



State of Oregon Department of Environmental Quality

# Written Comments

## Climate Protection Program 2022 Temporary Rulemaking

This document is a compilation of written comments received for Climate Protection Program 2022 Temporary Rulemaking. DEQ announced the Climate Protection Program 2022 Temporary Rulemaking on October 13, 2022 and accepted comments received by 4 p.m. on October 31, 2022. Only comments received by 4 p.m. on October 31, 2022 are included in this document.

October 31, 2022

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**VIA ELECTRONIC MAIL ONLY**

Ms. Nicole Singh  
Oregon Department of Environmental Protection  
700 NE Multnomah Street, Suite 600  
Portland, OR 97232

**Re: Comments on the Oregon Department of Environmental Quality’s Climate Protection Program Temporary Rulemaking**

Dear Ms. Singh:

Thank you for the opportunity to comment on the Oregon Department of Environmental Quality’s (“DEQ”) Climate Protection Program (“CPP”) temporary rulemaking. The following comments are on behalf of various clients that are exploring using natural gas in innovative ways. We also support the comments submitted by NW Natural.

The current regulation should not be revised.

There is no need or purpose for the temporary rule. When the CPP was originally adopted, DEQ and the Rulemaking Advisory Committee (“RAC”) recognized that there could be greenhouse gas (“GHG”) emissions from non-combustion processes that use natural gas that would not be regulated through the Local Distribution Companies (“LDCs”) and subject to the Cap. This included not only using natural gas to produce a product (i.e., fertilizer) but the potential use of natural gas to make other products including hydrogen and/or ammonia to foster the development and use of cleaner fuels.

The current rule provides DEQ with the discretion to determine which natural gas non-combustion-related processes are not regulated through the LDCs and subject to the Cap. OAR 340-270-0110(4)(b)(B)(iii). For the additional reasons, outlined below, DEQ should keep this flexibility. The proposed revision takes away DEQ’s discretion and flexibility.

The proposed revision is too narrow.

The proposed revision exempts emissions that are captured and stored within a “product.” “Product” is not currently defined in any of the relevant regulatory definition sections (e.g., OAR 340-271-0020, OAR 340-200-0020, OAR 340-215-0020). The proposed revision could lead to further ambiguity as to what constitutes a “product.” Hydrogen and ammonia are also products that can be produced from natural gas through steam-methane reforming which is not an

oxidation process. DEQ's proposed rule would exclude such processes. The proposed rule should clarify the definition of "Product" consistent with these comments.

The proposed revision does not foster innovation.

The proposed revision decimates incentive to create new processes that do not involve the combustion of natural gas. It is impossible to predict how natural gas will be used in the future and applied to climate change solutions (e.g., creation of cleaner fuels such as hydrogen and ammonia, carbon black manufacturing, carbon capture technologies, etc.). The current regulations foster innovation and allow the use of natural gas not subject to the Cap to be applied to creative strategies to combat climate change. Subjecting natural gas used in these processes to the Cap, will result in less innovation and companies engaged in this technology will not come to Oregon since there will not be any natural gas available. Rather than remedying a perceived "serious prejudice," the proposed rule will actually result in the opposite effect. The rule will create a serious prejudice by not fostering technology and not attracting good paying green jobs to Oregon.

Exempting natural gas used in non-combustion related process does not mean the emissions are unregulated.

As discussed during the RAC meetings, emissions from natural gas used in non-combustion related processes would be regulated at the stationary source level. Sources with GHG process emissions at or greater than 25,000 metric tons are subject to the Best Available Emissions Reduction ("BAER") program. DEQ and the RAC determined that regulating stationary sources through the BAER program would meet the goals intended by the program. Rather than regulating natural gas used for non-combustion purposes through the LDCs, DEQ should regulate emissions through the stationary sources.

There is no serious prejudice.

DEQ claims there is serious prejudice to the interests of the LDCs and the parties contemplating business investments in Oregon that justifies the temporary rule. DEQ has not shown any evidence of such "serious prejudice." To the contrary, the LDCs and the parties contemplating the use of natural gas to produce hydrogen and other products will be seriously prejudiced if the natural gas is regulated through the LDCs and subject to the Cap, there may not be sufficient amounts of natural gas and/or the price may make the project uneconomical. These facilities will be faced with either looking for direct connections to interstate pipelines or relocating to other states.

Conclusion

There is no justifiable reason to amend the CPP rules and good policy reasons not to go forward with the temporary rule. Under the current regulations, DEQ has the flexibility to determine

N. Singh  
October 31, 2022  
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whether natural gas used in non-combustion related processes should be regulated under the Cap or under the BAER program. DEQ should maintain this flexibility. Further, DEQ should not adopt rules that impede new green technologies that may be developed in the future.

We appreciate the opportunity to offer comments on DEQ's Climate Protection Program temporary rulemaking and request that DEQ not proceed with the rulemaking. Please contact me if you have any questions regarding these comments.

Sincerely,

Perkins Coie LLP

A handwritten signature in blue ink, appearing to read "J.L. Hunter", written in a cursive style.

Jeffrey L. Hunter



October 31, 2022

Oregon Department of Environmental Quality  
Attn: Nicole Singh  
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*Via Email to:* [cpp.info@deq.oregon.gov](mailto:cpp.info@deq.oregon.gov)

**RE: Climate Protection Program Temporary Rulemaking 2022**

Dear Oregon Department of Environmental Quality,

Please accept these comments from the undersigned organizations to be included in the record for the Climate Protection Program (CPP) Temporary Rulemaking.

Beyond Toxics has been an active public interest participant in legal processes and policy decisions related to air toxics and climate issues in Oregon for over twenty years. We work to guarantee environmental protection and health for all communities as well as individual residents, regardless of their income, status, or background. Our organization emphasizes environmental justice and community engagement, and we sat on the CPP Rulemaking Advisory Committee as an environmental justice organization. Beyond Toxics appreciates this opportunity to support this temporary rulemaking and is heavily invested in the CPP's meaningful and equitable implementation.

Columbia Riverkeeper's mission is to protect and restore the water quality of the Columbia River and all life connected to it. A large part of this work involves tracking new and existing fossil fuel infrastructure that pollutes the environment and threatens the health of our communities. Riverkeeper was highly engaged in the public process for the CPP and appreciates the opportunity to support this temporary rulemaking to clarify the CPP's application.

Northwest Environmental Defense Center (NEDC) is an independent, non-profit organization dedicated to preserving the natural environment of the Pacific Northwest. NEDC has a long history of advocacy for improved air quality, emissions reductions, and policies that will promote climate resiliency throughout Oregon. Accordingly, NEDC has a specific interest in ensuring that the CPP adequately protects the health of the environment and Oregon communities. NEDC appreciates the opportunity to ensure that the goals of the CPP are met.

On behalf of thousands of Beyond Toxics, Columbia Riverkeeper, and NEDC members, we express our strong support for the DEQ’s CPP Temporary Rulemaking. We request that the Oregon Environmental Quality Commission (EQC) grant this temporary rulemaking.

In 2020, Governor Brown’s Executive Order No. 20-04 directed multiple state agencies to take action to reduce greenhouse gas emissions and avoid the worst effects of climate change.<sup>1</sup> The CPP was one of many actions taken to meet this direction,<sup>2</sup> and in December 2021, it was the first policy of its kind adopted in Oregon. The CPP sets a declining cap on greenhouse gas (GHG) emissions from fossil fuels across various sectors. It requires oil companies and fossil gas utilities in Oregon to reduce their emissions 50% by 2035 and 90% by 2050; establishes the first-ever requirements for major industrial facilities to reduce greenhouse gas emissions; and enables millions of dollars to be annually invested in clean energy projects that benefit environmental justice and other communities across Oregon. If implemented meaningfully, it will help secure a healthy climate future, invest in frontline and rural communities, and hold many corporate polluters accountable. DEQ must be intentional with the CPP’s implementation to ensure the Program dramatically reduces GHG emissions over the next thirty years. This temporary rulemaking is an important step in clarifying the CPP and ensuring large corporations do not have avenues to evade compliance and continue to emit large, harmful GHG quantities.

### **This Temporary Rulemaking Brings Necessary Clarity to the CPP.**

We strongly agree with DEQ that local distribution companies must clearly understand what constitutes covered emissions. The proposed language amending OAR 340-271-0110(4)(b)(B)(iii) in the temporary rulemaking provides necessary clarity and will close potential loopholes in the CPP rules. Without this amendment, the CPP rules would exempt several potential “non-combustion processes” that would have significant greenhouse gas emissions and harmful climate impacts.<sup>3</sup> This would allow large corporations to dodge tighter restrictions and continue harmful “business as usual” practices.

It is vital that the CPP’s language does not undermine the policy’s original intent: to implement strong climate action that reduces emissions, promotes equity, and contains costs. This amendment will bolster the integrity of the CPP, cover emissions originally intended to be regulated by the Program, and ensure that this policy will succeed in its strong emissions reductions goals.

### **This Temporary Rulemaking is Necessary to Achieve Oregon’s Climate Goals.**

We strongly agree with the DEQ that this temporary rulemaking is necessary to stay on target and achieve Oregon’s climate goals. Governor Brown’s Executive Order No. 20-40 established science-based carbon emission goals, setting a target of a 45% reduction from 1990

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<sup>1</sup> See generally Executive Order No. 20-04 (directing state agencies to take actions to reduce and regulate GHG emissions).

<sup>2</sup> *Id.* at 6, ¶4(C).

<sup>3</sup> We also appreciate the clarification from the October 24, 2022 public meeting that emissions from steam methane reforming in hydrogen production are covered emissions under the CPP.

levels by 2035 and an 80% reduction from 1990 levels by 2050.<sup>4</sup> According to recent modeling led by the Oregon Department of Energy and the Oregon Global Warming Commission, the CPP is an essential piece of the puzzle in Oregon meeting its climate pollution reduction goals.<sup>5</sup> That modeling, known as Oregon’s “Roadmap to 2035,” found that our state is only on target to meet our 2035 goals *if* all current programs—including the CPP—are implemented as intended with no deviation. This temporary rulemaking must amend the CPP so large quantities of emissions are covered and not exempt merely by being “non-combustion-related.” Without it, we would likely not meet our 2035 or 2050 goals.

### **Failure to Clarify the CPP Rules Will Perpetuate the Climate Crisis and Climate Injustice.**

Failure to amend OAR 340-271-0110(4)(b)(B)(iii) will perpetuate the climate crisis by allowing large greenhouse gas emissions to evade CPP regulation. This will have harmful climate impacts and only further exacerbate the climate crisis. Addressing the climate crisis and meeting our state’s climate goals requires swift action across all sectors. Corporations have the means to comply with CPP mandates and reduce emissions—there should be no avenue available for them to avoid accountability. Oregon is already experiencing the dire effects of climate change through drought, increasingly severe and prolonged fire seasons, heat domes in the summer months, species loss, loss of biodiversity, and more. The far-reaching impacts of climate change affect the health and safety of all Oregonians but particularly impact vulnerable, frontline, and BIPOC communities that experience the worst of the climate crisis.

Climate change also has far-reaching economic impacts that touch every sector and facet of life. Landmark policies like the CPP offer an opportunity for polluters to change their practices and, instead, support investments in clean energy projects that support job creation, economic vitality, technical innovation and advancement, and healthier energy options across the state. Regulating corporate polluters and preventing unchecked greenhouse gas emissions from future energy projects are vital pieces in curbing the climate crisis and protecting our state’s most vulnerable populations.

### **Conclusion**

For the reasons stated above, Beyond Toxics, Columbia Riverkeeper, and NEDC strongly support the DEQ’s temporary rulemaking to amend OAR 340-271-0110(4)(b)(B)(iii) and request the EQC act and grant this temporary rulemaking. We commend the DEQ’s timely clarification of these rules and thank you in advance for your time and consideration of these comments.

Sincerely,

Teryn Yazdani,

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<sup>4</sup> *Id.* at 5, ¶2.

<sup>5</sup> See *Roadmap to 2035: A Plan for Oregon to Meet its Greenhouse Gas Reduction Targets*, OR. GLOB. WARMING COMM’N, <https://www.keeporegoncool.org/tighger> (last visited Oct. 28, 2022) (describing the Commission’s plan to develop a plan for Oregon meeting its GHG emissions reductions targets).

Staff Attorney and Climate Policy Manager  
Beyond Toxics

Lisa Arkin,  
Executive Director  
Beyond Toxics

Audrey Leonard,  
Staff Attorney  
Columbia Riverkeeper

Mary Stites,  
Legal Fellow  
Northwest Environmental Defense Center



October 31, 2022

Submitted via email to [cpp.info@deq.oregon.gov](mailto:cpp.info@deq.oregon.gov)

Nicole Singh, Senior Climate Policy Advisor  
Oregon Department of Environmental Quality  
700 NE Multnomah St., Room 600  
Portland, OR 97232-4100



**Re: Temporary Rulemaking: Climate Protection Program 2022 – RNG Coalition Comments**

Dear Ms. Singh,

The Coalition for Renewable Natural Gas (RNG Coalition)<sup>1</sup> offers the following comments on the draft rule change of the Climate Protection Program (CPP) published by the Oregon Department of Environmental Quality (DEQ) on October 21, 2022<sup>2</sup> and presented at an information session on October 24.<sup>3</sup> Oregon is ahead of many other jurisdictions in exploring the role of Renewable Natural Gas (RNG) in reducing greenhouse gases (GHG). The recently adopted CPP continues to expand Oregon’s leadership position in this area with a program that will help drive RNG growth, in alignment with the goals of Senate Bill (SB) 98.<sup>4,5</sup>

We support DEQ’s intent to clarify the scope of the emissions from natural gas utilities that need to create a compliance obligation in the CPP, given various end uses. We understand DEQ’s desire to implement this clarification swiftly but we also recommend that greater attention be given holistically to the process by which a gas supplier would know and demonstrate that upstream or downstream emissions and sinks did or did not occur.

As Oregon progresses in its decarbonization journey, it will likely find it advantageous to promote carbon removal technologies, and future rulemakings should lay the groundwork for how natural gas supplier’s obligations would be impacted by options where carbon dioxide derived from supplied gas is, or is not, converted to CO<sub>2</sub> that escapes to the atmosphere. We recommend that DEQ continue to look at options, including the potential of bioenergy with carbon capture and storage (BECCS) or utilization which can, on net, remove GHG emissions from the atmosphere.

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<sup>1</sup> <http://www.rngcoalition.com/>

<sup>2</sup> Oregon Department of Environmental Quality, *Draft Rules – Division 271*.  
<https://www.oregon.gov/deq/rulemaking/Documents/CPP2022-Division271-340-271-0110.pdf>

<sup>3</sup> DEQ presentation slides can be accessed here:  
<https://www.oregon.gov/deq/rulemaking/Documents/cppTR2022pres1022.pdf>

<sup>4</sup> Oregon Legislative Assembly, *Enrolled Senate Bill 98*.  
<https://olis.oregonlegislature.gov/liz/2019R1/Downloads/MeasureDocument/SB98/Enrolled>

<sup>5</sup> According to the gas utility modelling in Oregon Public Utility Commission’s (PUC) Natural Gas Fact Finding in Docket UM 2178. Oregon Public Utility Commission, *Docket 2178 – Natural Gas Fact Finding per EO 20-04 PUC Year One Work Plan*. <https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=22869>

## **About the RNG Coalition and the RNG Industry**

The RNG Coalition is the trade association for the RNG industry in the United States and Canada. Our diverse membership of over 350 organizations is comprised of leading companies across the RNG supply chain, including recycling and waste management companies, renewable energy project developers, engineers, financiers, investors, organized labor, manufacturers, technology and service providers, gas and power marketers, gas and power transporters, transportation fleets, fueling stations, law firms, environmental advocates, research organizations, municipalities, universities, and utilities. Together we advocate for the sustainable development, deployment, and utilization of RNG, so that present and future generations have access to domestic, renewable, clean fuel and energy in Oregon and across North America.

## **The CPP Could Look to Incentivize Innovative Renewable Gas and BECCS Technologies In Future Rulemakings**

In past comments,<sup>6</sup> we recommended that the CPP consider lifecycle GHG impacts of RNG and other biologically-derived abatement strategies. For example, renewable gas facilities that adopt carbon capture technologies need a way to differentiate themselves as they sell to Oregon gas suppliers. These include landfill RNG sites, anaerobic digestion plants, methane pyrolysis facilities, gasification facilities, and steam methane reformers that use RNG as feedstock. In absence of a lifecycle accounting approach, DEQ should consider how gas suppliers can report upstream and downstream sinks of GHGs. Developers need an incentive to add carbon capture technologies to their renewable gas facilities and/or to end uses of gas, because those represent major additional capital and operational costs to a project.

We would be happy to brief DEQ on the way such strategies can be coupled with renewable gas production to support deep decarbonization targets.

## **Conclusion**

The CPP is one of Oregon's flagship climate programs and will enable the state to achieve significant GHG emission reductions if its rules are set properly. Bioenergy with carbon capture applications that result in permanent GHG emission reductions can play a significant role in the CPP. It is important to keep the door open to more investment in all clean technologies that can support Oregon's climate goals.

Policies that cover a large section of the economy, such as the CPP, will play an essential role when state targets are updated to net zero GHG emissions. Oregon needs to keep all options on the table to eventually adopt a successful climate portfolio that allows the state to achieve net zero emissions.

We look forward to next steps of the implementation of the CPP.

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<sup>6</sup> DEQ, *Greenhouse Gas Emissions Program 2021 Rulemaking Climate Protection Program – Written Comments*, Page 3870. <https://www.oregon.gov/deq/rulemaking/Documents/GHGCR2021WrittenComments.pdf>

Sincerely,

/S/

**Sam Wade**

Director of Public Policy  
Coalition for Renewable Natural Gas  
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October 28, 2022

Oregon Department of Environmental Quality  
Attn: Nicole Singh  
700 NE Multnomah St., Room 600  
Portland, OR 97232-4100

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

I appreciate the opportunity to provide a public comment on DEQ's proposed temporary rule amendments to OAR 340-271-0110(4)(b)(B)(iii) ("Proposed Temporary Rule").

As a researcher, entrepreneur, and educator who works on decarbonization technology in the state of Oregon I have a vested interest in the wording of this amendment.

I support the inclusion of carbon capture under the Climate Protection Program (CPP) and feel that all forms of carbon capture should be included in the exemptions listed OAR 340-271-0110(4)(b)(B). As currently proposed the Temporary Rule limits flexibility and inhibits innovation. All captured and avoided emissions should be exempt from CPP compliance. By including the words "within a product" DEQ is creating uncertainty as to the definition of a product and potentially limiting what carbon capture technologies are recognized under the CPP. All carbon capture that avoids emissions is in alignment with the goals of the CPP and should be exempt.

For my research, it is important that all carbon capture is exempt under CPP and the rule language is clear so that I can invest in these innovative and emission saving technologies. If DEQ continues to pursue this temporary rulemaking, I urge DEQ to support all forms of carbon capture by removing the reference to the term "within a product".

Sincerely,

Christopher L. Hagen, PhD, PE

A handwritten signature in blue ink that reads "Christopher L. Hagen". The signature is fluid and cursive, with the first name being the most prominent.



October 31, 2022

Submitted to: [cpp.info@deq.oregon.gov](mailto:cpp.info@deq.oregon.gov)  
ATTN: Nicole Singh, Senior Climate Change Policy Advisor

Oregon Department of Environmental Quality  
Office of Greenhouse Gas Programs  
700 NE Multnomah Street, Room 600  
Portland, Oregon 97232-4100

Dear Oregon Department of Environmental Quality (“DEQ”),

Avista Corporation, d/b/a Avista Utilities (“Avista”), appreciates the opportunity to provide comments on DEQ’s proposed temporary rule amendments to OAR 340-271-0110(4)(b)(B)(iii) (“Proposed Temporary Rule”).

Avista is committed to ensuring that reliable and affordable energy is supplied to the rural communities that the company serves, while also being committed to achieving emission goals aligned with the energy transition. But counter to such goals, the Proposed Temporary Rule would relinquish critical flexibility from the existing regulations by removing a provision aimed at promoting energy innovation to address climate change, and instead replacing it with a provision that circumscribes what that innovation must look like.<sup>1</sup>

Specifically, Avista urges DEQ not to proceed with the Proposed Temporary Rule for the following reasons:

- **The Proposed Temporary Rule is unnecessary.** DEQ has proposed to amend the regulations because it worries that certain non-combustion uses of natural gas might eventually result in emissions not sequestered “and instead directly emitted to the atmosphere, with the same emission results as if the natural gas was combusted.”<sup>2</sup> Even assuming that justification is true, the current OAR 340-271-0110(4)(b)(B)(iii) already allows DEQ discretion to “determine” that such emissions do fall under the Climate

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<sup>1</sup> The Proposed Temporary Rule seeks to exclude from covered emissions “Emissions avoided where the use of natural gas results in greenhouse gas emissions captured and stored *within a product.*” DEQ, *Draft Rules – Division 271*, at page 3 (2022) (proposed Section 340-271-0110(4)(b)(B)(iii)) (emphasis added). In addition to hampering climate change efforts, the Proposed Temporary Rule would be legally defective because DEQ lacks the authority to regulate captured and sequestered emissions which, by definition, are not emitted into the atmosphere and, like the regulation of non-emitting entities, are outside the scope of what DEQ may regulate. *See, e.g.*, ORS 468A.005(4), .135(4) (authorizing DEQ to regulate “air contamination sources,” which is defined as “any source at, from, or by reason of which there is *emitted into the atmosphere* any air contaminant” (emphasis added)).

<sup>2</sup> DEQ, *Climate Protection Program Temporary Rulemaking 2022: Draft Statement of Need and Justification* (“*Draft Justification*”), at pages 1–2 (2022).



Protection Program’s scope.<sup>3</sup> Since the current regulations resolve all of DEQ’s stated justifications, DEQ’s proposal fails to comply with the legal standard for issuing a temporary rule, which is needing to demonstrate “serious prejudice” that will result from following the regular rulemaking process.<sup>4</sup>

- **The Proposed Temporary Rule would remove flexibility from the existing regulations.** OAR 340-271-0110(4)(b)(B)(iii), the provision that the Proposed Temporary Rule seeks to amend, is a provision that preserves some limited flexibility in the Climate Protection Program aimed at sparking innovation in emissions reductions. The provision broadly exempts “non-combustion-related processes that use natural gas” from being subject to the Climate Protection Program with the understanding that such technologies would ensure innovative “processes that use natural gas” improve, not worsen, climate change. But the Proposed Temporary Rule would remove such flexibility by mandating that any captured carbon be stored “within a product.” DEQ’s over-specification is puzzling since CCS mechanisms vary widely; to illustrate, carbon could be sequestered in fuel cells, minerals, or even the oceans, just to name a few.<sup>5</sup> In sum, the inflexible nature of the Proposed Temporary Rule closes off new, potentially better, solutions when all options must be on the table.
- **CCS is demonstrably beneficial.** The Proposed Temporary Rule would stifle broad deployment of CCS, which would be contrary to the recommendation of the many scientific and political institutions that support this measure in addressing climate change. The most recent IPCC Report references CCS measures as “unavoidable if net zero CO<sub>2</sub> or GHG emissions are to be achieved.”<sup>6</sup> Indeed, IPCC acknowledges that more CCS deployment is necessary: “currently, global rates of CCS deployment are far below those in modelled pathways limiting global warming to 1.5°C or 2°C.”<sup>7</sup> Recognizing the need to deploy more CCS, the federal and other state governments have taken robust measures to promote CCS, some examples being: the Inflation Reduction Act’s CCS tax credits,<sup>8</sup> California’s CCS protocols under the Low Carbon Fuel Standard,<sup>9</sup> and even Washington’s recent Climate Commitment Act Program—which explicitly excluded sequestered carbon

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<sup>3</sup> The regulation already in place states: “(B) Covered emissions do not include: . . . (iii) Emissions that result from non-combustion-related processes that use natural gas, *as determined by DEQ.*” OAR 340-271-0110(4)(b)(B) (emphasis added).

<sup>4</sup> *Friends of the Columbia Gorge v. Energy Facility Siting Council*, 456 P.3d 635, 644 (Or. 2020) (discussing how legal uncertainty alone will not justify a temporary rule because “[t]hat would allow temporary rulemaking to be commonplace, rather than exceptional”).

<sup>5</sup> See, e.g., Intergovernmental Panel on Climate Change (“IPCC”), *Working Group III Contribution to the IPCC Sixth Assessment Report (AR6)*, at page 11-35 (2022) (“The potentials and costs for CCS in industry vary considerably due to the diversity of industrial processes . . . .”), available at [https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC\\_AR6\\_WGIII\\_Full\\_Report.pdf](https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC_AR6_WGIII_Full_Report.pdf).

<sup>6</sup> See *id.* at page SPM-47.

<sup>7</sup> *Id.* at page SPM-37.

<sup>8</sup> Pub. L. No. 117-169 (codified as amended at 26 U.S.C. § 45Q).

<sup>9</sup> E.g., Cal. Air Res. Bd. (“CARB”), *Carbon Capture and Sequestration Protocol Under the Low Carbon Fuel Standard* (Aug. 13, 2018), available at [https://ww2.arb.ca.gov/sites/default/files/2020-03/CCS\\_Protocol\\_Under\\_LCFS\\_8-13-18\\_ada.pdf](https://ww2.arb.ca.gov/sites/default/files/2020-03/CCS_Protocol_Under_LCFS_8-13-18_ada.pdf).



from “covered emissions” that would be subject to the state’s cap-and-investment regime.<sup>10</sup> DEQ should similarly encourage *broader* CCS initiatives, not narrower.

At minimum, DEQ should encourage all forms of CCS methods by either (1) removing the reference to the term “within a product,” or (2) clarifying that captured carbon dioxide is a “product” because CCS is an essential pathway for decarbonization in the industrial sector. Any initiatives that would reduce greenhouse gas emissions should be welcomed, and the Proposed Temporary Rule should not stand in the way.

Oregon utilities such as Avista have an obligation to provide safe, reliable, and cost-effective service to our customers. We thank you for the opportunity to participate in this process to ensure the best possible outcome for our environment, economy, and equity for all Oregonians.

Respectfully Submitted,

Bruce Howard

A handwritten signature in black ink that reads "Bruce Howard". The signature is written in a cursive style with a large, prominent "B" and "H".

Sr. Director, Environmental Affairs  
Avista Corporation

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<sup>10</sup> Wash. Admin. Code § 173-446-040(3)(a)(ii)(B)(I).



### AWEC Comments

**To:** Nicole Singh, Oregon Department of Environmental Quality  
**From:** Bill Gaines, Executive Director, Alliance of Western Energy Consumers  
**Date:** October 31, 2022  
**Re:** Temporary Rulemaking: Climate Protection Program 2022 (OAR 340-271-0110)

The Alliance of Western Energy Consumers (AWEC) appreciates the opportunity to provide public comment on the Oregon Department of Environmental Quality’s (DEQ) proposed rule amendment to OAR 340-271-0110(4)b(B)(iii). DEQ’s stated justification for this rule amendment is “to provide further clarification and to ensure that emissions from natural gas delivered by a local distribution company, whether combusted or oxidized, are covered emissions for local distribution companies”<sup>1</sup> under the Climate Protection Program (CPP).

AWEC is a non-profit organization that represents some of Oregon’s largest, most innovative, and trusted employers. AWEC advocates on behalf of its members to support the availability and affordability of electricity and natural gas. Affordable energy is key to sustainable and strong economic growth within the Pacific Northwest.

As a preliminary matter, AWEC does not believe that the proposed rule amendment is necessary. DEQ already has the authority to address the concerns outlined in DEQ’s stated justification and retains the discretion to evaluate emissions that result from non-combustion related processes that use natural gas on a case-by-case basis.

AWEC is concerned with DEQ’s proposal to expand emissions covered under the CPP to those that result from oxidation processes that are not the result of combustion. AWEC believes that all forms of carbon capture should be included in the exemptions listed OAR 340-271-0110(4)(b)(B). However, DEQ’s proposed temporary rule amendment may disincentive future investments in carbon capture and sequestration (CCS) and more efficient technologies that further the goals of the CPP. DEQ must recognize that a diverse set of low-carbon solutions is crucial—one of them being CCS—in order to ensure a secure and affordable energy future. If DEQ moves forward with a temporary rule, AWEC urges DEQ to encourage all forms of CCS and either remove reference to the term “within a product” or clarify that captured carbon dioxide is a product.

Numerous scientific and political associations have made it clear that CCS is an essential pathway for decarbonization within the industrial sector. AWEC members are committed to

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<sup>1</sup> DEQ, *Climate Protection Program Temporary Rulemaking 2022: Draft Statement of Need and Justification* (“*Draft Justification*”), at page 2.



working with DEQ to help Oregon transition to a lower carbon, renewable energy future, but we must do this in a manner that ensures energy reliability and affordability for Oregon employers.

AWEC urges DEQ not to proceed with the proposed rule amendment. However, if the agency does move forward, AWEC respectfully requests DEQ to include the changes suggested in these comments. Thank you for your consideration of our request.



October 31, 2022

Submitted to: [cpp.info@deq.oregon.gov](mailto:cpp.info@deq.oregon.gov)

ATTN: Nicole Singh, Senior Climate Change Policy Advisor

Oregon Department of Environmental Quality  
Office of Greenhouse Gas Programs  
700 NE Multnomah Street, Room 600  
Portland, Oregon 97232-4100

Dear Oregon Department of Environmental Quality (“DEQ”),

Cascade Natural Gas Corporation (“Cascade”) appreciates the opportunity to provide comments on DEQ’s proposed temporary rule amendments to OAR 340-271-0110(4)(b)(B)(iii) (“Proposed Temporary Rule”), which seek “to provide further clarification and to ensure that emissions from natural gas delivered by a local distribution company, whether combusted or oxidized, are covered emissions for local distribution companies” under the Climate Protection Program (“the Program”).<sup>1</sup>

Cascade is committed to ensuring that reliable and affordable energy is supplied to the rural communities that the company serves, while also being committed to achieving emission goals. In doing so, Cascade highlights that certain uses of natural gas—especially those that involve non-combustion-related technologies—could accomplish net emission reductions by making alternative fuels available for other sectors.

Unfortunately, the Proposed Temporary Rule discourages such opportunities. Whereas the current regulation excludes from covered emissions any “Emissions that result from non-combustion-related processes that use natural gas, as determined by DEQ,” the Proposed Temporary Rule would only exclude “Emissions avoided where the use of natural gas results in greenhouse gas emissions captured and stored within a product.”<sup>2</sup> DEQ’s proposed amendment inherently limits the possibilities natural gas may offer in reducing greenhouse gas emissions overall, and therefore should be rejected.<sup>3</sup> Cascade respectfully submits the following comments to request that DEQ not move forward with the Proposed Temporary Rule.

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<sup>1</sup> DEQ, *Climate Protection Program Temporary Rulemaking 2022: Draft Statement of Need and Justification* (“Draft Justification”), at page 2 (2022).

<sup>2</sup> DEQ, *Draft Rules – Division 271*, at page 3 (2022) (proposed Section 340-271-0110(4)(b)(B)(iii)).

<sup>3</sup> In addition to hampering efforts to reduce net greenhouse gas emissions, the Proposed Temporary Rule would be legally defective because DEQ lacks the authority to regulate captured and sequestered emissions which, by definition, are not emitted into the atmosphere and—like the regulation of non-emitting entities—

## 1. The Proposed Temporary Rule is unnecessary.

DEQ does not need to finalize this Proposed Temporary Rule because it already has the regulatory tools available to address its expressed concerns. DEQ has proposed to amend its existing regulations because the agency worries that certain non-combustion uses of natural gas might result in emissions “not . . . captured and stored in a product and instead directly emitted to the atmosphere, with the same emission results as if the natural gas was combusted.”<sup>4</sup> However, OAR 340-271-0110(4)(b)(B)(iii) as it is currently in place already addresses this concern.

Under the current OAR 340-271-0110(4)(b)(B)(iii), DEQ expressly retains the discretion to evaluate on a case-by-case basis emissions that result from non-combustion related processes that use natural gas, and then conclude that such emissions do fall under the Program’s scope. The regulation states “(B) Covered emissions do not include: . . . (iii) Emissions that result from non-combustion-related processes that use natural gas, *as determined by DEQ.*”<sup>5</sup> In other words, such emissions would not be subject to the regulation if—but only if—DEQ did not determine otherwise. Thus, *even if* DEQ’s Draft Justification is correct that certain non-combustion uses of natural gas may lead to emissions into the atmosphere as if natural gas were combusted, those resultant emissions *still* fall under the existing regulations as “covered emissions” if DEQ “determines” that the (B)(iii) exception does not apply. At best, the Proposed Temporary Rule reinvents the wheel because no regulatory gap exists in the first place.

Lacking any urgency since the current regulations resolve all of DEQ’s stated justifications, DEQ’s proposal fails to meet the legal standard for issuing a temporary rule. Regardless of how much more “clarification” DEQ thinks it needs,<sup>6</sup> legal uncertainty alone does not justify a temporary rule. This is because “if providing regulated entities with immediate guidance were, by itself, sufficient, then agencies would be able to justify temporary rulemaking whenever they adopt regulations implementing new statutes. That would allow temporary rulemaking to be commonplace, rather than exceptional.”<sup>7</sup> Instead, “an agency must point to serious prejudice that will result from delaying legal guidance during the time that it takes to complete a reasonable permanent rulemaking process.”<sup>8</sup>

When DEQ already has the tools it needs to resolve a given issue, “serious prejudice” cannot result unless the agency makes it so by refusing to use the tools at hand. Simply put, the Proposed Temporary Rule lacks basis to invoke what is supposed to be a rare exception to the rulemaking process.

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are outside the scope of what DEQ may regulate. *See, e.g.*, ORS 468A.005(4), .135(4) (authorizing DEQ to regulate “air contamination sources,” which is defined as “any source at, from, or by reason of which there is *emitted into the atmosphere* any air contaminant” (emphasis added)).

<sup>4</sup> DEQ, *Draft Justification*, *supra* note 1, at pages 1–2.

<sup>5</sup> OAR 340-271-0110(4)(b)(B) (emphasis added).

<sup>6</sup> *See* DEQ, *Draft Justification*, *supra* note 1, at pages 1–3 (discussing how the current regulation “needs to be amended to provide further clarification”).

<sup>7</sup> *Friends of the Columbia Gorge v. Energy Facility Siting Council*, 456 P.3d 635, 644 (Or. 2020).

<sup>8</sup> *Id.*

## 2. The Proposed Temporary Rule would remove flexibility in using natural gas to decrease overall greenhouse gas emissions.

OAR 340-271-0110(4)(b)(B)(iii), the provision that the Proposed Temporary Rule seeks to amend, is a provision that preserves flexibility in the Climate Protection Program which could in turn spark energy innovation that reduces greenhouse gas emissions. The provision broadly exempts “Emissions that result from non-combustion-related processes that use natural gas, as determined by DEQ” from being subject to the Climate Protection Program with the understanding that, even if certain natural gas usages might result in emissions, such usage could result in a *net* emissions reduction in various ways.

As just one illustrative example, natural gas, through the development of fuel cells, could quicken Oregon’s transition to a hydrogen economy which would decrease the state’s reliance on even more carbon-intensive fuels such as oil.<sup>9</sup> True, it is possible that this process may result in some emissions; but the eventual availability of alternative fuel sources could lead to emission reductions in even greater quantities. Ultimately, DEQ could make the judgment call on whether such processes would be exempt from the Climate Protection Program.

The Proposed Temporary Rule would unduly constrain the possibilities natural gas—especially in its non-combustion usage—may offer in tackling climate change. The Proposed Temporary Rule exempts natural gas usage from the Climate Protection Program’s reach only if “the use of natural gas results in greenhouse gas emissions captured and stored within a product, if sufficiently documented by information provided to DEQ.” Such proposal faces at least two problems. First, it wholly ignores the possibility that *even if* some emissions may occur from non-combustion technologies that involve natural gas, the net emission decrease that would result from such technologies would still be better for the environment. Previously, DEQ could at least make that determination on a case-by-case basis, but the new language wholly closes that option. Second, it mandates that any captured emission be stored “within a product” without defining the term. And with uncertainty as to which emission-storage technology may or may not result in a “product,”<sup>10</sup> any natural gas usage that could serve as a groundbreaking method to tackle climate change is also discouraged.

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<sup>9</sup> See, e.g., U.S. Dep’t of Energy, *DOE National Clean Hydrogen Strategy and Roadmap (Draft)* (Sept. 2022) (discussing the potential of hydrogen fuel cells as a decarbonization strategy), available at <https://www.hydrogen.energy.gov/pdfs/clean-hydrogen-strategy-roadmap.pdf>.

<sup>10</sup> For example, carbon could be sequestered in fuel cells, minerals, or even the oceans, just to name a few. See generally Intergovernmental Panel on Climate Change (“IPCC”), *Working Group III Contribution to the IPCC Sixth Assessment Report (AR6)*, at page 11-35 (2022) (“The potentials and costs for CCS [carbon capture and sequestration/storage] in industry vary considerably due to the diversity of industrial processes . . . .”), available at [https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC\\_AR6\\_WGIII\\_Full\\_Report.pdf](https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC_AR6_WGIII_Full_Report.pdf). Important to note, any proposed rule that discourages CCS would contravene the scientific and political consensus in support of this technology as a key measure to address climate change. For example, the most recent IPCC Report, *supra*, references CCS measures as “unavoidable if net zero CO<sub>2</sub> or GHG emissions are to be achieved” and warns us that “currently, global rates of CCS deployment are far below those in modelled pathways limiting global warming to 1.5°C or 2°C.” *Id.* at pages SPM-37 and SPM-47. The federal government and various state governments have also promoted policies incentivizing CCS developments. See, e.g., Inflation Reduction Act of 2022, Pub. L. No. 117-169 (codified as amended at 26

In sum, whereas the urgency of the climate crisis asks for innovative solutions and broad strategies, all the Proposed Temporary Rule does is make the existing rules even more rigid. As a result, the Proposed Temporary Rule would stifle non-combustion natural gas technologies that could decrease greenhouse gas emissions even quicker.

\* \* \*

Public utilities such as Cascade have an obligation to provide safe, reliable, and cost-effective service to our customers. We thank you for the opportunity to participate in this process to ensure the best possible outcome for our environment, economy, and equity for all Oregonians.

Respectfully submitted,

Abbie S. Krebsbach



Environmental Director  
Cascade Natural Gas Corporation

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U.S.C. § 45Q) (offering various tax credits to CCS); Cal. Air Res. Bd. (“CARB”), *Carbon Capture and Sequestration Protocol Under the Low Carbon Fuel Standard* (Aug. 13, 2018), available at [https://ww2.arb.ca.gov/sites/default/files/2020-03/CCS\\_Protocol\\_Under\\_LCFS\\_8-13-18\\_ada.pdf](https://ww2.arb.ca.gov/sites/default/files/2020-03/CCS_Protocol_Under_LCFS_8-13-18_ada.pdf); Wash. Admin. Code § 173-446-040(3)(a)(ii)(B)(I) (excluding sequestered carbon from “covered emissions” that would be subject to the Washington Climate Commitment Act Program’s cap-and-investment regime).

## Natural gas fuel cell power systems and CO<sub>2</sub> emissions

Send to: [CPP.info@deg.oregon.gov](mailto:CPP.info@deg.oregon.gov)

Subject: Support for the temporary rulemaking to the Oregon Climate Protection Program

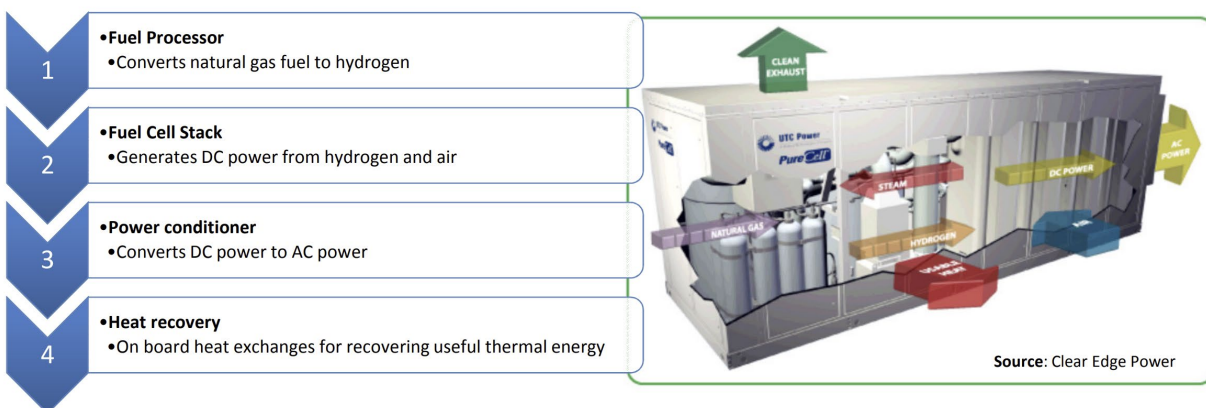
DEQ Staff,

I am writing in support of the DEQ staff recommendation for a temporary rulemaking to the Oregon Climate Protection Program (CPP).

It appears this rule clarification is needed because Amazon is seeking exemptions to the emissions coming from **on-site fuel cells that run on methane gas** and used to power their operations at several energy-intensive data centers in Eastern Oregon. As I understand, the basis of the claim is that the gas is oxidized, not combusted. Such a statement is both technically incorrect and misleading.

First, it is technically incorrect because the natural gas fuel cell power systems, like the example below, include a steam reformer that converts the methane in natural gas into hydrogen by reacting it with steam using a reformer, using the following reaction ( $\text{CH}_4 + 2\text{H}_2\text{O} = 4\text{H}_2 + \text{CO}_2$ ), where the CO<sub>2</sub> is generally emitted to the atmosphere. The so-called “clean exhaust” in the figure below.

Second, it is misleading because the fact that the resulting hydrogen is oxidized is not relevant. Because the process that uses the natural gas emits CO<sub>2</sub> at the same rate (per therm of gas) as combustion.



I strongly support this proposed rulemaking, which will affirm that the requirements of the CPP apply to methane gas users like Amazon and the utilities that supply fossil fuels. The amendment proposed by DEQ more clearly defines the exemption language to only apply to uses of natural gas that result in the embodied CO<sub>2</sub> being captured and stored within a product and is not emitted to the atmosphere.

Amazon’s proposal would result in an enormous increase in methane gas use and GHG in Oregon, leading to ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state. Amazon claims to be “the world’s largest corporate purchaser of renewable energy” and be on a path to powering their operations with “100% renewable energy by 2025”. Their proposal flies in the face of that pledge.

Thank you for this opportunity to testify. I am a clean energy technology expert, as well as energy system modeler and climate policy analyst, and I organize with the Metro Climate Action Team

Dr. Pat DeLaquil  
Gresham, OR 97080

October 31, 2022

Dear DEQ Staff and Members of the EQC:

I want to voice my support of the proposed temporary rule change to OAR 340-271-0110(4)(b) section on exclusions (B)(iii) "Emissions that result from non-combustion-related processes that use natural gas, as determined by DEQ". This provision was intended to apply to processes where methane gas was used in such a way that the CO<sub>2</sub> was captured in the product and not released into the air.

I am a strong supporter of the Climate Protection Plan and its health benefits for the citizens of Oregon. This Program was developed to reduce GHG emissions in our state. DEQ have been consistent about this goal. I applaud the staff for their fine work on this issue. I am proud of Oregon being a leader in this regard.

Proposed processes that may not involve combustion but that will release CO<sub>2</sub> through oxidation, rather than incorporating it into product, should not be exempted from CPP regulation. Allowing them to be exempted would be detrimental to the goal of GHG reduction.

This rule change is needed urgently to make clear that such pending processes that release CO<sub>2</sub> are clearly not exempted even if no combustion is involved. Otherwise, businesses that may be planning to develop such processes will be financially harmed if they proceed under the assumption that they are covered by CPP exemption, despite the CPP goal of GHG reduction. This change is necessary. Failure to make this clarification would result in serious prejudice to affected businesses. Clarifying the rule is needed now to prevent such harm to businesses by resolving any confusion about its application in this instance.

Proposed language for this seems appropriate: (B)(iii) "Emissions avoided where the use of natural gas results in greenhouse gases emissions captured and stored within a product, if sufficiently documented by information provided to DEQ".

I encourage you to rapidly proceed with adopting this verbiage to clarify any potential uses that would violate the laudable goals of the CPP.

Joseph Stenger MD

Metro Climate Action Team (MCAT)

Portland, Oregon 97211



October 31, 2022

Oregon Department of Environmental Quality  
ATTN: Nicole Singh  
Office of Greenhouse Gas Programs  
700 NE Multnomah St., Suite 600  
Portland, OR 97232

**BY EMAIL TO:** [cpp.info@deq.oregon.gov](mailto:cpp.info@deq.oregon.gov)

**RE: Climate Protection Program Temporary Rule**

Dear members of the Environmental Quality Commission, Director Whitman, and DEQ staff,

We write in support of the proposed temporary Climate Protection Program (CPP) rules.

Throughout the initial rulemaking for the CPP, we pointed out in comments that failing to apply the CPP's stationary source provisions to Oregon's fracked gas power plants that do not supply Oregon's grid left a significant gap between Oregon's 100% clean energy law and the CPP that could make Oregon increasingly attractive to high-energy users like proof-of-work cryptocurrency miners and data centers, dramatically undermining Oregon's ability to meet its climate goals.

We are troubled to hear that, already, Amazon is trying to find additional loopholes in the CPP language to allow it to obtain cheap fracked gas to power Amazon's data centers from Cascade Gas—an investor-owned utility that is plainly covered by the CPP—without their emissions being subject to the CPP cap.

The climate impacts from continued reliance on gas are clear, well documented, and devastating, particularly for environmental justice communities that are often hit first and worst



by climate disasters. Whether gas is “oxidized” or combusted makes no difference to its climate impacts.

It is critical that DEQ immediately adopt rules to clarify that fracked gas supplied by a CPP covered fuel suppliers is not exempt from the CPP just because it is “oxidized” in a fuel cell instead of combusted.

Sincerely,

*[listed in alphabetical order by organization]*

Audrey Leonard, *Staff Attorney*, **Columbia Riverkeeper**

Molly Tack-Hooper, *Supervising Senior Attorney*, **Earthjustice**

Allie Rosenbluth, *Campaigns Director*, **Rogue Climate**

Oriana Magnera, *Energy, Climate, and Transportation Manager*, **Verde**

October 31, 2022

DEQ Office of Greenhouse Gas Emissions  
700 NE Multnomah St. Suite 600  
Portland, OR 97232

**Re: Comments on DEQ's proposed Climate Protection Program rules**

Dear DEQ Office of Greenhouse Gas Emissions:

Thank you for the opportunity to comment on the Department of Environmental Quality's temporary rulemaking for the Oregon Climate Protection Program. Our organizations have long advocated for a statewide program to "cap and reduce" climate pollution from Oregon's top emitting sectors, and were deeply involved in the extensive 18 month rulemaking process to help inform and design this cornerstone climate protection program.

The CPP is absolutely essential to achieving our state's climate pollution reduction goals. The program will also improve public health and resiliency for Oregon communities most harmed by fossil fuels and climate impacts; enable investments in clean energy projects to support job creation, economic vitality, and cleaner, cheaper, healthier energy and transportation options in environmental justice and other communities across the state; and incentivize technological innovation and advancement that will benefit Oregon's workers and consumers by transitioning to a clean energy economy.

**For all these and other reasons, it is vital that the CPP is effectively implemented as intended. We therefore strongly support DEQ's proposed amendments to the CPP rules, which will provide added clarity to affirm requirements for covered entities and emissions and help ensure the environmental integrity of this essential program.**

We are extremely concerned by any attempts to expand fossil gas use in Oregon and avoid accountability under this cornerstone climate protection program. Proposals to use on-site fuel cells that run on fossil gas to power their operations at energy-intensive data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. As DEQ shared in its presentation at the October 24 hearing on the proposed rules, gas that is used in a non-combustion process will result in essentially the same amount of emissions as combusting the gas. With climate-fueled extreme heat, wildfires and drought already impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a new fossil gas user coming to Oregon.

We strongly agree with DEQ staff that it is critical for our local distribution companies and their industrial customers to have a clear understanding of their covered emissions. Corporations, especially in the tech sector, should be leading the way on reducing climate emissions because they have every means to do so. Our organizations strongly support this proposed rulemaking, which will provide necessary clarity to affirm that the requirements of the CPP apply to on-site gas users and the methane gas utilities that supply fossil fuels, and in turn help ensure the environmental integrity of this essential program.

We also recognize that multiple questions arose in DEQ’s temporary rulemaking hearing on October 24th concerning the applicability of this proposed rule to hydrogen production. We believe that this rule clarifies that the CPP includes hydrogen production through both Steam Methane Reform and Partial Methane Oxidation processes as ‘covered emissions,’ and we urge DEQ to confirm this interpretation.

We applaud DEQ for being proactive in taking this action, and are hopeful that the Environmental Quality Commission will take up and approve this proposed rule amendment as soon as possible.

Thank you for your consideration,

Joshua Basofin  
*Clean Energy Policy Manager*  
**Climate Solutions**

Stuart Liebowitz  
*Facilitator*  
**Douglas County Global Warming Coalition**

Kjellen Belcher  
*Manager, U.S. Climate*  
**Environmental Defense Fund**

Tim Miller  
*Director*  
**Oregon Business for Climate**

Nora Apter  
*Climate Program Director*  
**Oregon Environmental Council**

Rose Monahan  
*Staff Attorney*  
**Sierra Club**

Laura Tabor  
*Climate Action Director*  
**The Nature Conservancy**

Philip H. Carver, Ph.D.  
*Co-coordinator*  
**350 Salem OR**

October 31, 2022

*VIA ELECTRONIC MAIL*

Oregon Department of Environmental Quality  
Office of Greenhouse Gas Programs  
700 NE Multnomah Street, Suite 600  
Portland, Oregon 97232

Dear Oregon Department of Environmental Quality (“DEQ”),

NW Natural appreciates the opportunity to provide public comments on DEQ’s proposed temporary rule amendments to OAR 340-271-0110(4)(b)(B)(iii) (“Proposed Temporary Rule”), which seek “to provide further clarification and to ensure that emissions from natural gas delivered by a local distribution company, whether combusted or oxidized, are covered emissions for local distribution companies”<sup>1</sup> under the Climate Protection Program (“the Program”).

NW Natural is committed to helping Oregon transition to a low-carbon, renewable-energy future while ensuring energy reliability for all Oregonians. In line with the consensus of the scientific community and environmental policymakers, NW Natural recognizes a diverse set of solutions is essential—one of them being carbon capture and sequestration (“CCS”) and the variety of ways this solution may manifest.<sup>2</sup>

The Proposed Temporary Rule, which proposes to exclude from covered emissions “Emissions avoided where the use of natural gas results in greenhouse gas emissions captured and stored *within a product*,”<sup>3</sup> would be too restrictive in treating CCS. If DEQ proceeds with the Proposed Temporary Rule, DEQ should encourage all forms of CCS methods that reduce atmospheric greenhouse gas by either (1) removing the reference to the term “within a product,” or (2) clarifying that captured and sequestered carbon dioxide is a “product.”

NW Natural respectfully submits the following comments in support of its request that DEQ preserve the status quo or amend the Proposed Temporary Rule.

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<sup>1</sup> DEQ, *Climate Protection Program Temporary Rulemaking 2022: Draft Statement of Need and Justification* (“Draft Justification”), at page 2 (2022).

<sup>2</sup> “CCS” also refers to carbon capture and storage. See generally The British Geological Survey, *Understanding Carbon Capture and Storage* (2022) (discussing various methods at each of the capture, transport, and storage phase), available at <https://www.bgs.ac.uk/discovering-geology/climate-change/carbon-capture-and-storage/>.

<sup>3</sup> DEQ, *Draft Rules – Division 271*, at page 3 (2022) (proposed Section 340-271-0110(4)(b)(B)(iii)) (emphasis added).

## 1. The Proposed Temporary Rule is unnecessary.

DEQ does not need to finalize this Proposed Temporary Rule because it already has the regulatory tools available to address its expressed concerns. DEQ has proposed to amend its existing regulations because the agency worries that certain non-combustion uses of natural gas might result in emissions “not . . . captured and stored in a product and instead directly emitted to the atmosphere, with the same emission results as if the natural gas was combusted.”<sup>4</sup> However, OAR 340-271-0110(4)(b)(B)(iii) as it is currently in place already addresses this concern.

Under the current OAR 340-271-0110(4)(b)(B)(iii), DEQ expressly retains the discretion to evaluate on a case-by-case basis emissions that result from non-combustion related processes that use natural gas, and then conclude that such emissions do fall under the Program’s scope. The regulation states “(B) Covered emissions do not include: . . . (iii) Emissions that result from non-combustion-related processes that use natural gas, *as determined by DEQ.*”<sup>5</sup> In other words, such emissions would not be subject to the regulation if—but only if—DEQ did not determine otherwise. Thus, *even if* DEQ’s Draft Justification is correct that certain non-combustion uses of natural gas may lead to emissions into the atmosphere as if natural gas were combusted, those resultant emissions *still* fall under the existing regulations as “covered emissions” if DEQ “determines” that the (B)(iii) exception does not apply. At best, the Proposed Temporary Rule reinvents the wheel because no regulatory gap exists in the first place.

Lacking any urgency since the current regulations resolve all of DEQ’s stated justifications, DEQ’s proposal fails to meet the legal standard for issuing a temporary rule.<sup>6</sup> Regardless of how much more “clarification” DEQ thinks it needs,<sup>7</sup> legal uncertainty alone does not justify a temporary rule. This is because “if providing regulated entities with immediate guidance were, by itself, sufficient, then agencies would be able to justify temporary rulemaking whenever they adopt regulations implementing new statutes. That would allow temporary rulemaking to be commonplace, rather than exceptional.”<sup>8</sup> Instead, “an agency must point to serious prejudice that will result from delaying legal guidance during the time that it takes to complete a reasonable permanent rulemaking process.”<sup>9</sup>

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<sup>4</sup> DEQ, *Draft Justification*, *supra* note 1, at pages 1–2.

<sup>5</sup> OAR 340-271-0110(4)(b)(B) (emphasis added).

<sup>6</sup> Further, the Proposed Temporary Rule is unnecessary because DEQ lacks the authority to regulate captured and sequestered emissions which, by definition, are not emitted into the atmosphere and, like the regulation of non-emitting entities, are outside the scope of what DEQ may regulate. *See, e.g.*, ORS 468A.005(4), .135(4) (authorizing DEQ to regulate “air contamination sources,” which is defined as “any source at, from, or by reason of which there is *emitted into the atmosphere* any air contaminant” (emphasis added)).

<sup>7</sup> *See* DEQ, *Draft Justification*, *supra* note 1, at pages 1–3 (discussing how the current regulation “needs to be amended to provide further clarification”).

<sup>8</sup> *Friends of the Columbia Gorge v. Energy Facility Siting Council*, 456 P.3d 635, 644 (Or. 2020).

<sup>9</sup> *Id.*

When DEQ already has the tools it needs to resolve a given issue, “serious prejudice” cannot result unless the agency makes it so by refusing to use the tools at hand. Simply put, the Proposed Temporary Rule lacks basis to invoke what is supposed to be a rare exception to the rulemaking process.

## 2. The scientific consensus supports broad deployment of CCS.

If DEQ moves forward with the Proposed Temporary Rule, DEQ should encourage all forms of CCS methods by either (1) removing the reference to the term “within a product,” or (2) clarifying that captured carbon dioxide is a “product” because CCS is an essential pathway for decarbonization in the industrial sector.

Countless scientific and political institutions make the importance of CCS clear. The most recent IPCC Report references CCS measures as “unavoidable if net zero CO<sub>2</sub> or GHG emissions are to be achieved.”<sup>10</sup> According to IPCC’s projections, all but one decarbonization strategy that would keep global warming below 2°C must include CCS as a necessary component.<sup>11</sup> Indeed, IPCC acknowledges that far more CCS deployment is necessary: “currently, global rates of CCS deployment are far below those in modelled pathways limiting global warming to 1.5°C or 2°C.”<sup>12</sup>

Existing laws, both at the federal and state level, recognize the benefits of CCS. As just a couple of examples, recently the federal Inflation Reduction Act of 2022 extended and expanded tax credits for CCS by, among other things, increasing credit values, extending project commencement windows, and broadening the definition of qualified facilities.<sup>13</sup> California, through the Global Warming Solutions Act of 2006, has embraced CCS as well.<sup>14</sup> And in turn, the California Air Resources Board (“CARB”) has developed a Scoping Plan that includes CCS protocols under the Low Carbon Fuel Standard.<sup>15</sup> As recent as

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<sup>10</sup> See Intergovernmental Panel on Climate Change (“IPCC”), *Working Group III Contribution to the IPCC Sixth Assessment Report (AR6)*, at page SPM-47 (2022), available at [https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC\\_AR6\\_WGIII\\_Full\\_Report.pdf](https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC_AR6_WGIII_Full_Report.pdf).

<sup>11</sup> The one other strategy that does not incorporate CCS would require global energy demand to nearly halve in the next 30 years, which would be a socio-politically naïve approach. See *id.* at page 3-47; see also Clean Air Task Force, *What Does the Latest IPCC Report Say About Carbon Capture?* (Apr. 20, 2022) (explaining the IPCC Report’s conclusions on CCS), available at <https://www.catf.us/2022/04/what-does-latest-ipcc-report-say-about-carbon-capture/>.

<sup>12</sup> IPCC, *supra* note 10, at page SPM-37.

<sup>13</sup> Pub. L. No. 117-169 (codified as amended at 26 U.S.C. § 45Q); see also Clean Air Task Force, *Carbon Capture Provisions in the Inflation Reduction Act of 2022* (Aug. 19, 2022) (summarizing key CCS provisions in the Act), available at <https://cdn.catf.us/wp-content/uploads/2022/08/19102026/carbon-capture-provisions-ira.pdf>.

<sup>14</sup> See Assemb. B. 32, at § 38561(f), 2006 Gen. Assemb., Reg. Sess. (Cal. 2006) (requiring “carbon sequestration projects” to be included in emission reductions measures).

<sup>15</sup> E.g., CARB, *Carbon Capture and Sequestration Protocol Under the Low Carbon Fuel Standard* (Aug. 13, 2018), available at [https://ww2.arb.ca.gov/sites/default/files/2020-03/CCS\\_Protocol\\_Under\\_LCFS\\_8-13-18\\_ada.pdf](https://ww2.arb.ca.gov/sites/default/files/2020-03/CCS_Protocol_Under_LCFS_8-13-18_ada.pdf); CARB, *Draft 2022 Scoping Plan Update* (May 10, 2022) (“(CCS) will be a necessary tool to reduce GHG emissions

about a month ago, the Washington Department of Ecology adopted the Climate Commitment Act Program, and the state’s cap-and-invest regime made sure to exclude sequestered carbon from “covered emissions.”<sup>16</sup>

Perhaps most importantly, the state of Oregon and DEQ itself have also manifested interest in CCS, as Oregon’s Clean Fuels Program values CCS in determining GHG emissions reductions.<sup>17</sup> After all, Oregon’s Executive Order No. 20-04 directs various Oregon agencies to address climate change “to the greatest extent possible” and “in a variety of circumstances.”<sup>18</sup> In addition, the Executive Order specifically directs DEQ to take actions necessary to cap and reduce GHG emissions “consistent with the science-based emissions reduction goals.”<sup>19</sup> Such sweeping language calls for all options to be on the table, and to the extent that scientific consensus supports CCS in any shape or form, the Proposed Temporary Rule should err on the side of *broader* CCS initiatives, not narrower. There are likely many technologies under the umbrella of CCS that cannot be known today but could offer significant emission reduction opportunities in the future.

DEQ has a meaningful opportunity to encourage industries in Oregon to adopt CCS. By either tweaking the rule language or clarifying it to support all forms of CCS, the Proposed Temporary Rule could provide even more options to tackle climate change.

\* \* \*

NW Natural thanks DEQ for this opportunity to engage with the agency on the Proposed Temporary Rule. We hope our comments will assist DEQ in ensuring significant, sustainable emissions reductions that are real, cost-effective, and equitable. If you have any questions or would like to discuss our comments further, please reach out to me at [kwilliams@nwnatural.com](mailto:kwilliams@nwnatural.com).

Respectfully,



Kathryn Williams  
VP, Public Affairs & Sustainability

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and mitigate climate change while minimizing leakage.”), *available at* <https://ww2.arb.ca.gov/sites/default/files/2022-05/2022-draft-sp.pdf>.

<sup>16</sup> Wash. Admin. Code § 173-446-040(3)(a)(ii)(B)(I).

<sup>17</sup> *See, e.g.*, OAR 340-253-0400(6)(b)(H) (referencing CCS as “innovative methods”).

<sup>18</sup> Oregon Office of the Governor, Exec. Order No. 20-04, at page 3 (Mar. 10, 2020), *available at* [https://www.oregon.gov/gov/Documents/executive\\_orders/eo\\_20-04.pdf](https://www.oregon.gov/gov/Documents/executive_orders/eo_20-04.pdf).

<sup>19</sup> *Id.* at pages 6–7.



October 31, 2022

Nicole Singh  
Oregon Department of Environmental Quality  
Office of Greenhouse Gas Programs  
700 NE Multnomah St., Suite 600  
Portland, OR 97232

**RE: Environmental Defense Fund Comments on DEQ’s Temporary Rulemaking: Climate Protection Program 2022**

Dear Ms. Nicole Singh, DEQ Office of Greenhouse Gas Programs staff, and Environmental Quality Commission members,

Environmental Defense Fund (EDF) appreciates the opportunity to submit the following comments in response to the proposed 2022 temporary rulemaking on the Climate Protection Program (CPP). EDF is a non-profit, non-governmental, and non-partisan organization that links science, economics, and law to create innovative, equitable, and cost-effective solutions to urgent environmental problems. EDF brings deep expertise to climate policy design and has long pursued initiatives at the state, national, and international levels designed to reduce emissions of climate-altering and health-harming air pollutants, and we participated extensively in the year-and-a-half long rulemaking process for the CPP. We are writing on behalf of our thousands of Oregon members and our supporters across the country who want to see swift, meaningful action to reduce climate pollution. **EDF supports DEQ’s proposed temporary rulemaking to clarify that greenhouse gas emissions from oxidation of natural gas fuels are covered emissions subject to a compliance obligation under the CPP.**

The Climate Protection Program was intended to cap and reduce all greenhouse gas emissions from natural gas fuel usage, and the program rules clearly state that covered emissions for local distribution companies include, “emissions of anthropogenic greenhouse gases in metric tons of CO<sub>2e</sub> that would result from the complete combustion **or oxidation** of the annual quantity of natural gas imported, sold, or distributed for use in this state.” DEQ’s proposed clarification to the CPP’s exemptions affirms the environmental integrity of the CPP by making it clear that regulated entities have a compliance obligation for climate pollution from natural gas fuels that are oxidized, as well as combusted. The CPP is an important step forwards for Oregon and will drive critical progress towards the achievement of Oregon’s climate goals. The program must be implemented in a way that provides comprehensive coverage for greenhouse gas emissions from covered sources.



Oregon's Climate Protection Program makes Oregon only the third state in the nation—alongside California and Washington—to place a binding, enforceable limit on greenhouse gas emissions from transportation and natural gas fuel usage. Under program rules in both California and Washington, emissions from both combusted and oxidized natural gas fuels are covered emissions subject to a compliance obligation. DEQ's proposed clarification is in line with the requirements for covered emissions in Washington and California—and will make it clear that across the west coast, all climate pollution emitted to the atmosphere from natural gas fuel usage is subject to a firm, declining, enforceable limit.

EDF deeply appreciates DEQ's swift action to ensure that the CPP's limits on climate pollution from natural gas fuel usage are comprehensive and account for all greenhouse gases emitted to the atmosphere from covered sectors and sources. It is important that DEQ and the EQC work to maintain and improve the ambition and environmental integrity of the CPP over time to protect Oregonians from dangerous climate impacts, ensure equitable outcomes, and maintain Oregon's climate leadership in an evolving energy landscape.

Thank you for your consideration.

Sincerely,

Kjellen Belcher  
Manager, U.S. Climate  
**Environmental Defense Fund**

October 31, 2022

Oregon Department of Environmental Quality  
Attn: Nicole Singh  
700 NE Multnomah St., Room 600  
Portland, OR 97232-4100

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

Dear Ms. Singh:

HyFuels Holdings LLC appreciates the opportunity to provide public comments on DEQ's proposed temporary rule amendments to OAR 340-271-0110(4)(b)(B)(iii) ("Proposed Temporary Rule").

HyFuels is a subsidiary of BNB Renewable Energy Holdings LLC, which has been working to decarbonize the energy economy since we founded the company in 2005, having developed more than 1GW of operating wind and solar power plants throughout the United States and Mexico in that time. More than two years ago, we launched HyFuels in order to take our efforts to the logical – and, in the global fight against climate change, critical – next step: to use the wind and solar plants we develop to power electrolyzers, thereby converting clean kilowatt hours into green hydrogen and its derivatives. We located our operations in Texas not only because it is, in our opinion, the best place in the country to generate green hydrogen consistently and cost-effectively, but also because it provides a number of avenues via which to get our green hydrogen to market. In our view, the most important way to jump-start the green-hydrogen economy is to get it to use as quickly as possible, and priced as closely as possible to current market rates.

We support the inclusion of carbon capture under the Climate Protection Program (CPP) and feel that all forms of carbon capture should be included in the exemptions listed OAR 340-271-0110(4)(b)(B). We are concerned by the Temporary Rule language as currently proposed, which seems to limit flexibility and inhibit innovation. All captured and avoided emissions should be exempt from CPP compliance. By including the words "within a product," DEQ is creating uncertainty as to the definition of a product and potentially limiting what carbon-capture technologies are recognized under the CPP. All carbon capture that avoids emissions is in alignment with the goals of the CPP and should be exempt.

As a renewable-fuel developer, it is important that all carbon capture is exempt under CPP and the rule language is clear so that we can invest in these innovative and emission-saving technologies. If DEQ continues to pursue this temporary rulemaking, we urge DEQ to support all forms of carbon capture by removing the reference to the term "within a product."

We appreciate the work the DEQ is doing to advance this complex transition.

Sincerely,



Jonathan Nicholas  
Chief Executive Officer  
BNB Renewable Energy Holdings LLC & HyFuels Holdings LLC

*The League of Women Voters of Oregon is a 102-year-old grassroots nonpartisan political organization that encourages informed and active participation in government. We envision informed Oregonians participating in a fully accessible, responsive, and transparent government to achieve the common good. LWVOR Legislative Action is based on advocacy positions formed through studies and member consensus. The League never supports or opposes any candidate or political party.*

October 26, 2022

To: [cpp.info@deq.oregon.gov](mailto:cpp.info@deq.oregon.gov)

Re: **LWVOR Comments on Climate Protection Program Temporary Rulemaking**

Deadline for comments: October 31, 2022, by 4 PM

Because the League of Women Voters of Oregon (LWVOR) believes that climate change is a serious threat facing our nation and planet, LWVOR supports climate goals and policies that are consistent with the best available climate science and that will ensure a stable climate system for future generations.

The Department of Environmental Quality (DEQ) has discovered that in the Rules as adopted by the Environmental Quality Commission in December 2021, the section titled “Covered emissions do not include” has a loophole which may allow the emission of significant amounts of unregulated greenhouse gases.

Members of LWVOR participated in the development of the Climate Protection Program (CPP) and testimony on behalf of LWVOR was submitted several times. The [testimony](#) for the first RAC meeting is most applicable to these comments.

We do agree that a change needs to be made immediately. However, we have a suggestion for a change in the [temporary rules](#) and would also like to see a broader scope to the Rulemaking process for the permanent rules.

### Temporary Rules

Original text

- A. Covered emissions include emissions of anthropogenic greenhouse gases in metric tons of CO<sub>2</sub>e that would result from the complete combustion or oxidation of the annual quantity of natural gas imported, sold, or distributed for use in this state.
- B. Covered emissions do not include:
  - i. Emissions that are from the combustion of biomass-derived fuels;
  - ii. Emissions described in 40 CFR part 98 subpart W – Petroleum and Natural Gas Systems;
  - iii. Emissions that result from non-combustion-related processes that use natural gas, as determined by DEQ; and
  - iv. Emissions from natural gas delivered to an air contamination source that is an electric power generating plant with a total nominal electric generating capacity greater than or equal to 25 megawatts.

Proposed change:

- iii Emissions avoided where the use of natural gas results in greenhouse gases emissions captured and stored within a product if sufficiently documented by information provided to DEQ;

The concern was raised because “combustion and oxidation” are explicitly mentioned in A, but only “combustion” is mentioned in B. DEQ found that some sources interpreted that to mean that oxidation does not produce covered emissions. That was not DEQ’s intent when the Rules were adopted. We therefore support changing the Rules to include oxidation.

One of the public commenters at the public hearing on October 24 suggested that the term “stored within a product” could be used to exclude the emissions even if the storage were only short-term. We, therefore, recommend that the draft rules be modified to exclude this possibility.

Instead of just adding “non-oxidation,” DEQ made the rule more general, which we support as it may lead to more greenhouse gas emissions being covered. The issue of whether the emissions resulting from the use of natural gas to make hydrogen would be considered covered emissions was raised at the public hearing, but not clearly answered. We expect this question will be responded to when the final rules are published for the EQC.

#### Permanent Rules

The Rules as adopted by the EQC for stationary sources using natural gas are somewhat cryptic, especially item ii. We understand that its effect is that stationary sources receiving their natural gas from one of the three utilities regulated by the PUC are not regulated by the CPP, while those that receive their natural gas from another source are regulated by the CPP.

The LWVOR testimony referenced above included the following statement:

“We believe that large stationary sources should be regulated for both their on-site combustion of natural gas and their emissions generated by their industrial processes.”

We still support this statement and request the DEQ to include reconsideration of this during the permanent Rulemaking process.

Thank you for the opportunity to provide comments.



Rebecca Gladstone  
LWVOR President



Claudia Keith, Kathy Moyd  
LWVOR Climate Emergency Portfolio



October 31, 2022

Oregon Department of Environmental Quality  
Attn: Nicole Singh  
700 NE Multnomah St., Room 600  
Portland, OR 97232-4100

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

Oregon Manufacturers and Commerce appreciates the opportunity to provide public comments on the proposed temporary rule amendments to OAR 340-271-0110(4)(b)(B)(iii) (“Proposed Temporary Rule”) by the Oregon Department of Environmental Quality (“DEQ”). As a reference, Oregon Manufacturers and Commerce (“OMC”) is an association dedicated to promoting, protecting, and advancing Oregon manufacturers and their allied partners.

OMC provided public comment during the Climate Protection Program (“CPP”) rulemaking in 2021, and writes today in opposition to the Proposed Temporary Rule, which we do not believe is justified. DEQ already has the authority to address the concerns outlined in the Justification. Under OAR 340-271-0110(4)(b)(B), DEQ retains the discretion to evaluate emissions that result from non-combustion related processes that use natural gas on a case-by-case basis. The blanket change made by the Proposed Temporary Rule is unnecessary.

OMC supports the inclusion of carbon capture and sequestration (“CCS”) under the CPP and believes that all forms of carbon capture should be included in the exemptions listed OAR 340-271-0110(4)(b)(B). However, as currently proposed, the Temporary Rule limits flexibility, inhibits innovation, and disincentivizes cleaner processes that reduce air toxics. CCS is an essential pathway for decarbonization in the industrial sector; numerous scientific and political institutions make this clear. OMC believes that all captured and avoided emissions should be exempt from CPP compliance.

As drafted the Proposed Temporary Rule unnecessarily expands the scope of the CPP and does not support investments in innovative or emission saving technologies. DEQ should not move forward with the Proposed Temporary Rule at this time. If the agency does proceed with the Proposed Temporary Rule, OMC recommends that DEQ encourage all forms of CCS methods by either (1) removing the reference to the term “within a product,” or (2) clarifying that captured carbon dioxide is a “product.”

OMC looks forward to continued engagement on this issue. We thank you for the opportunity to provide comments today.

Sincerely,

Shaun Jillions  
Executive Director  
Oregon Manufacturers & Commerce

October 31, 2022

Oregon Department of Environmental Quality  
Attn: Nicole Singh  
700 NE Multnomah St., Room 600  
Portland, OR 97232-4100

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

Modern Electron appreciates the opportunity to provide public comments on DEQ's proposed temporary rule amendments to OAR 340-271-0110(4)(b)(B)(iii) ("Proposed Temporary Rule").

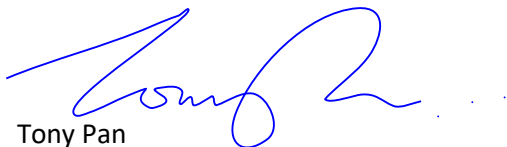
Modern Electron is a sustainable heat and hydrogen technologies company. We are helping to reduce greenhouse gas emissions by accelerating commercial and industrial operator transitions from burning natural gas to burning clean hydrogen. We do this by stripping solid carbon out of methane gas with no carbon dioxide.

We support the inclusion of carbon capture under the Climate Protection Program (CPP) and feel that all forms of CO<sub>2</sub> mitigation and carbon capture should be included in the exemptions listed OAR 340-271-0110(4)(b)(B). In other words, **all carbon capture** that avoids CO<sub>2</sub> emissions should be in alignment with the goals of the CPP and should be exempt. As currently proposed, by including the words "within a product" DEQ creates uncertainty as to the definition of a product and potentially limits what carbon capture technologies will be recognized under the CPP. The current wording of the Temporary Rule would severely inhibit innovation and some of the most promising decarbonization technologies in the marketplace.

As a technology company delivering pre-combustion carbon capture and clean decarbonized fuels for industrial operations it is critically important that all carbon capture is exempt under CPP. As such the rule language must be clear so that we can invest in these innovative and emission saving technologies. If DEQ continues to pursue this temporary rulemaking, we urge DEQ to support all forms of carbon capture by removing the reference to the term "within a product".

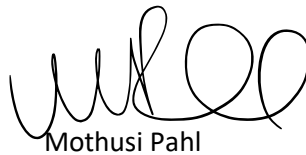
If you have any additional questions, we can be reached at [mothusi.pahl@modernelectron.com](mailto:mothusi.pahl@modernelectron.com) and [tony.pan@modernelectron.com](mailto:tony.pan@modernelectron.com).

Sincerely,



Tony Pan

Co-founder & CEO



Mothusi Pahl

Vice President

Southern Oregon Climate Action Now

**SOCAN**

Confronting Climate Change

<http://socan.eco>

Alan R.P. Journet Ph.D.

Cofacilitator

Southern Oregon Climate Action Now

7113 Griffin Lane

Jacksonville

OR 97530-9342

October 21<sup>st</sup> 2022

[alan@socan.eco](mailto:alan@socan.eco)

541-301-4107 cell

541-500-2331 VOIP

Richard Whitman

Director DEQ

Colin McConnaha

Manager,

Office of Greenhouse Gas Programs

Oregon DEQ

Portland State Office Building

800 NE Oregon St., Suite 611.

Portland, OR 97232-

[CPP.INFO@deq.oregon.gov](mailto:CPP.INFO@deq.oregon.gov)

Director Whitman, Manager McConnaha:

I write as cofacilitator of Southern Oregon Climate Action Now, an organization of over 2000 rural Southern Oregonians and friends who are concerned about the climate crisis and support action to address this existential crisis. Following years of resistance to meaningful action among Republicans in the state legislature, thanks to Governor Brown's Executive Order 20-04, state agencies were charged with developing programs within their authority to reduce greenhouse gas emissions across the state. One of the most important such programs is the Climate Protection Program developed by the Department of Environmental Quality following input from stakeholders- including representatives of fossil gas corporations.

We at SOCAN were very involved in the Rulemaking Advisory Committee hearings that contributed to the development of this program. Throughout this process we were disappointed by the ongoing resistance to developing a program that would allow Oregon to contribute to the global effort to address the climate crisis, especially the opposition to rational programs offered by the fossil fuel industry and many corporations.

Now, it appears, the opponents of climate action, those very industries that have contributed to the failure of the voluntary program resulting from the 2007 legislation to achieve its goals, are undertaking whatever steps they can to thwart the well-intentioned efforts of Oregon's DEQ to address this problem. The legal action they promulgated was the first evidence of this resistance. Efforts to take advantage of perceived loopholes in the program is the second.

I write at this time to express first our disgust at efforts by Amazon to exploit an apparent loophole in the legislation and, second, to express support for DEQ in their effort to adopt language that would close this loophole.

What we are witnessing is corporations in Oregon acting to promote the climate crisis and thus promote wildfires in Oregon and hasten the arrival of a climate that will render our planet uninhabitable by the diversity of organisms, including humans, that currently occupy its fragile biosphere.

I write to urge DEQ to take all steps necessary to block the inhuman and inhumane effort of Amazon to by-pass the Climate Protection Program rules. Rural Oregon, on the frontlines of the climate threat strongly supports Governor Brown and the agencies in their effort to avert the ongoing climate crisis.

Respectfully submitted

A handwritten signature in black ink that reads "Alan R.P. Journet". The signature is written in a cursive style with a large, stylized initial "A".

Alan R.P. Journet Ph.D.  
Cofacilitator Southern Oregon Climate Action Now



October 25, 2022

Dear DEQ Staff and Members of the EQC

I am writing in support of the Climate Protection Program (CPP) and the proposed temporary rule change to OAR 340-271-0110(4)(b) section on exclusions (B)(iii) "*Emissions that result from non-combustion-related processes that use natural gas, as determined by DEQ*". This exception was made for Oregon businesses that use natural gas in manufacturing processes that capture the greenhouse gasses in their product.

The intent of the CPP is to reduce greenhouse gas emissions from sources in Oregon and the DEQ staff are committed to that goal. They identified a proposed non-combustion-related process that uses natural gas but releases CO<sub>2</sub> through a process of oxidization and does not store it in the product. These types of emissions were never intended to be exempt from regulation. This is clearly against the intent of the CPP.

A rule change is needed immediately to clarify the exemption before any other businesses begin planning that could result in non-combustion-related processes that will release methane, CO<sub>2</sub> or other greenhouse gases into the atmosphere. It would be detrimental to businesses who interpret the current wording broadly without consideration of the intent of the CPP. This has happened once and could happen again. Clarifying the rule in regard to the capture of the gasses will prevent further confusion.

I think the proposed change to read (B)(iii) "*Emissions avoided where the use of natural gas results in greenhouse gases emissions captured and stored within a product, if sufficiently documented by information provided to DEQ, and*" will be sufficient.

I urge immediate adoption of this temporary rule change. Thank you for the opportunity to comment. We must be vigilant to ensure the success of the CPP.

Jane Stackhouse

Metro Climate Action Team (MCAT)

Portland, Oregon 97212



October 28, 2022

Oregon Department of Environmental Quality  
Attn: Nicole Singh  
700 NE Multnomah St., Room 600  
Portland, OR 97232

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

We thank the Department of Environmental Quality (“DEQ”) for the opportunity to provide public comments on the DEQ’s proposed temporary rule amendments to OAR 340-271-0110(4)(b)(B)(iii) (“Proposed Temporary Rule”).

Our company, GreenPeak Resources, is a producer and supplier of clean hydrogen for the nation’s industrial sector to help accelerate their transition to a lower carbon-emitting era. GreenPeak supplies clean hydrogen to hard-to-electrify industrials seeking to reduce their consumption of natural gas and thus reduce the carbon footprint of their operations. By consuming our clean hydrogen instead of natural gas, they significantly reduce or in some cases completely eliminate their greenhouse gas emissions.

We support the inclusion of carbon capture under the Climate Protection Program (“CPP”). We suggest, however, that all forms of carbon capture that prevent the release of carbon oxides to the atmosphere are in alignment with the goals of the CPP and should be included in the exemptions listed in OAR 340-271-0110(4)(b)(B). We believe the Temporary Rule’s language, as currently proposed, will limit flexibility and inhibit innovation. Specifically, we see the words *‘within a product’* introducing uncertainty as to the definition of a ‘product’ which will make it unclear which carbon capture technologies will be acceptable under the CPP and will discourage and/or delay many good projects.

It is imperative that any State programs aimed at reducing greenhouse gas emissions make it clear to investors that all legitimate carbon capture methods are acceptable under the applicable regulations. This gives future project developers certainty of the rules for operating in Oregon.

We recommend aligning the ‘capture’ method for the CPP with the Federal government’s Carbon Capture Sequestration and Utilization (CCSU) rules. Aligning the rules simplifies the process for project developers and will ultimately attract more projects to Oregon. Additionally, utilizing the Federal government’s rules will allow more projects to qualify for the CPP as there are significant tax credits available from the Federal government that assist in lowering the cost of the program to the Oregon citizens.

Again, thank you for the opportunity to provide our comments.

Sincerely,

A handwritten signature in blue ink that reads "Quinn Laws". The signature is fluid and cursive, with the first name "Quinn" and last name "Laws" clearly distinguishable.

Quinn Laws  
Chief Financial Officer  
GreenPeak Resources, LLC

**From:** [Emily Polanshek](#)  
**To:** [CPP INFO \\* DEQ](#)  
**Subject:** In support of proposed rule change - OAR 340-271-0110(4)(b) section on exclusions (B)(iii)  
**Date:** Monday, October 31, 2022 3:39:02 PM

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October 31, 2022

To Whom It May Concern at DEQ and EQC,

I write in support of the Climate Protection Program (CPP) and the proposed temporary rule change to OAR 340-271-0110(4)(b) section on exclusions (B)(iii) "Emissions that result from non-combustion-related processes that use natural gas, as determined by DEQ."

My understanding is that the above exclusion was intended for Oregon businesses that use natural gas in manufacturing processes that capture greenhouse gas emissions in their product. I strongly support the proposed temporary rules change to prevent businesses from interpreting the current rules such that they release methane, carbon dioxide, or other greenhouse gases into the atmosphere contrary to the intent of the CPP.

Please adopt this temporary rule change immediately. Let's give our Climate Protection Plan a chance to succeed. A storm, drought and fire-ridden planet from will not be good for business anywhere, and Oregon must do its part.

Thank you,  
Emily Polanshek  
Member, P'nai Or of Portland  
97219

**From:** [Diane Meisenhelter](#)  
**To:** [CPP INFO \\* DEQ](#)  
**Subject:** Amazon and methane suppliers should be covered under CPP  
**Date:** Monday, October 31, 2022 9:58:34 AM

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First I'd like to thank DEQ for being proactive in working to clarify CPP rules. I'm an Oregonian who is deeply concerned that planetary warming is rapidly approaching at least four major tipping points that could have long-term, unthinkable consequences for a healthy climate future and will endanger both humans and millions of other species. I find it appalling that Amazon and methane utilities are seeking loopholes to dodge climate regulation under Oregon's Climate Protection Program. Both should be regulated under the CPP and should be accountable for reducing GHG emissions and they have the resources to do so. We are already experiencing drought, wildfires, and heat domes that threaten both lives, livability, and livelihoods here in Oregon. Amazon's proposal to use on-site fuel cells that run on methane to power their energy intensive data centers will result in a huge increase in greenhouse gas emissions and should not be permitted. Please affirm that the requirements of the CPP apply to gas users like Amazon and the methane gas utilities that supply them fossil fuels. We need to seriously decrease state emissions and this would be a step in the wrong direction. Thanks for your time and consideration.

Diana Meisenhelter  
Cell: 503-349-1460  
[meissun@hotmail.com](mailto:meissun@hotmail.com)

**From:** [Pat Kaczmarek](#)  
**To:** [CPP INFO \\* DEQ](#)  
**Subject:** CPP rulemaking - testimony on proposed ammendment regarding gas oxidation  
**Date:** Sunday, October 30, 2022 11:15:41 PM

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Dear DEQ commission,

I would like to express my support for the temporary rule to clarify that gas that is oxidized (in addition to gas that is combusted) is regulated by the requirements of the CPP program. I believe that a temporary rulemaking will ensure that this change can go into effect immediately. It will ensure there are no perceived loopholes for corporations to try to exploit and dodge climate regulation.

I also support a permanent rulemaking process next year that will address this issue.

Thank you for the opportunity to provide written testimony on this issue.

Sincerely,  
Pat Kaczmarek  
A resident of Oregon

**From:** [Reuben Peterson](#)  
**To:** [CPP INFO \\* DEQ](#)  
**Subject:** Natural gas oxidation rulemaking comment  
**Date:** Sunday, October 30, 2022 7:06:14 PM

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Hi, I would like to express my strong support for the oxidation of natural gas, and its emissions, to be covered by the emissions reductions goals of the Climate Protection Program. The exemption requests by some of the most powerful companies in the world is obviously yet another ploy to force an emissions loophole for short term company profits that cost long term environmental destruction and taxpayer funded cleanup.

Thanks,

Reuben Peterson

**From:** [swiss1927](#)  
**To:** [CPP INFO \\* DEQ](#)  
**Subject:** Climate Protection Program Rulemaking Public Comment  
**Date:** Sunday, October 30, 2022 3:59:23 PM

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After careful consideration, it seems like this temporary rule making is either unnecessary or excessively deferential to industry because it may disempower DEQ to execute the CPP.

Why can't DEQ "provide additional clarity to local distribution companies" by issuing a written determination of its finding on this matter?

I'm not an admin law buff and don't know a ton about the ins and outs of this issue, but there are other tools or perhaps more precise means to clarify things for industry.

As written, DEQ now has full authority under OAR 340-271-0110(4)(b)(B)(iii) to "determine" whether "covered emissions" do not include emissions from non-combustion-related processes that use natural gas.

However, this proposed temporary change would seemingly eliminate DEQ's discretion to "determine" and replace it with a "sufficient documentation" standard that is both vague and less exacting. Now is the time to make sure government and policymakers have more tools, not less, and from a common-sense standpoint a list of exemptions from covered emissions that rattles off "emissions from X" and "emissions from Y" and then has a strange carve-out category of "emissions avoided because of a novel situation Q" just reads like something iffy is going on.

John Fuhrer  
Portland, OR

**From:** [Dan Frye](#)  
**To:** [CPP INFO \\* DEQ](#)  
**Subject:** Support for Draft Rule change to the Climate Protection Program  
**Date:** Sunday, October 30, 2022 8:30:54 AM

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Dear DEQ Staff and Members of the EQC,

I am writing in strong support of the proposed rule change to OAR 340-271-0110(4)(b) of the Climate Protection Program (CPP) on exclusions. The change from the current wording "*Emissions that result from non-combustion-related processes that use natural gas, as determined by DEQ*" to a clarified working of "*Emissions avoided where the use of natural gas results in greenhouse gases emissions captured and stored within a product, if sufficiently documented by information provided to DEQ*" is a reasonable and necessary change. This change will prohibit a recently requested workaround of using a non-combustion related process that would simply release CO<sub>2</sub> freely while simultaneously allowing others to sequester carbon in long-lived products, which was the intent of the original draft.

I urge immediate adoption of this rule change. Thank you for the opportunity to comment and thank you for your diligence in protecting Oregon's future.

Daniel Frye, PhD  
Metro Climate Action Team  
Portland



**From:** [William McCall](#)  
**To:** [CPP INFO \\* DEQ](#)  
**Subject:** CPP must cover all natural gas emissions  
**Date:** Saturday, October 29, 2022 12:43:53 PM

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To whom it may concern,

It is my strongly held opinion that it is vital to limit greenhouse gas emissions as quickly as possible and to do so without letting fossil fuels companies exploit loopholes.

ALL emissions from natural gas should be considered, and regulated.

Regards,

**From:** [John Perona](#)  
**To:** [CPP INFO \\* DEQ](#)  
**Subject:** comment on temporary rule making re. OAR 340-271-0110(4)(b)(B)  
**Date:** Thursday, October 27, 2022 11:05:48 AM

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27 October 2022

To: DEQ Staff and Members of the EQC  
From: Dr John Perona, Professor of Environmental Biochemistry & Law,  
Portland State University  
Re: OAR 340-271-0110(4)(b)(B)

I'm writing to support the DEQ initiative regarding the temporary rulemaking that will clarify which carbon dioxide emissions are covered under the Climate Protection Program (CPP). The present rule allows an exemption for any carbon dioxide emissions that are generated by non-combustion processes. This language unfortunately creates a loophole: in addition to the intended exemption for carbon that is captured or sequestered in a stable product, the present rule will also exempt carbon dioxide gas that is emitted into the atmosphere from industrial processes that do not involve direct combustion. Such a process is exemplified by the proposed use of natural gas-powered fuel cells at Amazon data centers, and likely elsewhere. These fuel cells result in carbon dioxide emission to the atmosphere to the same extent as direct combustion. Thus, their apparent exemption under OAR 340-271-0110(4)(b)(B) clearly is at cross purposes with the intent of the CPP.

I support amending this regulation to clarify that only carbon that is securely sequestered underground or in stable products should be exempt under the CPP.

Thank you for considering my comment,

John Perona

--

John Perona

[johnjperona@gmail.com](mailto:johnjperona@gmail.com)

Linked In: <https://www.linkedin.com/in/john-perona-b31542124>

Check out the website for my new book *From Knowledge to Power: The Comprehensive Handbook for Climate Science and Advocacy*:  
<https://www.fromknowledgetopower.com>

**From:** [Jim Edelson](#)  
**To:** [CPP INFO \\* DEQ](#)  
**Subject:** Comment on temporary rulemaking  
**Date:** Wednesday, October 26, 2022 8:18:12 PM

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*Attn: Nicole Singh*

As a participant in several national rules regarding carbon emissions, I believe that the proposed rule lacks specificity on the sequestration mechanism. For instance, I serve on ASHRAE 228p, a Standard to define net zero emission for buildings. In its third public review draft of September 2022, the proposed parallel passage on sequestration specifications states:

Carbon offset projects shall be limited to technologies and strategies that permanently sequester carbon for a minimum of 200 years that are assessed to have a de minimis risk of release of sequestered emissions.

I propose the following modification to the proposed DEQ rule:

Emissions avoided where the use of natural gas results in greenhouse gases emissions captured and stored within a product **for a minimum of 200 years with a de minimis risk of release**, if sufficiently documented by information provided to DEQ.

Sincerely  
Jim Edelson  
--  
Jim Edelson  
*Portland OR*  
*503.209.4625*

**From:** [Ruth Dallas](#)  
**To:** [CPP INFO \\* DEQ](#)  
**Subject:** Temporary CPP rule making  
**Date:** Wednesday, October 26, 2022 6:06:43 PM

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Dear Folks at DEQ,

I am writing to support your tentative decision not to allow some companies to find a loophole for not complying with the CPP rules.

We get worse and worse news about the climate crisis every day and we need everyone to do their part to bring down emissions. I hope you will stand strong and not allow companies to reduce the effectiveness of the CPP.

Thank you,

Ruth Dallas  
Gaston OR

**From:** [Jason Young](#)  
**To:** [CPP INFO \\* DEQ](#)  
**Cc:** [Savannah Carroll](#); [Jon Jensen](#)  
**Subject:** Public Comment on Climate Protection Program temporary rule making  
**Date:** Wednesday, October 26, 2022 11:29:49 AM  
**Attachments:** [image001.png](#)

---

Oregon DEQ,

Thank you for the opportunity to comment on the temporary rule making for the Climate Protection Program.

Based on the meeting provided I do not believe that “emergency” rule making is required and oppose the rushed timeline for pushing these changes through.

Oregon is not global or national significant source of CO<sub>2</sub>e and therefore there isn’t an emergency. It is my belief that there are potential unintended consequences for the proposed rule changes that warrant discussion with a wider audience. The proposed technology for using fuel cell technology (oxidative process) has immediate potential benefits to air quality with reduced PM<sub>2.5</sub>, VOC’s and PAH’s that would otherwise be released to atmosphere if facilities favored diesel or natural gas generators for electricity. This potential benefit needs to be investigated for DEQ to best understand the potential benefits for air toxics reduction vs the potential pass through of CO<sub>2</sub>e. This is a situation where regulatory programs are in direct conflict with providing regulatory certainty and providing the best possible outcome for our communities.

I do not want to see Oregon DEQ rush through these changes without a thorough review process that includes Cleaner Air Oregon and Air Quality Program participation along with industry and environmental community activist stakeholders to create the best path forward that balances the need to reduce air toxics vs GHG emissions. Based on the oral public comments, there was a hyperfocus on GHG emissions and no consideration for other potential benefits to the oxidative process technology that DEQ is proposing to capture into the Climate Protection Program. In my opinion, DEQ has an obligation to review all of its programs and ensure that these programs work together to ensure we are doing the most good for our communities rather than operating in “silos” without any regard to the other programs and DEQ primary objectives. Greenhouse gases are not a criteria pollutant and CO<sub>2</sub> is not an air toxic, therefore there should be a consideration on how best to improve air quality and promote technologies that would positively impact our communities.

Careful, thoughtful consideration should always be the norm for rulemaking efforts so that all stakeholders have an opportunity to participate and be heard. As I have stated previously, there isn’t an emergency and DEQ should slow this process down and thoughtfully review the changes with all stakeholders within DEQ and outside DEQ to ensure the best possible outcome.

Best Regards,

Jason Young

**Jason Young**



Environmental Manager

PO Box 428

2550 Old Salem Road NE, Albany, OR 97321

Phone: (541) 917 6222 Mobile: (541) 510-4939

[www.arauco.com](http://www.arauco.com)

**From:** [Robert Kugler](#)  
**To:** [CPP INFO \\* DEQ](#)  
**Subject:** Natural gas company request for oxidized gas exception  
**Date:** Tuesday, October 25, 2022 9:14:49 PM

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I understand that natural gas companies in Oregon are seeking an exemption for oxidized gas from the Climate Protection Plan Rules. I want to share my strong opposition to this exception. I'm sure you're not fooled: oxidation emits the same GHGs as combustion—it is just spread out across a longer timeline.

The CPP covers CO2 emissions; oxidized gas emits CO2, as much as combusted gas. No exception should be allowed.

Thank you for your attention to this matter.

Rob Kugler  
4970 Bonnet Dr  
West Linn, Or 97068

**From:** [Diane Hodiak](#)  
**To:** [CPP INFO \\* DEQ](#)  
**Subject:** DEQ Temp RuleMaking. Dont Allow Polluters To Undermine Your Authority  
**Date:** Monday, October 24, 2022 12:55:47 PM

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Thank you for this opportunity.

350 Deschutes represents about 1800 stakeholders in Central Oregon.

DEQ is charged with regulating emissions under the CPP. As such I believe it critically important that regulated entities, or polluters, not be allowed a free pass to avoid the restrictions and consequences imposed by this authority. Weakening the rules or making exceptions will cast doubt on DEQ's authority and could lay the groundwork for other polluters to follow suit.

In the case of oxidized gas I feel it especially important to retain this authority since this is essentially methane, with 84x more global warming potential than co2. This oxidation results in equal if not increased hydrocarbons and other volatile compounds that are extremely harmful to both climate and air quality. Vulnerable populations where this is happening will suffer most, with pollution impacts to health. Research shows that those living within 200 miles of this pollution could experience harmful consequences. I believe that DEQ has an important charge to protect our communities, and especially the most vulnerable.

Allowing any exceptions for oxidation on the basis that it is not combustion does not serve the community, nor does it align with the original intent of the executive order 20-04. Please do not allow polluters to be exempt from CPP regulation for oxidized gas which will further harm our communities.

Diane Hodiak  
Executive Director  
She/Her/Hers  
206-498-5887 talk or text  
[dhodiak@350Deschutes.org](mailto:dhodiak@350Deschutes.org)  
***Attend the [GoCleanEnergy.org](#) Conference***





**From:** [Ann Turner](#)  
**To:** [CPP INFO \\* DEQ](#)  
**Subject:** DEQ Rulemaking for CPP on Methane  
**Date:** Monday, October 24, 2022 10:03:08 AM

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To DEQ Temporary Rulemaking on the Climate Protection Program:

My name is Dr. Ann Turner. I am retired from a career in community health where I was Medical Director at VGMHC and now volunteer with Oregon Physicians for Social Responsibility, focusing on the intersection of health, climate change, and environmental justice.

I am writing in complete support of DEQ's proposed amendment to the Climate Protection Program Rules, clarifying that using methane as an energy source, oxidizing rather than combusting it, is regulated because it results in the production of climate-warming greenhouse gas emissions. The consequences of a warmer climate are the single greatest public health threat to our planet. This is settled science. We can no longer kick the can down the road. It is an issue of environmental justice because those who are most affected contributed least to the problem and are the most vulnerable in our communities—low income, minorities, children, the elderly, those with underlying health conditions and those who live in rural communities.

I understand that Amazon in partnership with the gas companies are making this request for an exemption to the CPP rules to avoid the need to reduce climate pollution in a large facility in Eastern Oregon. We must hold corporations, especially giant corporations, accountable for their greenhouse gas emissions to achieve the goals of Oregon's Climate Protection Program. Corporations like Amazon should be taking a leadership role in using clean energy to power their massive operations.

Climate change is here. The recent wildfires with air pollution at unhealthy levels in Portland is our most recent reminder of this, but drought in the West, hurricanes and flooding are in the news every day. We must do as much as we can to mitigate its effects. DEQ's proposed rule clarification to the CPP is the right thing to do. Thank you.

Ann Turner, MD

2007 NE Mason St.

Portland, OR 97211

503-318-6238

**From:** [Julia Pommert](#)  
**To:** [CPP INFO \\* DEQ](#)  
**Subject:** Stopping greenhouse gasses must include all  
**Date:** Sunday, October 23, 2022 10:12:05 AM

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While combustion of fossil fuels is a huge cause of climate change, there are other sources of green-house gasses that increase climate change. We should prioritize stopping the big causes of green-house gasses but we must soon address the non-combustion sources of green-house gasses. Methane that escapes into the atmosphere increases climate change even if it is not burned.

The longer we wait to stop producing green-house gasses from any source the worse climate change will be. We know that there are some "tipping point" climate systems in our world that must not be allowed to be exceeded if we want to prevent catastrophic results. We must aggressively reduce production of all climate change gasses now.

Sincerely,  
Julia Pommert  
5425 NW Lianna Way  
Portland, OR 97229

**From:** [Walt Mintkeski](#)  
**To:** [CPP INFO \\* DEQ](#)  
**Subject:** Natural Gas must be covered by Climate Protection Plan Rules  
**Date:** Sunday, October 23, 2022 7:50:02 AM

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To the Oregon Department of Environmental Quality,

Natural Gas Companies are seeking to be exempted from the CPP Rules governing emissions, which are regulated by DEQ. These companies are claiming that oxidized gas (as opposed to combusted gas) should not be covered by Climate Protection Plan Rules.

I strongly object to this request for an exemption and urge you to deny it immediately. Whether natural gas (methane) is oxidized or combusted, essentially the same amount of pollution results.

Walt Mintkeski  
503-771-0232  
[mintkeski@juno.com](mailto:mintkeski@juno.com)

**From:** [Rebecca Maloney](#)  
**To:** [CPP INFO \\* DEQ](#)  
**Subject:** No exemptions for oxidized gas  
**Date:** Saturday, October 22, 2022 11:48:56 AM

---

Oxidized gas should be covered in the climate protection plan rules. No exemptions. We have to bite the bullet now and decrease all of our emissions.

Rebecca Maloney  
Portland, OR 97206

Sent from my iPhone

**From:** [Linda Ganzini](#)  
**To:** [CPP INFO \\* DEQ](#)  
**Subject:** Protect the integrity of the CPP  
**Date:** Saturday, October 22, 2022 10:27:45 AM

---

Hello-

Oregon's Climate Protection Plan (CPP) is a very forward looking plan to dramatically reduce greenhouse gas emissions. Some fossil (natural) gas companies are attempting to remove themselves from the plan by claiming that it doesn't apply to them. These companies are claiming that they oxidize gas and oxidized gas (as opposed to combusted gas) *should not be covered* by Climate Protection Plan Rules. Their claim is weak and an attempt to skirt having to reduce their greenhouse gas emissions. Don't be fooled by this argument. The CPP must cover CO2 emissions from all natural (methane) gas users if we are to reach our climate goals.

Linda Ganzini  
Lake Oswego, OR

**From:** [Brian Wenzl](#)  
**To:** [CPP INFO \\* DEQ](#)  
**Subject:** Oxidized Gas is Still Greenhouse Gas  
**Date:** Saturday, October 22, 2022 10:26:10 AM

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To whom it may concern:

I'm writing today to urge the DEQ to hold Oregon gas companies to the spirit and intent of the CPP rules, by including oxidized gases in calculations.

Oxidation may well be a good and wise practice for gas companies to ensure more complete conversion of methane to CO<sub>2</sub> when burning natural gas. That doesn't change the fact that these processes still constitute greenhouse gas emissions.

Our children and grandchildren will despise us if we don't do everything we can - and they will be right to do so. Allowing the biggest emitters end-around ways to bypass the rules trades the future for the present. We've taken enough.

Thank you for your consideration.

Kind regards  
Brian  
541.579.1599

**From:** [Barbara Harris](#)  
**To:** [CPP INFO \\* DEQ](#)  
**Subject:** Temporary Ruling regarding GHG  
**Date:** Friday, October 21, 2022 12:20:38 PM

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Gentle persons,

Green house gas is warming our earth toward a temperature that will not permit reasonable human existence. It is imperative that we eliminate the new and as rapidly as possible reduce the existing green house gas as soon as possible. We cannot tolerate avoidable green house gas production.

The CPP regulates the human production of green house gas. Carbon dioxide is produced when oxidizing methane to free hydrogen and carbon dioxide. There would be immense amounts of new carbon dioxide produced and released to create the hydrogen fuel. Even if the hydrogen fuel is very effecient for generating electricity the new carbon dioxide will join other sources of green house and warm our globe.

There will likely be good uses for hydrogen fuel but the hydrogen fuel must be created with clean electric power and not with fossil fuel.

Bill Harris  
503 228 3448  
NW Portland

**From:** [veronica poklemba](#)  
**To:** [CPP INFO \\* DEQ](#)  
**Subject:** Comment regarding Natural Gas Hearing - Oct. 24  
**Date:** Friday, October 21, 2022 8:05:30 AM

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- The CPP must cover CO2 emissions *from all natural (methane) gas users*

*Please do not allow any loop holes. All gas emissions must be counted if we are to reach our goals to decrease carbon emissions.*

*Thank you,*

*Veronica Poklemba  
Portland, OR. 97206*



**From:** [Kristin Edmark](#)  
**To:** [CPP INFO \\* DEQ](#)  
**Subject:** Climate Protection Plan Rules  
**Date:** Thursday, October 20, 2022 8:52:52 PM

---

Dear Oregon DEQ:

Please include "natural gas" companies in the regulations in the Climate Protection Plan Rules. Oxidation and combustion both produce carbon dioxide in the end. Using methane to produce hydrogen is not clean energy and defeats the purpose of the CCP and continues our path to worsening climate disaster.

Thank you. My daughter-in-law's family lost a home in the 2020 Oregon fires.

Sincerely, Kristin Edmark

**From:** [Linda Kubes](#)  
**To:** [CPP INFO \\* DEQ](#)  
**Subject:** don't be lobbied by gas giants  
**Date:** Thursday, October 20, 2022 5:54:18 PM

---

No to oxidized gas!!!!

**It is vital that we ensure there are no perceived loopholes for corporations to try to exploit and dodge climate regulation.**

**Support temporary rulemaking to close this exemption!**

- Oxidation is the chemical process that takes place *during combustion*.
- Combustion processes use surplus oxygen to ensure complete conversion *to CO2* and water vapor
- During oxidation, the level of oxygen is controlled to produce hydrogen and other combustible gases.
- *Oxidation process releases the same amount of CO2 as combustion*, but spread over both the oxidation process and any downstream combustion processes.
- The CPP must cover CO2 emissions *from all natural (methane) gas users*

Linda Kubes

**From:** [Maria Nazzaro](#)  
**To:** [CPP INFO \\* DEQ](#)  
**Subject:** Stop the loophole  
**Date:** Thursday, October 20, 2022 4:32:58 PM

---

Please regulate CO2 emissions from ALL natural gas users.

Than you,  
Maria

**From:** [John Livingston](#)  
**To:** [CPP INFO \\* DEQ](#)  
**Subject:** Livingston supports rulemaking to close loopholes on CO2 emissions  
**Date:** Thursday, October 20, 2022 4:24:08 PM

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**As a citizen of Oregon I strongly urge the DEQ to pass temporary rulemaking to close exemptions related to CO2. The specific areas are:**

- Oxidation is the chemical process that takes place *during combustion*.
- Combustion processes use surplus oxygen to ensure complete conversation *to CO2* and water vapor
- During oxidation, the level of oxygen is controlled to produce hydrogen and other combustible gases.
- *Oxidation process releases the same amount of CO2 as combustion*, but spread over both the oxidation process and any downstream combustion processes.
- The CPP must cover CO2 emissions *from all natural (methane) gas users*

*Please do not allow any industries to circumvent the intentions related to eliminating harmful emissions.*

*Sincerely, John Livingston, 6473 Doral Dr. SE Salem, Oregon, 97306*

## On the hope of a new year

by Amanda Gorman National Youth Poet.

May this be the day  
We come together.  
Mourning, we come to mend,  
Withered, we come to weather,  
Torn, we come to tend,  
Battered, we come to better.

Tethered by this year of yearning,  
We are learning  
That though we weren't ready for this,  
We have been readied by it.  
We steadily vow that no matter  
How we are weighed down,  
We must always pave a way forward.

*Excerpt from poem "New Day's Lyric."*

**From:** [KB Mercer](#)  
**To:** [CPP INFO \\* DEQ](#)  
**Subject:** Support of DEQ rulemaking to close Natural Gas Oxidation exemption  
**Date:** Thursday, October 20, 2022 1:35:09 PM

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To: DEQ  
Re: Rulemaking to close oxidation exemption for Natural Gas Companies' emissions standards

Dear Commissioners;

I am writing to express my concern and support for closing the oxidation loophole for Natural Gas (methane) Companies seeking an exemption from CPP emissions regulations. It is vital that all corporations using or selling fossil fuels like methane, whether oxidized or combusted or both, be regulated under CPP compliance rules.

Oxidation is not cleaner. It emits essentially as much pollution as combustion.

- Oxidation is the chemical process that takes place *during combustion*.
- Combustion processes use surplus oxygen to ensure complete conversation *to CO2* and water vapor
- During oxidation, the level of oxygen is controlled to produce hydrogen and other combustible gases.
- *Oxidation process releases the same amount of CO2 as combustion*, but spread over both the oxidation process and any downstream combustion processes.
- The CPP must cover CO2 emissions *from all natural (methane) gas users*

Please adopt temporary rulemaking to clarify that oxidation is a source of pollution that must be regulated by the terms of the Climate Protection Plan.

Thank you;

KB Mercer  
10811 SE Schiller St.  
Portland, OR 97266  
619 890 5399  
[kb@travelinglantern.com](mailto:kb@travelinglantern.com)

**From:** [phil barnhart](#)  
**To:** [CPP INFO \\* DEQ](#)  
**Subject:** Comment in support of CPP Temporary Rule set for hearing next week  
**Date:** Thursday, October 20, 2022 11:37:04 AM

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I strongly support rules that restrict and regulate the emission into the atmosphere, land or waters of Oregon of any greenhouse gas. Oxidized methane gas must be included in the regulatory system.

My understanding is that the temporary rule would clarify that oxidized methane gas will be covered by CPP rules. I strongly support the temporary rule. We must phase out the emission of greenhouse gases whatever the source as fast as possible.

Thanks,

Phil Barnhart  
Eugene, OR

--

Philip N Barnhart  
[Phil@philbarnhart.com](mailto:Phil@philbarnhart.com)  
Take action against climate change now

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**From:** Ben Basin <campaigns@good.do>  
**Sent:** Sunday, October 30, 2022 11:06 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Ben Basin

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Please reply to Ben Basin at ben\_basin@yahoo.com.

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**From:** Laurie Todd Todd <campaigns@good.do>  
**Sent:** Sunday, October 30, 2022 9:12 AM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Laurie L Todd Todd

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**From:** Patricia Patrón <campaigns@good.do>  
**Sent:** Saturday, October 29, 2022 11:05 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Patricia Patrón

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**From:** Stuart Liebowitz <campaigns@good.do>  
**Sent:** Friday, October 28, 2022 11:17 AM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Stuart Liebowitz

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Please reply to Stuart Liebowitz at dcglobalwarmingcoaition@gmail.com.

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**From:** Colleen Taylor <campaigns@good.do>  
**Sent:** Thursday, October 27, 2022 9:33 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Colleen Taylor

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This email was sent by Colleen Taylor via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Colleen provided an email address (colecانplay@comcast.net) which we included in the REPLY-TO field.

Please reply to Colleen Taylor at colecanplay@comcast.net.

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**From:** Valerie Snyder <campaigns@good.do>  
**Sent:** Thursday, October 27, 2022 3:41 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Valerie Snyder Snyder

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This email was sent by Valerie Snyder via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Valerie provided an email address (mvensnyder@yahoo.com) which we included in the REPLY-TO field.

Please reply to Valerie Snyder at mvensnyder@yahoo.com.

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**From:** Lisa Caine <campaigns@good.do>  
**Sent:** Thursday, October 27, 2022 2:37 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Lisa Caine

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This email was sent by Lisa Caine via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Lisa provided an email address (Lcaine530@gmail.com) which we included in the REPLY-TO field.

Please reply to Lisa Caine at Lcaine530@gmail.com.

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**From:** Marcia Mersky <campaigns@good.do>  
**Sent:** Thursday, October 27, 2022 2:04 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Marcia Mersky

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This email was sent by Marcia Mersky via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Marcia provided an email address (marciapdx@gmail.com) which we included in the REPLY-TO field.

Please reply to Marcia Mersky at marciapdx@gmail.com.

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**From:** William M. Musser IV <campaigns@good.do>  
**Sent:** Thursday, October 27, 2022 12:28 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
William M. Musser IV Musser IV

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This email was sent by William M. Musser IV via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however William M. provided an email address (wmusseriv@icloud.com) which we included in the REPLY-TO field.

Please reply to William M. Musser IV at wmusseriv@icloud.com.

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**From:** Emma DeFontes <campaigns@good.do>  
**Sent:** Thursday, October 27, 2022 12:07 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon have the resources necessary to the way on reducing climate emissions – they should not be trying to avoid accountability instead.

If Amazon's proposed new data centers in Oregon are run on gas-powered fuel cells as proposed, it will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Emma DeFontes

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This email was sent by Emma DeFontes via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Emma provided an email address (edefontes@gmail.com) which we included in the REPLY-TO field.

Please reply to Emma DeFontes at edefontes@gmail.com.

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**From:** Adam Gretzinger <campaigns@good.do>  
**Sent:** Thursday, October 27, 2022 10:57 AM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

Oregon DEQ:

Amazon should not be able to use Fossil Fuels and be exempt from GHG regulations. Please do not let them get away with it. I support CPP 2022. We must insist in green energy and fuels, and new pollution sources should not be allowed.

Yours sincerely,  
Adam Gretzinger

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This email was sent by Adam Gretzinger via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Adam provided an email address (adam.gretzinger@gmail.com) which we included in the REPLY-TO field.

Please reply to Adam Gretzinger at adam.gretzinger@gmail.com.

To learn more about Do Gooder visit

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**From:** David Muller Muller <campaigns@good.do>  
**Sent:** Thursday, October 27, 2022 10:33 AM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
David Muller Muller

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This email was sent by David Muller Muller via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however David Muller provided an email address (davidbmuller@yahoo.com) which we included in the REPLY-TO field.

Please reply to David Muller Muller at davidbmuller@yahoo.com.

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**From:** a schaffer <campaigns@good.do>  
**Sent:** Thursday, October 27, 2022 10:11 AM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

I care about ensuring our healthy climate future, and am concerned about Amazon seeking to expand fossil gas use in Eastern OR by evading regulation.

I support the Climate Protection Program, and want to ensure that its requirements are enforced. Companies like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon’s proposed new data centers in Oregon will result in increases in natural gas fracking and usage, resulting in mass amounts of greenhouse gas emissions.

I strongly support DEQ’s proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you,  
a schaffer

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This email was sent by a schaffer via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however a provided an email address (2piap@frontier.net) which we included in the REPLY-TO field.

Please reply to a schaffer at 2piap@frontier.net.

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**From:** Meagan Golec <campaigns@good.do>  
**Sent:** Thursday, October 27, 2022 10:00 AM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Meagan Golec

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This email was sent by Meagan Golec via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Meagan provided an email address (meagansar@gmail.com) which we included in the REPLY-TO field.

Please reply to Meagan Golec at meagansar@gmail.com.

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**From:** Stephen Bachhuber <campaigns@good.do>  
**Sent:** Thursday, October 27, 2022 9:18 AM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

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I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Stephen Bachhuber

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This email was sent by Stephen Bachhuber via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Stephen provided an email address (srbachhuber1@gmail.com) which we included in the REPLY-TO field.

Please reply to Stephen Bachhuber at srbachhuber1@gmail.com.

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**From:** Steve Hanrahan Hanrahan <campaigns@good.do>  
**Sent:** Thursday, October 27, 2022 8:36 AM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

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I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

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This email was sent by Steve Hanrahan Hanrahan via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Steve Hanrahan provided an email address (steve@lshanrahan.com) which we included in the REPLY-TO field.

Please reply to Steve Hanrahan Hanrahan at steve@lshanrahan.com.

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**From:** Margaret Dillender <campaigns@good.do>  
**Sent:** Thursday, October 27, 2022 8:09 AM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

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I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Margaret Dillender

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This email was sent by Margaret Dillender via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Margaret provided an email address (tekedillender@gmail.com) which we included in the REPLY-TO field.

Please reply to Margaret Dillender at tekedillender@gmail.com.

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**From:** Cooper Morrow <campaigns@good.do>  
**Sent:** Thursday, October 27, 2022 6:49 AM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

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I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Cooper Morrow

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This email was sent by Cooper Morrow via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Cooper provided an email address (coopmorrow@yahoo.com) which we included in the REPLY-TO field.

Please reply to Cooper Morrow at coopmorrow@yahoo.com.

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**From:** Gina Norman <campaigns@good.do>  
**Sent:** Thursday, October 27, 2022 6:13 AM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Gina Norman

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This email was sent by Gina Norman via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Gina provided an email address (ginan5@yahoo.com) which we included in the REPLY-TO field.

Please reply to Gina Norman at ginan5@yahoo.com.

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**From:** Mary McGaughey <campaigns@good.do>  
**Sent:** Thursday, October 27, 2022 1:25 AM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Mary McGaughey

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This email was sent by Mary McGaughey via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Mary provided an email address (marymcgaughey@yahoo.com) which we included in the REPLY-TO field.

Please reply to Mary McGaughey at marymcgaughey@yahoo.com.

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**From:** Lynn Cardiff <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 11:23 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

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I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Lynn Cardiff

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This email was sent by Lynn Cardiff via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Lynn provided an email address (lcardiff@comcast.net) which we included in the REPLY-TO field.

Please reply to Lynn Cardiff at lcardiff@comcast.net.

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<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CCPP.INFO%40deq.oregon.gov%7C02a5abb2bd6944518f4708dab7e3aa9c%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638024485704196446%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&reserved=0>

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**From:** L SorensenJolink <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 9:59 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

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I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
L Sorensen-Jolink

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This email was sent by L SorensenJolink via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however L provided an email address (lsorensenjolink@gmail.com) which we included in the REPLY-TO field.

Please reply to L SorensenJolink at lsorensenjolink@gmail.com.

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**From:** Dorothy Tharsing <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 9:08 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Dorothy Tharsing Tharsing

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This email was sent by Dorothy Tharsing via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Dorothy provided an email address (dtharsing@gmail.com) which we included in the REPLY-TO field.

Please reply to Dorothy Tharsing at dtharsing@gmail.com.

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**From:** Pamela Vasquez <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 8:58 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Pamela Vasquez

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This email was sent by Pamela Vasquez via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Pamela provided an email address (cayetanatabullo@gmail.com) which we included in the REPLY-TO field.

Please reply to Pamela Vasquez at cayetanatabullo@gmail.com.

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**From:** Susan Heath <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 8:54 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Susan Heath

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This email was sent by Susan Heath via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Susan provided an email address (forbux@hotmail.com) which we included in the REPLY-TO field.

Please reply to Susan Heath at forbux@hotmail.com.

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**From:** Estelle Voeller Voeller <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 8:53 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Estelle Voeller Voeller

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This email was sent by Estelle Voeller Voeller via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Estelle Voeller provided an email address (evoeller@charter.net) which we included in the REPLY-TO field.

Please reply to Estelle Voeller Voeller at evoeller@charter.net.

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**From:** Birgitta Carlson <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 8:39 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Birgitta Carlson

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This email was sent by Birgitta Carlson via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Birgitta provided an email address (baswede1@gmail.com) which we included in the REPLY-TO field.

Please reply to Birgitta Carlson at baswede1@gmail.com.

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**From:** Phil Houston Goldsmith <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 8:34 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Phil Houston Goldsmith

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This email was sent by Phil Houston Goldsmith via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Phil provided an email address (phil@lopglaw.com) which we included in the REPLY-TO field.

Please reply to Phil Houston Goldsmith at phil@lopglaw.com.

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**From:** Michael Horenstein <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 8:31 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Michael Horenstein

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This email was sent by Michael Horenstein via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Michael provided an email address (mthorenstein@gmail.com) which we included in the REPLY-TO field.

Please reply to Michael Horenstein at mthorenstein@gmail.com.

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**From:** Tabitha Boschetti <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 7:58 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

Oregon's Climate Protection Program is critical to protecting the future of our state and our society. To work, regulations must be applied without loopholes and special exceptions for players with deep pockets or loud voices. I am concerned to hear that Amazon is seeking to expand fossil gas use while attempting to squirm out of standards under the Climate Protection Program.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. While we all use data centers, Amazon is perfectly well positioned to manage the externalities of this impact, and should be pushed to do better, sooner.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Sincerely,  
Tabitha Boschetti

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This email was sent by Tabitha Boschetti via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Tabitha provided an email address (tabitha.bos@gmail.com) which we included in the REPLY-TO field.

Please reply to Tabitha Boschetti at tabitha.bos@gmail.com.

To learn more about Do Gooder visit

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CCPP.INFO%40deq.oregon.gov%7C7401d711dd704b4b159008dab7c71663%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638024362959556514%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikk1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sd=OAKAmxLfPMw%2FQJFWWF1CznAW0zomtk7Ok%2FLM5PuTMAw%3D&reserved=0>

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**From:** Suzanne Zuniga <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 7:33 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

I am an Amazon Prime member but I WILL cancel my membership if Amazon does not meet the Climate Protection Program.

Thank you.

Yours sincerely,  
Suzanne Zuniga

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This email was sent by Suzanne Zuniga via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Suzanne provided an email address (suzuniga@icloud.com) which we included in the REPLY-TO field.

Please reply to Suzanne Zuniga at [suzuniga@icloud.com](mailto:suzuniga@icloud.com).

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**From:** Suzanna Nadler <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 7:28 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Suzanna Nadler

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This email was sent by Suzanna Nadler via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Suzanna provided an email address (yayaalisuz@gmail.com) which we included in the REPLY-TO field.

Please reply to Suzanna Nadler at yayaalisuz@gmail.com.

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**From:** Philip Wu <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 6:57 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Philip Wu

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This email was sent by Philip Wu via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Philip provided an email address (philwupdx@mac.com) which we included in the REPLY-TO field.

Please reply to Philip Wu at philwupdx@mac.com.

To learn more about Do Gooder visit

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**From:** Debra Saude <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 6:40 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Debra Saude

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This email was sent by Debra Saude via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Debra provided an email address (deanndeb@centurytel.net) which we included in the REPLY-TO field.

Please reply to Debra Saude at deanndeb@centurytel.net.

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**From:** Elyce M Benham <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 6:33 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Elyce M Benham

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This email was sent by Elyce M Benham via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Elyce M provided an email address (elyce.benham@yahoo.com) which we included in the REPLY-TO field.

Please reply to Elyce M Benham at elyce.benham@yahoo.com.

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**From:** Hanna Heddy <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 6:32 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Hanna Heddy

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This email was sent by Hanna Heddy via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Hanna provided an email address (hannaheddy@hotmail.com) which we included in the REPLY-TO field.

Please reply to Hanna Heddy at hannaheddy@hotmail.com.

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**From:** Stephen Bomber Bomber <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 6:25 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use violating climate regulation under Oregon's Climate Protection Program.

The climate crisis requires immediate action. I support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Stephen Bomber Bomber

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This email was sent by Stephen Bomber Bomber via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Stephen Bomber provided an email address (stvbomb@yahoo.com) which we included in the REPLY-TO field.

Please reply to Stephen Bomber Bomber at stvbomb@yahoo.com.

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**From:** Judy Wilcox <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 5:56 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Judy Wilcox Wilcox

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This email was sent by Judy Wilcox via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Judy provided an email address (judytaylorwilcox@comcast.net) which we included in the REPLY-TO field.

Please reply to Judy Wilcox at judytaylorwilcox@comcast.net.

To learn more about Do Gooder visit

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**From:** Jenna Garmon Garmon <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 5:55 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Jenna Garmon Garmon

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This email was sent by Jenna Garmon Garmon via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Jenna Garmon provided an email address (garmonita@gmail.com) which we included in the REPLY-TO field.

Please reply to Jenna Garmon Garmon at garmonita@gmail.com.

To learn more about Do Gooder visit

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**From:** Cheryl Bristah <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 5:47 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Cheryl Bristah

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This email was sent by Cheryl Bristah via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Cheryl provided an email address (cherylbristah@gmail.com) which we included in the REPLY-TO field.

Please reply to Cheryl Bristah at cherylbristah@gmail.com.

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**From:** Carol Gold <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 5:47 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Carol Gold

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This email was sent by Carol Gold via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Carol provided an email address (cggum@yahoo.com) which we included in the REPLY-TO field.

Please reply to Carol Gold at cggum@yahoo.com.

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<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CCPP.INFO%40deq.oregon.gov%7C514d96e32ee64b5f84e808dab7b4b359%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C638024283972266491%7CUnknown%7CTWFpbGZsb3d8eyJWlloiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IkhhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=z%2BklBJOUgaME3xb00i6OGP9YLUljyFa7Ob7KYZleMz4%3D&reserved=0>

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**From:** Janet Weil <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 5:39 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program. Amazon is not an ethical business, and I never order from Amazon.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Janet Weil

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This email was sent by Janet Weil via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Janet provided an email address (janet.weil13@gmail.com) which we included in the REPLY-TO field.

Please reply to Janet Weil at janet.weil13@gmail.com.

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**From:** dorinda kelley <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 5:35 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
dorinda kelley

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This email was sent by dorinda kelley via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however dorinda provided an email address (dorindask@gmail.com) which we included in the REPLY-TO field.

Please reply to dorinda kelley at dorindask@gmail.com.

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**From:** John Nettleton <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 5:30 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
John Nettleton

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This email was sent by John Nettleton via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however John provided an email address (jpn5710@yahoo.com) which we included in the REPLY-TO field.

Please reply to John Nettleton at jpn5710@yahoo.com.

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**From:** Deborah Clark <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 5:17 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As a mother, grandmother, and scientist, addressing the climate emergency is a priority for me. Thus, I am very disturbed that Amazon is seeking approval to build several energy-intensive data centers in Eastern Oregon. These data centers will use on-site fuel cells that run on fossil gas and will result in an enormous increase in gas use and greenhouse gas emissions.

I am dismayed that Amazon is arguing that this approach is exempt from Oregon's cornerstone Climate Protection Program. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended.

I understand that the Department of Environmental Quality has announced a temporary rulemaking process to clarify the Climate Protection Program rules and ensure there are no perceived loopholes for corporations to try to exploit and dodge climate regulation. I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Giant corporations like Amazon should be leading the way on reducing climate emissions because they have every means to do so – not trying to avoid accountability.

Thank you.

Yours sincerely,  
Deborah Clark

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This email was sent by Deborah Clark via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Deborah provided an email address (deborah.clark@lifetime.oregonstate.edu) which we included in the REPLY-TO field.

Please reply to Deborah Clark at [deborah.clark@lifetime.oregonstate.edu](mailto:deborah.clark@lifetime.oregonstate.edu).

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**From:** Nancy Phillips <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 5:17 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon. I am also an Amazon Prime member and believe it's even more important to speak up since we have experienced severe drought, a huge wildfire next to us this summer and worry that Amazon isn't the kind of company we should be supporting anymore with our hard earned money by being a prime member.

Thank you.

Yours sincerely,  
Nancy Phillips

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This email was sent by Nancy Phillips via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Nancy provided an email address (harp8392@gmail.com) which we included in the REPLY-TO field.

Please reply to Nancy Phillips at harp8392@gmail.com.

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**From:** Robert Miller <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 5:04 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Robert Miller

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This email was sent by Robert Miller via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Robert provided an email address (rbmiller@lclark.edu) which we included in the REPLY-TO field.

Please reply to Robert Miller at rbmiller@lclark.edu.

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**From:** Debra Smith <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 4:54 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Debra Smith

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This email was sent by Debra Smith via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Debra provided an email address (rubydeb5@yahoo.com) which we included in the REPLY-TO field.

Please reply to Debra Smith at rubydeb5@yahoo.com.

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**From:** Marianne nelson <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 4:52 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Marianne nelson

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This email was sent by Marianne nelson via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Marianne provided an email address (manelson316@yahoo.com) which we included in the REPLY-TO field.

Please reply to Marianne nelson at manelson316@yahoo.com.

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**From:** Denise Duren <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 4:47 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Denise Duren

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This email was sent by Denise Duren via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Denise provided an email address (duren.denise@gmail.com) which we included in the REPLY-TO field.

Please reply to Denise Duren at duren.denise@gmail.com.

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**From:** Clifford Myers <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 4:41 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

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I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Clifford Myers

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This email was sent by Clifford Myers via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Clifford provided an email address (wizardg@aol.com) which we included in the REPLY-TO field.

Please reply to Clifford Myers at wizardg@aol.com.

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**From:** Linda Flanders <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 4:30 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Linda Flanders

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This email was sent by Linda Flanders via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Linda provided an email address (linderflan@yahoo.com) which we included in the REPLY-TO field.

Please reply to Linda Flanders at linderflan@yahoo.com.

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**From:** Joe Walicki <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 4:28 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

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I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Joe Walicki

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This email was sent by Joe Walicki via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Joe provided an email address (joewalicki@comcast.net) which we included in the REPLY-TO field.

Please reply to Joe Walicki at joewalicki@comcast.net.

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**From:** Cheri Laos <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 4:24 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Cheri Laos

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This email was sent by Cheri Laos via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Cheri provided an email address (cheryllaos@yahoo.com) which we included in the REPLY-TO field.

Please reply to Cheri Laos at cheryllaos@yahoo.com.

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**From:** Jenny Pompilio <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 4:21 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian, physician, public health advocate and mother who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Jenny Pompilio

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This email was sent by Jenny Pompilio via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Jenny provided an email address (jpompilio@usa.net) which we included in the REPLY-TO field.

Please reply to Jenny Pompilio at jpompilio@usa.net.

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**From:** Joyce De Monnin <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 4:19 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

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I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Joyce De Monnin

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This email was sent by Joyce De Monnin via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Joyce provided an email address (safety-manses-0g@icloud.com) which we included in the REPLY-TO field.

Please reply to Joyce De Monnin at safety-manses-0g@icloud.com.

To learn more about Do Gooder visit

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**From:** Cherine Bauer <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 4:14 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

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I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Cherine Bauer

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This email was sent by Cherine Bauer via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Cherine provided an email address (cherinel@comcast.net) which we included in the REPLY-TO field.

Please reply to Cherine Bauer at cherinel@comcast.net.

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**From:** Nancy Carl <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 4:07 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Nancy Carl

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This email was sent by Nancy Carl via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Nancy provided an email address (dlnlcarl2@gmail.com) which we included in the REPLY-TO field.

Please reply to Nancy Carl at dlnlcarl2@gmail.com.

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**From:** Dena Turner <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 4:00 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Dena Turner

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This email was sent by Dena Turner via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Dena provided an email address (denaturn62@gmail.com) which we included in the REPLY-TO field.

Please reply to Dena Turner at denaturn62@gmail.com.

To learn more about Do Gooder visit

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**From:** Alice Elshoff <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 3:59 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Alice Elshoff

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This email was sent by Alice Elshoff via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Alice provided an email address (calice58@gmail.com) which we included in the REPLY-TO field.

Please reply to Alice Elshoff at calice58@gmail.com.

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**From:** Juliae Riva <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 3:51 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

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I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Juliae Riva

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This email was sent by Juliae Riva via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Juliae provided an email address (juliae.riva1@gmail.com) which we included in the REPLY-TO field.

Please reply to Juliae Riva at juliae.riva1@gmail.com.

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**From:** Jean Lofy <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 3:43 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

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I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Jean Lofy

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This email was sent by Jean Lofy via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Jean provided an email address (jeanlofy@gmail.com) which we included in the REPLY-TO field.

Please reply to Jean Lofy at jeanlofy@gmail.com.

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**From:** Joshua Munger <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 3:43 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Joshua Munger

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This email was sent by Joshua Munger via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Joshua provided an email address (josh.munger@gmail.com) which we included in the REPLY-TO field.

Please reply to Joshua Munger at [josh.munger@gmail.com](mailto:josh.munger@gmail.com).

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---

**From:** Alice West <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 3:39 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Alice West

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This email was sent by Alice West via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Alice provided an email address (agentsassysquirrel@hotmail.com) which we included in the REPLY-TO field.

Please reply to Alice West at agentsassysquirrel@hotmail.com.

To learn more about Do Gooder visit

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**From:** William Obrien <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 3:37 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

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I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
William Obrien

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This email was sent by William Obrien via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however William provided an email address (wobobr123@yahoo.com) which we included in the REPLY-TO field.

Please reply to William Obrien at wobobr123@yahoo.com.

To learn more about Do Gooder visit

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**From:** Heather Stein <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 3:29 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

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I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Heather Stein

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This email was sent by Heather Stein via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Heather provided an email address (heatherdoc66@gmail.com) which we included in the REPLY-TO field.

Please reply to Heather Stein at heatherdoc66@gmail.com.

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<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CCPP.INFO%40deq.oregon.gov%7C39d231e711124689e95608dab7a1779e%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C638024201384427617%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikh1aWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=Z6G0dNj2DrkGz8%2FfOOvlygSQX2bM%2FIn26V0RCrNq49I%3D&reserved=0>

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**From:** Judith Lienhard <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 3:25 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Judith Lienhard

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This email was sent by Judith Lienhard via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Judith provided an email address (lienjud@aol.com) which we included in the REPLY-TO field.

Please reply to Judith Lienhard at lienjud@aol.com.

To learn more about Do Gooder visit

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**From:** Karen Smith <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 3:25 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Karen Smith

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This email was sent by Karen Smith via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Karen provided an email address (kmsmith42@gmail.com) which we included in the REPLY-TO field.

Please reply to Karen Smith at kmsmith42@gmail.com.

To learn more about Do Gooder visit

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**From:** John Tangney <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 3:23 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

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I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
John Tangney

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This email was sent by John Tangney via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however John provided an email address (jctangney@comcast.net) which we included in the REPLY-TO field.

Please reply to John Tangney at jctangney@comcast.net.

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<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CCPP.INFO%40deq.oregon.gov%7C6efc7c0465f6414ee57908dab7a0b4b8%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638024198098939226%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&data=6QvGIVJnA2jEuWf6faTqOfDNNvPRRxtpbaUO1iTHfKA%3D&am p;reserved=0>

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**From:** ilene moss <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 3:21 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you,  
ilene moss

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This email was sent by ilene moss via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however ilene provided an email address (abilene9@comcast.net) which we included in the REPLY-TO field.

Please reply to ilene moss at abilene9@comcast.net.

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**From:** Meghane Hardin <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 3:17 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Meghane Hardin

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This email was sent by Meghane Hardin via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Meghane provided an email address (meghane.hardin@gmail.com) which we included in the REPLY-TO field.

Please reply to Meghane Hardin at meghane.hardin@gmail.com.

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**From:** Bruce Schacht <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 3:16 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Bruce Schacht

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This email was sent by Bruce Schacht via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Bruce provided an email address (bruce\_s@columbiasteel.com) which we included in the REPLY-TO field.

Please reply to Bruce Schacht at bruce\_s@columbiasteel.com.

To learn more about Do Gooder visit

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**From:** Dana Petre-Miller Petre-Miller <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 3:14 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Dana Petre-Miller Petre-Miller

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This email was sent by Dana Petre-Miller Petre-Miller via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Dana Petre-Miller provided an email address (mraltogether@comcast.net) which we included in the REPLY-TO field.

Please reply to Dana Petre-Miller Petre-Miller at mraltogether@comcast.net.

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**From:** David Nichols <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 3:12 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program, and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
David Nichols

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This email was sent by David Nichols via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however David provided an email address (davemult@aol.com) which we included in the REPLY-TO field.

Please reply to David Nichols at davemult@aol.com.

To learn more about Do Gooder visit

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CCPP.INFO%40deq.oregon.gov%7C53f59422af6d4086a3c708dab79f3239%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638024191615049027%7CUnknown%7CTWFpbGZsb3d8eyJWljoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikl1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&data=b30tfKkbCCfTg3vKXQASbgpXwvxfO74ReLve9t4wxqM%3D&mp;reserved=0>

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**From:** Dana Weintraub <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 3:12 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

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I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Dana Weintraub

---

This email was sent by Dana Weintraub via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Dana provided an email address (mrdanaweintraub@tutanota.com) which we included in the REPLY-TO field.

Please reply to Dana Weintraub at mrdanaweintraub@tutanota.com.

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**From:** Juanita Rinas <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 3:10 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

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I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Juanita Rinas

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This email was sent by Juanita Rinas via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Juanita provided an email address (solacdncs@yahoo.com) which we included in the REPLY-TO field.

Please reply to Juanita Rinas at solacdncs@yahoo.com.

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**From:** Thomas Stibolt <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 3:09 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares very deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and evade climate regulation under Oregon's cornerstone Climate Protection Program.

The climate crisis requires an all-hands-on-deck approach. I strongly support the Climate Protection Program and want to ensure that this program's requirements are enforced as intended. Giant corporations like Amazon should be leading the way on reducing climate emissions – not trying to avoid accountability.

Amazon's proposed new data centers in Oregon will result in an enormous increase in gas use and greenhouse gas emissions. With ever-worsening climate impacts like extreme heat, wildfires and drought impacting the lives and livelihoods of Oregonians across the state, the last thing we need is a major new fossil gas source coming to Oregon.

I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Thomas Stibolt Stibolt

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This email was sent by Thomas Stibolt via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Thomas provided an email address (stibolt@stanfordalumni.org) which we included in the REPLY-TO field.

Please reply to Thomas Stibolt at stibolt@stanfordalumni.org.

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**From:** Janell Brittain <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 3:09 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

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I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Janell Brittain

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This email was sent by Janell Brittain via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Janell provided an email address (janellb@oeonline.org) which we included in the REPLY-TO field.

Please reply to Janell Brittain at janellb@oeonline.org.

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**From:** Terry Robson <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 3:09 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

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I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Terry Robson

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This email was sent by Terry Robson via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Terry provided an email address (robsont@aol.com) which we included in the REPLY-TO field.

Please reply to Terry Robson at robsont@aol.com.

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**From:** Emily Herbert <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 3:09 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

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I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Emily Herbert

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This email was sent by Emily Herbert via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Emily provided an email address (ewh1960@gmail.com) which we included in the REPLY-TO field.

Please reply to Emily Herbert at ewh1960@gmail.com.

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**From:** Sasha Pollack <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 3:08 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

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I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Sasha Pollack

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This email was sent by Sasha Pollack via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Sasha provided an email address (sillahee@gmail.com) which we included in the REPLY-TO field.

Please reply to Sasha Pollack at [sillahee@gmail.com](mailto:sillahee@gmail.com).

To learn more about Do Gooder visit

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CCPP.INFO%40deq.oregon.gov%7Cf5653b9c37ac420d348008dab79e82a7%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C638024188665248084%7CUnknown%7CTWFpbGZsb3d8eyJWljoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&data=LJ%2B%2FielUWOv9wpASbaGrGlZa6MA7ogOMXzd%2FSP%2Bi0Z0%3D&reserved=0>

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**From:** Dylan Lamar <campaigns@good.do>  
**Sent:** Wednesday, October 26, 2022 3:07 PM  
**To:** CPP INFO \* DEQ  
**Subject:** Public comment re: support for CPP 2022 rulemaking

As an Oregonian who cares deeply about ensuring a healthy climate future, I am extremely concerned that Amazon is seeking to expand fossil gas use and dodge climate regulation under Oregon's cornerstone Climate Protection Program.

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I strongly support DEQ's proposed rulemaking to clarify and affirm that the requirements of the Climate Protection Program apply to gas utilities that supply their fossil fuels to giant corporations like Amazon.

Thank you.

Yours sincerely,  
Dylan Lamar

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This email was sent by Dylan Lamar via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Dylan provided an email address (lamar.dylan@gmail.com) which we included in the REPLY-TO field.

Please reply to Dylan Lamar at lamar.dylan@gmail.com.

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**From:** [Lenny Dee](#)  
**To:** [CPP INFO \\* DEQ](#)  
**Subject:** Oxidized Gas Should Be Covered By CPP  
**Date:** Friday, October 21, 2022 10:03:10 AM

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Hi,

- Oxidation is the chemical process that takes place *during combustion*.
- Combustion processes use surplus oxygen to ensure complete conversion *to CO2* and water vapor
- During oxidation, the level of oxygen is controlled to produce hydrogen and other combustible gases.
- *Oxidation process releases the same amount of CO2 as combustion*, but spread over both the oxidation process and any downstream combustion processes.
- The CPP must cover CO2 emissions *from all natural (methane) gas users*

Lenny Dee  
Onward Oregon  
Your Oregon Information Source  
<https://onwardoregon.org/>