

August 17, 2022

Dear Attorney General Ellen Rosenblum,

The undersigned individuals and organizations are writing to highlight the misleading advertising and communications of the state-regulated methane gas utility NW Natural, one of the largest fossil fuel corporations in the State of Oregon. We are calling on the Oregon Department of Justice to take action to investigate these activities and to protect residents from the increasingly harmful actions of a desperate company using unconscionable tactics in an attempt to prevent regulation of its poisonous product.

In the past few years, concerns about the impacts that “natural” methane gas has on our climate, public health, and safety have become increasingly prominent.<sup>1</sup> Methane, an extremely potent greenhouse gas, is 86 times more powerful than carbon dioxide in driving climate change over a 20 year period. As research about the various impacts of methane grows, international bodies such as the Intergovernmental Panel on Climate Change (IPCC) call for dramatic methane emissions reductions as in their most recent report.<sup>2</sup> In addition, on June 14th, the American Medical Association adopted a resolution highlighting the harms of methane gas in homes, explicitly stating that methane from gas stoves increases household air pollution and childhood asthma rates.<sup>3</sup> Currently, around 60% of global methane emissions are due to human activities, with the primary source being the oil and methane gas industry. Unfortunately, even though climate science shows the urgent need to divest from fossil fuels, it is easy for fossil fuel corporations to spread climate misinformation and climate disinformation amongst their networks. Climate misinformation is the sharing of false or incorrect climate change information, while climate disinformation is when someone deliberately spreads information with the intent to mislead.

The [Fossil Free Eugene coalition](#) is a group of organizations that advocate for racial, economic, and climate justice across the City of Eugene. Our network includes [the National Association for the Advancement of Colored People \(NAACP\) of Eugene-Springfield](#), the [Springfield Eugene Tenants Association \(SETA\)](#), Sunrise Eugene, and many more. Together, we have been advocating for equitable policies to transition buildings to clean, renewable electricity and away from polluting methane gas.

In response to the growing evidence of climate consequences from methane and the activism of the Fossil Free Eugene Coalition and communities across their distribution area, NW Natural has engaged in an escalating propaganda campaign to mislead its customers, elected officials, and Oregonians at large. NW Natural’s goal is to prevent critical climate policies which would help governments reduce emissions in line with Governor Brown’s Executive Order 20-04. Laid out below are several examples of how NW

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<sup>1</sup> “Methane: A Dangerous Problem, An Easy Solution”, EarthJustice, November 2, 2021, <https://earthjustice.org/features/methane-everything-you-need-to-know>.

<sup>2</sup> Sixth Assessment Report Working Group III: Climate Mitigation, “Headline Statements from the Summary for Policymakers”, Intergovernmental Panel on Climate Change (IPCC), April 4 2022, [https://report.ipcc.ch/ar6wg3/pdf/IPCC\\_AR6\\_WGIII\\_HeadlineStatements.pdf](https://report.ipcc.ch/ar6wg3/pdf/IPCC_AR6_WGIII_HeadlineStatements.pdf).

<sup>3</sup> See recent recommendations made by the American Medical Association: American Medical Association House of Delegates (A-22), Draft Report of Reference Committee D, Resolution 439, p. 16, <https://www.ama-assn.org/system/files/a22-refcmt-d-report-annotated.pdf>.

Natural is participating in the dangerous spread of misinformation and disinformation related to climate, clean energy, and the health impacts of methane gas:

- NW Natural staff has provided misleading verbal and written communication and testimony to the Eugene City Council.<sup>4</sup>
- NW Natural government affairs staff has sent emails obfuscating the growing body of science on the impacts of gas on public health.<sup>5</sup>
- NW Natural has spent tens of thousands of dollars to distribute propaganda for children in the form of workbooks and curriculums that mislead the audience about the safety of their products.<sup>6</sup>
- NW Natural has spread misinformation about the viability of decarbonizing its business through “renewable” natural gas (RNG) and green hydrogen.<sup>7</sup>
- NW Natural has taken out full-page advertisements in local newspapers using scare tactics and disinformation to gin up opposition to climate policies.<sup>8</sup>
- NW Natural has published opinion pieces in local newspapers promoting non-viable pathways to decarbonization, including RNG and green hydrogen.<sup>9</sup>

In testimony to the Oregon Public Utility Commission regarding NW Natural’s ongoing rate case, Greer Ryan, Clean Buildings Policy Manager with Climate Solutions, stated:

NW Natural seeks recovery from ratepayers for advertising that falsely promotes gas as a climate-friendly solution, misleads the public regarding the company’s renewable energy investments and carbon footprint, and influences school children—who are not ratepayers—to encourage them to think positively about fossil gas, promotes connecting to gas utility service, promotes the use of gas appliances, and encourages fuel switching from electric to gas appliances. NW Natural marketed its gas utility service to school children—encouraging them to associate fossil gas with baking cookies, pizza, clean clothes, and dinosaurs... The primary purpose of these booklets is to promote the continued use and consumption of fossil gas by influencing public opinion, in this case—the next generation. While these booklets contain some information

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<sup>4</sup> City of Eugene Public Meetings, “City Council Meeting”, April 11, 2022, [https://www.youtube.com/watch?v=4eOMT\\_L3E\\_w&t=1920s](https://www.youtube.com/watch?v=4eOMT_L3E_w&t=1920s); City of Eugene Public Meetings, “City Council Meeting”, March 8, 2021 [https://www.youtube.com/watch?v=OieF0ujD-\\_o&t=5634s](https://www.youtube.com/watch?v=OieF0ujD-_o&t=5634s).

<sup>5</sup> NW Natural, email to Eugene City Manager Sarah Medary, March 3, 2021, <https://drive.google.com/file/d/1rQyh0-Xsi3vFwn-D4wSRk5WIDKfP6BNb/view?usp=sharing>; NW Natural's Request for a General Rate Revision, Docket No. UG 435, “Rebuttal and Cross-Answering Testimony by Coalition of Communities of Color, Climate Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy Project, and Sierra Club (“Coalition”)” at page 863, June 30, 2022, <https://edocs.puc.state.or.us/efdocs/HTB/ug435htb173818.pdf>.

<sup>6</sup> Nick Cunningham, “Gas Utility Sends Kid-Friendly Activity Books to Oregon Schools”, DeSmog, May 25, 2022, <https://www.desmog.com/2022/05/25/northwest-natural-gas-utility-oregon-schools-booklets/>.

<sup>7</sup> Nick Cunningham, “Oregon Gas Utility Wants to Bill Customers Millions for Executive Bonuses and ‘Misleading Advertising’”, DeSmog, May 9, 2022, <https://www.desmog.com/2022/05/09/oregon-nw-natural-gas-rate-increase-earthjustice/>.

<sup>8</sup> Register Guard, NW Natural Advertisement, May 22, 2022, <https://drive.google.com/file/d/1dVhDXJlUVQq4U6EAYO8kuCnv3OxrR7Sm/view>

<sup>9</sup> David H. Anderson, “NW Natural: Collaborating for Our Energy Future”, The Register-Guard, February 20, 2021, <https://www.registerguard.com/story/opinion/columns/2021/02/20/nw-natural-collaborating-our-energy-future/4491038001/>.

about safety hazards associated with gas utility services, the majority of their contents seek to promote fossil gas as a fuel source to the reader by associating it with things that children often love, including dinosaurs, pizza, baseball, and cookies. The books also contain propaganda about the environmental impacts of fossil gas, describing it as “clean,” “efficient,” and “safe.” In another example of the promotional intent of the pamphlets, they discuss and promote the use of fossil gas as a vehicle fuel.<sup>10</sup>

It is particularly concerning that school children are being subjected to misinformation from corporate entities of any kind, but especially by a fossil fuel corporation selling a product that is harmful to children’s health. A growing body of research shows that children are disproportionately harmed by indoor air quality from fossil fuel gas use in homes.<sup>11</sup> For example, one meta-analysis study shows that children who grow up with gas stoves in their homes have a 42 percent increase in asthma symptoms. NW Natural fails to disclose this and other negative impacts of methane gas in their materials, and otherwise obfuscates the harms of their product.<sup>12</sup> NW Natural’s advertising and materials downplay the health risks of cooking with gas by stating that all forms of cooking impact indoor air quality, implying that electric and gas stoves affect health in similar ways. They also create the misleading impression that ventilation will protect the user from negative effects when recent studies have shown that the effectiveness of vent hoods vary widely.<sup>13</sup> NW Natural surely has more knowledge of the negative impact of gas than their advertising conveys and it is plausible that the gas corporation is intentionally attempting to bury this information.

Beyond explicitly propagandizing children with false information, NW Natural is also participating in greenwashing to improve its corporate image. [Greenwashing](#) is the practice of making false, misleading, unsubstantiated, or otherwise incomplete claims about the sustainability of a product, service, or business operation. This occurs when corporations wish to appear engaged in rigorous environmental social governance analysis. NW Natural is working overtime to mislead ratepayers, elected officials, government staff, regulators, and Oregon residents about the availability and viability of RNG. For example, NW Natural released advertisements promoting the fuel “[on its way home](#)” and “can be delivered through our existing pipeline to your home or business.” This RNG advertising aims to improve NW Natural’s corporate image by associating its gas utility service with renewable energy, including wind turbines and solar power. Not only that, it is used as an effort to refute the growing body of evidence that supports electrification as the fastest and most effective means of decarbonizing in the building sector.

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<sup>10</sup> NW Natural’s Request for a General Rate Revision, Docket No. UG 435, “Opening Testimony of Intervenors: Coalition of Communities of Color, Climate Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy Project, and Sierra Club” at page 225, June 30, 2022, <https://edocs.puc.state.or.us/efdocs/HTB/ug435htb16597.pdf>

<sup>11</sup> David Roberts, “Gas Stoves Can Generate Unsafe Levels of Indoor Air Pollution”, Vox, May 11, 2020, <https://www.vox.com/energy-and-environment/2020/5/7/21247602/gas-stove-cooking-indoor-air-pollution-health-risks>.

<sup>12</sup> Weiwei Lin, Bert Brunekreef, and Ulrike Gehring, “Meta-Analysis of the Effects of Indoor Nitrogen Dioxide and Gas Cooking on Asthma and Wheeze in Children”, International Journal of Epidemiology, August 20, 2013, <https://academic.oup.com/ije/article/42/6/1724/737113>.

<sup>13</sup> Iain Walker, Brett Singer, and Chan Rengie, “Ventilation and Measured IAQ in New US Homes”, Lawrence Berkeley National Laboratory--Energy Technologies Area, October 2019, <https://escholarship.org/content/qt44f554wf/qt44f554wf.pdf>.

Promoting RNG is one of the primary tactics that methane gas companies are using to greenwash their product. Contrary to what gas corporations like NW Natural would have Oregonians believe, RNG is not a viable climate-friendly alternative because it is costly to acquire, the supply of source material is minimal, and it still requires fossil fuel infrastructure.<sup>14</sup> To date, none of NW Natural's agreements to purchase renewable energy credits provide RNG service to commercial or residential gas utility customers in Oregon. For example, NW Natural informed ratepayers that the Lexington RNG project would provide enough gas to "heat 18,000 homes we serve in Oregon."<sup>15</sup> However, none of the RNG produced from the Lexington Project is piped to residential customers in Oregon. NW Natural has only purchased the renewable thermal credit associated with RNG production from the Lexington project, but it intends to sell the actual gas to out-of-state utilities.<sup>16</sup>

In light of the explicit efforts that NW Natural is taking to prevent regulation by misleading the public about the impacts of methane gas, the undersigned individuals and organizations strongly urge the Department of Justice to take action to investigate the activities of NW Natural and protect residents and ratepayers from their dangerous propaganda campaign and their toxic product.

Thank you for your consideration,

Nora Apter, Climate Program Director, Oregon Environmental Council

Phil Barnhart, Former Oregon State Representative, District 40

Danny Cage, Student Representative to the Portland Public School Board of Education Policy Committee

WLnsvay Campos, Oregon State Representative, District 28

Cathryn Chudy, Board of Directors, Oregon Conservancy Foundation

Aya Cockram, Coalition Coordinator, Fossil Free Eugene

Bethany Cotton, Conservation Director, Cascadia Wildlands

Sue Craig, Board Member, Oregon Unitarian Universalist Voices for Justice

Adah Crandall, Organizer, Portland Youth Climate Strike

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<sup>14</sup> "Renewable Natural Gas (RNG): Reality vs Rhetoric", Sierra Club, December 8 2020, <https://www.sierraclub.org/minnesota/blog/2020/12/renewable-natural-gas-rng-reality-vs-rhetoric>.

<sup>15</sup> "NW Natural and BioCarbN Form Innovative Renewable Natural Gas Partnership with Tyson Foods", BusinessWire, January 7, 2021, <https://www.businesswire.com/news/home/20210107005874/en/>.

<sup>16</sup> NW Natural's Request for a General Rate Revision, Docket No. UG 435, "Opening Testimony of Intervenors: Coalition of Communities of Color, Climate Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy Project, and Sierra Club" at page 21, June 30, 2022, <https://edocs.puc.state.or.us/efdocs/HTB/ug435htb16597.pdf>

Lenny Dee, President, Onward Oregon

Julia Degraw, Coalition Director, Oregon League of Conservation Voters

Laurie Dougherty, Co-Coordinator, 350 Salem

Mark Gamba, Mayor, City of Milwaukie

Debby Garman, Team Lead, 350 Washington County

Samantha Hernandez, Climate Justice Organizer, Oregon Physicians for Social Responsibility

Debra Higbee-Sudyka, Conservation Committee Chair, Oregon Chapter Sierra Club

Patricia Hine, President, 350 Eugene

Paige Hopkins, Climate Justice Organizer, Beyond Toxics

Kyle Purdy, Organizer, Sunrise Eugene

Alan Journet, Co-facilitator, Southern Oregon Climate Action Now

Matt Keating, Eugene City Councilor, Ward 2

Casey Kulla, Yamhill County Commissioner, Vice-Chair

Stuart Liebowitz, Facilitator, Douglas County Global Warming Coalition

Eloise Navarro, Co-Director, University of Oregon Climate Justice League

Dineen O'Rourke, Campaign Manager, 350PDX

Miles Pendleton, President, Eugene-Springfield NAACP

Khanh Pham, Oregon State Representative, District 46

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Jennifer Schram, Co-Lead, Divest Oregon

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Jesús Ramírez Silva, Secretary, Eugene Students' Cooperative Association

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Wendy Woods, Co-Founder, Electrify Corvallis