moreover, we are concerned that SSG will not use actual and real data from Oregon, but instead will rely on aggregation or average data, that will leave a skewed and inaccurate picture of emissions and potential in Oregon. We need to ensure we are modeling Oregon, not Washington, California or the nation. Our challenges are unique, the modeling needs to reflect Oregon's uniqueness.

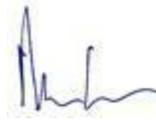
We understand this is a lot of information. Our standards are high because the outcomes impact all Oregonians currently experiencing increased costs at home and work. In order to do this right, we understand we need all the information and the right model. It is not the modelers, who are clearly intending to do their best work, but rather the model and methodology that are the topic of concern. This body of work is too important not to critique. We are concerned that this team and the model they are using are not up to the complexity of this task.

Finally, the Oregon Global Warming Commission recently announced that Oregon is already on track to meet the state's climate goals. We question why additional policy is needed. If it is, to what end? We ask the Task Force Co-Chairs to please cite statute directing the task force to go farther. Oregon faces a generational and existential crisis around housing affordability. We fear this task force is set to make the harm worse, and add needless cost to already expensive construction, while getting little to no GHG reduction.

Thanks again for the opportunity to provide substantive input on the Study work to date. We look forward to continuing to contribute to this effort and to achieving our shared goal of an objective analysis clearly identify the impacts and trade-offs of "feasible and practical" decarbonization pathways.



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Senate District 30



Representative Mark Owens
House District 60