



February 6, 2023

Dear Chair Marsh, Vice-Chairs Levy and Levy, and Members of the Committee,

Re: Support for HB 2530

Thank you for the opportunity to provide testimony.

My name is Danny Noonan and I am a Climate and Energy Strategist with Breach Collective, a 501(c)(3) nonprofit based in Eugene and Portland. Breach Collective partners with communities on the front lines of the climate crisis to advance justice through locally-driven campaigns rooted in the power of grassroots organizing, legal advocacy, and human stories.

We generally support HB 2530 and the anticipated -1 amendment provided in written testimony by Meredith Connolly of Climate Solutions, with a couple of caveats:

First: While we support harmonizing definitions for hydrogen with other states in our region, Breach Collective would prefer a definition for green electrolytic hydrogen that prioritizes hydrogen production from wind, solar and hydroelectric energy, and deprioritizes hydrogen production from biomass energy. In brief, this is because we do not consider biomass to be a truly renewable, zero-emissions or emissions-neutral energy source. We further do not think this legislature should be doubling-down on past legislative decisions that would have the effect of further incentivizing biomass development and its many negative externalities (which tend to be borne by already disadvantaged communities).

Second: We do not see a role for blending green electrolytic hydrogen (or any other type of hydrogen) for use within existing gas utility distribution networks, or for producing synthetic methane (so-called “methanated hydrogen”). These end-uses for hydrogen are being touted by gas utilities as a decarbonization tool, but in reality this is merely another greenwashing tactic aimed at propping-up gas in the face of a much more effective decarbonization strategy: electrification. Specifically:

- The technical limit for blending hydrogen in the gas system is less than 20%, and comes with negative trade-offs including heightened explosion risks and increased Nitrogen Dioxide emissions within the home. NW Natural and other gas utilities are aggressively attempting to develop and deploy hydrogen blending in their system in spite of these risks, including through

a pilot project in a low-income neighborhood of Eugene that was only withdrawn in the face of strong community opposition.

- Methanated hydrogen refers to producing methane gas from hydrogen. The concept of producing hydrogen via an inherently energy-intensive process, only to then use that hydrogen in another energy-intensive process to produce a potent greenhouse gas, is absurd on its face. Hydrogen production capacity is inherently limited by its energy-intensive nature, and should be reserved for hard-to-decarbonize processes, via dedicated infrastructure, not to produce more hydrocarbons.

Regarding the bigger picture of hydrogen development in the State, we note that, while ODOE's Renewable Hydrogen Study was strong in several places, it gave a very light touch to NW Natural's intended use of hydrogen within its distribution network. Accordingly, [we refer you to a recent report by Accufacts, Inc., commissioned by the Pipeline Safety Trust](#), which provides greater detail the risks of introducing hydrogen into existing methane pipeline infrastructure.

We encourage you to pass HB 2530 out of committee, and to continue to closely scrutinize both the sources and end-uses of hydrogen development that is proposed to be regulated or incentivized by state legislation. Thank you for your consideration.

Sincerely,

Danny Noonan

Climate and Energy Strategist, Breach Collective