



**Home Builders Association**  
of Metropolitan Portland

10/20/2021

Oregon DEQ  
Attn: Nicole Singh  
700 NE Multnomah St., Room 600  
Portland, OR 97232-4100  
*By E-mail*

**Re: CPP Rulemaking Comment**

I am writing you today to express support for state efforts to address climate change and the substantial work, over 18 months, that has gone into the recently released draft rules, however as a representative of the homebuilding industry, our members companies, their employees and the Oregon families that we supply homes to, I must also provide our concerns for the record.

The Home Builders Association of Metropolitan Portland (“HBA”) represents over 1300 companies and tens of thousands of women and men who work in the residential building and remodeling industries throughout the greater Portland area. We work to promote housing affordability and are dedicated to maximizing housing choice for all who reside in the region.

Although the rules do not expressly prohibit natural gas, they seem designed to add cost and complexity that will serve to remove residential gas from the statewide mix of energy products. This is also an evident goal of many advocates, in support of the rules as drafted, with many also supporting even more restrictive measures to curb all residential gas usage.

We believe a balanced approach, recognizing all forms of transitional and renewable energy including renewable hydrogen and natural gas, solar, etc. as part of the solution should be the goal of this program rather than an exclusionary outcome. Just as a best practice dictates having a diverse stock portfolio, a diverse energy portfolio is also important to the resiliency and cost effectiveness of the energy grid.

The market expects and often demands gas in new homes, and with the advances in renewable natural gas and hydrogen technologies, it is possible and becoming more cost effective to provide a sustainable, climate-friendly solution to the end user. We encourage the state to not “throw the baby out with the bath water” through the rulemaking process, but understand the market demand and work to offer a better, more sustainable climate friendly version of what is desired rather than try and force a change through a mandate serving to exclude a specific type of energy delivery.

A sustainable solution requires balance and compromise, rather than asymmetrical mandates. If we wish to see a resilient, long-term and effective climate change program, it is imperative that the rules and execution recognize the diverse needs and wants of the consumer and those that use the products to be regulated.

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As an industry that provides homes to Oregonians, we respectfully ask that you consider a balanced approach that recognizes the need for multiple resilient and redundant systems to deliver affordable energy to the end user in their home.

Sincerely,

Ryan Makinster  
Director of Policy and Government Relations