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October 19, 2022

State of Rhode Island Public Utilities Commission

ATTN: 22-01-NG Future of Gas; DOCKET NO. 22-01-NG, Draft Staff Recommendation for Public Comment

Dear PUC Staff,

Thank you for your work on this critical task and for the opportunity for public comment on future use of natural gas. I would like to comment in particular on *Section III D. Policy Development* of the docket and highlight areas that seem important to me.

I would kindly ask the PUC to pursue a policy that no new natural gas installations be made, neither on the supply and infrastructure side, nor on the consumer end. Instead, installation and use of renewable energy should be fully supported as an existing and viable alternative.

In addition, incentives should be offered to rapidly phase out existing natural gas installations and to replace these with currently available alternatives for better and cleaner renewable energy.

Besides poisoning our residents by releasing toxins when burnt in our homes, natural gas is a major contributor to the climate crisis, from leaks in our frail gas distribution network that release the potent greenhouse gas methane, and from burning the gas releasing carbon dioxide, which is the main culprit for rising global temperatures that ultimately threaten human life on the planet.

The Act on Climate mandates aggressive reduction of carbon emissions, and a substantial portion of the reduction can be achieved by expeditiously phasing out natural gas production, distribution and use. Please support a policy that serves that goal.

In detail, the policy should

1. Provide a level of urgency that is commensurate with the rapid degradation of our climate. Time is of the essence.
2. Ban all new gas infrastructure and installations.
3. Discontinue use of Rhode Island as transit location for natural gas being brought into our state for distribution into other states or for export. All of the current efforts in this direction contribute to continued, avoidable carbon burning and must be stopped.

4. For new construction of municipal, commercial and residential buildings, ban the use of natural gas (and other fossil fuels).

Buildings can be powered for the same, or lower cost with currently available efficient electric alternatives. Compared to current use of fossil fuels, the cost of cleaner renewable energy will become even more favorable in the future, continuing the historic trend.

5. For upgrading existing buildings, make heat pumps the standard for furnace replacement and ban new natural gas installations and associated incentives that will lock the building owners into polluting technology that will leave them with stranded assets.
6. Pilot and pursue hydronic systems that can use heat pump generated hot water to heat a building. The potential of these systems is to replace an existing furnace with a heat pump driven heat exchanger that allows continued use of the remainder of a building's existing heating system without further modifications.
7. Support piloting local geothermal grids for heating and cooling.
8. Support workforce transition to renewable energy.
9. Incentivize transitioning away from gas to renewable energy for Rhode Islanders in poor, marginalized, and environmentally overburdened communities.
10. Support local electric grids.

Improving the current electric grid with a capability that allows to rapidly isolate parts of the grid into micro grids will increase resilience during severe weather events, where the micro grids will continue to safely function despite power outages in the grid. This should be supported by incentives for local installation of solar and wind generation and battery storage to maximize self sufficiency of the micro grids.

Counterproductive current residential solar capacity limits must be eliminated, under a mechanism that doesn't burden other ratepayers and reimburses the system-owners fairly for generated electricity delivered into the grid / micro grid.

The PUC should have the authority and zest to constructively enforce a meaningful policy that moves rapidly from natural gas to renewable energy, even if some of that policy clashes with the current business interests of the Utility.

Thank you very much for considering my input.



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