

From: [David Ciochetto](#)
To: [PublicComments, PUC](#)
Cc: [David Ciochetto](#)
Subject: [EXTERNAL] : ATTN: 22-01-NG Future of Gas
Date: Friday, October 7, 2022 5:42:03 PM

Dear RI PUC,

Thank you for the opportunity to comment on Docket No. 22-01-NG regarding the investigation into the future of the regulated distribution ... in light of the act on climate. I want to preclude this communication that while I am drawing heavily on my experience as a state employee, in no way is this comment to reflect my agency or my technical team, these are my own comments and observations based on my years of working with energy in Rhode Island.

If I am reading this correctly, you are tasked with investigating the future of regulated natural gas distribution within Rhode Island contracted to the Act on Climate. With that in mind, I would **request that the scope of the investigation into the future of Natural Gas distribution include a serious, thorough and transparent look at the potential of the Natural Gas distribution system to be adapted for the use of Blue Hydrogen.** Blue Hydrogen is Hydrogen produced from offshore wind and utilized as means to use renewable resources (offshore wind in the European development) to decarbonize industrial processes that are not readily adapted to electrification and for energy storage and distribution. I fear that even PUC Docket-22-22-EL is going to have problems with the bidders due to the problems with the coastal connection access to the regional transmission grid. As is being discussed nationally and is a general consensus in the US Offshore Wind development, the major obstacle to the next round of wind farms that are developed will be ability to land the power and tie into the grid. This is acknowledged by the Federal Government as well with their incentives for grid development to the coast to be able to accept this electrical power. There are known obstacles. By the time these projects are operational and the third round of projects are proposed to get to our 2050 goals, their may (or may not) be the ability to optimally land the power. We all know the difficulties and risks that face any overland transmission and close to the coast may only compound the permitting risks. As part of my request, I would ask that the uncertainties and stakeholder concerns over offshore electrical transmission be compared to the environmental impacts and stakeholder concerns for a submerged, buried natural gas line. From my research following the blue hydrogen build out, it appears that additional capacity (energy transmission) can be added to offshore pipes where additional electrical transmission capacity will require new export transmission cables and environmental analysis / impacts and other complications. I am not certain as to the adaptation of residential appliances from Natural Gas to Hydrogen so I am not sure if it is realistic to ask for an investigation of the potential for residential use. However, the potential to deliver Hydrogen to residences would create opportunity for innovation, economic development and future jobs. Europe is working on this technology now, the US fell behind Europe in the development of offshore wind, I would encourage us not to focus our future solely on electrification and ignore the potential to join Europe in the examination and development of a hydrogen economy to de-carbonize the processes that are more expensive and challenging to convert to electrification. Blue Hydrogen also provides security in the energy supply both in the distribution sense, jobs and economic development and in potential cyber or other attacks on the electrical distribution. When a hurricane hits, and RI is due for one, the electrical grid is

likely to drop out and leave people with no energy. In the cases of electrical outages I have experienced, as an owner with natural gas appliances, I was able to continue critical aspects of life until power was restored. In particular I was able to use my stove and my neighbors were able to run their natural gas on site whole house generators. So maintenance and adaptation of the gas distribution system with an already as built system is worth investigation and I request that the scope of any evaluation of the existing natural gas distribution system include a thorough and transparent look at blue hydrogen.

This docket mentions in many places about transitioning customers to alternate fuels (e.g. p.2) but not much was noted in the scoping to transition to another energy gas carrier with that is carbon neutral. Please make sure the scoping questions are sufficient to include an alternate gas for energy delivery.

So in summary, this request / comment appears to apply to III. - C. 1. But it may be premature and you are only asking that we agree with these outlines of questions. If that is the case, I hope the outline of questions presented within this docket is sufficient to capture the concern raised above. I am happy to work with you as this moves forward regarding how Offshore Wind may benefit from an existing Natural Gas distribution system that we do not allow to decline but rather transition to a new fuel source.

Specifically to answer IV

1. The purpose of the docket was not very clear, it appeared to state that based on the Act on Climate, we will do a study to justify ceasing natural gas distribution and transitioning customers to all electrical sources.

2. It was not clear to me that an alternate gas to deliver energy would be considered as a replacement in the existing infrastructure. Such a gas could be blue hydrogen as is advanced development in Europe already. I encourage you to evaluate the questions to be certain the analysis will not exclude adapting the infrastructure to the greatest extent possible. It reads as if the scoping is biased toward electrification.

3. and 4. I did not have enough time in my evaluation of this docket to edit the statements in Section III

I have been told in conversations prior to this that RI is agnostic toward the future of energy and I would like to support that sentiment and encourage us to consider all viable options and not over-incentivize one industry to handicap another that is under development but promising.

Thank you for considering my comments.

Best Regards,

David Ciochetto, P.O.E.

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